# Michael Howlett Adam M. Wellstead Professional policy work in federal states: Institutional autonomy and Canadian policy analysis

Abstract: Despite all the attention paid to the topic of policy analysis, the actual work of policy analysts in government is little investigated and little known (Colebatch 2005, 2006a, 2006b; Colebatch and Radin 2006). This is true not only at the national level, which has been the subject of most existing studies, but especially at the sub-national level, where substantial powers rest. In order to address this gap, this article presents evidence from the first, large-scale set of surveys of Canadian federal, provincial and territorial policy analysts, examining the similarities and differences in their policy work. While many similarities exist in areas related to overall governance trends, such as consultation and participation work overtaking more technical policy evaluations, there are significant differences in the nature of policy work and attitudes, which are linked to the lesser autonomy from political masters experienced by sub-national analysts. The results suggest that sub-national policy work must be studied carefully in its own right.

Sommaire : Malgré toute l'attention accordée à l'analyse des politiques, le travail des analystes de politiques au gouvernement n'a été que très peu étudié et est peu connu (Colebatch 2005, 2006a, 2006b; Colebatch et Radin 2006). Cela est vrai non seulement à l'échelle nationale, ce qui a fait l'objet de la plupart des études existantes, mais plus particulièrement à l'échelle infranationale, où les gouvernements détiennent d'énormes pouvoirs. Pour remédier à cette lacune, cet article présente des témoignages de la première série de sondages à grande échelle menée auprès des analystes de politiques fédéraux, provinciaux et territoriaux du Canada, qui examine les similarités et les différences dans le travail d'élaboration des politiques. Alors que de nombreuses similarités existent dans les domaines liés aux tendances de gouvernance en général, comme le travail de consultation et de participation dépassant des évaluations de politiques plus techniques, il existe également d'importantes différences dans la nature du travail d'élaboration de politiques et dans les attitudes, qui sont liées au fait que les analystes infranationaux jouissent de moins d'autonomie que les maîtres politiques. Les résultats laissent entendre que les études de politiques à l'échelle infranationale doivent être examinées attentivement en tant que tel.

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# Introduction: Gaps in knowledge of policy work in multi-level states

Despite having been a matter of academic attention for over half a century, the working world of policy analysts is largely unknown, as Colebatch and Radin argued in their 2006 survey of comparative policy analysis. Many studies rely on anecdotal case studies and interview research (Radin 2000; Hoppe and Jeliazkova 2006; Colebatch et al. 2011; Noordegraaf 2011) which, while informative and useful for theory building, raise questions about the robustness of findings.<sup>1</sup>

Large-scale, comprehensive, empirical studies of policy work are not only very rare but are also dated and cover few jurisdictions, most commonly the US. Some analyses of these studies employ only partial survey evidence (see, for example, Page and Jenkins' 2005 study of the UK "policy bureaucracy") and in many cases observers seeking large-n empirical data rely on one or two dated American studies, such as Meltsner's (1976) work from three decades ago or Durning and Osuna's 1994 study, to support their conclusions about the tasks, duties and roles played by policy analysts in contemporary policy processes. These gaps in knowledge about the characteristics and activities of professional policy workers have led many observers to decry the lack in many countries of such basic data as how many policy analysts there are in government, what subjects they work on, and with what effect (New Zealand, State Services Commission 1991, 1999; Uhr and Mackay 1996; Bakvis 1997 and 2000; Weller and Stevens 1998) and to suggest that the conduct of newer, large-n surveys of professional policy workers in government is required to advance thinking on this topic.2

Understanding what sub-national policy workers do and with what effect, however, is an essential pre-requisite to understanding how policy processes and policy advice work in federal states and, more generally, in many states where policy processes involve complex, multi-level governance arrangements

This situation is especially acute in multi-level countries, since what little work exists focuses almost exclusively on the national or central level (for rare exceptions see Hollander and Prince 1993; Rieper and Toulemonde 1997; Hird 2005b; Dobuzinskis, Howlett and Laycock 2007; Liu et al. 2010), despite the fact that sub-national governments have extensive policy-making authority in many important areas of social and economic life, such as healthcare, social welfare programs, transportation and urban policy

(Howlett 1999). Even high-profile federal states, such as Australia, Germany, the US and Canada, whose central government decision-making processes have been studied intensively have had little attention paid to their sub-national jurisdictions (Wollmann 1989) until recently and empirical data have been lacking on the policy analytical techniques and practices found in these sub-national governments (Hird 2005b; Voyer 2007; Howlett 2009b, 2009c; Howlett and Newman 2010).

