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June 2016

# CASUALTY ASSISTANCE

## DOD and the Coast Guard Need to Develop Policies and Outreach Goals and Metrics for Program Supporting Servicemembers' Survivors

Accessible Version

## Why GAO Did This Study

From January 2002 through November 2015, 17,911 servicemembers died while on active duty, leaving approximately 24,000 surviving dependents. The military services' casualty assistance programs guide these survivors through the casualty assistance process following the death of a servicemember.

Senate Report 114-49 included a provision that GAO review the Gold Star Advocate Program and the training provided for casualty assistance officers. This report assesses the extent to which (1) DOD and the Coast Guard have implemented the Gold Star Advocate Program and conducted outreach to survivors; and (2) DOD has developed a training program for casualty assistance officers consistent with attributes of an effective training program.

GAO analyzed statutes, DOD and Coast Guard policies on casualty matters, and DOD's military services' casualty assistance guidance and training materials. GAO interviewed officials involved in the Gold Star Advocate Program at DOD, its military services, and the Coast Guard—which is part of the Department of Homeland Security (DHS).

## What GAO Recommends

GAO recommends that DOD and the Coast Guard develop interim policies for the Gold Star Advocate Program and determine goals and metrics for its outreach; and that DOD develop additional indicators for better evaluating its training. DOD and DHS on behalf of the Coast Guard concurred with the recommendations.

View [GAO-16-569](#). For more information, contact Brenda S. Farrell, (202) 512-3604, [farrellb@gao.gov](mailto:farrellb@gao.gov).

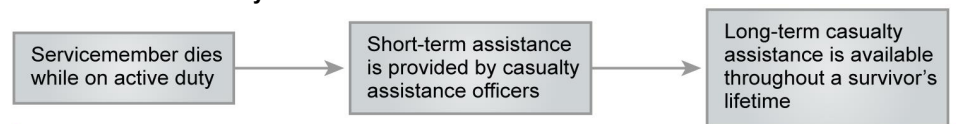
## CASUALTY ASSISTANCE

### DOD and the Coast Guard Need to Develop Policies and Outreach Goals and Metrics for Program Supporting Servicemembers' Survivors

## What GAO Found

The Department of Defense (DOD) and the Coast Guard took steps to implement the Gold Star Advocate Program in 2014 by designating Gold Star Advocates who have received, addressed, and reported a variety of issues raised by survivors, and they conducted some outreach to survivors for the program, but they have not established policies to manage the program. The National Defense Authorization Act for Fiscal Year 2014 required the designation of personnel to provide support to survivors of servicemembers who died while on active duty. Known as Gold Star Advocates, these personnel are available at any point in the casualty assistance process. If a survivor is not satisfied with the casualty assistance he or she has received, the survivor may contact a Gold Star Advocate. According to DOD officials, few issues have risen to the level of the program's attention because survivor issues are generally resolved by casualty assistance officers—who serve as liaison between the survivor and the service branch following the death of a servicemember, and assist with funeral arrangements and the application and receipt of benefits and entitlements—and long-term assistance programs, which are available to provide support throughout a survivor's lifetime.

#### Overview of the Casualty Assistance Process



**The Gold Star Advocate Program is available to survivors at any point in the casualty assistance process**

Source: GAO analysis of Department of Defense information. | GAO-16-569

However, while steps have been taken to implement the program, neither DOD nor the Coast Guard has established policies for the program, including roles, responsibilities, and procedures. Additionally, although DOD and the Coast Guard have conducted some outreach for the program, they have not developed goals and metrics for outreach, without which some survivors may remain unaware of the casualty assistance available to them. While the program is available to serve survivors of all servicemembers who died while on active duty, its outreach methods are primarily directed toward survivors of servicemembers who have died since the program was implemented in 2014.

DOD and its military services have developed a casualty assistance officer training program that addresses the duties required of casualty assistance officers that is consistent with some attributes of an effective training program, but DOD and its military services may not have the indicators needed to evaluate the effect of that training on casualty assistance program performance. For example, DOD administers a web-based survey to survivors regarding the quality of casualty assistance they received, but the survey has roughly a 10 percent response rate. With such a low response rate, DOD acknowledged that results should be interpreted cautiously. Without improved indicators for evaluating the effect of casualty assistance officer training, DOD may not have the information needed to improve the quality of casualty assistance provided to survivors.

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Figure 1: Overview of the Casualty Assistance Process

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**Abbreviations**

DHS	Department of Homeland Security
DOD	Department of Defense
OPM	Office of Personnel Management
OUSD(P&R)	Office of the Under Secretary of Defense for Personnel and Readiness
VA	Department of Veterans Affairs

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June 28, 2016

The Honorable John McCain  
Chairman  
The Honorable Jack Reed  
Ranking Member  
Committee on Armed Services  
United States Senate

Military operations have focused national attention on meeting the needs of survivors of servicemembers who die while on active duty. From January 2002 through November 2015, 17,911 servicemembers died while on active duty, leaving approximately 24,000 surviving dependents.<sup>1</sup> The casualty assistance programs of the Department of Defense (DOD) and the Coast Guard guide survivors through the casualty assistance process following the death of a servicemember.<sup>2</sup>

Casualty assistance is the provision of authorized and necessary assistance to eligible family members of deceased, missing, ill, or injured servicemembers. The casualty assistance process includes notification of death, assistance with funeral and burial arrangements, and assistance with applying for government benefits, among other things. DOD and the Coast Guard provide both short-term and long-term casualty assistance to survivors. After the death of a servicemember on active duty, DOD and the Coast Guard assign a casualty assistance officer who is responsible

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<sup>1</sup>A total of 17,621 active duty DOD military servicemember deaths occurred in this period, including those of activated reserve servicemembers and National Guard members; additionally, Coast Guard officials told us that 290 active duty Coast Guard deaths occurred in this period. The total number of 24,000 survivors includes 22,994 surviving dependents for DOD's military services. This also includes an estimated 870 surviving dependents reported by the Coast Guard. We requested the data on DOD servicemembers' deaths from the Defense Manpower Data Center in November 2015. At that time, the data we received on the number of deaths through November 2015 were the most current data available. We also requested data over the same time period from the Coast Guard on the number of Coast Guard servicemembers' deaths.

<sup>2</sup>Generally, and as used in this report, the term "survivor(s)" refers to the servicemember's designee(s) or next of kin, which include the surviving spouses, children, parents, siblings, estate executor or administrator, or other relatives. See 10 U.S.C. § 1477(a)-(b).

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for providing immediate assistance to survivors.<sup>3</sup> After that, survivors are assisted by long-term assistance programs, which are available to provide support throughout a survivor's lifetime. Additionally, section 633 of the National Defense Authorization Act for Fiscal Year 2014 required each secretary of a military department to designate for each armed force a member or civilian employee of such military department to assist survivors of servicemembers who die while on active duty.<sup>4</sup> Known as Gold Star Advocates, these personnel are available at any point in the casualty assistance process to provide survivors with support and address issues that are raised by survivors regarding casualty assistance and the receipt of benefits. While there are several programs available to provide support to survivors, the Gold Star Advocate Program is available to address any concerns that survivors may have during any stage of the casualty assistance process. If a survivor is not satisfied with the casualty assistance he or she has received, the survivor may contact a Gold Star Advocate. Section 633 of the National Defense Authorization Act for Fiscal Year 2014 also required the Secretary of Defense to implement a training program for casualty assistance officers. Casualty assistance officers serve as liaison between the survivor and the service branch and assist with funeral arrangements and the application and receipt of benefits and entitlements. The training program for these personnel was to include training designed to ensure that casualty assistance officers provide the spouse and other dependents of a deceased servicemember with accurate information about the benefits to which they are entitled and other casualty assistance available to them. Per the statutory provision, the services may include elements of the training that are specific or unique to a particular service, and they must provide the training not less often than annually.

Senate Report 114-49, which accompanied a proposed Senate bill for the National Defense Authorization Act for Fiscal Year 2016, included a provision for us to review the Gold Star Advocate Program of DOD and the Coast Guard and the training provided for casualty assistance

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<sup>3</sup>DOD's military services and the Coast Guard each have their own term for casualty assistance officers: the Army refers to them as casualty assistance officers; the Navy, the Marine Corps, and the Coast Guard refer to them as casualty assistance calls officers; and the Air Force refers to them as casualty assistance representatives. As used in this report, "casualty assistance officer(s)" encompasses all of these designations.

<sup>4</sup>National Defense Authorization Act for Fiscal Year 2014, Pub. L. No. 113-66, § 633(a) (2013).

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officers.<sup>5</sup> We assessed the extent to which (1) DOD and the Coast Guard have implemented the Gold Star Advocate Program and conducted outreach to survivors; and (2) DOD has developed a training program for casualty assistance officers consistent with attributes of an effective training program.<sup>6</sup>

For the first objective, we reviewed DOD and Coast Guard policy on casualty matters and the meeting minutes of DOD's Casualty Advisory Board—the panel responsible for developing and recommending casualty-related policy and guidance—and compared these documents with internal control standards and the statutory requirements of section 633 of the National Defense Authorization Act for Fiscal Year 2014 for the Gold Star Advocate Program.<sup>7</sup> We also interviewed officials involved in the Gold Star Advocate Program from the Office of the Under Secretary of Defense for Personnel and Readiness (OUSD(P&R)), DOD's military services, and the Coast Guard. To determine the extent to which DOD and the Coast Guard have conducted outreach to survivors for the Gold Star Advocate Program, we compared DOD and Coast Guard outreach efforts for the program with best practices for consumer education

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<sup>5</sup>S. Rep. No. 114-49, at 147-148 (2015) (accompanying S. 1376, a proposed bill for the National Defense Authorization Act for Fiscal Year 2016).

<sup>6</sup>Per the provision in the Senate Armed Services Committee report accompanying S. 1376, our second objective, reviewing the extent to which DOD has developed a training program on casualty assistance, is focused only on the military services of DOD: that is, the Army, the Navy, the Air Force, and the Marine Corps. Additionally, section 633(b)(1) of the National Defense Authorization Act for Fiscal Year 2014 required the Secretary of Defense to implement a training program for the following DOD personnel who provide casualty assistance to survivors of servicemembers who die while on active duty: casualty assistance officers, casualty assistance calls officers, and casualty assistance representatives. According to Coast Guard officials, while the Coast Guard does have casualty assistance calls officers, it does not have a formal training program for those officers.

<sup>7</sup>DOD Instruction 1300.18, *Department of Defense (DOD) Personnel Casualty Matters, Policies, and Procedures* (Jan. 8, 2008) (incorporating change 1, Aug. 14, 2009) (hereinafter referred to as casualty matters instruction); Commandant Instruction M1770.9, *Military Casualties and Decedent Affairs* (Sept. 29, 2011).

