

**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 Force 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 June 2020, National Defence provided the Public Accounts Committee with five progress updates, noting considerable delays in completing the policy review.

In June 2020, National Defence noted that significant work remained to review and revise 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 misjudged 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, National Defence provided a timeline illustrating the key steps and milestones required to complete the review, taking into account any possible delays due to COVID-19. 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.

**Update on the living accommodation policy suite review**

National Defence remains on track to have the updated living accommodation policy suite in place by spring 2024. This can be seen in the attached timeline, which has been revised slightly to reflect changes to the review process (explanations below). Since June 2020, National Defence has made progress on all three components of the policy suite, and has assigned additional personnel to the development process to ensure the spring 2024 commitment is met.

*Reviewing the Queen's Regulations and Orders*

In June 2020, National Defence noted that teams of subject matter experts were analyzing and reviewing regulatory articles, as well as creating instructions for legal drafters on regulations that will be amended. National Defence also noted that in

October 2020 these teams would begin consulting internal stakeholders who may be affected by changes to the regulations.

This work is ongoing. Subject matter experts continue to review relevant regulatory articles and conduct analyses to inform additional instructions required by legal drafters. In September 2020, National Defence began consulting internal stakeholders on elements of the departmental policy document that will impact regulatory amendments. National Defence will continue its efforts in 2021 and remains on schedule in its regulatory review.

#### *Reviewing the Defence Administrative Order and Directive*

Concurrently, National Defence continues to analyze, revise, and draft the policy document for living accommodations. In October 2020, National Defence stakeholders came together to review the policy section by section and to explore key issues, resulting in constructive feedback which will improve the final product. National Defence remains on schedule in its policy review.

#### *Reviewing the Living Accommodation Instruction*

Work also continues to modernize the Living Accommodation Instruction. In June 2020, National Defence reported that it had completed new sections of the Instruction to address pet ownership and rule violations. National Defence also committed to beginning wider stakeholder consultations in September 2020.

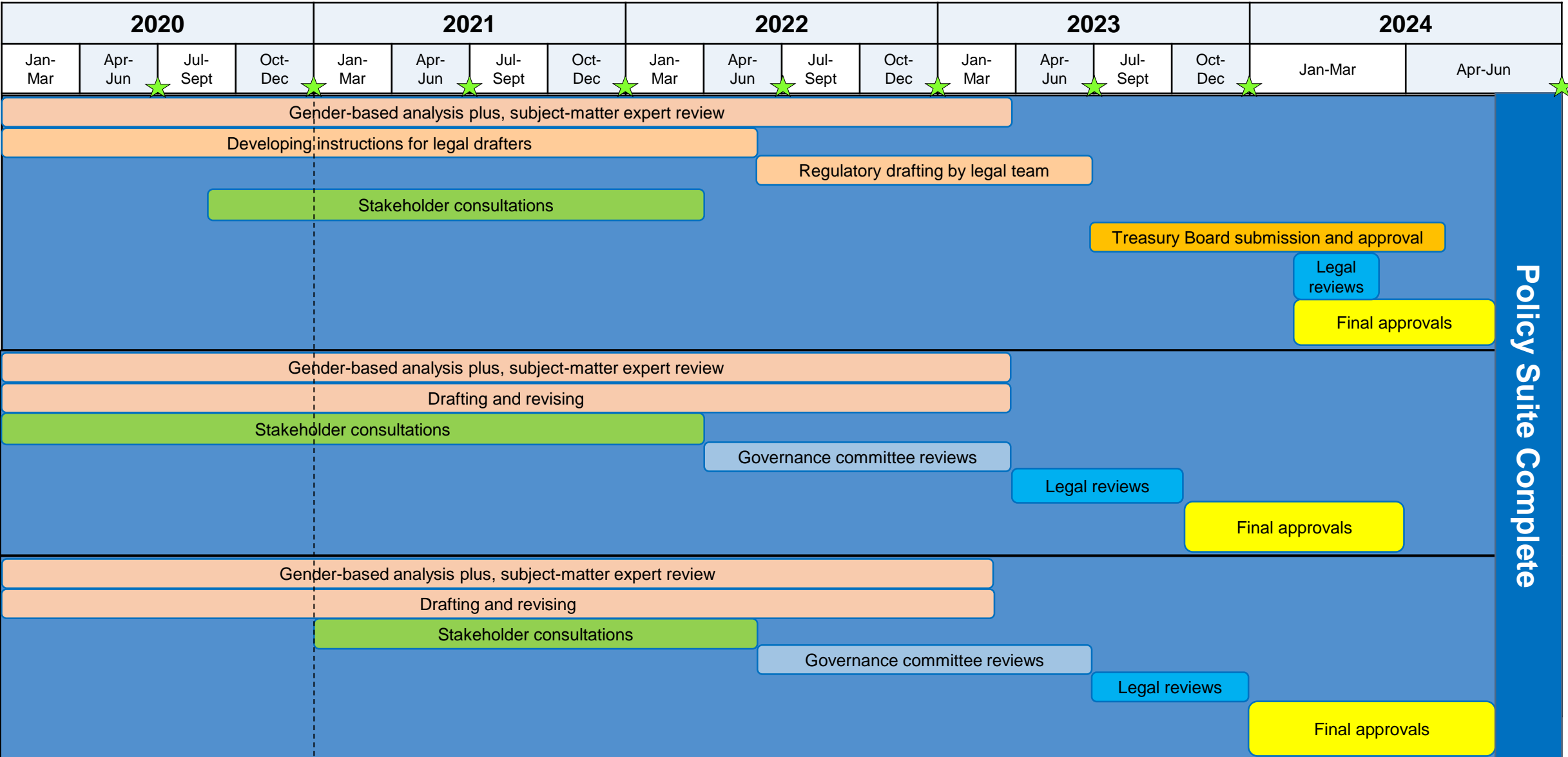
National Defence is revisiting its sections on pet ownership and rule violations to ensure that all policy and legal aspects are properly accounted for, after its policy experts discovered that some important elements had not been sufficiently addressed. As a result, National Defence did not begin consulting stakeholders on new sections of the Instruction in September 2020. National Defence will begin consulting stakeholders on any changes made to the pet and rule violation sections beginning in January 2021, and will continue its policy and legal reviews until May 2021. In June 2021, National Defence will move on to additional sections of the Instruction, as planned.


Despite the need to revisit these sections, National Defence does not expect that this change will impact its ability to complete the Instruction by spring 2024.

#### **Way forward**

National Defence remains committed to modernizing its policy to address its operational requirements. In accordance with the attached timeline, National Defence will once again update the Committee on its progress by June 30, 2021.

# Living Accommodation Policy Suite Timeline



 = semi-annual PACP update due June 30 and December 31