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CAF Accommodation Policy: Appropriate Housing for All

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ACCOMMODATION POLICY: APPROPRIATE HOUSING FOR ALL

The realities of service complicate the life of a military member: moving to unknown places, possibly far from their hometown, and potentially with dependents accompanying. In addition, while there is no current entitlement or benefit under existing policy, the evolving nature of the Canadian housing market has raised the question of whether military members can secure appropriate accommodation at every potential posting.

The right to shelter is formalized under Canadian law.¹ While the Canadian Armed Forces (CAF) recognizes the impact on operational readiness and morale from having "suitable living accommodation,"² the CAF has not committed to housing its personnel except under specific circumstances.³ This lack of policy contrasts with our closest allies, who treat housing as a right, ensuring that their service members receive appropriate housing through direct programs.⁴ The question emerges as to whether there is an optimal military housing strategy for the CAF based on allied policies.

The thesis of this paper is that the CAF's current accommodation policy is limited in scope to Department of National Defence (DND) controlled housing and does not suitably encapsulate the private sector accommodation where over 80% of the CAF resides⁵. This paper proposes a new accommodation policy that captures the complexity of the private sector is required. It will focus on accommodation policy in the private sector as it is an orphan cause compared with the volume of policy and literature on DND-controlled housing.

This paper will use the Walt and Gilson policy triangle framework⁶ to demonstrate a way forward for the CAF accommodation policy. First, it will build context by looking at the current housing situation in Canada and comparing it with the CAF policy. It will then compare Canadian with British and American military housing policies. It will then look at the content of the policy: the objectives, the fundamental mechanisms, and a general implementation plan. Finally, it will conclude by considering the actors involved and the process of how the CAF could achieve it.

¹ Canada, Department of Justice Canada. "Consolidated Federal Laws of Canada, National Housing Strategy Act." Accessed Apr 19, 2022. <https://laws-lois.justice.gc.ca/eng/acts/n-11.2/FullText.html>

² Canada, Department of National Defence. "DAOD 5024-0, DND Living Accommodation, effective 01 April 2007." Accessed Apr 19, 2022. <https://www.canada.ca/en/departement-national-defence/corporate/policies-standards/defence-administrative-orders-directives/5000-series/5024/5024-0-dnd-living-accommodation.html>

³ Ibid.

⁴ United Kingdom, Ministry of Defence. "JSP 464: Tri-Service Accommodation Regulations Volume 1: Service Family Accommodation (SFA) and Substitute Service Family Accommodation- UK and Overseas Part 1: Directive." Accessed Apr 19, 2022. 1-1.

⁵ Canada, Department of National Defence. "Evaluation of Military Housing". Accessed 19 April 2022. 9.

⁶ Gill Walt, Gilson, Lucy. "Reforming the health sector in developing countries: the central role of policy analysis." *Health Policy and Planning* 9, Issue 4 (December 1994): 353–370.

Context

While the CAF does not house the majority of its personnel, it has "committed to ensuring that CAF members can obtain suitable living accommodation in a timely fashion at any location where duty demands in Canada."⁷ While this implies that the CAF is taking active steps to ensure members can obtain suitable living accommodation, the policy focuses on DND-controlled living accommodation.⁸

The CAF has established seven conditions for the provision of DND-owned housing.⁹ The first four are long-standing policies, and DND has sufficient housing to support them. They are when market capacity cannot provide sufficient accommodation, isolated postings, foreign military agreements, and designated residences for certain positions, such as the Commandant's house at the Canadian Forces College.¹⁰ In addition, the Chief of the Defence Staff added three additional operational requirements in 2017: new entrants to the CAF, members whose training is longer than 12 months, and those constrained by the unique military lifestyle, essentially those who are frequently posted.¹¹ These added requirements have meant that while the DND has approximately 12,000 residential housing units, it requires a projected 7,000 additional units to meet the further requirements imposed on it.¹² As there is no current funding or policy that will bridge the gap between how many housing units the DND has versus what it needs¹³, the necessity for policies to support members living on the economy persists.

Defence Administrative Orders and Directives 5024-0, Department of National Defence (DND) Living Policy, is the CAF's main accommodation program, and since 2007, the program has not been updated.¹⁴ Furthermore, despite a commitment by DND to revise its policy every three years and to have a significant update completed by 2017¹⁵, it has now committed to updating its policy by July 2023, 16 years since the last update.¹⁶ Concurrently, the chief benefit that targets cost of living, Post Living

⁷ Canada, Department of National Defence. "DAOD 5024-0, DND Living Accommodation, effective 01 April 2007." . Accessed Apr 19, 2022. <https://www.canada.ca/en/department-national-defence/corporate/policies-standards/defence-administrative-orders-directives/5000-series/5024/5024-0-dnd-living-accommodation.html>

⁸ Ibid.

⁹ Canada, Department of National Defence. "Evaluation of Military Housing" . Accessed Apr 19, 2022, 15. <https://www.canada.ca/content/dam/dnd-mdn/documents/reports/2021/reports-pubs-audit-eval/report-1258-3-046-en.pdf>

¹⁰ Ibid 15.

¹¹ Ibid 15.

¹² Ibid 15.

¹³ Ibid 16-17.

¹⁴ Ibid 25.