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planning.<sup>8</sup> We also reviewed section 633 of the National Defense Authorization Act for Fiscal Year 2014, DOD and Coast Guard casualty assistance policy, and DOD's Casualty Advisory Board meeting minutes for statutory requirements, policies, or guidance related to outreach for the program. We also interviewed officials from OUSD(P&R), DOD's military services, and the Coast Guard to determine how they communicate information on the program, and we interviewed a non-generalizable range of survivor advocacy groups and casualty assistance officers to determine their level of understanding of the Gold Star Advocate Program.<sup>9</sup>

For the second objective, we reviewed DOD casualty assistance policy, service-level casualty assistance guidance, casualty assistance officer training materials, and the DOD Survivor Survey, intended to collect survivor feedback on the quality of casualty assistance provided by the military services, among other things, and compared these documents to the training assessment framework identified in *A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*.<sup>10</sup> We found the DOD Survivor Survey data to be of undetermined reliability, as will be discussed later in this report. We also reviewed section 562 of the National Defense Authorization Act for Fiscal Year 2006, which

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<sup>8</sup>GAO, *Digital Television Transition: Increased Federal Planning and Risk Management Could Further Facilitate the DTV Transition*, [GAO-08-43](#) (Washington, D.C.: Nov. 19, 2007). GAO convened a panel of experts representing public, private, and academic organizations to identify key practices for conducting consumer education. The key practices identified for consumer education planning include: (1) define goals and objectives, (2) analyze the situation, (3) identify stakeholders, (4) identify resources, (5) research target audience, (6) develop consistent, clear messages, (7) identify credible messengers, (8) design media mix, and (9) establish metrics to measure success. These key practices are applicable to outreach efforts to educate and make survivors aware of the Gold Star Advocate Program, as survivors are the consumers of the casualty assistance support available through the Gold Star Advocate Program.

<sup>9</sup>We met with a limited number of survivor advocacy groups and casualty assistance officers. As such, this information is not generalizable to the greater survivor and casualty assistance officer populations.

<sup>10</sup>GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2004). To develop this framework, we consulted with government officials and experts in the private sector, academia, and nonprofit organizations; examined laws and regulations related to training and development in the federal government; and reviewed literature on training and development issues, including previous GAO products on a range of human capital topics.



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required DOD to prescribe policy addressing data collection regarding the quality of casualty assistance provided to survivors, and section 633 of the National Defense Authorization Act for Fiscal Year 2014, which required DOD to develop a training program on casualty assistance.<sup>11</sup> Finally, we interviewed officials from OUSD(P&R) and DOD's military services to determine how they implement their respective casualty assistance officer training programs. Appendix I provides a more detailed discussion of our scope and methodology.

We conducted this performance audit from June 2015 to June 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

Casualty assistance has evolved over the past several decades. In years past, survivors were notified of a servicemember's death via telegram or a letter of condolence and were not provided assistance with applying for benefits. Today, casualty assistance has grown to encompass numerous benefits available to survivors as well as DOD and Coast Guard requirements with respect to the provision of casualty assistance for survivors. Section 562 of the National Defense Authorization Act for Fiscal Year 2006 required the Secretary of Defense to prescribe policy and procedures for the provision of casualty assistance that are, with some exceptions, uniform across the military departments.<sup>12</sup> Additionally, we reported in 2006 that DOD did not have a comprehensive oversight framework or standards to monitor casualty assistance provided to survivors, among other things.<sup>13</sup> We recommended that DOD develop an oversight framework that includes measurable DOD-wide objectives for casualty assistance programs and that the department incorporate

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<sup>11</sup>National Defense Authorization Act for Fiscal Year 2006, Pub. L. No. 109-163, § 562(b)(11) (2006); Pub. L. No. 113-66, § 633(b)(1) (2013).

<sup>12</sup>Pub. L. No. 109-163, § 562(a)(4) (2006).

<sup>13</sup>GAO, *Military Personnel: DOD Needs an Oversight Framework and Standards to Improve Management of Its Casualty Assistance Programs*, [GAO-06-1010](#) (Washington, D.C.: Sept. 22, 2006).

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standards, such as a comprehensive checklist of duties for casualty assistance officers, when revising its casualty matters instruction. In 2008 DOD issued its revised casualty matters instruction, which strengthened oversight of casualty assistance and required casualty assistance procedures to be uniform throughout DOD.<sup>14</sup> A list of related GAO products is included at the end of the report.

The present-day casualty assistance process entails numerous requirements, many of which must be addressed quickly following a servicemember's death, as described in the casualty assistance guidance of DOD, its military services, and the Coast Guard. Soon after the death of a servicemember, the casualty assistance process begins by notifying the next of kin of the death. This is usually performed by a uniformed military servicemember who is accompanied by a chaplain, if available, or another service personnel member. The notification team is trained to professionally and compassionately deliver news that expresses the secretary of the service's condolences and broadly describes the circumstances surrounding the servicemember's death.

Following notification, a casualty assistance officer begins assisting the person whom the deceased servicemember authorized to make funeral arrangements. The casualty assistance officer assists designated survivors in receiving the death gratuity payment that could help with any immediate financial needs the survivors may have. Casualty assistance officers also assist survivors with initiating the processes for obtaining federal benefits and entitlements, receiving the servicemember's personal effects, and obtaining copies of any completed investigation reports associated with the servicemember's death. The casualty assistance officer continues to assist the survivor until the survivor determines that he or she no longer needs assistance of the level provided by the casualty assistance officer or most benefits have been dispersed.

Once the survivor no longer needs the assistance provided by casualty assistance officers, the survivor may choose to receive assistance from the long-term assistance programs, which are available to provide support throughout a survivor's lifetime. Long-term assistance may include providing answers to survivors' questions or help with issues

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<sup>14</sup>The casualty matters instruction requires casualty procedures to be uniform across the military departments except to the extent necessary to reflect the traditional practices or customs of a particular military department.

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concerning benefits. The eligibility of these benefits may be affected by life changes that occur during a survivor's lifetime, such as remarriage or children turning 18 years of age. The provision of long-term case management for casualty assistance was prescribed in section 562 of the National Defense Authorization Act for Fiscal Year 2006. Since then, each of DOD's military services and the Coast Guard, as detailed below, have provided long-term assistance to support survivors:

- *Army*. The Army's Survivor Outreach Services is its official program designed to provide long-term support to survivors of deceased soldiers. Survivor Outreach Services provides support for survivors through specially trained support coordinators and financial counselors.
- *Navy*. The Navy Gold Star Program is its official program for providing long-term support to survivors of sailors who die while on active duty.<sup>15</sup> The Navy Gold Star Program facilitates counseling and other support services, such as organizing survivor events. Additionally, the Navy Long Term Assistance Program is available to address questions or issues related to survivor benefits.
- *Air Force*. The Air Force Families Forever program provides dedicated outreach and support to Air Force survivors. The program is organized to provide family care experts at Airman and Family Readiness Centers. It provides resources, support, and information to help survivors.
- *Marine Corps*. The Marine Corps Long-Term Assistance Program is a permanent resource for survivors to ensure that they receive sustained assistance from the Marine Corps. The program provides outreach and assistance to Marine Corps survivors concerning any issues associated with the receipt of benefits and entitlements.
- *Coast Guard*. According to officials, while the Coast Guard does not have a separate long-term assistance program, casualty assistance personnel are available to address survivors' issues and concerns for as long as needed.

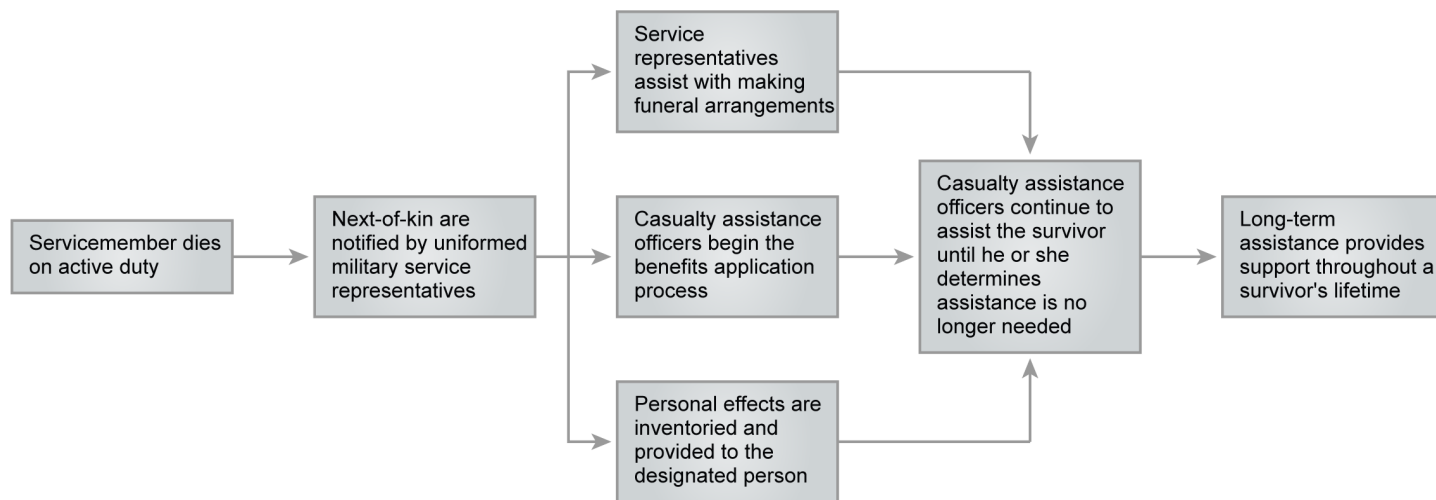
In addition to the support provided by the casualty assistance officers and the long-term assistance programs, the Gold Star Advocate Program is available at any point in the casualty assistance process to provide survivors with support and address issues that are raised by survivors regarding casualty assistance and the receipt of benefits. The Gold Star

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<sup>15</sup>The Navy Gold Star Program is separate from the Gold Star Advocate Program.

Advocate Program is co-located with the Casualty and Mortuary Affairs Office in the Military Community and Family Policy Office of OUSD(P&R). Figure 1 provides a general overview of the casualty assistance process.

**Figure 1: Overview of the Casualty Assistance Process**



**The Gold Star Advocate Program is available to survivors at any point in the casualty assistance process**

Source: GAO analysis of Department of Defense information. | GAO-16-569

DOD also established the Casualty Advisory Board, which is responsible for developing and recommending broad policy guidance related to casualty matters. According to OUSD(P&R) officials, the board discusses issues pertaining to casualty and survivor assistance. It also acts as the focal point with other federal agencies, veterans' service organizations, and non-profit organizations to improve support and assistance for survivors. The board meets tri-annually and is composed of voting members representing each of DOD's military services and the Coast Guard, as well as a member designated by the Chairman of the Joint Chiefs of Staff.

Within DOD, Military OneSource represents another source of support available to survivors. Military OneSource is a DOD-funded program that provides comprehensive information on aspects of military life, such as coping with deployments and spousal employment and education, at no cost to active duty servicemembers and their families. For survivors of servicemembers who died while on active duty, officials told us that Military OneSource provides grief counseling, tax assistance (such as

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assistance with filing the deceased servicemember's final tax return), and assistance with obtaining benefits.

There are also organizations outside of DOD and the Coast Guard that provide casualty assistance. For example, the Department of Veterans Affairs (VA) administers two monetary benefits available to survivors: the Servicemembers' Group Life Insurance program, which is purchased by the VA from an insurance company for military personnel; and Dependency Indemnity Compensation, which provides long-term monthly payments to eligible surviving spouses and children. The Social Security Administration also provides support to survivors through monthly payments. There are also several survivor advocacy groups that provide support to survivors. For example, Tragedy Assistance Program for Survivors, a non-profit organization, provides care to survivors through a national peer support network and connection to grief resources. The Gold Star Wives of America, Inc., is another survivor advocacy group that works to improve the benefits of surviving spouses.

Finally, depending on the circumstances surrounding the servicemember's death, the survivor may receive one of two types of survivor lapel buttons. Survivors of servicemembers whose deaths occurred in certain conflicts or military operations are entitled to wear the Gold Star Lapel Button, which is governed by statute and was established by Congress in 1947. Survivors of servicemembers who died while on active duty due to other circumstances receive the Next of Kin Lapel Button.

