Veterans Review and Appeal Board

2011-12

Departmental Performance Report

The Honourable Steven Blaney, P.C., M.P. Minister of Veterans Affairs

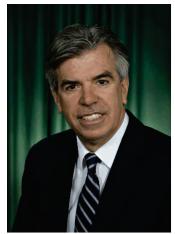
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Chair's Message

I am pleased to report on the performance against the plans and priorities of the Veterans Review and Appeal Board for 2011-12.

The Board exists to ensure that Veterans, Canadian Forces and Royal Canadian Mounted Police members, and their families receive the benefits to which they are entitled under the law. We do this by providing an independent avenue of appeal for disability decisions made by Veterans Affairs Canada (VAC). Our job is to provide Veterans with fair and impartial hearings, and to issue clear decisions in a timely manner. We do this for the most complex and challenging cases, since the straightforward ones are approved by VAC.



During the year, we devoted significant resources to a Business

Process Redesign project. By reviewing service delivery and identifying opportunities for efficiencies, we made great progress toward our goal of improving service and responding to applicants' changing needs and expectations. The Board also established its own Access to Information and Privacy Office and spent time developing new privacy training for personnel to ensure applicants' information is protected and processed under the highest standards.

At a time when Veterans and Canadians want to know more about the disability benefits appeal process, the Board focussed on improving and expanding its Web site; the addition of medical/legal resources increased transparency in decision-making and responded to stakeholders' requests to know more about how cases are decided. The Board also identified and pursued opportunities to increase outreach with new and traditional Veterans' organizations. It held meetings with stakeholders to share information and gain insight into Veterans' concerns. Through this outreach, the Board forged new relationships and built on existing ones.

The year's achievements would not have been possible without the hard work and dedication of Board Members and staff—for this I thank them. Together, we will meet next year's challenges while continuing to look for ways to better serve those who have served their country.

John D. Larlee Chair, Veterans Review and Appeal Board

Section I: Organizational Overview

Raison d'être

The Veterans Review and Appeal Board is an independent, quasi-judicial tribunal created in 1995. The Board provides an appeal program for service-related disability decisions made by Veterans Affairs Canada. This program gives applicants two levels of redress for disability pension and disability award decisions and the final level of appeal for War Veterans Allowance claims.

The Board's objective is to ensure that Canada's traditional Veterans, Canadian Forces members and Veterans, Royal Canadian Mounted Police applicants, qualified civilians and their families receive the disability pensions, disability awards and other benefits to which they are entitled under the law.

Responsibilities

The Board: An Administrative Tribunal

Administrative tribunals like the Board are highly specialized in the matters they deal with. They exist to give dissatisfied people a remedy that is less formal, less costly and less time-consuming than the courts. Learn more about the Board's mandate and organization.

The Board's work is governed by the:

- Veterans Review and Appeal Board Act²; and
- Veterans Review and Appeal Board Regulations³.

Applications for review and appeal can be made to the Board under the:

- Pension Act⁴;
- Canadian Forces Members and Veterans Re-establishment and Compensation Act⁵ Part 3 (New Veterans Charter);
- War Veterans Allowance Act⁶;
- Royal Canadian Mounted Police Pension Continuation Act⁷; and
- Royal Canadian Mounted Police Superannuation Act⁸.

What does the Board do for ill and injured Veterans?

The Board ensures that Canada's Veterans receive the disability benefits to which they are entitled under the law. To do this, the Board offers two levels of redress for Veterans who are dissatisfied with decisions made by Veterans Affairs Canada (VAC, the Department).

Review hearings are conducted by panels of two Board Members in approximately 30 locations across the country. Veterans have the opportunity to appear in person before fair, impartial decision-makers where they can give oral testimony and bring evidence and witnesses in support of their case.

Appeal hearings are conducted primarily in Charlottetown, Prince Edward Island by panels of three Board Members who did not hear the case at Review. While the legislation does not permit oral testimony at this level, the appeal hearing provides a further opportunity for applicants, through their representative, to submit new information and make arguments in support of their case.