¹⁵ Canada, Office of the Auditor General of Canada. "2015 Fall Reports of the Auditor General of Canada: Report 5 – Canadian Armed Forces Housing." Accessed Apr 19, 2022. https://www.oag-bvg.gc.ca/internet/English/parl_oag_201602_05_e_41062.html#hd2e

¹⁶ Canada, Department of National Defence. "Evaluation of Military Housing". Accessed Apr 19, 2022, 15. <https://www.canada.ca/content/dam/dnd-mdn/documents/reports/2021/reports-pubs-audit-eval/report-1258-3-046-en.pdf>

Differential (PLD), has not been updated in either scope or benefits since 2009¹⁷ despite multiple calls for its reevaluation.¹⁸

The Canadian perspective on housing as a right has evolved with the debt reduction policies of the 1990s and 2000s¹⁹. As successive federal and provincial governments aimed to reduce the deficit, they cut social programs to reduce spending. Concurrently, the construction and management of social housing shifted from the national realm to being primarily a provincial and municipal responsibility.²⁰ In 1993, the Federal Government ceased all funding for social housing.²¹ The provinces transferred their responsibility to municipalities in the 1990s into the early 2000s.²² These shifts in focus coincided with the condo boom that commenced during the same period²³ leading to a general change in Canadian housing policy from focusing on affordable accommodation to building private homes.

Concurrent to this loss of government support for social housing was a significant decline in rental accommodation, creating an affordable rental accommodation deficit in Canada.²⁴ In addition, the limited construction of rental properties has also focused primarily on limited occupancy, which has not been conducive for families.²⁵

The 2022 Canadian Federal Budget recognized that Canada has an affordability housing issue²⁶ as the national average home price has increased by 70% since 2015.²⁷ The affordability issue stems from a supply issue that demonstrates that, for its size, Canada should have "an additional 1.8 million dwellings to be comparable to other G7 countries."²⁸ To meet the housing deficit and account for Canada's rising population, the Canada Mortgage and Housing Corporation (CMHC) has predicted that Canada "will need to build at least 3.5 million new homes by 2031."²⁹ Achieving this goal translates to 389,000 homes per year, while Canada has only built approximately 200,000 new homes annually over the past decade.

¹⁷ Ibid 26.

¹⁸ Gary Walbourne. Letter to CDS: Requesting update on PLD, Ottawa, 31 July 2015.

¹⁹ Kaylee Ramage, et al. "Is the Right to Housing being Realized in Canada? Learning from the Experiences of Tenants in Affordable Housing Units in a Large Canadian City." *Societies* 11, no. 2 (2021): 53.

²⁰ Ibid 53.

²¹ Beibei Zhang. "Social Policies, Financial Markets and the Multi-Scalar Governance of Affordable Housing in Toronto." *Urban Studies* (November 26, 2019).

²² Ibid.

²³ Ibid.

²⁴ Murtaza Haider, Morris, Stephen. "Hitting Too Close To Home: Lack of supply and the housing affordability crisis in Canada." Ottawa: Macdonald-Laurier Institute, 2021: 4.

²⁵ Ibid 24.

²⁶ Canada, Department of Finance. "2022 Budget: A Plan to Grow Our Economy and Make Life More Affordable." Accessed Apr 19, 2022. 33. <https://budget.gc.ca/2022/report-rapport/chap1-en.html#wb-cont>

²⁷ Murtaza Haider, and Stephen Morris. "Hitting Too Close To Home: Lack of supply and the housing affordability crisis in Canada." Ottawa: Macdonald-Laurier Institute, 2021: 4.

²⁸ Ibid 4.

²⁹ Canada, Department of Finance. "2022 Budget: A Plan to Grow Our Economy and Make Life More Affordable." Accessed Apr 19, 2022. 33. <https://budget.gc.ca/2022/report-rapport/chap1-en.html#wb-cont>

To nearly double housing construction for the next nine years, the Government of Canada is focusing primarily on targeting municipalities with incentives to build more homes and provide more significant funding for affordable housing.³⁰ The 2022 Budget recognized that while the Government of Canada has a role to play in improving housing affordability, it will require every level of government and business to realize the home-building challenge.³¹ It will require significant changes in zoning policies that allow for densification in urban areas, the development of new areas for accommodation, and significant growth in material supply chains and the construction labour force.³²

The Government of Canada's plan to create considerably more housing units should improve the affordability of accommodation. However, it will take nearly a decade to achieve a stable housing market. For the CAF, there will be several years of pressure that it will need to relieve before military members have reasonable access to affordable accommodation.

According to the CMHC, the limit for affordable housing is less than 30% of pretax household income.³³ In contrast, DND's Queen's Regulations and Orders limit shelter charges to 25%, leaving an affordability buffer for utilities and other accommodation-related costs.³⁴ The cost of homeownership relative to median income has generally increased since 1998, despite interest rates consistently declining until 2022.³⁵ This has led to the average Canadian homeownership cost being 52% in 2018.³⁶ This paper will use 30% as its affordability level.

From a CAF perspective, the increase in accommodation costs impacts its personnel. For example, the National Capital Region (NCR), centred in Ottawa, where the DND employs approximately 25,000 military and civilian personnel³⁷, has experienced an approximate 100% increase in prices over the last five years.³⁸ Compared

³⁰ Ibid 36.

³¹ Ibid 34.

³² Murtaza Haider, Morris, Stephen. "Hitting Too Close To Home: Lack of supply and the housing affordability crisis in Canada.". Ottawa: Macdonald-Laurier Institute, 2021: 26.

³³ Ibid 18.