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## DOD and the Coast Guard Have Taken Steps to Implement the Gold Star Advocate Program, but Have Not Established It in Policy or Determined Outreach Goals or Metrics

DOD and the Coast Guard have taken steps to implement the Gold Star Advocate Program, in that they have designated Gold Star Advocates who have received, addressed, and reported a variety of issues raised by survivors. However, neither DOD nor the Coast Guard has developed policies to manage the program, including Gold Star Advocate Program roles, responsibilities, and procedures. Additionally, DOD and the Coast Guard have conducted outreach to survivors for the program, but they have not determined goals and metrics for outreach.

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## DOD and the Coast Guard Have Taken Steps to Implement the Gold Star Advocate Program to Address Issues Raised by Survivors

In 2014, DOD and the Coast Guard took steps to implement the Gold Star Advocate Program to address the requirements of section 633 of the National Defense Authorization Act for Fiscal Year 2014. This provision required each service secretary to designate a servicemember or civilian employee to assist survivors by (1) addressing complaints regarding casualty assistance or receipt of benefits; (2) providing support regarding casualty assistance or receipt of benefits; and (3) making reports regarding the resolution of complaints, including recommendations regarding the settlement of claims with respect to benefits. Following passage of the act, in June 2014 DOD's military services and the Coast Guard identified the Gold Star Advocates within their respective departments. According to DOD officials, the Gold Star Advocates are subject matter experts in casualty matters. Additionally, according to OUSD(P&R) officials, in June 2015 DOD designated a department-level Gold Star Advocate who was retitled the DOD Gold Star Advocate Program Manager in January 2016.

OUSD(P&R) officials stated that the Gold Star Advocate Program is intended to provide support to survivors by addressing issues raised by survivors. According to officials with OUSD(P&R), DOD's military services, and the Coast Guard, these issues are raised via several methods. For example, issues are received in emails and phone calls from survivors, and they are tracked by the Gold Star Advocates in spreadsheets, in email folders designated for tracking issues, or in databases. The Gold Star Advocates may themselves also raise issues to the attention of the program. For example, if a service Gold Star Advocate determines that an issue stems from a gap in policy related to survivors,

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or that the issue may warrant a change in policy, the Gold Star Advocate can identify the issue for further review.

Additionally, issues raised to the program are documented and tracked in a ledger maintained by the DOD Gold Star Advocate Program Manager. The ledger contains information on the issue, its origin, how it was raised to the program, and its ultimate resolution, among other things. Issues are also documented in briefing slides that are reported at tri-annual meetings of the Casualty Advisory Board, as the Casualty Advisory Board is able to recommend any policy changes that may be necessary. According to meeting minutes, they report on and discuss all issues received since the last meeting, as well as any updates to the resolution of previously received issues. Finally, according to DOD officials, the Gold Star Advocates from DOD's military services and the Coast Guard hold monthly meetings with DOD's Gold Star Advocate Program Manager during which they discuss issues raised to the program.

DOD officials stated that the Gold Star Advocates primarily address survivors' issues as they relate to casualty assistance policy. DOD officials stated that when survivors raise issues to the Gold Star Advocate Program it is usually not because they have received unsatisfactory casualty assistance, but rather because they disagree with the policies that govern the services they received. Several of the issues that the Gold Star Advocate Program addresses involve agencies or entities outside of DOD's casualty assistance programs. In these cases, the program coordinates with the agency or entity that is best equipped to resolve the issue. According to OUSD(P&R) officials, the Gold Star Advocate Program ensures that the agency or entity is made aware of the issue, coordinates with the agency on a plan of action, and follows up to determine what action was taken and whether the issue was resolved.

The Gold Star Advocate Program addresses a variety of issues raised by survivors. According to OUSD(P&R) officials, many survivor requests of the program are for replacements of the Gold Star Lapel or Next of Kin Lapel buttons provided to the primary next of kin of servicemembers who die in certain conflicts or military operations or on active duty due to other circumstances. Since 2014, the program has addressed 12 other discrete issues, including a travel and moving expense claim issue raised by a survivor who did not receive a moving expense settlement because the survivor had not submitted the requisite claim within the 2-year time limitation. The Gold Star Advocate Program reported the issue to the Defense Travel Management Office, which granted an exception to the time limitation and reimbursed the survivor for the moving expenses. As

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an example of an issue that is currently being addressed, the Gold Star Advocate Program was made aware that stepchildren of servicemembers who died while on active duty were having their DOD identification card privileges and medical benefits revoked when their biological parent remarried. The revocations were based on Defense Enrollment Eligibility Reporting System personnel's interpretation of an instruction provision. The issue was reported to the Defense Human Resources Agency and the Defense Health Agency. The Defense Health Agency General Counsel found that the stepchildren should retain their benefits even if their biological parent remarries. Additionally, the Defense Human Resources Agency is working on a communications plan to disseminate this information. Appendix II provides a complete list of the issues addressed by the Gold Star Advocate Program through March 2016.

According to DOD officials, few issues have risen to the level of the Gold Star Advocate Program because survivor issues are generally resolved by casualty assistance officers and the long-term assistance programs. For example, in 2015 the Marine Corps Long-Term Assistance Program addressed 29 cases of survivor issues with benefits and compensation and 30 cases of issues concerning personal effects, among others. Similarly, from October 2015 through the beginning of December 2015, the Navy Long Term Assistance Program addressed 24 survivor issues concerning benefits, among others. According to Air Force officials, most survivor issues are handled at family readiness centers at the installation level, and three issues were addressed by the Air Force Families Forever program. Army officials stated that one reason why issues are resolved without rising to the level of the Gold Star Advocate is because the Army has an active outreach program that allows them to address issues as they arise.

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### DOD and the Coast Guard Have Not Established Policies Covering the Gold Star Advocate Program

DOD and the Coast Guard have taken steps to implement the Gold Star Advocate Program, but they have not established policies to manage the program. For example, DOD and the Coast Guard have designated Gold Star Advocates, but they have not clearly defined their roles and responsibilities in policy. Moreover, DOD and the Coast Guard have procedures for addressing and reporting on issues raised by survivors, but they have not established these procedures in policy. Federal internal control standards state the importance of internal control activities, such as policies and procedures, to help ensure that management's directives



are carried out and that the organization’s missions, goals, and objectives are met.<sup>16</sup> Internal controls also help ensure compliance with laws and regulations. A good internal control environment requires that the organizational structure clearly defines key areas of authority and responsibility and establishes appropriate lines of reporting. Establishing policy for a program can aid in establishing internal control and defining the program’s roles, responsibilities, and procedures. For example, DOD’s casualty matters instruction defines the Casualty Advisory Board’s roles, responsibilities, and procedures for developing and recommending policy guidance related to casualty matters. Table 1 lists the key statutory requirements of section 633 of the National Defense Authorization Act for Fiscal Year 2014, the extent to which DOD and the Coast Guard have implemented those requirements, and whether DOD and the Coast Guard have issued policy on those requirements.

**Table 1: Key Statutory Requirements and DOD’s and the Coast Guard’s Implementation Status for the Gold Star Advocate Program**

National Defense Authorization Act for Fiscal Year 2014 , Section 633, Requirements	Implementation Status	Requirement Included in Policy (Yes/No)
Addressing complaints regarding casualty assistance or receipt of benefits.	The Gold Star Advocate Program receives issues raised by survivors and addresses them by coordinating with the agency or entity best equipped to resolve the issue.	No
Providing support regarding casualty assistance or receipt of benefits.	DOD’s military services and the Coast Guard designated Gold Star Advocates in June 2014 to provide support to survivors regarding casualty assistance or receipt of benefits.	No
Making reports regarding resolution of complaints, including recommendations regarding the settlement of claims with respect to benefits.	DOD’s military services and the Coast Guard report on survivor issues raised to the Gold Star Advocate Program at monthly meetings of the Gold Star Advocates and tri-annual meetings of the Casualty Advisory Board.	No

Source: GAO analysis of section 633 of the National Defense Authorization Act for Fiscal Year 2014 and of DOD, Coast Guard, and Gold Star Advocate Program documentation and information. | GAO-16-569

<sup>16</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: Nov. 1999). These standards were in effect prior to fiscal year 2016 and cover the time period during which the Gold Star Advocate Program was implemented. The standards were subsequently revised and state that management should design control activities, such as policies and procedures, to achieve an effective internal control system. The revision went into effect on October 1, 2016. See GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 2014).

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Existing policies governing casualty assistance matters have not been updated to include policies for the Gold Star Advocate Program because the Gold Star Advocate Program was just implemented in 2014. According to DOD officials, the Gold Star Advocate Program is planned for inclusion in its revision to its casualty matters instruction. In an April 2015 update provided to Congress on the implementation of section 633 of the National Defense Authorization Act for Fiscal Year 2014, DOD stated that the revision was expected to be published in summer 2016; however, according to OUSD(P&R) officials, the revision is not expected to be completed until 2017, due to internal review and approval procedures and the necessity of issuing another casualty-related policy first. While OUSD(P&R) officials provided a timeline for when they anticipate issuing the revised casualty matters instruction, they did not provide documentation of a draft. According to a Coast Guard official, the Gold Star Advocate Program is also planned for inclusion in a revision of its casualty matters instruction; however, officials stated that the revision process will take several years. Therefore, the Coast Guard was also not able to provide documentation of a draft.

While the Gold Star Advocate Program has not yet been included in the casualty matters instructions for DOD or the Coast Guard, interim policy covering the Gold Star Advocate Program could be promulgated in other ways. For example, according to OUSD(P&R) officials, interim policy for the program could be established in a charter. Similarly, DOD and the Coast Guard could issue memoranda establishing the roles, responsibilities, and procedures for the program. However, while the program is ultimately planned for inclusion in the revision to the casualty matters instructions of DOD and the Coast Guard, according to DOD and Coast Guard officials, in the interim preceding the revision, policies covering the program have not been established. Until policies to govern the Gold Star Advocate Program are established that outline roles, responsibilities, and procedures, it may be difficult for DOD and the Coast Guard to ensure that the program's mission, objectives, and statutory requirements under section 633 of the National Defense Authorization Act for Fiscal Year 2014 are carried out consistently and sustained.

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## DOD and the Coast Guard Have Conducted Some Outreach to Survivors for the Gold Star Advocate Program but Do Not Have Outreach Goals or Metrics

In addition to taking steps to implement the Gold Star Advocate Program, DOD and the Coast Guard conduct some outreach for and publicize the program to survivors using a variety of both direct and indirect methods and media, but they have not developed outreach goals or metrics. As an example of direct outreach, DOD and the Coast Guard provide survivors with DOD's *A Survivor's Guide to Benefits*, which contains information on funeral and burial arrangements, benefits, and survivor support services, among other things.<sup>17</sup> The guide also contains a section on the Gold Star Advocate Program and provides contact information for the Gold Star Advocates of each of DOD's military services and the Coast Guard, along with the contact information for the DOD Gold Star Advocate.<sup>18</sup> The guide explains that the purpose of the Gold Star Advocate Program is to provide support to survivors through addressing issues raised by survivors. It informs survivors that they can contact the Gold Star Advocates if they have any concerns with the casualty assistance provided to them. Survivors are also made aware of the program through letters sent by DOD's military services and the Coast Guard to survivors at different times following the servicemember's death. For example, the Navy sends letters at the 60-day and 1-year points following the death of a servicemember, according to Navy officials. The Gold Star Advocate Program may also be publicized to survivors through their casualty assistance officers. However, while casualty assistance officers could serve as a primary means of providing information about the program to survivors, of the casualty assistance officer training materials we reviewed only the Marine Corps' contained specific information about the Gold Star Advocate Program.