All hearings are non-adversarial, which means no one argues against the Veteran. Learn more about the Board's hearings⁹.

An Independent Appeal Process

The Board operates at arm's-length from the Department to provide an independent appeal process. As independent adjudicators, Board Members are not bound by previous decisions and will change them to benefit Veterans if there is credible evidence to support a service-related disability.

What kind of cases does the Board hear?

Decisions appealed to the Board represent the most complex and challenging cases, since the straightforward ones are approved by the Department. Many applicants are satisfied with their departmental decisions and only a small percentage come to the Board for an independent appeal. Approximately 10-15% of VAC's 35,000 to 40,000 annual disability decisions are appealed to the Board.

The Board reviews decisions related to:

- disability pensions or awards
- special awards, including Attendance Allowance, Exceptional Incapacity Allowance and Clothing Allowance
- dependent/survivor benefits
- War Veterans Allowance appeals

The Board also hears applications for compassionate awards.

The top five medical conditions in applications to the Board:

- lower back conditions
- knee conditions
- tinnitus
- hearing loss
- neck conditions

Workload and Outcomes

The Board issues approximately 4,500 decisions annually, three-quarters of which are Review and one-quarter Appeal. The Board manages this workload with approximately 24 Board Members and 85 operational staff.

In 2011-2012, the Board ruled favourably in 49.5% of Reviews and 29.4% of Appeals. These favourability rates are due, in part, to the Board's ability to give applications a fresh new look, receive new evidence, and hear testimony from the Veteran and witnesses. Learn more about the Board's workload statistics¹⁰.

Board Members

Members are independent, impartial adjudicators. Their job is to decide whether the evidence meets the requirements of the legislation to award new or increased levels of disability benefits.

To do this, they:

- conduct hearings where they listen to testimony and arguments and weigh all the evidence;
- make a full and fair examination of available information;
- interpret and apply the legislation based on the evidence presented; and
- write clear and well-reasoned decisions.

Members are appointed through a transparent, merit-based selection process that recognizes the value of military, medical, policing, and legal backgrounds. Before hearing cases, all new Members undergo a rigorous training program, and receive ongoing and specialized training from medical, legal, military and lay experts. Learn more about Members 11 and the Member Selection Process 12.

Transparency

The Board is committed to increasing transparency in the decision-making process by providing instructive and easily-accessible information on its Web site. In 2011- 2012, the Board focussed on publishing more content online, including legal and medical resources.

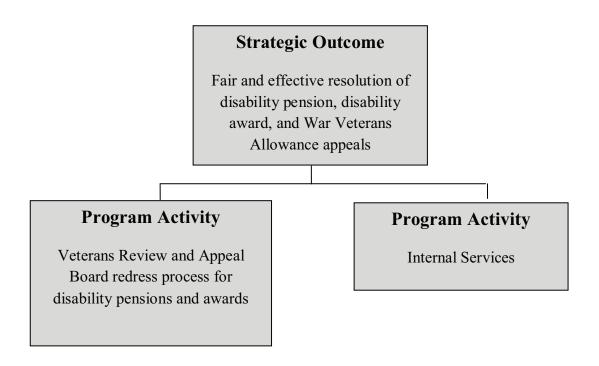
Communication

The Board continues to focus on increasing communications with Veterans and Canadians. This year, the Board continued its broader outreach initiative to meet with newer Veterans organizations while maintaining relationships with more established stakeholders. These groups provide helpful perspectives and suggestions on how to improve service to Veterans.

Privacy

The Board has strengthened its approach to safeguarding the personal information in its care. It has reviewed and limited employees' access to systems containing client information, spent time developing new privacy training, and communicated regular reminders to reinforce the "need-to-know" principle for employees. The Board continues to review its processes through a privacy lens to ensure they meet the highest possible standards.

Strategic Outcome and Program Activity Architecture



Organizational Priorities

The Board has four organizational priorities which support its Strategic Outcome.