Understanding what sub-national policy workers do and with what effect, however, is an essential pre-requisite to understanding how policy processes and policy advice work in federal states and, more generally, in many states where policy processes involve complex, multi-level governance arrangements. This article uses data gleaned from the first large-scale survey of federal, provincial and territorial policy analysts in Canada to shed some light on these questions.

# Policy work in multi-level systems The limited autonomy hypothesis

A key question in the study of sub-national policy work is whether, and to what extent, analytical activities differ from those identified at the national or central level. Limited case study and interview-based research examining state- or provincial-level policy making (see for example Halligan 1995; Segsworth and Poel 1997; Rasmussen 1999; Maley 2000; McArthur 2007) is far from conclusive about how sub-national analytical work differs from that conducted by central governments, but it does provide a basic set of working hypotheses which can be tested against larger-scale and more comprehensive empirical survey results.

McArthur's 2007 work on federal and provincial policy making in Canada is especially useful in this regard. This work highlights the impact upon policy work and workers of organizational differences between sub-national and national levels of government, and, in particular, the consequences for policy work flowing from the smaller size of government and the tighter lines of political control found at the sub-national level. Because of these structural characteristics, McArthur argued, provincial government agencies and the analysts they employ suffer from a lack of autonomy from demands placed upon them by political masters and by prominent social actors such as trade unions, business associations, think tanks and interest groups. As a result, sub-national policy workers are much more constrained and short-term in their activities and orientations than their national counterparts, and are much more likely to follow political dictates and fashions in government, and much less able to resist pressure-group politics. Liu et al. (2010) found a similar pattern and effect at the local government level.

As a high-profile federal state with significant policymaking responsibilities at the sub-national level, Canada provides a strong case from which to generate insights into the differences and similarities of policy analytical work in multi-level governance systems

This study will evaluate this limited autonomy hypothesis. By comparing policy work and workers at different levels in a multi-level state such as Canada, we would expect to see large similarities across levels of governments, with professional analysts using similar techniques and approaches, but with some major differences between their analytical practices and policy work. This hypothesis will be tested using empirical data gathered from a unique set of surveys of professional policy analysts working in the federal, ten provincial and three territorial governments of the Canadian federation. As a high-profile federal state with significant policy-making responsibilities at the sub-national level, Canada provides a strong case from which to generate insights into the differences and similarities of policy analytical work in multi-level governance systems (Howlett and Lindquist 2004).

#### Data

In order to assess this institutional autonomy thesis, data from two sets of surveys of Canadian policy workers conducted in 2007 and 2008 by the authors were combined so that the attitudes, practices and situations of respondents in Canada's National Capital Region (NCR) (located in the adjoining communities of Ottawa, Ontario, and Gatineau, Quebec) could be compared with those of analysts in the country's thirteen provincial and territorial jurisdictions. Data were divided into five topic areas: demographic characteristics; job experience of analysts; their education and training; the nature of their day-to-day duties; and the techniques and data they employ in their analyses. Overall survey results and demographic profiles for the federal level are available in Wellstead et al. (2009) and for the provincial and territorial level in Howlett (2009b, 2009c). Response rates by provincial and territorial jurisdiction are set out in Appendix 1.<sup>3</sup>

The combined data collected from these surveys allowed profiles of federal, provincial and territorial analysts to be compared and provided the basis for the first large-n, comparative, empirical analysis of the background and activities of sub-national and national-level government policy analysts working in a multi-level governance system. The comparison reveals interesting similarities and differences among policy workers and policy work in such systems, and provides the empirical data required to evaluate differences in the practices employed by analysts working in a multi-level state.

## Results

Federal-provincial-territorial commonalities

Table 1 illustrates many important similarities in the policy tasks conducted at the federal, provincial and territorial levels of Canadian government. Regardless of their location or level of operation, policy workers are likely to be engaged in implementation work that requires coordination with other levels of government and technical or specialized knowledge, and to exhibit a similar division of short- and long-term tasks. They also share many similar attitudes towards those in power, and have similar views about such topics as their own and non-governmental policy capacity.