According to OUSD(P&R) officials, outreach for the Gold Star Advocate Program is also conducted through some less direct methods. For example, outreach for the program is conducted at survivor forums sponsored by DOD and the VA. These forums are held quarterly and are attended by DOD's military services and the Coast Guard, federal agencies involved in casualty matters, and survivor advocacy groups, according to DOD officials. The Gold Star Advocate Program is also publicized on the Military OneSource website, which provides contact information for the Gold Star Advocates of each of DOD's military

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<sup>17</sup>Department of Defense, *A Survivor's Guide to Benefits*, July 2015.

<sup>18</sup>As noted earlier, the DOD Gold Star Advocate was retitled the DOD Gold Star Advocate Program Manager in January 2016.

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services and the Coast Guard, along with that of the DOD Gold Star Advocate, and explains the purpose of the program. OUSD(P&R) officials stated that they monitor the number of “hits” the Military OneSource website receives for its Gold Star Advocate Program webpage. Each of DOD’s military services and the Coast Guard also has a separate website that provides long-term assistance information for survivors. These websites identify the long-term assistance services available as well as casualty assistance support contact information; however, only the websites of the Marine Corps and Army contain information on their respective Gold Star Advocates and the Gold Star Advocate Program. Finally, an article announcing the Gold Star Advocate Program was published in July 2014 on the Gold Star Wives of America, Inc., website, informing members of that advocacy group.

While OUSD(P&R), DOD’s military services, and the Coast Guard conduct outreach and publicize the Gold Star Advocate Program to survivors using a variety of methods and media, they have not determined goals or metrics for this outreach. Key practices for conducting consumer education include, among other things, defining goals and objectives and establishing metrics to measure success in achieving objectives.<sup>19</sup> For example, a goal can be to increase awareness of the Gold Star Advocate Program. Once a goal is clearly defined, DOD and the Coast Guard can establish the necessary targets to measure the effectiveness of their outreach efforts. Establishing process and outcome metrics could also help DOD and the Coast Guard determine whether the current resources dedicated to outreach need to be adjusted.<sup>20</sup>

According to officials from each of DOD’s military services and OUSD(P&R), they do not have a goal or plan to reach back to survivors of servicemembers who died prior to the program’s implementation to increase awareness of the program among these survivors. OUSD(P&R) officials emphasized that reaching back to these survivors is not a

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<sup>19</sup>GAO-08-43. The key practices identified for consumer education planning include: (1) define goals and objectives, (2) analyze the situation, (3) identify stakeholders, (4) identify resources, (5) research target audience, (6) develop consistent, clear messages, (7) identify credible messengers, (8) design media mix, and (9) establish metrics to measure success.

<sup>20</sup>Process metrics assure the quality, quantity, and timeliness of outreach work. Outcome metrics evaluate how well the consumer education efforts influenced the attitudes and behaviors of the target audience(s). See GAO-08-43.

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statutory requirement. However, while the Gold Star Advocate Program is available to serve survivors of all servicemembers who died while on active duty, its direct outreach methods are primarily directed toward the survivors of servicemembers who have died since the program was implemented. For example, survivors of servicemembers who have died since the program was implemented receive information about it from casualty assistance officers, DOD's *A Survivor's Guide to Benefits*, and the letters DOD's military services and the Coast Guard send to survivors at different times following the servicemember's death. Several of DOD's military services noted resource constraints in making all survivors aware of the Gold Star Advocate Program, especially with respect to contacting survivors of servicemembers who died prior to the program's implementation. OUSD(P&R) officials stated that some of these survivors may have progressed in their stages of grief such that direct outreach may now be more painful for them than helpful. According to Navy officials, the Navy Gold Star Program, which is separate from the Gold Star Advocate Program, contacted those survivors of servicemembers who died prior to the development of the Navy Gold Star Program to let them know of the Navy program and found that while some were appreciative of the contact, others were upset by it. According to Coast Guard officials, the Coast Guard is also planning to reach out to survivors of Coast Guard servicemembers who have died since September 2001, to make them aware of the Coast Guard's casualty assistance services that are available to them.

Although DOD does not have plans to directly contact survivors of servicemembers who died prior to the program's implementation, most of the issues the Gold Star Advocate Program has received have originated with survivors of servicemembers who died prior to the implementation of the program. For example, of the 12 issues raised to the program, 7 originated from survivors of servicemembers who died prior to the program's implementation. An additional 4 issues were raised to the program by multiple survivors, so there is not a servicemember date of death associated with these issues. Only one of the issues raised to the program originated from a survivor of a servicemember who died since the program was implemented. Additionally, as the Gold Star Advocate Program addresses issues that are primarily not related to specific benefits but rather to policy concerns, it is possible that more policy concerns could originate from survivors of servicemembers who died prior to 2014.

For the issues raised to the Gold Star Advocate Program, the ways in which the survivor was made aware of the program were limited. For

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example, of the 12 issues, 2 of those survivors were made aware of the program through the Military OneSource website, and 1 through “read-ahead” slides prepared by DOD for a survivor’s forum. Three others were made aware of the program through familiarity with DOD’s Casualty and Mortuary Affairs Office, which is where the Gold Star Advocate Program is managed. For the remaining 6 issues, either the manner in which the survivor was made aware of the program is unknown, the issue was raised by one of the Gold Star Advocates, or the issue was raised by multiple survivors, so that a single manner through which the survivor was made aware of the program is not applicable.

Although DOD does not have a goal or plans to reach back to survivors who predate the Gold Star Advocate program due to sensitivity concerns, there are other methods through which outreach for the program could be improved. For example, in 2007 DOD reported on outreach actions taken toward non-governmental organizations by providing DOD and service casualty office points of contact and telephone numbers. Providing this contact information was intended to aid in addressing survivor issues, as DOD noted that often these organizations are the first to discover that survivors have unresolved issues.<sup>21</sup> Specifically, DOD noted that due to organizational meetings, forums, and chat-rooms on the internet, these organizations are in a unique position to discover any unresolved issues that survivors may experience long after their relationship with their casualty assistance officer has ended. During our review we also heard from a survivor that information is often disseminated among survivors through chat-rooms and social media sites.

While DOD may decide not to reach back to survivors of those servicemembers who died prior to 2014 due to sensitivity concerns, it is important to ensure that outreach activities are aligned with an overall outreach goal with associated metrics in order for DOD and the Coast Guard to establish the necessary targets to measure the effectiveness of their outreach efforts. Moreover, establishing process and outcome metrics could also help DOD and the Coast Guard determine whether the current resources dedicated to outreach need to be adjusted. If OUSD(P&R), DOD’s military services, and the Coast Guard do not develop goals, such as to increase awareness of the Gold Star Advocate

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<sup>21</sup>DOD, *Report to Congress On Improvement of Casualty Assistance Programs*, April 2007.

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Program, and metrics to assess their outreach for the program, some survivors may remain unaware of the casualty assistance available to them, and consequently the program may not be able to provide support to all survivors who need it.

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## DOD Has Developed a Training Program That Is Consistent with Some Attributes of an Effective Training Program but May Not Have the Indicators Needed to Evaluate Its Effect

DOD has planned, designed, and implemented training to cover the duties required of casualty assistance officers that is consistent with some attributes of an effective training program, including providing survivors with information on their benefits and entitlements and other forms of casualty assistance. However, DOD's method of collecting survivor feedback on the quality of casualty assistance received from casualty assistance officers—information that could aid in evaluating the effect of casualty assistance officer training on program performance—has a low response rate.

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## DOD Plans, Designs, and Delivers Casualty Assistance Training Based on Program Goals and Casualty Assistance Officer Duties

DOD has developed a training program for casualty assistance officers as required by section 633 of the National Defense Authorization Act for Fiscal Year 2014. This section required DOD to develop a standardized comprehensive training program on casualty assistance, to ensure that casualty assistance officers provide the spouses and other dependents of servicemembers who have died while on active duty with accurate information on the benefits to which they are entitled, as well as other casualty assistance available to them. Additionally, section 562 of the National Defense Authorization Act for Fiscal Year 2006 required policy that would include the qualifications, assignment, training, duties, supervision, and accountability for the performance of casualty assistance responsibilities. We previously developed a framework for assessing strategic training programs in the federal government that summarizes attributes of effective training programs. This framework consists of the

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following set of components: (1) planning/front-end analysis, (2) design/development, (3) implementation, and (4) evaluation.<sup>22</sup>

In planning its casualty assistance training program—the first component of the framework—DOD determined the duties needed for casualty assistance officers. DOD identifies casualty assistance officer duties in its casualty matters instruction. For example, the instruction requires all service casualty assistance officers to assist survivors until benefits have been applied for and received; to deliver DOD’s *A Survivor’s Guide to Benefits*; to assist survivors in obtaining new identification cards; and to provide information on available legal assistance, among other duties. Furthermore, the casualty matters instruction identifies training requirements for casualty assistance officers that include, among other topics, an overview of benefits and forms preparation, grief and trauma awareness, and public affairs information.

In addition to DOD-wide guidance on the duties of casualty assistance officers, the services also planned their respective casualty assistance training programs by publishing service-level guidance that identifies each service’s casualty assistance program and the duties required for that service’s casualty assistance officers. OUSD(P&R) officials stated that, while the casualty matters instruction provides DOD’s military services with the DOD standard for casualty assistance, it does not prescribe how the services must meet that standard. Additionally, the National Defense Authorization Act for Fiscal Year 2014, section 633, provides for variations in casualty assistance officer training so as to incorporate the traditional practices or customs of a particular service. As such, each service assigns varying duties to its casualty assistance officers, which incorporate service-specific practices and customs. For example, Army, Navy, and Marine Corps casualty assistance officers are uniformed servicemembers who provide casualty assistance as a secondary duty, assisting survivors only when assigned to a casualty assistance case. However, once assigned to a case, these servicemembers’ primary duty becomes providing assistance to survivors until all benefits and entitlements have been applied for or the survivor determines he or she

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<sup>22</sup>[GAO-04-546G](#). To develop the framework and components, we consulted government officials and experts in the private sector, academia, and nonprofit organizations; examined laws and regulations related to training and development in the federal government; and reviewed literature on training and development issues, including previous GAO products on a range of human capital topics.



no longer requires assistance. Conversely, according to Air Force officials, Air Force casualty assistance officers are civilian employees whose primary job is casualty assistance, including aiding survivors in obtaining benefits and educating Air Force personnel on casualty assistance. Additionally, while the Navy and Marine Corps assign all of their casualty assistance officers with responsibility for notification of a servicemember’s death, aiding survivors with funeral arrangements, and assisting survivors with obtaining benefits and entitlements, the Army assigns notification duty to one group of casualty assistance officers and assigns assistance with funeral arrangements and benefits and entitlements to another. Army officials stated that the Army separates these duties so that survivors do not need to again see the servicemember who delivered the news of their servicemember’s death. The Air Force separates these three duties further, with one group of personnel responsible for notifications, a second group responsible for assistance with funeral arrangements, and a third group responsible for assistance with benefits and other entitlements. Table 2 identifies the title each service assigns to its casualty assistance officers, whether the duty is performed by uniformed servicemembers or civilian employees, and the duties assigned to each service’s casualty assistance officers.