Summary of Progress Against Priorities

Priority	Туре	Strategic Outcome			
Program Delivery	Ongoing since 2008	Fair and effective resolution of disability pension, disability award, and War Veterans Allowance appeals			
 Applicants were given the opportunity to appeal their decisions to an independent tribunal and have their cases heard as quickly as possible. Over 3,500 applicants appeared in person at their review hearings. More than 1,050 appellants, through their representatives, presented new information and arguments at their appeal hearings. The Board focussed on improving internal practices and increased controls to strengthen performance in issuing written decisions following the hearing. Performance improved significantly between the first quarter and the last quarter. 					
Improved Program Delivery	Ongoing since 2004	Fair and effective resolution of disability pension, disability award, and War Veterans Allowance appeals			
 opportunities to make the process initiated the validation and implen To ensure cases were scheduled representing applicants to refine the applicants in approximately 30 loc Specialized training for staff and the second se	 opportunities to make the process faster and easier for Veterans. Phase I was completed and the Board initiated the validation and implementation phases. To ensure cases were scheduled as quickly as possible, the Board consulted with organizations representing applicants to refine the annual review hearing schedule. This resulted in timely hearings for applicants in approximately 30 locations throughout Canada. 				
Communication	Ongoing since 2004	Fair and effective resolution of disability pension, disability award, and War Veterans Allowance appeals			
 The Board continued to identify and pursue opportunities to communicate with internal and external audiences, increasing outreach with stakeholders, including with new and traditional Veterans' organizations. To inform applicants and Canadians about its program, the Board focused on improving its Web site by adding new content such as decision-making resources. 					
Accountable Management	Previously committed to in 2010-11	Fair and effective resolution of disability pension, disability award, and War Veterans Allowance appeals			
The Board continued to respond to new reporting requirements from central agencies, implemented the new Policy on Internal Control, established an Access to Information and Privacy (ATIP) office, updated its Web site to comply with Government of Canada Accessibility Guidelines, and supported Canada's Open Government initiative.					

Risk Analysis

Operating Environment The Board carries out its mandate—to provide an independent appeal program for disability decisions—within a complex and changing environment. The Board schedules hearings in cooperation with representative organizations (Bureau of Pensions Advocates; Royal Canadian Legion). Sometimes, the ability to schedule hearings depends on factors beyond the control of both VRAB and representatives: for example, a requested medical opinion or other evidence may take a long time to obtain.

In 2011-12, the Board faced increased media/social media attention and pressure from applicants and stakeholders to shorten wait times, simplify processes, and to increase transparency by publishing more information on the appeal program. At the same time, the Board continued to face additional reporting requirements to central agencies. The Board is challenged to invest its limited resources in new initiatives without impacting its program delivery. VRAB's capacity to address emerging financial pressures decreased as a result of recent budgets and other centrally-imposed cost containment measures which require government departments and agencies to manage increased spending within existing reference levels.

Risk Analysis To identify and mitigate risks, the Board has a strategic plan, an annual risk assessment, and quarterly business planning meetings to ensure strong governance, management and accountability practices. Staff and members discuss and assess strategic and operational risks on a regular basis.

Workload While it remains difficult to accurately forecast the volume of applications, the Board managed its caseload and adjusted the hearing schedule to ensure applicants had their hearings at the earliest opportunity. Extensive case monitoring practices resulted in applicants receiving their written decisions in the shortest time frame possible.

Increased expectations Amid pressure from applicants to reduce complexity in processes and wait times for services, the Board continued to search for improvements in its program. It dedicated significant resources to a Business Process Redesign project to identify opportunities for efficiencies. Although VRAB is independent from Veterans Affairs Canada, many applicants do not make this distinction. As a result, complexities and delays that may occur in other areas of the adjudicative process and service delivery can negatively impact on the Board's image and credibility. Now more than ever, Veterans, Canadians, and media are requesting more information on the appeal program. This put increased demands on limited human and financial resources as the Board focussed on publishing decision-making resources and Noteworthy Decisions on its Web site, and increased outreach with Veterans' organizations and stakeholders.