³⁴ Canadian Mortgage and Housing Corporation. "About Affordable Housing in Canada." . Accessed Apr 19, 2022. <https://www.cmhc-schl.gc.ca/en/professionals/industry-innovation-and-leadership/industry-expertise/affordable-housing/about-affordable-housing/affordable-housing-in-canada>

³⁵ Canada, Department of National Defence. "QR&O: Volume IV – Appendix 4.1 Charges for Family Housing Regulations.". effective date 01 April 2007, last accessed 19 April 2022. <https://www.canada.ca/en/department-national-defence/corporate/policies-standards/queens-regulations-orders/vol-4-appendices/appendix-4-1.html>

³⁶ Murtaza Haider, Morris, Stephen. "Hitting Too Close To Home: Lack of supply and the housing affordability crisis in Canada.". Ottawa: Macdonald-Laurier Institute, 2021: 17.

³⁷ Ibid 18.

³⁸ Canada, Department of National Defence. "Canadian Forces Support Group Ottawa-Gatineau." . Accessed Apr 19, 2022. <https://www.canada.ca/en/department-national-defence/services/bases-support-units/canadian-forces-support-unit-ottawa.html>

³⁹ Leanne Cusack. "What's Your Home Worth? Ottawa-Area Real Estate Now Vs. Five Years Ago." . Accessed Apr 19, 2022. <https://ottawa.ctvnews.ca/what-s-your-home-worth-ottawa-area-real-estate-now-vs-five-years-ago-1.5818703>.

with the CAF pay increase of 6.1% between 2018 and 2021³⁹, this highlights significant potential affordability issues as housing price increases outstrip wage increases. In addition, other military postings experiencing rapid accommodation cost increases drive the need for considerable change to the CAF accommodation strategy.

DND froze PLD in 2010⁴⁰. Designed to mitigate the impact of military personnel and their dependents living in areas where the cost of living was above the national average,⁴¹ it has not changed with the evolving markets in Canada. Based on the cost of living in the NCR, PLD "reduces the adverse financial impact" where the cost of living exceeds the national average.⁴² Since then, despite the considerable changes in the Canadian accommodation market, it has remained static, with no change to entitlements. This lack of evolution stems from PLD being under review since 2010 between DND and the Treasury Board with no public updates.⁴³ PLD is the existing mechanism that is well suited to mitigate the housing challenges of the CAF.⁴⁴

It is critical to look at junior members with dependents most vulnerable to the market to analyze the CAF housing challenges. For example, consider a newly promoted corporal with two dependents whose salary is \$63,840 per year.⁴⁵ Given CMHC's 30% of gross income accommodation affordability recommendation⁴⁶, they should have a budget of no more than \$19,152 per year or \$1,596 per month to spend on accommodation, including utilities.⁴⁷

The average two-bedroom townhome⁴⁸ rent in Canada is \$1,771 per month. While the average exceeds the appropriate amount to be spent on accommodation by a corporal, it is an average across all markets in Canada. So, depending on a posting, some postings will be affordable. As every significant city in Canada has Regular Force military members posted to it, the analysis will focus on a few urban postings in areas with a

³⁹ Canada, Department of National Defence. "Canadian Armed Forces Members to Receive Pay Increase." . Accessed Apr 19, 2022. <https://www.canada.ca/en/department-national-defence/maple-leaf/defence/2021/03/caf-members-receive-pay-increase.html>.

⁴⁰ Canada, Department of National Defence. "*CANFORGEN 084/10 CMP 039/10 081701Z APR 10 Post Living Differential Update*." 8 April 2010.

⁴¹ Canada, Department of National Defence. "Chapter 205- Allowances for Officers and Non-Commissioned Members." . Accessed Apr 19, 2022. <https://www.canada.ca/en/department-national-defence/corporate/policies-standards/compensation-benefits-instructions/chapter-205-allowances-for-officers-and-non-commissioned-members.html>.

⁴² Ibid.

⁴³ Gary Walbourne. Letter to CDS: Requesting update on PLD, Ottawa, 31 July 2015.

⁴⁴ Ibid.

⁴⁵ Canada, Department of National Defence. "Pay Rates for Non-Commissioned Members." . Accessed Apr 19, 2022. <https://www.canada.ca/en/department-national-defence/services/benefits-military/pay-pension-benefits/pay/non-commissioned.html>.

⁴⁶ Canadian Mortgage and Housing Corporation. "About Affordable Housing in Canada." . Accessed Apr 19, 2022. <https://www.cmhc-schl.gc.ca/en/professionals/industry-innovation-and-leadership/industry-expertise/affordable-housing/about-affordable-housing/affordable-housing-in-canada>

⁴⁷ 30% of \$63,840

⁴⁸ The American basic equivalent for military members with dependents is a two bedroom townhouse.

significant military presence and readily available rental data: Borden, Ottawa, Halifax, Esquimalt, Kingston, Edmonton, and Winnipeg.

Table 1 – Comparing Accommodation Costs with Gross Salaries in CAF Cities

City	Average 2 Bedroom Price⁴⁹	PLD⁵⁰	Gross Corporal Pay⁵¹	Gross Private Pay⁵²	Gross Lieutenant Pay⁵³
Borden	\$2,029	0	38%	52%	42%
Ottawa	\$2,033	0	38%	52%	42%
Kingston	\$1,909	0	36%	49%	40%
Halifax	\$2,028	\$631	34%	34%	37%
Esquimalt	\$2,667	\$816	43%	43%	48%
Winnipeg	\$1,435	0	27%	27%	30%
Edmonton	\$1,260	\$684	21%	21%	23%

Examining the entry-level trained non-commissioned member and officer pay scales, all major cities with CAF bases except Winnipeg and Edmonton are unaffordable for new members of the CAF when applying the 30% affordability criterion. It is also

⁴⁹ Rentals.ca. "Rentals.Ca April 2022 Rent Report." . Accessed Apr 19, 2022. <https://rentals.ca>.