**Table 2: Title, Designated Personnel, and Assigned Duties of Casualty Assistance Officers, by Service**

Service	Duty Title	Uniformed or Civilian	Assigned Duties		
			Notification	Mortuary Affairs	Benefits Assistance
Army	Casualty Notification Officer	Uniformed	Yes	No	No
	Casualty Assistance Officer	Uniformed	No	Yes	Yes
Navy	Casualty Assistance Calls Officer	Uniformed	Yes	Yes	Yes
Air Force	Casualty Notification Officer	Uniformed	Yes	No	No
	Mortuary Officer/Technician	Uniformed/Civilian	No	Yes	No
	Casualty Assistance Representative	Civilian	No	No	Yes
Marine Corps	Casualty Assistance Calls Officer	Uniformed	Yes	Yes	Yes

Source: GAO analysis of Army, Navy, Air Force, and Marine Corps casualty assistance guidance and information. | GAO-16-569

DOD and its military services address the second component of the training assessment framework—design/development—by designing casualty assistance training programs to cover those duties identified in both the DOD casualty matters instruction and the service-specific guidance. For example, the Marine Corps assigns casualty assistance officers to notify survivors of a servicemember’s death, assist survivors

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with funeral arrangements, and facilitate survivors applying for benefits and entitlements. Therefore, the Marine Corps designed its casualty assistance officer training to cover these duties. On the other hand, since the Air Force divides up notification, assistance with funeral arrangements, and assistance with benefits and entitlements among three groups of personnel, the Air Force separates its casualty assistance training and covers only the duties assigned to each group in the separate training courses.

In addition to the training programs designed by the services, OUSD(P&R) has developed a simulation training program for use by all service casualty assistance officers. Officials stated that OUSD(P&R) designed the program, with input from DOD's military services and the Coast Guard, to provide a standardized course of instruction on casualty assistance. However, the program also incorporates the customs and traditions unique to each service, depending on which service the casualty assistance officer selects at the beginning of training. The program consists of three modules—notification, funeral arrangements, and assistance with benefits and entitlements. At the beginning of each module, the program provides the casualty assistance officer with background information to prepare that officer for the upcoming scenario. Casualty assistance officers are then presented with videos of actors role-playing as survivors who “interact” with the casualty assistance officer by demonstrating some of the potential behaviors or responses the officer may experience with a survivor. Following the actors' dialogue, casualty assistance officers are presented with multiple written responses from which to choose. Designed to portray real-life scenarios that casualty assistance officers may encounter while conducting their duties, the actors' dispositions change depending on the response an officer chooses—correct responses result in favorable reactions, while incorrect responses may result in actors becoming uncooperative or angry. After each response, a virtual coach provides casualty assistance officers with immediate feedback explaining why the response the officer chose was correct or incorrect. OUSD(P&R) officials stated that the training will be available to the services in summer 2016.

DOD addresses the third component of the training assessment framework—implementation—by delivering training to casualty assistance officers to instruct them on their duties. Due to the varying roles and duties assigned to each service's casualty assistance officers, the delivery of each service's training varies in format and duration, as described below:

- *Army.* According to Army officials, Army casualty assistance officer training spans 3 days of instructor-led classroom training covering notification duties; assistance with funeral arrangements, benefits, and entitlements; and grief, bereavement, and self-care. Although Army casualty assistance officers undergo training to assist survivors with notifications, funeral arrangements, and provision of benefits and entitlements, they will only perform notification or assistance with funeral arrangements, benefits, and entitlements when assigned to a casualty assistance case.
- *Navy.* Navy casualty assistance officer training consists of five modules covering an introduction to casualty assistance, notifications, funeral arrangements, assistance with benefits and entitlements, and case studies. Navy officials stated that while most casualty assistance training is provided over 2 days of instructor-led classroom training, some Navy installations cover all five modules in 1 day.
- *Air Force.* The Air Force splits notification, mortuary affairs, and benefits assistance duties among three groups of personnel, with each group attending separate training. According to Air Force officials, the group of casualty assistance officers that provides notifications to survivors undergoes 1-2 hours of training, while the group that provides assistance with funeral arrangements and the group that provides assistance with benefits and other entitlements each attend 5 days of training.
- *Marine Corps.* According to Marine Corps officials, Marine Corps casualty assistance officers undergo 1 day of instructor-led classroom training that covers eight modules, including notification, mortuary affairs, benefits and entitlements, and grief and bereavement, among other topics.

Table 3 summarizes the duration of training for each service’s casualty assistance officers.

**Table 3: Duration of Casualty Assistance Officer Training, by Service**

Service	Duty Title	Duration of Training
Army	Casualty Notification Officer	3 days
	Casualty Assistance Officer	3 days
Navy	Casualty Assistance Calls Officer	1-2 days
Air Force	Casualty Notification Officer	1-2 hours
	Mortuary Officer/Technician	5 days
	Casualty Assistance Representative	5 days
Marine Corps	Casualty Assistance Calls Officer	1 day

Source: GAO analysis of Army, Navy, Air Force, and Marine Corps casualty assistance guidance, training materials, and information. | GAO-16-569

DOD's military services have also made training available in accordance with the annual requirement in section 633 of the National Defense Authorization Act for Fiscal Year 2014. For example, Army casualty assistance guidance states that casualty assistance officer certification expires 1 year after completion of training. Marine Corps guidance states that all noncommissioned and commissioned officers who could potentially be assigned as casualty assistance officers are required to receive annual training. According to Air Force officials, Air Force casualty assistance officers who provide assistance with benefits and entitlements after initial training continue to participate in monthly training sessions which cover any changes to benefits that the casualty assistance officers may need to be aware of. Additionally, casualty assistance officers receive refresher training every 3 years. According to Air Force officials, these casualty assistance officers assist survivors of both active duty and retirees as part of their full-time position, unlike other service casualty assistance officers, who only conduct casualty assistance duties when assigned to a casualty assistance case. According to Navy officials, Navy casualty assistance officers may access web-based refresher training; however, the training is being updated.

During our review, Air Force officials provided a draft of their casualty assistance instruction, which will include a requirement for the initial, monthly, and triennial refresher training for their casualty assistance officers. Air Force officials stated that this revision is planned for implementation in summer 2016. Additionally, during our review, Navy officials provided a draft of their casualty assistance instruction, which will require annual training for their casualty assistance officers. According to Navy officials, both the revised instruction and the updates to the web-based training will be implemented by the end of fiscal year 2016. Table 4 summarizes the frequency with which each service makes training available to its casualty assistance officers.

**Table 4: Frequency of Training for Casualty Assistance Officers, by Service**

Service	Duty Title	Frequency of Training
Army	Casualty Notification Officer	1 year
	Casualty Assistance Officer	1 year
Navy	Casualty Assistance Calls Officer	Online retraining available <sup>a</sup>
Air Force	Casualty Notification Officer	Retraining provided before each case
	Mortuary Officer/Technician <sup>b</sup>	No required retraining

Service	Duty Title	Frequency of Training
	Casualty Assistance Representative	Monthly training sessions and refresher training every 3 years
Marine Corps	Casualty Assistance Calls Officer	1 year

Source: GAO analysis of Army, Navy, Air Force, and Marine Corps casualty assistance guidance and information. | GAO-16-569

<sup>a</sup>According to Navy officials, updates to the online training will be implemented by the end of fiscal year 2016.

<sup>b</sup>The duties of the Air Force mortuary officer/technician are different from those of the casualty assistance representative. The mortuary officer/technician personnel are not subject to the annual training requirement under section 633 of the National Defense Authorization Act for Fiscal Year 2014.

Although the services have implemented training to cover the duties assigned to casualty assistance officers and have made training available in accordance with the annual requirement in section 633 of the National Defense Authorization Act for Fiscal Year 2014, DOD does not include that statutory requirement in its casualty matters instruction. Additionally, when we met with OUSD(P&R) officials, they were not aware of that statutory requirement and, therefore, did not require the services to conduct training annually. Officials stated, however, that they would incorporate the requirement for at least annual training for casualty assistance officers in the upcoming revision to their casualty matters instruction. Therefore, we are not making a recommendation on this issue.

### DOD Evaluates Its Casualty Assistance Training but May Not Have the Indicators Needed to Determine Its Effect on Program Performance and the Quality of Casualty Assistance

DOD and its services address the fourth component of the training assessment framework—evaluation—by conducting some evaluation of their casualty assistance officer training. However, current evaluation methods may not provide the indicators needed to fully evaluate the training’s effect and the quality of the assistance provided by casualty assistance officers. To measure the real effect of training, agencies need to develop indicators that help determine how training contributes to the accomplishment of agency goals and objectives.<sup>23</sup> One commonly accepted model to evaluate training consists of levels of assessment that measure (1) participant reaction to and satisfaction with the training program; (2) changes in employee skills, knowledge, or abilities; and (3) the effect of the training on program results, among others. As part of a

<sup>23</sup>[GAO-04-546G](#).

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balanced approach, assessing training should consider feedback from employees, such as casualty assistance officers, and from customers, such as survivors, as well as organizational results.<sup>24</sup>

DOD and its services conduct some evaluations of casualty assistance officer training programs in accordance with the first level of assessment by measuring participant reaction to training. For example, according to service officials, DOD's military services evaluate participant reaction to training by surveying casualty assistance officers upon their completion of training. However, currently not all of DOD's military services survey casualty assistance officers after they have served in this function to gauge casualty assistance officer satisfaction with how the training prepared them to conduct their duties. According to casualty assistance officers we met with from the Army and Marine Corps, they may complete after-action reports to provide feedback on the services' casualty assistance processes. While this could serve as a method of providing feedback on casualty assistance officer training, these after-action reports do not specifically focus on training. Additionally, OUSD(P&R) officials stated that DOD plans to survey casualty assistance officers on DOD's simulation training after they have provided assistance to survivors in order to better gauge how the simulation training prepares casualty assistance officers to conduct their duties. Such indicators on how prepared casualty assistance officers felt due to the training they received could prove useful in evaluating the effect of casualty assistance officer training on program performance.

DOD and its services also conduct knowledge checks either during training or upon its completion, which can assess changes in skills, knowledge, or abilities in accordance with the second level of assessment. For example, the Army requires its casualty assistance officers to take an exam covering notification procedures and assisting survivors with benefits and entitlements. Similarly, at the completion of each module of DOD's simulation training, casualty assistance officers receive a score based on their professionalism, compassion, and

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<sup>24</sup>[GAO-04-546G](#). In this report, we discuss a commonly recognized four-level model for evaluating training and development efforts developed by Donald L. Kirkpatrick (author of *Evaluating Training Programs: the Four Levels*). The levels of assessment measure (1) participant reaction to the training program; (2) changes in employee skills, knowledge, or abilities; (3) changes in on-the-job behaviors; and (4) the impact of the training on program or organizational results. The fourth level is sometimes split into two levels, with the fifth level representing a comparison of costs and benefits quantified in dollars.

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knowledge. Casualty assistance officers must receive a score of 80 percent or greater to earn a certificate of completion for the simulation training.