Allocation of resources The Board carefully leveraged existing resources and reallocated them internally to maintain its core level of service to applicants and support its strategic priorities. Strengthened planning and risk management frameworks and practices developed over the course of the past year ensured that limited resources were directed to the areas of highest priority.

The Board is funded through annual appropriations. As a result, its operations are impacted by any changes in funding approved through Parliament. The Board developed a multi-year plan to proactively prioritize spending initiatives and address emerging pressures. Authorities and expenditures were monitored regularly through progress reports and with the engagement of senior management.

Opportunities The Board is undertaking a comprehensive review of its appeal program to identify efficiencies and streamline processes. The collaborative approach developed with the main organizations that represent applicants before VRAB provides opportunities to work together in identifying efficiencies in the hearing process. The Board continues to promote videoconferencing as a way to provide timely hearings for applicants across the country. The Board also co-operates with Veterans Affairs Canada to understand both the systems and service delivery changes evolving from their Transformation Agenda which will impact the Board's process.

Summary of Performance

This section contains a summary of the Board's financial resources, human resources and performance summary table. The summary provides the indicators and targets from the 2011-12 Report on Plans and Priorities along with information on the progress achieved for the Strategic Outcome (SO).

2011–12 Financial Resources (\$ millions)

Planned Spending	Total Authorities	Actual Spending
11.5	12.9	12.7

2011–12 Human Resources (full-time equivalents [FTEs])

Planned	Actual	Difference
121	108	13

Summary of Performance Tables

Progress Toward Strategic Outcome

Strategic Outcome: Fair and effective resolution of disability pension, disability award, and War Veterans Allowance appeals				
Performance Indicators Targets 2011–12 Performance				
Percentage of client concerns that are effectively responded to	80% of complaints are responded to within 60 days	Of the four complaints received through the Board's formal complaint process, 75% were responded to and completed within 60 days		

Performance Summary, Excluding Internal Services

Program	2010–11 Actual	2011–12 (\$ millions)			Alignment to Government	
Activity	Spending	Main Estimates	Planned Spending	Total Authorities	Actual Spending	of Canada Outcome
Veterans Review and Appeal Board redress process for disability pensions and awards	12.1	11.5	11.5	12.9	12.7	Income Security and Employment for Canadians ¹³
Total	12.1	11.5	11.5	12.9	12.7	

Performance Summary for Internal Services

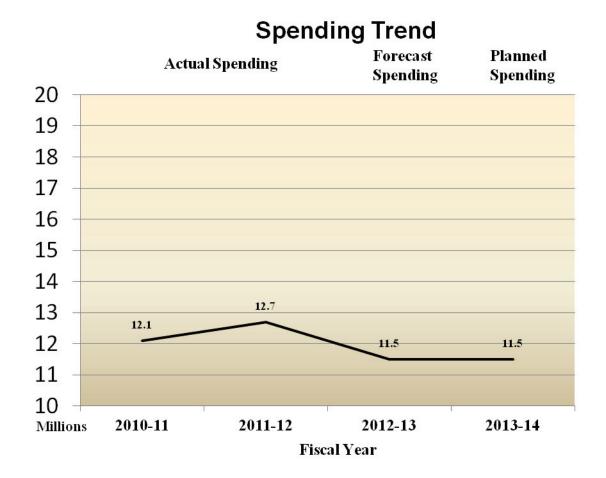
Program 2010–11 Actual			2011–12 (\$ millions)		
Activity	Spending	Main Estimates	Planned Spending	Total Authorities	Actual Spending

As reported in the Report on Plans and Priorities 2011-12, the Internal Services to support the operations of the Veterans Review and Appeal Board are provided by Veterans Affairs Canada¹⁴ through its Vote 1 – Operating Expenditures

Strategic Environmental Assessment

During 2011–12, none of the initiatives undertaken by the Veterans Review and Appeal Board were subject to the *Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals*. An electronic version of the *Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals*¹⁵ is available on the Canadian Environmental Assessment Agency's Web site.

Expenditure Profile



The total actual spending for the Veterans Review and Appeal Board for 2011-12 was \$12.7 million, an increase of 5.0% over fiscal year 2010-11. This increase is due to an increase in the payout of severance and termination benefits related to the revision of specific collective agreements. All other spending was consistent with previous fiscal years due to the stable nature of the Board's operations.