⁵⁰ Canada, Department of National Defence. "Chapter 205- Allowances for Officers and Non-Commissioned Members." . Accessed Apr 19, 2022. <https://www.canada.ca/en/department-national-defence/corporate/policies-standards/compensation-benefits-instructions/chapter-205-allowances-for-officers-and-non-commissioned-members.html>.

⁵¹ Canada, Department of National Defence. "Pay Rates for Non-Commissioned Members." . Accessed Apr 19, 2022. Based on a standard corporal at their basic pay scale. Calculated using the annual cost of rent, divided by the salary including any annual PLD. <https://www.canada.ca/en/department-national-defence/services/benefits-military/pay-pension-benefits/pay/non-commissioned.html>.

⁵² Ibid. Based on a standard private at their second pay scale when most are anticipated to have completed training and could expect to live on the economy. Calculated using the annual cost of rent, divided by the salary including any annual PLD.

⁵³ Ibid. Based on a Direct Entry Office Lieutenant at their basic pay scale. Calculated using the annual cost of rent, divided by the salary including any annual PLD.

important to note that this is based only on rent and does not include any other accommodation costs such as utilities which further exacerbates the affordability issue.

When comparing Edmonton with any of the Ontario locations, the present PLD policy is noticeably dated. Even without PLD, accommodation would still be affordable in Edmonton. However, as prices have increased disproportionately in different parts of the country, consistent monitoring and change to a policy are required to maintain fairness.

Beyond renting accommodation, the average price of a house sold in Canada in March of 2022 is \$816,720.⁵⁴ With the minimum down payment of \$56,672⁵⁵, at the current expected interest rate of 3.74%⁵⁶, the monthly payment would be \$3,904 per month⁵⁷, well beyond a corporal's ability to carry a mortgage at 73% of their gross pay even without utilities, property taxes, or other homeownership costs included.

While the situation improves as rank and pay increase, the affordability challenges for the CAF's members reflect a considerable hurdle for members to manage. It also presents recruiting and retention opportunities. While the Canadian Federal Budget of 2022 has focused on housing as the government's critical domestic policy goal, it also represents an opportunity for the CAF to leverage the crisis to encourage recruitment and retention. As the affordability crisis is likely to persist as housing unit production begins to increase, the CAF can make itself a more attractive employer if it creates opportunities for affordable housing.⁵⁸ In addition, the scale of construction required to improve housing affordability in Canada means that the CAF has a window of opportunity to leverage allied partners' strategies to improve retention and recruitment.

The CAF is struggling to reflect the diversity of Canadian society.⁵⁹ As most of the diverse Canadians that the CAF wants, whether based on ethnicity or from the LGBTQ2S+ community, live in urban areas, the CAF must focus its recruitment strategy there.⁶⁰ To better engage with the urban populations it needs for success, the CAF can use benefits that appeal to urban dwellers, such as affordable accommodation in an urban

⁵⁴ WOWA.ca. "Canadian Housing Market Report Mar. 21st, 2022 | Interactive Map - WOWA.Ca." . Accessed Apr 19, 2022. <https://wowa.ca/reports/canada-housing-market>.

⁵⁵ Canada, Financial Consumer Agency of Canada. "5.2.2 Down Payment." . Accessed Apr 19, 2022. <https://www.canada.ca/en/financial-consumer-agency/services/financial-toolkit/mortgages/mortgages-2/3.html>. 5% of first 500,000 and 10% of remaining price.

⁵⁶ Pattie Lovett-Reid. "RBC Cuts Five-Year Fixed Mortgage Rate." . Accessed Apr 19, 2022. <https://www.bnnbloomberg.ca/video/rbc-cuts-five-year-fixed-mortgage-rate~1588518.5> year fixed rate on 19 April 2022.

⁵⁷ Canada, Financial Consumer Agency of Canada. "Mortgage Calculator." . Accessed Apr 19, 2022. <https://itools-ioutils.fcac-acfc.gc.ca/MC-CH/MC-CH-eng.aspx>.

⁵⁸ Canada, Department of National Defence. "Evaluation of Military Housing" . Accessed Apr 19, 2022, 11-13. <https://www.canada.ca/content/dam/dnd-mdn/documents/reports/2021/reports-pubs-audit-eval/report-1258-3-046-en.pdf>

⁵⁹ Thomas Juneau, et al. Canadian Defence Policy in Theory and Practice. Canada and International Affairs. Canada: Palgrave Macmillan, 2019. 186.

⁶⁰ Ibid 187.

community, to attract and retain the members it needs to grow and better reflect Canada.⁶¹

In the British military, accommodation is a condition of service, ensuring that "personnel are provided with high quality subsidized accommodation."⁶² The realization that military service leads to frequent postings in potentially remote locations generates the need for this benefit.⁶³ As a result, the United Kingdom provides significant housing subsidies for serving members. This leads to the typical service personnel spending 10% of their salary on accommodation instead of the 30-40% salary that the average Briton pays.⁶⁴

The volume of military-owned accommodation does not constrain the British military's accommodation system. The Ministry of Defence Accommodation Agency Contractor will source an equivalent housing solution if no adequate service accommodation is available.⁶⁵ This alternative accommodation will match the member's housing entitlements. The member will pay for their housing at the equivalent rate to what they would have paid in military-owned accommodation. The military subsidizes the remainder of the cost.⁶⁶

The British system is stratified⁶⁷. While the type of accommodation a member is entitled to be based partially on the number of dependents, rank is critical.⁶⁸ All non-commissioned members are entitled to 85.50 square meters of accommodations or 94.50 square meters with two or more children. In contrast, junior officers are entitled to 116.5 square meters, and general officers are entitled to 210 square meters.⁶⁹ Beyond the

⁶¹ Ibid 184.