DOD's method of addressing the final level of assessment—the effect of the training on program results—may not provide DOD with the information needed to determine the effect of training on program results or the quality of casualty assistance provided to survivors by casualty assistance officers. In assessing the effect of training on performance, agencies should incorporate the perspectives of different stakeholders—such as those of customers, or in this case survivors—in assessing the effect of training.<sup>25</sup> DOD currently surveys survivors on the quality of casualty assistance provided to them by casualty assistance officers via a web-based survey that could provide information on the effect of training on program results. This survey is administered in accordance with section 562 of the National Defense Authorization Act for Fiscal Year 2006, which required that DOD prescribe policy for data collection regarding the quality of casualty assistance provided to survivors of deceased servicemembers.<sup>26</sup> For example, the survey queries survivors on whether the casualty assistance they received provided them with accurate information. Responses to the survey questions range from “strongly agree” to “strongly disagree.” Feedback from survivors on the quality of casualty assistance provided to them by their casualty assistance officer could provide information on the effect of casualty assistance officer training on program performance and the quality of casualty assistance provided to survivors. However, the web-based survey has historically had a low response rate. For example, the survey conducted between October 2014 and March 2015 resulted in a survivor response rate of 10 percent. With such a low response rate, DOD has acknowledged that results should be interpreted cautiously. According to Army and OUSD(P&R) officials, the Army previously utilized a telephone survey of survivors with an approximate 80 percent response rate. According to OUSD(P&R) officials, DOD is planning to institute a similar telephone survey of survivors across DOD in 2016, but it is still too early to determine whether that survey will result in a higher response rate. Without more complete feedback from survivors, DOD may be missing valuable indicators to help evaluate how casualty assistance officer

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<sup>25</sup>[GAO-04-546G](#).

<sup>26</sup>Pub. L. No. 109-163, § 562(b)(11) (2006).

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training contributes to improved program performance and the quality of casualty assistance provided to survivors.

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## Conclusions

The Gold Star Advocate Program has been addressing issues raised by survivors of deceased DOD and Coast Guard servicemembers since it was implemented in 2014, and DOD and the Coast Guard have conducted some outreach to survivors using several methods to inform them of the program's availability to provide support. However, DOD and the Coast Guard have not yet developed policies establishing roles, responsibilities, and procedures for the program; nor have they determined outreach goals, along with metrics by which to measure progress in attaining those goals. Without such policies, it may be difficult for DOD and the Coast Guard to ensure that the program's mission, objectives, and statutory requirements under section 633 of the National Defense Authorization Act for Fiscal Year 2014 continue to be carried out. Moreover, without goals and metrics for outreach, DOD and the Coast Guard may miss opportunities to reach some survivors who may be unaware of the casualty assistance available to them from the Gold Star Advocate Program. Regarding DOD's casualty assistance officer training program, without improved indicators for evaluating the effect of casualty assistance officer training on program performance, DOD may not have the information needed to improve the quality of casualty assistance provided to survivors.

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## Recommendations for Executive Action

To help ensure that the Gold Star Advocate Program achieves its mission and objectives and to enhance outreach for the program, we recommend that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness, in collaboration with the service secretaries, to take the following two actions:

- Develop interim policies to govern the program, to include identification of roles, responsibilities, and procedures; and
- Determine outreach goals and metrics by which to measure progress in attaining those goals.

To help ensure that the Gold Star Advocate Program achieves its mission and objectives and to enhance outreach for the program, we recommend that the Commandant of the Coast Guard take the following two actions:

- Develop interim policies to govern the program, to include identification of roles, responsibilities, and procedures; and



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- Determine outreach goals and metrics by which to measure progress in attaining those goals.

To improve the efficacy of the training provided, we recommend that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to develop indicators to help determine how casualty assistance officer training contributes to the quality of the casualty assistance program.

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## Agency Comments and Our Evaluation

We provided a draft of this report to DOD and the Department of Homeland Security (DHS) for review and comment. Both DOD and DHS, responding with respect to the Coast Guard, concurred with our recommendations. Written comments from DOD and DHS are reprinted in their entirety in appendixes III and IV, respectively. DOD also provided technical comments, which we have incorporated in the report where appropriate.

In its comments, DOD noted concerns with the title of our draft report. Specifically, DOD stated that the report identifies issues with developing metrics and measurements and codifying policy regarding the Gold Star Advocate Program, rather than issues with casualty assistance provided to survivors. The Gold Star Advocate Program and casualty assistance officer training both represent subsets of DOD's casualty assistance program. Therefore, we changed the report title to specifically identify the subsets which the report addresses and to reflect the recommendations contained in the report.

DOD concurred with our recommendation to develop interim policies to govern the Gold Star Advocate Program, to include the identification of roles, responsibilities, and procedures. DOD stated that the policies regarding the Gold Star Advocate Program are being incorporated into the revision of its casualty matters instruction and that a charter is being established for the program in the interim. DOD also concurred with our recommendation to determine outreach goals and metrics for the program. DOD stated that questions regarding the Gold Star Advocate Program will be included in its planned telephonic survey of survivors, with a goal of having the majority of survivors interviewed being aware of the program. DOD also stated that the department will determine other outreach goals and metrics within the next 6 months. Additionally, DOD concurred with our recommendation to develop indicators to help determine how casualty assistance officer training contributes to the quality of the casualty assistance program. DOD noted that it has developed two surveys to gauge how effective casualty assistance

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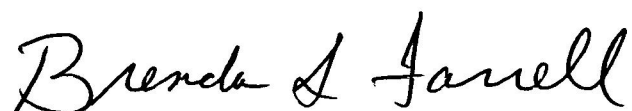
officers found the simulation training developed by OUSD(P&R) to be (as discussed in this report). We agree that this is a good first step with respect to determining how casualty assistance officer training contributes to the quality of the casualty assistance program, but as we stated in our report, it would also be beneficial to incorporate the perspectives of stakeholders—such as survivors—in assessing the effect of training on program performance.

DHS also concurred with our recommendation to develop interim policies to govern the Gold Star Advocate Program. DHS stated that the Coast Guard will publish a policy memorandum announcing the formal establishment of the program and outlining the program's policies, procedures, and responsibilities. Additionally, DHS concurred with our recommendation to determine outreach goals and metrics for the program. DHS noted several steps that it plans to take, including creating a Gold Star Advocate Program webpage and developing measures for outreach effectiveness.

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We are sending copies of this report to the appropriate congressional committees, the Secretary of Defense, the Under Secretary of Defense for Personnel and Readiness, the Chairman of the Joint Chiefs of Staff, the Secretaries of the military departments, the Secretary of Homeland Security, and the Commandant of the Coast Guard. The report is also available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix V.



Brenda S. Farrell  
Director, Defense Capabilities and Management

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# Appendix I: Scope and Methodology

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The scope of our engagement included the casualty assistance programs of the Department of Defense (DOD), the Army, the Navy, the Air Force, the Marine Corps, and the Coast Guard. We obtained data on the number of servicemembers who died while on active duty and the number of surviving dependents from the Defense Manpower Data Center and the Coast Guard, from January 2002 through November 2015.<sup>1</sup>

For our first objective, to determine the extent to which DOD and the Coast Guard have implemented the Gold Star Advocate Program, we compared DOD and Coast Guard policies on casualty matters and the meeting minutes of DOD's Casualty Advisory Board, the panel responsible for developing and recommending casualty-related policy and guidance, with the statutory requirements of the National Defense Authorization Act for Fiscal Year 2014, section 633, for the Gold Star Advocate Program.<sup>2</sup> We also compared DOD and Coast Guard policies on casualty matters with federal control standards, which state the importance of internal control activities, such as policies and procedures, to help ensure that management's directives are carried out and that the organization's missions, goals, and objectives are met.<sup>3</sup> We also interviewed officials involved in the Gold Star Advocate Program at the Office of the Under Secretary of Defense for Personnel and Readiness (OUSDP&R), the Army, the Navy, the Air Force, the Marine Corps, and the Coast Guard to understand how the Gold Star Advocates were designated, and the methods used to address and report on issues raised

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<sup>1</sup>We requested the data on servicemembers' deaths from Defense Manpower Data Center in November 2015. At that time, the data we received on the number of deaths through November 2015 were the most current data available. We also requested data over the same period from the Coast Guard on the number of Coast Guard servicemembers' deaths.

<sup>2</sup>DOD Instruction 1300.18, *Department of Defense (DOD) Personnel Casualty Matters, Policies, and Procedures* (Jan. 8, 2008) (incorporating change 1, Aug. 14, 2009) (hereinafter referred to as casualty matters instruction); Commandant Instruction M1770.9, *Military Casualties and Decedent Affairs* (Sept. 29, 2011); Pub. L. No. 113-66 § 633 (2013).

<sup>3</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: Nov. 1999). These standards were in effect prior to fiscal year 2016 and cover the time period during which the Gold Star Advocate Program was implemented. The standards were subsequently updated and state that management should design control activities, such as policies and procedures, to achieve an effective internal control system. The update went into effect on October 1, 2015. See GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 2014).

by survivors to the Gold Star Advocate Program. To determine the extent to which DOD and the Coast Guard have conducted outreach to survivors for the Gold Star Advocate Program, we compared DOD's outreach for the program with best practices for consumer education planning.<sup>4</sup> We reviewed section 633 of the National Defense Authorization Act for Fiscal Year 2014 for statutory requirements for the Gold Star Advocate Program related to outreach. We also reviewed DOD and Coast Guard policy for casualty matters, and DOD's Casualty Advisory Board meeting minutes, for policies or guidance related to outreach for the program. We interviewed officials from the Gold Star Advocate Program at OUSD(P&R), the Army, the Navy, the Air Force, the Marine Corps, and the Coast Guard to determine how they conduct outreach for the program, and we interviewed a non-generalizable range of survivor advocacy groups and casualty assistance officers to determine their level of understanding of the Gold Star Advocate Program.<sup>5</sup>

For the second objective, to determine the extent to which DOD has developed a training program for casualty assistance officers consistent with attributes of an effective training program, we compared DOD's casualty matters instruction, service-level casualty assistance guidance, and DOD and service casualty assistance officer training materials against the training assessment framework identified in *A Guide for Assessing Strategic Training and Development Efforts in the Federal*

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<sup>4</sup>GAO, *Digital Television Transition: Increased Federal Planning and Risk Management Could Further Facilitate the DTV Transition*, [GAO-08-43](#) (Washington, D.C.: Nov. 19, 2007). GAO convened a panel of experts representing public, private, and academic organizations to identify key practices for conducting consumer education. The key practices identified for consumer education planning include: (1) define goals and objectives; (2) analyze the situation; (3) identify stakeholders; (4) identify resources; (5) research target audience; (6) develop consistent, clear messages; (7) identify credible messengers; (8) design media mix; and (9) establish metrics to measure success. These key practices are applicable to outreach efforts to educate and make survivors aware of the Gold Star Advocate Program, as survivors are the consumers of the casualty assistance support available through the Gold Star Advocate Program.

<sup>5</sup>We met with a limited number of survivor advocacy groups and casualty assistance officers. As such, this information is not generalizable to the greater survivor and casualty assistance officer populations.