Planned spending for the Veterans Review and Appeal Board is expected to remain constant in 2012-13 and 2013-14. The 2011-12 Departmental Performance Report is the first stand-alone report for the Board. Spending for previous years has been reported as part of the Veterans Affairs Portfolio.

Estimates by Vote

For information on the Veterans Review and Appeal Board's organizational Vote and/or statutory expenditures, please see the Public Accounts of Canada 2011 (Volume II)¹⁶. An electronic version of the Public Accounts 2011 is available on the Public Works and Government Services Canada's Web site.

Section II: Analysis of Program Activities by Strategic Outcome

This section presents the Veterans Review and Appeal Board's performance against the expected results identified in the 2011-12 Report on Plans and Priorities.

Strategic Outcome

Fair and effective resolution of disability pension, disability award, and War Veterans Allowance appeals.

Program Activity 1.1: Veterans Review and Appeal Board redress process for disability pensions and awards

Program Activity Description

This program ensures applicants have an avenue of redress by an independent tribunal for disability compensation and War Veterans Allowance claims.

Program Activity 1.2: Internal Services

As reported in the RPP 2011-12, internal services to support the operations of the Veterans Review and Appeal Board are provided by Veterans Affairs Canada¹⁷ through its Vote 1 - Operating Expenditures. This relationship has been in place since the Board was created in 1995 and continues to capitalize on the efficiencies presented by the Portfolio Department providing internal services to a very small Portfolio member. A Memorandum of Understanding dated 28 February 2011 between the Veterans Review and Appeal Board and Veterans Affairs Canada describes the internal services that are provided on an ongoing basis. These services are provided without charge to the Veterans Review and Appeal Board appropriations, with the exception of telecommunications, information technology hardware and certain program evaluation services. As part of this agreement, the Board's targets and reporting on the Departmental Sustainable Development Strategy¹⁸ are included in the Veterans Affairs Portfolio-wide report.

2011-12 Financial Resources (\$ millions)

Planned Spending	Total Authorities	Actual Spending
11.5	12.9	12.7

2011-12 Human Resources (FTEs)

Planned	Actual	Difference
121	108	13

Program Activity Performance Summary

Expected Results	Performance Indicators	Targets	Actual Results
Veterans and other clients receive a timely	Percentage of decisions finalized within the	85 %	81.7% of 3,636 review decisions met the target;
decision following their hearing	published service standard		85.5% of 1,072 appeal decisions met the target.

Performance Summary and Analysis of Program Activity

Applicants who are dissatisfied with a disability decision from Veterans Affairs Canada have the right to appeal to VRAB, an independent tribunal that operates at arm's length from the Department to provide a fair appeal process. In 2011-12, the Board met its targets for program delivery in terms of the number of applications received, hearings held and decisions issued. Focussed efforts resulted in program delivery improvements in the areas of: enhancing prehearing documentation with additional medical information; professional development; and reviewing practices related to handling personal information. The Board's case management system was updated to more efficiently store, share and search for information within VRAB to support consistency in decision making and tracking cases. This has resulted in timely and detailed operational reports allowing for better monitoring of turn-around-times and, consequently, more responsive corrective actions.

Although the volume of applications in 2011-12 was similar to the previous year, the proportion made by still-serving and retired Canadian Forces members increased, while the proportion from traditional Veterans decreased. The number from Royal Canadian Mounted Police applicants remained the same. Applications to the Board continued to represent the most complex medical interrelationships and legal arguments.

Through concerted efforts to prepare pre-hearing documentation and schedule cases at the earliest opportunity, the Board maintained a similar number of hearings and issued over 4,900 decisions: 3,636 review; 1,072 appeal; 178 reconsideration; and 22 War Veterans Allowance decisions. This represents an increase of 240 decisions from the previous year. The average time

from registration of an application with the Board to issuing a decision remained similar to the previous year: 161 days for review cases and 82 days for appeal cases. During the year, the Board reduced its end-of-year pending caseload and continued to be able to schedule the majority of the cases ready to proceed.