Federal differences versus provincial-territorial similarities

There are also several statistically significant differences between analysts working in national governments and those working at the sub-national level. As Table 2 shows, federal government analysts display many unique characteristics as compared to their sub-national counterparts. At the same time, there are many similarities between provincial and territorial analysts in these same areas. Some results are unsurprising, such as the likelihood of federal analysts to work on national issues, but others confirm the McArthur expectation that federal analysts tend to deal more often with more complex and longer-term issues. Nationallevel analysts are also more supportive of head-office control and less supportive of the devolution of government programs and services. More significantly for the McArthur hypothesis, federal analysts have many fewer interactions with other governments than do provincial and territorial analysts, and are less likely to be involved with interest groups, NGOs or other provincial or municipal governments than their provincial and territorial counterparts. Both provincial and territorial analysts, in contrast, share similar attitudes and practices in these and other areas of policy work.

Federal-provincial similarities versus provincial-territorial differences

Prima facie, the findings in Tables 1 and 2 support the expectations of the limited autonomy thesis. While there may be basic commonalities in

Table 1. Similarities Across All Three Orders of Government (Mean Scores)

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Variable	Federal employees	Provincial employees	Territorial employees
I implement/deliver programs	2.83	2.90	2.87
I deal with issues that emerge as a result of	3.73	3.66	3.67
governmental priorities in headquarters			
I deal with issues that require coordination with other levels of government	3.04	2.90	3.02
I deal with issues that require specialist or technical knowledge	3.65	3.64	3.50
I appraise policy options	3.43	3.56	3.67
I consult with the public	1.96	1.97	2.17
I deal with regional issues	3.03	3.01	2.71
I identify policy issues	3.85	3.92	4.04
I deal with tasks which demand immediate action (i.e., "fire fighting")	3.94	3.81	3.79
I negotiate with central agencies	2.40	2.62	2.62**
I negotiate with program managers	2.85	3.06	3.07**
I deal with short-term tasks which can be resolved in less than a month	3.69	3.69	3.71
I deal with medium-term tasks which are ongoing for between 1–6 months	3.60	3.59	3.65
I deal with long-term tasks which are ongoing for between 6–12 months	3.61	3.47	3.54
I deal with urgent day-to-day issues that seem to take precedence over long-term thinking	4.18	4.28	4.27
I negotiate with stakeholders	2.68	2.85	2.63**
I consult with stakeholders	2.62	2.76	2.63*
I think policy decisions seem to increasingly be those that are most politically acceptable	3.91#	3.98	3.99
I think there seems to be less governmental capacity to analyse policy options than there used to be	3.37#	3.43	3.52
I think much of the existing policy capacity is outside the formal structure of government	2.76#	2.91	2.82
I think those who have more authority in decision making usually have less specialized technical expertise	3.77#	3.80	3.74
I think government is becoming increasingly accountable for its decisions	3.51#	3.66	3.44*
I prefer networking with colleagues	4.04#	4.08	4.06
I prefer more control from central agencies	2.48#	2.69	2.62
I prefer more control from the regions	2.71#	2.80	2.76

Based on a 1 to 5 scale where 1 = never and 5 = daily #Based on a 1 to 5 scale where 1 = strongly disagree and 5 = strongly agree \*significant at 0.05 level; \*\*significant at 0.01 level

Table 2. Provincial—Territorial Similarities (Federal Differences)