*Government.*<sup>6</sup> We also compared the casualty assistance officer training frequency requirements, if any, in DOD's casualty matters instruction and service-level casualty assistance guidance to the National Defense Authorization Act for Fiscal Year 2014, section 633, which requires casualty assistance officer training no less often than annually.<sup>7</sup> We conducted a content analysis of DOD's casualty matters instruction and the service-level casualty assistance guidance and training materials to determine the extent to which DOD has developed training that identifies the duties needed for casualty assistance officers and links training to these duties. To do so, two analysts independently reviewed and assessed the casualty assistance officer duties identified in the DOD and service-level guidance to determine whether the training materials addressed the duties. The analysts then compared their results to identify any disagreements and reached agreement on all items through discussion. We also reviewed section 562 of the National Defense Authorization Act for Fiscal Year 2006, which required DOD to prescribe policy on data collection regarding the quality of casualty assistance provided to survivors, and the National Defense Authorization Act for Fiscal Year 2014, section 633, which required DOD to develop a training program on casualty assistance.<sup>8</sup> We reviewed the DOD Survivor Survey, intended to collect survivor feedback on the quality of casualty assistance provided by the military services, among other things, and analyzed the response rate to the survey over the period of October 2014 through March 2015. We found data from the survey to be of undetermined reliability, since the response rate is too low to serve as a reliable source of information for evaluating the quality of casualty assistance provided to survivors. With such a low response rate, OUSD(P&R) officials also acknowledged that DOD Survivor Survey responses should be interpreted cautiously. We interviewed officials from OUSD(P&R) and DOD's military services to determine how they implement their respective casualty assistance officer training programs. Finally, we interviewed casualty assistance officers to understand their experience serving as

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<sup>6</sup>GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government* [GAO-04-546G](#) (Washington, D.C.: March 2004). To develop this framework, we consulted with government officials and experts in the private sector, academia, and nonprofit organizations; examined laws and regulations related to training and development in the federal government; and reviewed literature on training and development issues, including previous GAO products on a range of human capital topics.

<sup>7</sup>Pub. L. No. 113-66, § 633(b)(4) (2013).

<sup>8</sup>Pub. L. No. 109-163, § 562(b)(11) (2006); Pub. L. No. 113-66, § 633(b)(1) (2013).

casualty assistance officers and the training they received to prepare them to serve in this capacity.<sup>9</sup>

Table 5 contains a complete list of the agencies and offices we contacted during the course of our review.

**Table 5: Agencies and Offices Contacted**

<b>Department of Defense</b>	<b>Gold Star Advocate Program</b>
No data	Office of the Under Secretary of Defense for Personnel and Readiness, Military Community and Family Policy, Casualty and Mortuary Affairs
Army	Army Survivor Outreach Services
	Army Installation Management Command, Casualty Program
	Army Human Resources Command, Casualty and Mortuary Affairs Operations Center
Navy	Navy Personnel Command, Navy Casualty Division, Long Term Assistance Program
	Commander, Navy Installations Command, Navy Casualty Office and Funeral Honors
	Navy Gold Star Program
Air Force	Headquarters Air Force, Airman and Family Readiness Policy Branch
	Headquarters Air Force, Airman and Family Care Division
	Air Force Families Forever
	Air Force Mortuary Affairs Operations
Marine Corps	Marine Corps Manpower and Reserve Affairs, Casualty Section
Military OneSource	No data
American Gold Star Mothers, Inc.	No data
Gold Star Wives of America, Inc. Representative	No data
American Armed Forces Mutual Aid Association	No data

Source: GAO. | GAO-16-569

We conducted this performance audit from June 2015 to June 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

<sup>9</sup>We met with a limited number of casualty assistance officers. As such, this information is not generalizable to the greater casualty assistance officer populations.

# Appendix II: Issues Received and Addressed by the Gold Star Advocate Program

Table 6 provides a complete list of the issues received and addressed by the Gold Star Advocate Program through March 2016. The contents of the table are based on the Office of the Under Secretary of Defense for Personnel and Readiness (OUSD(P&R))’s documentation of issues addressed by the program.

**Table 6: Issues Received and Addressed by the Gold Star Advocate Program**

Issue	Background	Servicemember’s Death Prior to Implementation of Gold Star Advocate Program (Yes/No)	Method Learned of Program	Status
Revocation of stepchildren’s identification card privileges and medical care upon the remarriage of the biological parent <sup>a</sup>	Privileges were revoked based on interpretation of an instruction provision.	Issue raised by multiple survivors, so a single date of death is not applicable.	Working relationship with Department of Defense’s (DOD) Casualty and Mortuary Affairs and Military Honors Office	Referred to Defense Human Resources Agency and Defense Health Agency, which determined that stepchildren should retain privileges. Identification cards will be reissued.
Exception for burial of remarried spouses at Arlington National Cemetery	Current policy states that remarried spouses are not eligible for interment with their deceased servicemember spouse upon remarriage.	Yes	Survivor’s forum slides from DOD	Service General Counsel determined there are legal equities that the Service Secretary must consider in order to be in compliance with statute.
Travel and household goods claim	Survivor claimed a travel and household goods settlement was not received.	Yes	Working relationship with DOD’s Casualty and Mortuary Affairs Office	Defense Travel Management Office granted an exception to policy for the claim.
Dissatisfaction with non-government agency	Survivor previously received monetary assistance from non-government agency.	Yes	Service Gold Star Advocate was seeking assistance from DOD Gold Star Advocate Program Manager	According to OUSD(P&R)’s ledger, DOD does not have authority over non-government agencies.
Assistance with flood recovery	Survivor requested assistance following flooding at residence.	Yes	Working relationship with DOD’s Casualty and Mortuary Affairs Office	DOD General Counsel advised that requested assistance would be a misuse of government resources. Service long-term assistance program assisted with applying for emergency relief grant.

**Appendix II: Issues Received and Addressed  
by the Gold Star Advocate Program**

<b>Issue</b>	<b>Background</b>	<b>Servicemember's Death Prior to Implementation of Gold Star Advocate Program (Yes/No)</b>	<b>Method Learned of Program</b>	<b>Status</b>
Office of Personnel Management (OPM) notification letters sent to deceased servicemembers	Spouses received notification letters from OPM addressed to their deceased servicemembers.	Issue raised by multiple survivors, so a single date of death is not applicable.	Service Gold Star Advocate raised issue to DOD Gold Star Advocate Program Manager, since issue affects multiple survivors	Based on the information available to OPM, letters were not sent to individuals "known" to be deceased. According to OUSD(P&R) officials, it was never OPM's intent to send letters to any deceased individuals.
Line-of-duty determinations affecting survivor benefits	Survivors of servicemembers whose deaths were determined not to have been in the line of duty are not eligible for some benefits.	Issue raised due to its effect on multiple survivors, so a single date of death is not applicable.	Issue raised by Service Gold Star Advocate	According to OUSD(P&R)'s ledger, this requires a statutory change.
Internal Revenue Service form addressed to deceased servicemembers	Spouse received an Internal Revenue Service form addressed to deceased servicemember instead of to the spouse.	Yes	Unknown	According to OUSD(P&R) officials, a system needs to be developed to change current processes. Defense Finance and Accounting Services is analyzing the issue.
Expand eligibility to stepsiblings and grandparents for the Gold Star Lapel Button <sup>b</sup>	10 U.S.C. § 1126 defines eligibility for the Gold Star Lapel Button.	Issue raised by multiple survivors, so a single date of death is not applicable.	Military OneSource website	According to OUSD(P&R) officials, the issue requires a statutory change. May be considered for the unified legislation and budgeting process.
Children whose parents were divorced were denied DOD ID card and installation access	Children were denied access to a military base to obtain medical care even though they have ID cards authorizing benefits.	Yes	Military OneSource website	Base commander authorized a temporary DOD ID card to parent to access installation.
Expanding eligibility for Gold Star license plates to all survivors	Spouse of deceased servicemember who died while on active duty due to non-combat-related circumstances wants eligibility for the Gold Star license plate in Virginia to be expanded to all survivors.	No	Unknown	DOD Legislative Affairs is working with the Virginia Department of Motor Vehicles to develop a next of kin license plate instead of expanding eligibility.



**Appendix II: Issues Received and Addressed  
by the Gold Star Advocate Program**

<b>Issue</b>	<b>Background</b>	<b>Servicemember's Death Prior to Implementation of Gold Star Advocate Program (Yes/No)</b>	<b>Method Learned of Program</b>	<b>Status</b>
Servicemember's Disability Discharge	Servicemember died after being medically discharged. Survivor wanted statute changed so that veterans who died from a service-connected cause receive same survivor benefits as survivors of servicemembers who die on active duty.	Yes	Unknown	Veteran was not in an active duty status at the time of death and according to OUSD(P&R) officials, by statute, the survivor is not eligible for survivor benefits of a servicemember who died on active duty.

Source: GAO analysis of Gold Star Advocate Program documentation and information. | GAO-16-569

<sup>a</sup>Issue was not raised by a single survivor, but rather was raised by numerous survivors as a result of a service long-term assistance program event.

<sup>b</sup>Issue was received by the Gold Star Advocates of two services via telephone calls to the advocates.

# Appendix III: Comments from the Department of Defense



MANPOWER AND  
RESERVE AFFAIRS

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE  
4000 DEFENSE PENTAGON  
WASHINGTON, D.C. 20301-4000

June 10, 2016

Ms. Brenda Farrell  
Director, Defense Capabilities Management  
U.S. Government Accountability Office  
441 G Street, NW  
Washington DC 20548

Dear Ms. Farrell,

This is the Department of Defense (DoD) response to the GAO Draft Report GAO-16-569, "MILITARY PERSONNEL: DOD and the Coast Guard Need to Take Steps to Improve Casualty Assistance for Survivors of Deceased Servicemembers," dated May 20, 2016 (GAO Code 100194).

Attached is DoD's proposed response to the subject report. My point of contact is Lisiane Valentine who can be reached at [lisiane.m.valentine.civ@mail.mil](mailto:lisiane.m.valentine.civ@mail.mil) and phone 571-372-5319.

Sincerely,

A handwritten signature in black ink that reads "Deborah S Skillman".

Deborah S. Skillman  
Director, Casualty, Mortuary Affairs and  
Military Funeral Honors  
Office of the Deputy Assistant Secretary  
of Defense for Military Community  
and Family Policy

Attachment:  
As stated

GAO DRAFT REPORT DATED JUNE 1, 2015  
16-569 (GAO CODE 100194)

**“MILITARY PERSONNEL: DOD AND THE COAST GUARD NEED TO TAKE STEPS  
TO IMPROVE CASUALTY ASSISTANCE FOR SURVIVORS OF DECEASED  
SERVICEMEMBERS”**

DoD appreciates GAO’s review of the DoD’s Gold Star Advocate Program and Casualty Training, as the Department’s casualty and mortuary affairs programs are always taking steps to improve care for surviving family members. However, we are concerned that the title of this report misrepresents what the issues found are when compared to the recommendations. In the report we did not see anything that identifies issues with casualty assistance provided to survivors but rather issues with developing metrics and measurements and codifying policy regarding the Gold Star Advocate Program. Generally survivors are satisfied with the casualty assistance received; the issues brought to the Gold Star Advocates typically involve agencies or entities outside of DoD’s casualty assistance program and disagreement with their policies.

**DOD COMMENTS  
TO THE GAO RECOMMENDATIONS**

**RECOMMENDATION 1:** The GAO recommends that the Secretary of Defense develop interim policies to govern the program, to include the identification of roles, responsibilities and procedures.

**DoD RESPONSE:** Concur. Policies regarding the Gold Star Advocate Program are being incorporated in the revision of DoDI 1300.18, “Department of Defense (DoD) Personnel Casualty Matters, Policies, and Procedures.” The revision is anticipated to be published in 12-18 months. A charter is being established for the Gold Star Advocate Program in the interim.

**RECOMMENDATION 2:** The GAO recommends that the Secretary of Defense determine outreach goals and metrics by which to measure progress in attaining these goals (Recommendation 1).