Due to new evidence, Veterans' oral testimony, arguments by representatives, and the benefit of the doubt, VRAB was able to award new or increased benefits in 49.5% of review and 29.4% of appeal decisions. The Board had an ambitious target to issue 85% of its written decisions within 6 weeks of the hearing. Overall, 81.7% of review decisions and 85.5% of appeal decisions were issued within this timeframe.

An applicant who has exhausted all redress options with the Board and remains dissatisfied has the right to apply to the Federal Court for a judicial review of the VRAB decision. In 2011-12, 22 applicants requested a judicial review by the Federal Court (representing less than 1.8% of VRAB's 1, 250 appeal and reconsideration decisions). In the same year, the Federal Court issued 14 rulings: 7 upheld the decision of the Board while 7 were returned to be reheard. One decision was returned to the Board pursuant to a Consent Order and 2 applications were discontinued.

In an environment where stakeholders want to know more about the appeal process, VRAB continued to identify and pursue opportunities to communicate with internal and external audiences. It forged relationships with newer Veterans' organizations and increased outreach with traditional organizations and other stakeholders. It held meetings to share information and gain an understanding of Veterans' concerns and issues and to learn how it could improve service to Veterans. These meetings also allowed the Board to identify areas where it could improve communications, especially around the more complex legal issues associated with VRAB's work as an administrative tribunal (e.g. benefit of the doubt, credibility of evidence, etc).

To better inform applicants and Canadians about its program and to increase transparency in decision-making, the Board published medical/legal resources on its Web site and made great progress towards publishing its Noteworthy Decisions. At the same time, VRAB responded to information requests from parliamentarians, media, and stakeholders and addressed increased media/social media attention.

Lessons Learned

The priorities identified in the Board's Strategic Plan focus efforts on two core activities: hearings and decision-making. In response to applicant/stakeholder requests for information and decisions that are easier to understand, the Board conducted plain language decision-writing training and plans to review its decision format and content. The Board also plans to leverage opportunities to hold hearings by videoconference. As a result of a Federal Court decision, the

Board amended its pre-hearing documentation and Web site content by adding medical resources and information.

While the Board improved its Web site by adding more information including decision-making resources, it identified areas where it could do more. As the public relies increasingly on Webbased information as a first resource, the Board will continue to focus on improving its Web site to make it more user-friendly and informative.

Change is a reality in the current environment. The Board recognizes the importance of consulting staff and Members on change and supporting them through it. Under its Business Process Redesign project, VRAB will put in place a Change Management Framework to help staff and members to adopt and embrace future change.

Section III: Supplementary Information

Financial Highlights

The financial highlights presented in the 2011–12 Departmental Performance Report serve as a general overview of the Veterans Review and Appeal Board's financial position and operations. These financial highlights were prepared on an accrual basis to strengthen accountability and improve transparency and financial management.

Condensed Statement of Financial Position (Unaudited)

As at March 31, 2012 (\$ thousands)

	Change \$	2011–12	2010–11
Total net liabilities	-31%	1,732	2,527
Total net financial assets	-39%	298	491
Departmental net debt	-30%	1,435	2,037
Total non-financial assets	-95%	19	394
Departmental net financial position	-14%	(1,416)	(1,643)

Condensed Statement of Operations and Departmental Net Financial Position (Unaudited) For the Year Ended March 31, 2012 (\$ thousands)

	Change %	2011–12	2010–11
Total expenses	4%	13,686	13,137
Total revenues	0%	0	0
Net cost of operations before government funding and transfers	4%	13,730	13,203
Departmental net financial position	-14%	(1,416)	(1,643)

Condensed Statement of Financial Position

Liabilities decreased by approximately \$795K in 2011-12. This decrease primarily relates to the reduction in accounts payables and accrued liabilities, and in the employee future benefit liability.

Assets decreased by approximately \$568K in 2011-12. This is primarily a result of the reduced net book value of the tangible capital assets.