Variable	Federal employees	Provincial employees	Territorial employees
I collect policy-related data or information	3.01	3.98	4.05***
I deal with provincial and territorial issues	2.79	4.55	4.47***
I deal with national issues	4.27	2.61	2.71***
I identify policy options	3.55	3.72	3.87**
I deal with issues that demand input from society-based organizations	2.30	2.64	2.85***
I deal with issues that emerge as a result of public pressure on government	3.08	3.31	3.35***
I deal with issues where it is difficult to identify a single, clear, simple solution	3.96	3.81	3.71***
I deal with tasks which are ongoing for more than a year	4.20	3.27	3.33***
I interact frequently with senior regional management	2.47	3.10	2.98***
I interact frequently with other head office staff	3.72	3.83	4.00*
I interact frequently with central agencies	2.50	3.09	3.07***
I interact frequently with municipal government departments	1.40	2.14	2.02***
I interact frequently with federal departments in my region	2.81	2.26	2.13***
I interact frequently with environment/conservation groups	1.57	1.76	1.80**
I am increasingly consulting with the public as I do my policy-related work	2.32#	2.64	2.78***
I think policy problems increasingly require strong technical expertise	3.49#	3.83	3.78***
I think an important role of the provincial government is to foster involvement in the policy process by other non-governmental organizations	3.39#	3.71	3.63***
I think formal government institutions are becoming less relevant to policy making	2.69#	2.92	3.17***
I think decisions about government programs and operations are increasingly made by those outside of government	2.64#	2.86	3.01***
I network with non-governmental organizations	3.64	4.03	4.09***
I network with other provincial government departments or agencies	3.77	4.36	4.39***
I network with municipal government departments or agencies	3.07	3.80	3.66***
I prefer more control from head office	3.14#	2.83	2.93***
I think policy capacity has increased	3.73#	3.31	3.16***

Based on a 1 to 5 scale where 1 = never and 5 = daily #Based on a 1 to 5 scale where 1 = strongly disagree and 5 = strongly agree \*significant at 0.05 level; \*\*significant at 0.01 level; \*\*significant at the 0.001 level

the analytical practices and behavior of analysts in all three levels of government, they are different and these differences reflect the institutional characteristics of government at each level, especially the smaller size and operating characteristics of provincial and territorial governments.

Further support for this hypothesis can be found by examining similarities and differences between federal–provincial and territorial analysts and between federal–territorial and provincial analysts. The limited autonomy hypothesis suggests that there would be fewer similarities between these sets of analysts than found between federal and provincial–territorial analysts. As Tables 3 and 4 reveal, this is indeed the case. Table 3 shows that there are only a few areas of policy work in which the activities of federal and provincial analysts are more similar than provincial–territorial ones. Territorial analysts are less likely to be involved in regional issues despite their "regional" status in the Canadian north, and are more likely to be involved with head-office management and other head-office staff, while being less involved with think tanks. These latter findings can be linked to the small size and operating characteristics of territorial administrations, again supporting the McArthur hypothesis.

Table 4 illustrates the areas in which provincial analysts differ from their federal and territorial colleagues. Like Table 3, Table 4 underlines the relatively few areas in which federal and territorial analysts are more similar than are provincial and territorial ones. Significantly, with respect to the limited autonomy hypothesis, provincial analysts are more likely to negotiate and consult with stakeholders, especially industry and labour organizations, and to perceive their work to increasingly involve networks of people both within and outside of government. Territorial analysts do not share these characteristics, given their isolated, sparsely populated landbases in the far Canadian north.

Knowing whether or not it is possible (and accurate) to infer from national studies when describing policy arrangements is essential to the better understanding and improvement of the work carried out by professional analysts in government

#### Conclusion

Policy advice systems are complex entities (Boston 1994; Halligan 1995; Uhr and Mackay 1996; Maley 2000). Given their reliance on existing institutional configurations, policy advice systems vary by jurisdiction,

Variable	Federal employees	Provincial employees	Territorial employees
I deal with issues that require coordination across regions	3.14	3.12	2.82*
I interact frequently with senior head office-based management	3.67	3.85***	4.14***
I interact frequently with think tanks	1.81	1.82***	1.44***

Table 3. Federal-Provincial Similarities (Territorial Differences)

Based on a 1 to 5 scale where 1 = never and 5 = daily \*significant at 0.05 level; \*\*\*significant at 0.001 level

Table 4. Federal-Territorial Similarities (Provincial Differences)

Variable	Federal employees	Provincial employees	Territorial employees
I deal with issues that require coordination with head office	3.77	3.50	3.79***
I deal with issues where it is difficult to identify a single, clear, simple solution	3.96	3.81	3.71
I interact frequently with industry organizations	2.11	2.36	1.97***
I interact frequently with labour organizations	1.47	1.74	1.56***
My policy-related work increasingly involves networks of people across regions or levels of government or even outside of government	3.56	3.74	3.44**