⁶² United Kingdom, Ministry of Defence. "JSP 464: Tri-Service Accommodation Regulations Volume 1: Service Family Accommodation (SFA) and Substitute Service Family Accommodation- UK and Overseas Part 1: Directive." Accessed Apr 19, 2022. 1-1.

⁶³ United Kingdom, Ministry of Defence. "JSP 464: Tri-Service Accommodation Regulations Volume 1: Service Family Accommodation (SFA) and Substitute Service Family Accommodation- UK and Overseas Part 1: Directive." Accessed Apr 19, 2022. 1-1.

⁶⁴ United Kingdom, Ministry of Defence. "Combined Accommodation Assessment System." Accessed Apr 19, 2022.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/366803/NEM-CAAS-V3.pdf

⁶⁵ United Kingdom, Ministry of Defence. "JSP 464: Tri-Service Accommodation Regulations Volume 1: Service Family Accommodation (SFA) and Substitute Service Family Accommodation- UK and Overseas Part 1: Directive." Accessed Apr 19, 2022, 5-2.

⁶⁶ United Kingdom, Ministry of Defence. "JSP 464: Tri-Service Accommodation Regulations Volume 1: Service Family Accommodation (SFA) and Substitute Service Family Accommodation- UK and Overseas Part 1: Directive." Accessed Apr 19, 2022 5-3.

⁶⁷ Georgina Coupe. "All the Gen on the Future Accommodation Model." *Forces.Net* (July 21, 2020).). <https://www.forces.net/military-life/all-gen-future-accommodation-model-fam>

⁶⁸ United Kingdom, Ministry of Defence. "JSP 464: Tri-Service Accommodation Regulations Volume 1: Service Family Accommodation (SFA) and Substitute Service Family Accommodation- UK and Overseas Part 2: Directive." Accessed Apr 19, 2022, 1-3.

⁶⁹ Ibid 3-2.

differences in accommodation size, officers and soldiers are, by policy, housed in different accommodation locations.⁷⁰

There is a tendency for British military members (especially officers) to purchase rental houses to build equity while serving.⁷¹ Unlike in Canada, where the expectation is buying a house from posting to posting for accommodation, the trend in the British military is to purchase a home that the member may live in only briefly, if ever. The British banking system allows for a residential mortgage when a military member rents out their property.⁷² This is a significant reduction in mortgage rates as a standard commercial mortgage would come with higher interest rates. In addition, they do not receive any special tax exemptions on the income received from rent.⁷³ The tendency for officers to purchase homes over other ranks stems from additional disposable income.⁷⁴

Comparing British and Canadian salaries, the average CAF member⁷⁵ is better paid than the average British military member.⁷⁶ This imbalance decreases as rank increases, and from lieutenant-colonel to colonel, the British military pay scale surpasses the Canadian. For non-commissioned members, the British are paid 58% of their Canadian equivalent when comparing British lance corporals and their equivalent Canadian corporals. While the gap improves, 79% for a sergeant and 81% for a warrant officer 1, the discrepancy remains. This leads to a difference in veteran pensions between the two countries. The subsidized housing benefits that British military members experienced are not captured in their pay⁷⁷ and, therefore, pension, while CAF members' pay includes that benefit (as salary.) As a result, a career non-commissioned member in the British military has a significantly reduced pension compared with their Canadian equivalent due to the different benefit calculations.⁷⁸

While there are some inherent classist parts to their system (essentially, officers getting the better houses)⁷⁹, overall, the system is designed to provide affordable housing to its members. Once out of the military, the British military veteran homeownership rate

⁷⁰ United Kingdom, Ministry of Defence. "JSP 464: Tri-Service Accommodation Regulations Volume 1: Service Family Accommodation (SFA) and Substitute Service Family Accommodation- UK and Overseas Part 2: Directive." Accessed Apr 19, 2022, 1-3

⁷¹ Nicola Way, Fielder, Andrew, Allen, Jon, conversation with author, 24 March 2022.

⁷² Forces Compare. "Best Military Mortgages and Armed Forces Mortgages." . Accessed Apr 25, 2022. <https://forcescompare.uk/military-mortgages/>.

⁷³ United Kingdom. "Renting Out Your Property." . Accessed Apr 25, 2022. <https://www.gov.uk/renting-out-a-property/paying-tax>.

⁷⁴ Nicola Way, Fielder, Andrew, Allen, Jon, conversation with author, 24 March 2022.

⁷⁵ Canada, Department of National Defence. "Pay Rates for Non-Commissioned Members." . Accessed Apr 19, 2022. <https://www.canada.ca/en/department-national-defence/services/benefits-military/pay-pension-benefits/pay/non-commissioned.html>.

⁷⁶ United Kingdom. "MOD Roles and Salaries: 2021." . Accessed Apr 25, 2022. <https://www.gov.uk/government/publications/mod-roles-and-salaries-2021>.

⁷⁷ Nicola Way, Fielder, Andrew, Allen, Jon, conversation with author, 24 March 2022.