Condensed Statement of Operations and Departmental Net Financial Position

Expenses of the Board increased by \$549K in 2011-12, as compared to 2010-11. This increase is mainly due to additional expenditures on personnel as a result of the requirement to make payments in lieu of severance and termination benefits due to the revision of specific collective agreements.

Financial Highlights—Charts and Graphs

Total Spending: \$12.7 Million



Veterans Review and Appeal Board redress process for disability pensions and awards.

Financial Statements

The Board's Financial Statements¹⁹ are available on the VRAB Web site.

Section IV: Other Items of Interest

Organizational Contact Information

To learn more, visit the Board's Web site²⁰ at www.vrab-tacra.gc.ca or contact the Board at:

Veterans Review and Appeal Board 161 Grafton Street Post Office Box 9900

Charlottetown PE C1A 8V7

Tel: 1-800-450-8006 Toll Free in Canada and the United States Tel: 0-(902)-566-8751 Call collect from all other locations E-mail: vrab_tacra@vrab-tacra.gc.ca Fax: 1-902-566-7850

Endnotes

¹ About the Board, http://www.vrab-tacra.gc.ca/AbouttheBoard-AuSujetduTribunal-eng.cfm

² Veterans Review and Appeal Board Act, http://laws-lois.justice.gc.ca/eng/acts/V-1.6/page-1.html

³ Veterans Review and Appeal Board Regulations, http://laws-lois.justice.gc.ca/eng/regulations/SOR-96-67/index.html

⁴ Pension Act, http://laws-lois.justice.gc.ca/eng/acts/P-6/index.html

 $^{^5 \} Canadian \ Forces \ Members \ and \ Veterans \ Re-establishment \ and \ Compensation \ Act, \ http://laws-lois.justice.gc.ca/eng/acts/C-16.8/index.html$

⁶ War Veterans Allowance Act, http://laws-lois.justice.gc.ca/eng/acts/W-3/index.html

⁷ Royal Canadian Mounted Police Pension Continuation Act, http://laws-lois.justice.gc.ca/eng/acts/R-10.6/index.html

 $^{^{8}\} Royal\ Canadian\ Mounted\ Police\ Superannuation\ Act,\ http://laws-lois.justice.gc.ca/eng/acts/R-11/index.html$

 $^{^9}$ Hearings, http://www.vrab-tacra.gc.ca/Overview-Apercu-eng.cfm $\,$

 $^{^{10}\} Workload\ Statistics, http://www.vrab-tacra.gc.ca/Facts/QuickFacts-faitsenbref-eng.cfm$

 $^{^{11}\} Members,\ http://www.vrab-tacra.gc.ca/Chair-and-members-President-et-membres-eng.cfm$

 $^{^{12}\} Member\ Selection\ Process,\ http://www.vrab-tacra.gc.ca/Employment-Emploi/Appointment-Process-Processus-de-nomination-eng.cfm$

¹³ Income Security and Employment for Canadians, http://www.tbs-sct.gc.ca/ppg-cpr/frame-cadre-eng.aspx

¹⁴ Veterans Affairs Canada Report on Plans and Priorities 2011-12, http://www.tbs-sct.gc.ca/rpp/2011-2012/inst/dva/dva-eng.pdf

¹⁵ Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals, http://www.ceaa.gc.ca/default.asp?lang=En&n=B3186435-1

¹⁶ Public Accounts of Canada 2011 (Volume II), http://www.tpsgc-pwgsc.gc.ca/recgen/txt/72-eng.html

¹⁷ Veterans Affairs Canada Report on Plans and Priorities 2011-12, http://www.tbs-sct.gc.ca/rpp/2011-2012/inst/dva/dva-eng.pdf

¹⁸ Departmental Sustainable Development Strategy, http://www.veterans.gc.ca/eng/department/reports/sds2007

¹⁹ Veterans Review and Appeal Board Financial Statements, http://www.vrab-tacra.gc.ca/Plans-eng.cfm

²⁰ Veterans Review and Appeal Board Web site, http://www.vrab-tacra.gc.ca