Based on a 1 to 5 scale where 1 = never and 5 = daily \*\*significant at 0.01 level; \*\*\*significant at 0.001 level

especially by nation–state (Brinkerhoff and Crosby 2002; Brinkerhoff and Morgan 2010) and, somewhat less so, by policy sector (Hawke 1993) and department (Rochet 2004; Voyer 2007). An important and oft-overlooked aspect of these institutional variations, however, is the level of government involved in policy deliberations and policy making. As Hooghe and Marks (2001, 2003) and others have noted, multi-level governance systems place different demands on different levels of government since specific responsibilities for policy making in major areas like healthcare, education and the environment are distributed unequally across levels and jurisdictions (Piattoni 2009). Despite the impact that multi-level governance potentially has on the capacity of analysts to engage in high-level, long-term, sophisticated policy activities, the role and influence of such institutional characteristics on policy analysts and their work have not been systematically

evaluated (Riddell 2007; Howlett 2009a, 2009b and 2009c). Knowing whether or not it is possible (and accurate) to infer from national studies when describing policy arrangements is essential to the better understanding and improvement of the work carried out by professional analysts in government.

Using a unique, multi-level data set derived from fifteen separate but similar surveys of federal, provincial and territorial policy analysts in Canada in 2007 and 2008, this article tested an hypothesis derived from existing case study and anecdotal research, which posited that the activities and work of sub-national level analysts would differ in important ways from those undertaken at the national level due to differences in the structural configuration of governments and the interactions of analysts with interest group systems. The study examined the behaviour and attitudes of federal, provincial and territorial analysts in order to discern the similarities and differences between them. It found many similarities in policy work areas related to overall governance trends, such as moves towards increased consultation and participation overtaking more traditional technical policy evaluations, but it also found continuing significant differences between analysts working at each level. Sub-national level analysts have more interactions with societal policy actors and experience more direct control by senior management than analysts employed by central governments. These findings conform to the expectations of the limited autonomy hypothesis, which argues that the level of autonomy from political control and social actors affects policy work and workers. This in turn has important implications for the ability of analysts to undertake long-term independent research and analysis. Where lines of control and social contacts are higher, as in sub-national governments, analysis is expected to be more politically driven and short term in nature.

While it remains up to future research in other countries with multilevel governance systems to reveal how robust these conclusions are, in the Canadian case it was found that policy work among federal, provincial and territorial analysts, while broadly similar, varied significantly in the direction suggested by the limited autonomy hypothesis. Analysts and policy workers employed in smaller governments were found to have significantly more interactions with central agencies and pressure groups and to differ substantially from federal workers in terms of the issues they dealt with and the nature of the input they received in their work.

The findings suggest, moreover, that scholars cannot simply infer from existing national studies about trends and activities in policy analysis at sub-national levels of government, but must recognize each level of government as a significant policy actor in its own right. In other words,

the policy styles and practices found at different levels of government in multi-level states, while broadly similar, contain different features which affect not only the nature of the processes followed but also the content of decisions reached and policies adopted. This finding helps to illuminate aspects of the behaviour of policy analysts and decision makers in multi-level systems, and contributes to our understanding of policy work, its institutional components, and its ability or capacity to address important questions involving long-term, data-oriented issues in an objective, technical way (Howlett 2009a). While the specific sectoral nature of these impacts will depend upon the division of jurisdictions between levels found in different countries, in general, sub-national policy work can be expected to be more participatory, partisan, pluralist and short term than at the central level where policy makers enjoy higher levels of autonomy. As a result, that work will display a corresponding difficulty in marshalling expertise in the pursuit of longer-term solutions to ongoing policy problems.

## Appendix 1. Description of data set and response rates

Federal government analysts were identified through keyword searches in the publicly accessible online Government Electronic Directory Services (GEDS) system. In November 2007, an online survey using the Zoomerang® software was conducted from a random sample of 725 policy-based, NCR federal government employees. The survey garnered 395 useable responses for an overall response rate of 56.4 per cent. The provincial and territorial government surveys were carried out in November and December 2008 also using the Zoomerang® software and an appropriately amended version of the 2007 federal survey questionnaire. The questionnaire was sent to over 4,000 provincial and territorial civil servants covering each of Canada's thirteen provincial and territorial jurisdictions. Mailing lists for the ten provinces and three territories surveyed were compiled wherever possible from publicly available sources such as online government telephone directories using keyword searches for terms such as "policy analyst" in job titles or descriptions. In some cases, additional names were added to lists from hard-copy sources such as government organization manuals. In other cases, lists or additional names were provided by provincial public service commissions who also checked initial lists for completeness and accuracy.<sup>4</sup> Over 1,600 provincial and territorial completed survey were gathered from 3,856 valid e-mail addresses for a total response rate of 43.3 per cent (see Table below).<sup>5</sup>