⁷⁸ The comparison of salaries was done using exchange rates on 12 April 2022. Recognizing that purchasing power varies between countries, there are challenges in this methodology but it captures the difference in salaries reasonably effectively.

⁷⁹ Nicola Way, Fielder, Andrew, Allen, Jon, conversation with author, 24 March 2022.

is very similar with non-veterans: 76% for veterans versus 78% for non-veterans.⁸⁰ This implies that despite access to heavily subsidized housing, most military members can buy into the housing market once they have left the military. It also is indicative that while starting British military salaries are low compared with their Canadian equivalent, those who pursue long careers can achieve equivalent qualities of life.

The United States Department of Defence has a comprehensive housing policy designed to provide its military members with housing as a tax-free benefit.⁸¹ Each uniformed member of the American military is entitled to at least three types of compensation: a salary, quarters or an allowance for accommodation, and a subsistence allowance.⁸²

The American entitlement to housing is multifaceted, but there are two basic options: on-base quarters or living on the economy with a subsidy.⁸³ Quarters' sizes evolve as members' careers and personal relationships progress.⁸⁴ After living in single quarters, the accommodation options increase as apartments and single-family homes are available based on rank and family size.⁸⁵ Whatever quarters the member is assigned, they are a non-taxable benefit at no cost to the member.⁸⁶

There are various options open to a member for those not living on-base, including rental or purchasing a home.⁸⁷ The critical policy for those living on the economy is the Basic Allowance for Housing (BAH).⁸⁸ BAH allows members to rent in the local economy.⁸⁹ It can be applied to a mortgage or used to rent accommodation, and it is a fixed rate based on location, rank, and dependents.⁹⁰ The amount provided is paid directly to the member and allows them to choose how they want to secure accommodation. For example, they can choose to live in cheaper accommodation and

⁸⁰ United Kingdom, Ministry of Defence, Annual Population Survey, UK Armed Forces Veterans residing in Great Britain, 2017 (London: United Kingdom, 2019), 1.

⁸¹ Department of Defense. Military compensation background papers: Compensation elements and related manpower cost items—Their purposes and legislative backgrounds. Washington, DC: Office of the Under Secretary of Defense for Personnel Readiness, 9.

⁸² Department of Defense. Military compensation background papers: Compensation elements and related manpower cost items—Their purposes and legislative backgrounds. Washington, DC: Office of the Under Secretary of Defense for Personnel Readiness, 9.

⁸³ Ibid 149.

⁸⁴ Todaysmilitary.com. "Housing." Accessed Apr 19, 2022. <https://www.todaysmilitary.com/military-life/housing>

⁸⁵ Todaysmilitary.com. "Housing." Accessed Apr 19, 2022. <https://www.todaysmilitary.com/military-life/housing>.

⁸⁶ Department of Defense. Military compensation background papers: Compensation elements and related manpower cost items—Their purposes and legislative backgrounds. Washington, DC: Office of the Under Secretary of Defense for Personnel Readiness. 10.

⁸⁷ Ibid 149.

⁸⁸ United States. Department of Defense. "A Primer on the Basic Allowance for Housing (BAH) for the Uniformed Services (Washington: United States of America, 2022), 1.

⁸⁹ Ibid 1.

⁹⁰ Ibid 1.

spend the difference as they please, or they can choose to live in more expensive housing and cover the difference from their pay.⁹¹

BAH has been developed for roughly 300 areas throughout the United States and includes rental housing and utility calculations.⁹² Considering a series of housing types that reflect both rank and number of dependents, BAH is recalculated annually.⁹³ The assignment of housing type and entitlement is derived from equivalent civilian incomes compared with Regular Military Compensation (RMC), which considers all military entitlements, taxed and untaxed, and establishes a comparable civilian salary.⁹⁴

The strength of BAH as it applies to the CAF is that it involves a detailed and annually reviewed process that analyses the actual cost of housing in local economies. While there are some stratified aspects, BAH provides reasonable accommodation for all military members. For example, in San Francisco, California, BAH in 2022 for a captain with dependents is \$61,776.⁹⁵ That same captain would receive \$16,668 in Fort Smith, Arkansas.⁹⁶ Comparing the two amounts, the BAH in California would appear to be a significant advantage over that in Arkansas. Still, the reality is that the captain would be able to secure an equivalent residence in either community. The tangible difference would be if the captain purchased a home in one community over the other, there would be an opportunity to build more equity in California.

Homeownership in the American military is considerably lower than the American average: 42.7% of active-duty military own a home compared with 64.0% of all Americans.⁹⁷ While this reflects the expectation that military members do not, on average, buy their home, 57% of military members aged 35-54 own a home, and 78.2% of military veterans own their own home.⁹⁸ This demonstrates that military members are likely to purchase a home later in their career and are more likely to own a home than the average American once they have retired from the military.

The impact of housing on the American military's pension system is that the pension is calculated based upon basic salary vice RMC.⁹⁹ While the accommodation benefit accrued by American military members is a significant portion of their pay, their retirement income does not have it applied. While this causes a considerable loss of pensionable benefits, the impact of housing on income reduces as rank increases. With

⁹¹ United States. Department of Defense. "A Primer on the Basic Allowance for Housing (BAH) for the Uniformed Services (Washington: United States of America, 2022), 7.

⁹² Ibid 2.

⁹³ Ibid 4.

⁹⁴ United States. Department of Defense. "A Primer on the Basic Allowance for Housing (BAH) for the Uniformed Services (Washington: United States of America, 2022), 4.

⁹⁵ Defense Travel Management Office. "BAH Calculator." Accessed Apr 19, 2022.

