Response to the Standing Committee on Public Accounts Report 5, Canadian Armed Forces Housing, of the Fall 2015 Reports of the Auditor General of Canada

Recommendation 1

That the Department of National Defence provide the House of Commons Standing Committee on Public Accounts with its new operational requirements for military housing by 30 June 2017, and its revised accommodation policy by 31 December 2018.

Background

In its 2015 audit of Canadian Armed Forces housing, the Auditor General recommended that National Defence complete a review of its military housing policy. National Defence agreed and committed to producing a revised accommodation policy by fall 2017. From June 2017, to December 2021, National Defence provided the Public Accounts Committee with eight progress updates. Although National Defence has been challenged by delays in completing the policy review, the Department has developed a new work plan and is on track to complete the policy review by spring 2024.

In the June 2020 update, National Defence noted that significant work was still to be completed as part of the review, including the revision of the three component parts of its living accommodation policy suite: 1) Queen's Regulations and Orders (the policy's overarching regulatory framework); 2) Defence Administrative Orders and Directives (the departmental policy); and 3) the Living Accommodation Instruction (to guide personnel in implementing the policy). National Defence acknowledged that it had underestimated the time required to complete this review and re-evaluated the process in its entirety to ensure that it would complete all aspects of the policy review by spring 2024, without further delay.

In the interest of transparency and accountability, in June 2020, National Defence provided the Committee with a timeline illustrating the key steps and milestones required to complete the review. National Defence also committed to updating the Committee every six months – by 31 December, and 30 June of each year – until the review is complete and the new policy suite is in place.

In the December 2021 update, National Defence reported that it continues to consult subject matter policy experts and legal advisors on the regulatory and policy review process, and remains on schedule to meet the overall implementation of the living accommodation policies by spring 2024. Please find the June 2022 update below.

Update on the living accommodation policy suite review

Since the last update to the Committee in December 2021, National Defence has made progress on the overall regulatory and policy review, and remains on schedule to meet the implementation of the living accommodation policy suite by spring 2024.

The living accommodation policy suite review will be monitored through Governance Committee engagement with various stakeholder and policy committees, as major policy sections are being completed. These committees, which are composed of senior Defence Team officials, monitor the status of the initiatives outlined in this update, and will confirm that the implementation of the living accommodation policy suite will meet Departmental objectives, and determine whether

there is a need to further refine specific elements of the review.

As part of this regulatory and policy review process, National Defence also continues to apply a GBA+ analysis to all three components of the review to ensure that the principles of inclusivity and dignity for all Canadian Armed Forces members are incorporated into this policy suite.

Reviewing the Queen's Regulations and Orders (QR&Os)

Since the last update to the Committee, National Defence continues to make progress reviewing the Queen's Regulations and Orders (the policy's overarching regulatory framework), as part of the living accommodation policy suite. For example, in June 2022, National Defence provided internal departmental lawyers with the drafting instructions for review, which is in alignment with the attached living accommodation policy suite timeline. Department of Justice legal experts will receive the submission thereafter to begin the regulatory drafting phase. This process will serve to address legal and policy inconsistencies, as well as ensure closer alignment with other related federal housing directives.

Reviewing the Defence Administrative Order and Directive (DAOD)

Since December 2021, National Defence has been making progress on the development of a new departmental policy instruction (DAOD). Once completed in spring 2024, this policy instruction will provide additional details regarding the types of living accommodations, and outline the policy guidance for the requirements, eligibility, allocation, and charges/fees for National Defence living accommodations.

With the progress made on the QR&O review (mentioned above), National Defence has identified policy updates that are now required as a result of the QR&O analysis. These updates will now be incorporated in the departmental policy document. Additionally, National Defence commenced the detailed review of the living accommodation DAODs in June 2022. A detailed work plan has been developed to ensure the review is completed on time by spring 2024. Once completed, the revised DAOD will allow National Defence to implement a modernized policy and a new policy instruction.

Reviewing the Living Accommodation Instruction

Since the December 2021 update, National Defence has commenced a thorough review of the Living Accommodation Instruction concurrently with the DAOD review. This review will ensure the harmonization of the three component parts of the living accommodation policy suite. The detailed work plan will also ensure that all sections of the instruction will be reviewed within the timeline. This includes the *Responsible Pet Ownership* and the *Violation Management* annexes, which are anticipated to be completed by 31 December 2022.

Future updates to the Committee

National Defence will provide the Committee with a progress update on the living accommodation policy suite review by 31 December 2022.

Living Accommodation Policy Suite Timeline