Provincial	Survey	Sample	Sizes	and	Completion	Rates
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Province	Initial mail list size	Refusals and rejected e-mails	Valid partial completions	Complete	Response rate (%)
BC	513	51	30	194	48.5
Alberta	368	23	8	112	34.8
Saskatchewan	246	27	13	80	42.4
Manitoba	161	20	6	98	73.7
Ontario	1613	162	52	557	41.9
Québec*	250	0	44	86	52.0
New Brunswick	162	15	4	62	44.9
Nova Scotia	181	20	15	83	44.1
PEI	27	6	1	4	23.8
Newfoundland	139	24	16	55	61.7
Yukon	<i>7</i> 5	8	6	58	95.5
NWT	80	2	2	41	55.1
Nunavut	41	8	2	13	45.4
TOTAL (excluding Quebec)	3856	366	155	1357	43.3

<sup>\*</sup>Snowball sample methodology: data were excluded from totals and from subsequent table. See endnote 5.

### **Notes**

- 1 On the merits and demerits of naturalistic and survey research and the need to combine qualitative and quantitative analysis in social research, see Bryman (2004) and Gravetter and Forzano (2010).
- 2 Even less is known about both the "invisible civil service" (consultants) and those analysts who work outside of government in think tanks, business associations and labour unions, and elsewhere in the NGO sector (Saint-Martin 1998a, 1998b, 2004; Hird 2005a; Abelson 2007; Murray 2007; Speers 2007; Stritch 2007).
- 3 The 64-item survey instrument used in these studies asked the respondents a series of questions about the tasks they undertake, the nature of the issues they examine, the kinds of networks with which they are engaged, and their attitudes towards policy making. The statistical technique used to analyse the survey results was one-way analysis of variance (ANOVA), which compares the means of more than two samples. In this case the null hypothesis (H0) was

$$\mu 1 = \mu 2 = ... = \mu k$$

where µi is the mean of group i. The F statistic was constructed for testing the hypothesis:

$$F = \frac{\text{variation among sample means}}{\text{variation within samples}}$$

If the means are far apart, especially relative to the variation within each group, the F statistic is large and the null hypothesis is rejected. Throughout this study, a test of

- homogeneity of variance (the Levine test), ANOVA, and a post hoc pairwise multiple-comparison test using the Dunnett's C method were employed. The Levine test was used to test for equal variance. The ANOVA (F statistic) can indicate differences among means but does not identify the means that differ from each other. The Dunnett's c score identifies subsets of groups. Thus, using this technique, it is possible to determine similarities and differences between the three major groups of policy analysts. The survey itself is available from the authors upon request.
- 4 Provincial public service lists often included political appointees who had been left off our lists. In most cases, however, our lists and the internal lists were very close, with about an 80 per cent or higher overlap rate. The lists revealed a roughly proportional per-capita pattern of size of the policy analytical community in Canadian provincial governments, with about 1,800–2,000 individuals in Ontario, 500 in British Columbia and about 100 in the smallest jurisdictions. The total number of policy analysts at the provincial and territorial level, hence, is about 5,300 (3,000 in Quebec and Ontario; 1,000 in BC and Alberta; 500 in Saskatchewan and Manitoba; 400 in the Atlantic provinces and 300 in the territories). It is expected that this number would be matched by the federal government (Wellstead having identified about 1,300 operating outside Ottawa, the remaining 4,000 being located in the National Capital Region) bringing the total number of policy analysts actually employed in Canada to about 11,000.
- 5 Because of problems with job classification systems and terminology and privacy laws in Quebec, lists of analysts could not be gathered from publicly available sources. A snowball sampling method was instead used in which the questionnaire was sent to an initial seed of 42 potential respondents who were asked to pass the survey along to colleagues working as policy analysts. After six weeks, approximately 250 respondents had looked at the survey, with 130 having fully or partially completed it. Given this different data collection technique, the Quebec results have been omitted from the tables presented below. A separate analysis of the results from the Quebec survey, however, found a similar pattern of responses to those found in the other 12 provinces and territories (Bernier and Howlett 2011).

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