<https://www.defensetravel.dod.mil/site/bahCalc.cfm> Applied to San Francisco at O3 (US Army Captain)

⁹⁶ Ibid. Applied to Fort Smith at O3

⁹⁷ Sarah Storchak, Jung Hyun Choi, Laurie Goodman. The Impact of US Military Service on Homeownership and Income. *Urban Institute* (January, 2020), 7.

⁹⁸ Ibid 8.

⁹⁹ United States. Office of Financial Readiness. A Guide to the Uniformed Services Blended Retirement System. Washington, DC: U.S. Government Printing Office, 2017, 11.

extended service careers, basic pay becomes a much more significant proportion of overall benefits than housing.¹⁰⁰

Content

The critical proposal for modernizing the CAF housing policy stems from a hybrid of the compared allied accommodation strategies. It requires treating housing as a military necessity and modifying the programs to accommodate that need. By developing equitable funding schemes that allow every member to have reasonable accommodation, it better reflects the needs of the members while not requiring significant growth in DND-owned housing. This is achieved by understanding the accommodation market and conducting annual assessments of the market factors affecting military members while comparing accommodation data against military salaries and developing a progressive scale. It depends on funding accommodation more fairly so that every member has equal opportunities for a reasonable home no matter where they are posted.

An accommodation standard based on the number of dependents is required to fairly fund accommodation in the CAF. While both the British and American systems utilize rank to define entitlement and, to a lesser extent, dependents, given the execution of military quarters in the CAF, a system not prejudiced on rank better reflects our values and limits the financial impact on the Government of Canada by avoiding escalating costs based on rank. Therefore, like the American system, a revised PLD should include minimum acceptable standards, excluding substandard accommodation options for the calculations.¹⁰¹

The central aspect of a revised PLD is to ensure that the average total accommodation costs (to include local factors for utilities and other reasonable accommodation charges) are no more than 30% of the member's gross salary. Achieving this requires a significant understanding of accommodation costs in local markets. This equates to a PLD that will provide a taxable benefit that allocates enough funds for a member to afford reasonable accommodation given their dependent situation. While it will negate some of the financial advantages of promotion, it will ensure adequate access to housing. In addition, the perception of unjust fairness for those earning a higher salary receiving a smaller PLD benefit will be mitigated partially by a larger pension in the long run.

From a policy perspective, the most significant change to PLD is its core calculation: using the local cost of living vice comparing the member's community with the NCR. Changing the metrics for determining how PLD is determined will become a benefit that reacts to changes in the local situation and assigns the most assistance to those most in need of the support.

¹⁰⁰ Beth J. Asch, *Setting Military Compensation to Support Recruitment, Retention, and Performance*. Santa Monica, CA: RAND Corporation, 2019, 8.

¹⁰¹ United States. Department of Defense. "A Primer on the Basic Allowance for Housing (BAH) for the Uniformed Services (Washington: United States of America, 2022), 8. This includes but is not limited to housing in high crime areas as well as excluding certain housing types such as mobile homes.

This updated policy will require significant human and financial resources to be successful. From a human resources perspective, creating a viable structure, its implementation, and its refinement and updating will require people across the country to build and maintain a database. From a financial perspective, beyond the cost of the policy's benefits, there will be a management cost related to the analysis mechanisms required to maintain it. For example, the American BAH program uses a contractor to collect data¹⁰², and then the Department of Defence analyzes it. A similar mechanism could work in Canada but would require a dedicated staff, either within or working with the Chief of Military Personnel (CMP) to manage the policy.

The policy will also have a significant time constraint applied to it. As accommodation cost is variable month to month, an annual decision will have to be made that determines the rates for a given posting to ensure members understand their benefits before securing accommodation. As those rates will impact how members choose accommodation during the annual posting cycle, the managing authority should adjust the rates based on the fiscal year. While the housing market is constantly changing, a yearly adjustment before posting season will significantly improve the current PLD structure.

Process

The new policy requires several significant steps to be successful. The first is consultation with the military community to ensure that a fair and reasonable process is developed based on needs throughout the military rather than one subset. The second is engagement with the key actors, especially DND civilian and military leadership, Treasury Board, and Cabinet, to ensure that the major stakeholders have a workable consensus. Following that is the development of the process and a potential pilot program to test the mechanisms on a smaller scale. Finally, if all of that is successful, the policy will be approved, and then there is a need for continuous updating and refinement so that the policy maintains its relevance. While not an insurmountable challenge, it is a large and persistent task requiring considerable CMP support.

The consultation with the military community will be critical to understanding the diverse challenges that CAF members face. A few of the forecasted issues include regional differences in price, perception of fairness, how overall family income is incorporated into the process, including service and non-service couples, support for different family scenarios, and tension between those with and without dependents. A continuous consultation process is needed to provide context to these issues.

Actors

The actors involved in a policy are at the center of the Walt and Gibson model. For this policy, the key actors are the DND leadership, the Treasury Board Executive, the public service (and their perception), and the Government of Canada with the Cabinet in particular. While military members will play an essential role in providing input as the policy is crafted, the policy is for them instead of being driven by them. Nevertheless,

¹⁰² United States. Department of Defense. "A Primer on the Basic Allowance for Housing (BAH) for the Uniformed Services (Washington: United States of America, 2022), 2.

policy management does create a significant challenge and will require careful negotiations between the key actors so that there is appropriate governance.

The negotiation of this policy between DND and the Treasury Board will be a challenge. This policy uses market rates, and it will be highly susceptible to change and represent a budgetary concern as it requires a flexible funding model. Therefore, it will need political support at the Cabinet-level for it to succeed. This support will require well-documented research that captures the importance of stable accommodation on recruitment and retention (and, therefore, operational readiness) and actuarial analysis of the projected cost.

The public perception, particularly by public servants, of this policy will also impact its viability. DND and the Treasury Board Secretariat utilize the "principle of comparability"¹⁰³ when determining pay. Fundamentally the "principle of comparability" strives to equate the financial benefit derived from an hour of work by a CAF member with that of a member of the public service.¹⁰⁴ If this policy deviates too far from a comparable benefit, it can disrupt how the CAF calculates pay.

A potential solution is adjusting the military factor. The military factor deduces a value from the challenges of military service.¹⁰⁵ While the current posting turbulence factor of the overall military factor captures the complexities of frequently moving due to CAF service, sacrificing it from the pay calculations in return for a funded revised PLD enables enhanced negotiating power.¹⁰⁶ As the various public service unions conduct their collective bargaining, the CAF has the opportunity to adapt the military factor to satisfy both concerns that the CAF is receiving preferential treatment and some of the fiscal apprehensions of the Treasury Board on the cost of a revised PLD.

The Canadian annual inflation rate in March 2022 was 6.7%, the highest it has been since 1991.¹⁰⁷ In 2021, it was 4.7%.¹⁰⁸ As the CAF completed its last pay update in 2021 and before that in 2017, it is reasonable to assume that the next pay raise will occur in 2025.¹⁰⁹ Even if inflation returns to 2% in 2023 and 2024, the CAF will likely be looking at a minimum 16% pay increase in 2025 if it matches inflation. Given the scale of this raise, there is a potential opportunity to adjust the current posting turbulence factor of the overall military factor to be captured as a revised PLD benefit that provides

¹⁰³ Canada, National Defence. "Pay Overview for the Military." . Accessed Apr 27, 2022. <https://www.canada.ca/en/department-national-defence/services/benefits-military/pay-pension-benefits/pay/overview.html>.

¹⁰⁴ Canada, National Defence. "Pay Overview for the Military." . Accessed Apr 27, 2022. <https://www.canada.ca/en/department-national-defence/services/benefits-military/pay-pension-benefits/pay/overview.html>.

¹⁰⁵ Ibid.

¹⁰⁶ Ibid.

¹⁰⁷ "Canada Inflation Rate." . Accessed Apr 27, 2022. <https://www.rateinflation.com/inflation-rate/canada-inflation-rate/>.

¹⁰⁸ Ibid.

¹⁰⁹ Canada, National Defence. "Pay Overview for the Military." . Accessed Apr 27, 2022. <https://www.canada.ca/en/department-national-defence/services/benefits-military/pay-pension-benefits/pay/overview.html>.

consistent funding for suitable accommodation while not necessarily increasing salaries to the same extent. By capturing part of the cost of accommodation outside of salary, there is potential to make a revised policy more fiscally palatable for both the external actors and CAF members.

DND can influence Cabinet to support the revised PLD by targeting the posting turbulence factor. By highlighting the significance of the military factor and creating a non-pensionable benefit, it should satisfy the financial-centric members of the Cabinet. For those more focused on the operational effectiveness of the CAF, the enticement is the impact it will have on recruitment and retention, leading to a more operationally capable CAF.

The establishment of an organization similar to the British Accommodation Agency Contractor or the American Defense Travel will allow for dedicated personnel focused on the management and maintenance of the policy. The current mandate of the Canadian Forces Housing Agency (CFHA) as a Special Operating Agency is to manage residential housing units¹¹⁰. A new PLD management group could either be integrated into the CFHA organization with a larger mandate or aligned as a vital partner organization with CFHA to provide cohesive delivery of services to military members.

Conclusion

The Canadian accommodation market is experiencing an affordability issue impacting CAF members' ability to afford a reasonable home. While the CAF has focused on DND-owned assets, taking significant action to improve the quality and availability of military quarters¹¹¹, the majority of its member still live on the economy. As the volume of military quarters is unlikely ever to meet the needs of most of the CAF¹¹², the need for a progressive funding model that creates equity based both on posting location and salary is required.

Assuming the Government of Canada successfully stimulates growth in the number of dwellings to the point that the cost of accommodation is both affordable for Canadians and increasing at a rate similar to inflation, the cost of the revised PLD policy will decline. While there will likely be some need for financial support in urban areas where the prices may still be unaffordable, especially for military members early in their careers, the system's overall burden should be reduced.

A potential way forward involves the CAF developing a greater understanding of the private sector wherever military personnel are employed and providing funding to ensure members can afford reasonable accommodation. The CAF can ensure that every

¹¹⁰ Canada, Department of National Defence. "Canadian Forces Housing Agency Annual Report 2018-2019." Accessed Apr 19, 2022. <https://www.canada.ca/en/department-national-defence/corporate/reports-publications/cfha-annual-report-2019>.

¹¹¹ Canada, Department of National Defence. "Evaluation of Military Housing" . Accessed Apr 19, 2022, 11-13. <https://www.canada.ca/content/dam/dnd-mdn/documents/reports/2021/reports-pubs-audit-eval/report-1258-3-046-en.pdf>.

¹¹² Ibid.

member and their dependents are appropriately housed by modelling suitable accommodation data with military salaries. While no policy is perfect, a revised PLD has the potential to reduce fiscal inequality in the CAF and ensure that suitable accommodation is available to all members.

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