**DoD RESPONSE:** Concur. Enclosed is the revised protocol questions which now includes one about the Gold Star Advocate to help us with our metrics (see page 19, questions 56 & 57 of TAB 2). DoD’s goal is that the majority of those interviewed are aware of the Gold Star Advocate; however we also understand the fog of grief that can affect a survivor's retention or focus on information as there is so much information that is provided to them when their loved one dies. If the survivor participating in the telephonic survey is not aware the Gold Star Advocate, they will become aware with DoD’s new survivor survey which will be conducted telephonically by Military OneSource starting in the Fall. This new survey protocol will enable DoD to immediately and discretely assist survivors with any issues or concerns the survivor may be experiencing providing various options that can be selected by the survivor - to include the

Gold Star Advocate. DoD will also determine other outreach goals and metrics within the next six months.

**RECOMEMNDATION 3:** The GAO recommends that the Secretary of Defense develop indicators to help determine how casualty assistance officer training contributes to the quality of the casualty assistance program.

**DoD RESPONSE:** Concur. DoD has developed two separate surveys to guage how effective casualty assistance officers found the simulation training program (TAB 3).

# Appendix IV: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

June 9, 2016

Brenda Farrell  
Director, Defense Capabilities and Management  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Draft Report GAO-16-569, "MILITARY PERSONNEL: DOD and the Coast Guard Need to Take Steps to Improve Casualty Assistance for Survivors of Deceased Servicemembers"

Dear Ms. Farrell:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO's) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's positive recognition that the United States Coast Guard (USCG) has taken steps to implement the Gold Star Advocate Program and address issues raised by survivors. The National Defense Authorization Act of 2014 allowed for establishment of this program to increase the level of long-term assistance throughout a surviving dependent's lifetime. The Coast Guard continues to work closely with the Office of the Under Secretary of Defense for Personnel and Readiness [OUSD(P&R)] and the Department of Defense's Casualty Advisory Board to ensure the program's mission, objectives, and statutory requirements are carried out.

The Coast Guard takes seriously its obligation to meet the needs of survivors of servicemembers who die while on active duty (i.e., our Gold Star families). For example, the Coast Guard supports these families by assigning a well-trained casualty assistance calls officer (CACO) whose primary duty is to address the needs of the fallen servicemember's dependents. CACO duties include:

- providing as much information about the cause of death, as allowed, and when it becomes available,
- answering all questions to the best of his/her ability,
- ensuring immediate needs are being met during this difficult time,

- immediately arranging for any available Coast Guard assistance for funerals or memorial services,
- assisting in the preparation and submission of any forms needed to claim benefits from different government agencies, and
- continuing to assist until all claims are filed and settled or until any issues regarding those benefits are resolved to the surviving dependent's satisfaction.

The draft report contained two recommendations for the Coast Guard with which the Department concurs. Please see the attached for our detailed response to each recommendation.

Again, thank you for the opportunity to comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,



M. H. CRUMPACKER, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

**Attachment: DHS Management Response to Recommendations  
Contained in GAO-16-569**

GAO recommended that the Commandant of the Coast Guard:

**Recommendation 1:** Develop interim policies to govern the [Gold Star Advocate] program, to include identification of roles, responsibilities, procedures.

**Response:** Concur. The Coast Guard Personnel Service Center (PSC) will publish a policy memorandum on the PSC Casualty Matters website announcing the formal establishment of the Gold Star Advocate Program and outlining the policies, procedures, and responsibilities. Estimated Completion Date (ECD): December 31, 2016.

**Recommendation 2:** Determine outreach goals and metrics by which to measure progress in attaining these goals.

**Response:** Concur. The Coast Guard PSC has established the following goals and metrics for the Coast Guard's Gold Star Program:

1. Identify resources to support program
2. Create a Gold Star Program webpage
3. Update the Coast Guard's "A Survivors Guide to Benefits" and link it to the Gold Star Program webpage
4. Begin capturing addresses and other contact information for all Gold Star survivors for each Active Duty death
5. Perform a one-time mass mailing to Gold Star survivors from the addresses on file to inform them of the program
6. Develop measures for and measure outreach effectiveness
7. Partner with Department of Defense military services to identify other ways to ensure that all Gold Star survivors are contacted

The ECD for Items 1-4 is December 31, 2016; Item 5, March 31, 2017; and Items 6 and 7, September 30, 2017. Overall ECD: September 30, 2017.

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# Appendix V: GAO Contact and Staff Acknowledgments

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## GAO Contact

Brenda S. Farrell, (202) 512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Kimberly C. Seay (Assistant Director), Gustavo Crosetto, Clifton G. Douglas Jr., Cynthia Grant, Amie Lesser, Amanda Manning, Elisha Matvay, Michael McKemey, Shahrzad Nikoo, Terry Richardson, and Cheryl Weissman made major contributions to this report.



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# Appendix VI: Accessible Data

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## Agency Comment Letter

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### Text of Appendix III: Comments from the Department of Defense

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Page 1

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

4000 DEFENSE PENTAGON

WASHINGTON, O.C. 20301-4000

MANPOWER AND RESERVE AFFAIRS

June 10, 2016

Ms. Brenda Farrell

Director, Defense Capabilities Management

U.S. Government Accountability Office

441 G Street, NW

Washington DC 20548

Dear Ms. Farrell,

This is the Department of Defense (DoD) response to the GAO Draft Report GA0-16-569, "MILITARY PERSONNEL: DOD and the Coast Guard Need to Take Steps to Improve Casualty Assistance for Survivors of Deceased Servicemembers," dated May 20, 2016 (GAO Code 100194).

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Sincerely,

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Deborah S. Skillman

Director, Casualty, Mortuary Affairs and Military Funeral Honors

Office of the Deputy Assistant Secretary of Defense for Military  
Community and Family Policy

Attachment:

As stated

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Page 2

GAO DRAFT REPORT DATED JUNE 1, 2015 16-569 (GAO CODE  
100194)

“MILITARY PERSONNEL: DOD AND THE COAST GUARD NEED TO  
TAKE STEPS TO IMPROVE CASUALTY ASSISTANCE FOR  
SURVIVORS OF DECEASED SERVICEMEMBERS”

DoD appreciates GAO’s review of the DoD’s Gold Star Advocate Program and Casualty Training, as the Department’s casualty and mortuary affairs programs are always taking steps to improve care for surviving family members. However, we are concerned that the title of this report misrepresents what the issues found are when compared to the recommendations. In the report we did not see anything that identifies issues with casualty assistance provided to survivors but rather issues with developing metrics and measurements and codifying policy regarding the Gold Star Advocate Program. Generally survivors are satisfied with the casualty assistance received; the issues brought to the Gold Star Advocates typically involve agencies or entities outside of DoD’s casualty assistance program and disagreement with their policies.

DOD COMMENTS

TO THE GAO RECOMMENDATIONS

RECOMMENDATION 1: The GAO recommends that the Secretary of Defense develop interim policies to govern the program, to include the identification of roles, responsibilities and procedures.

DoD RESPONSE: Concur. Policies regarding the Gold Star Advocate Program are being incorporated in the revision of DoDI 1300.18, “Department of Defense (DoD) Personnel Casualty Matters, Policies, and Procedures.” The revision is anticipated to be published in 12-18 months.

A charter is being established for the Gold Star Advocate Program in the interim.

RECOMMENDATION 2: The GAO recommends that the Secretary of Defense determine outreach goals and metrics by which to measure progress in attaining these goals (Recommendation 1).

DoD RESPONSE: Concur. Enclosed is the revised protocol questions which now includes one about the Gold Star Advocate to help us with our metrics (see page 19, questions 56 & 57 of TAB 2). DoD's goal is that the majority of those interviewed are aware of the Gold Star Advocate; however we also understand the fog of grief that can affect a survivor's retention or focus on information as there is so much information that is provided to them when their loved one dies. If the survivor participating in the telephonic survey is not aware the Gold Star Advocate, they will become aware with DoD's new survivor survey which will be conducted telephonically by Military OneSource starting in the Fall. This new survey protocol will enable DoD to immediately and discretely assist survivors with any issues or concerns the survivor may be experiencing providing various options that can be selected by the survivor - to include the Gold Star Advocate. DoD will also determine other outreach goals and metrics within the next six months.

RECOMEMNDATION 3: The GAO recommends that the Secretary of Defense develop indicators to help determine how casualty assistance officer training contributes to the quality of the casualty assistance program.

DoD RESPONSE: Concur. DoD has developed two separate surveys to gauge how effective casualty assistance officers found the simulation training program (TAB 3).

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Text of Appendix IV:  
Comments from the  
Department of Homeland  
Security

Homeland Security

June 9, 2016

Brenda Farrell

Director, Defense Capabilities and Management

U.S. Government Accountability Office

441 G Street, NW

Washington, DC 20548

Re: Draft Report GAO-16-569, "MILITARY PERSONNEL: DOD and the Coast Guard Need to Take Steps to Improve Casualty Assistance for Survivors of Deceased Servicemembers"

Dear Ms. Farrell:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO's) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's positive recognition that the United States Coast Guard (USCG) has taken steps to implement the Gold Star Advocate Program and address issues raised by survivors. The National Defense Authorization Act of 2014 allowed for establishment of this program to increase the level of long-term assistance throughout a surviving dependent's lifetime. The Coast Guard continues to work closely with the Office of the Under Secretary of Defense for Personnel and Readiness [OUSD(P&R)] and the Department of Defense's Casualty Advisory Board to ensure the program's mission, objectives, and statutory requirements are carried out.

The Coast Guard takes seriously its obligation to meet the needs of survivors of servicemembers who die while on active duty (i.e., our Gold Star families). For example, the Coast Guard supports these families by assigning a well-trained casualty assistance calls officer (CACO) whose primary duty is to address the needs of the fallen servicemember's dependents. CACO duties include:

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- providing as much information about the cause of death, as allowed, and when it becomes available,
- answering all questions to the best of his/her ability,
- ensuring immediate needs are being met during this difficult time,
- immediately arranging for any available Coast Guard assistance for funerals or memorial services,
- assisting in the preparation and submission of any forms needed to claim benefits from different government agencies, and
- continuing to assist until all claims are filed and settled or until any issues regarding those benefits are resolved to the surviving dependent's satisfaction.

The draft report contained two recommendations for the Coast Guard with which the Department concurs. Please see the attached for our detailed response to each recommendation.

Again, thank you for the opportunity to comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,

Jim H. Crumpacker, CIA, CFE

Director

Departmental GAO-OIG Liaison Office

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Attachment: DHS Management Response to Recommendations Contained in GAO-16-569

GAO recommended that the Commandant of the Coast Guard:

Recommendation I: Develop interim policies to govern the [Gold Star Advocate] program, to include identification of roles, responsibilities, procedures.

Response: Concur. The Coast Guard Personnel Service Center (PSC) will publish a policy memorandum on the PSC Casualty Matters website announcing the formal establishment of the Gold Star Advocate Program and outlining the policies, procedures, and responsibilities. Estimated Completion Date (BCD): December 31, 2016.

Recommendation 2: Determine outreach goals and metrics by which to measure progress in attaining these goals.

Response: Concur. The Coast Guard PSC has established the following goals and metrics for the Coast Guard's Gold Star Program:

1. Identify resources to support program
2. Create a Gold Star Program webpage
3. Update the Coast Guard's "A Survivors Guide to Benefits" and link it to the Gold Star Program webpage
4. Begin capturing addresses and other contact information for all Gold Star survivors for each Active Duty death
5. Perform a one-time mass mailing to Gold Star survivors from the addresses on file to inform them of the program
6. Develop measures for and measure outreach effectiveness
7. Partner with Department of Defense military services to identify other ways to ensure that all Gold Star survivors are contacted

The ECD for Items 1-4 is December 31, 2016; Item 5, March 31, 2017; and Items 6 and 7, September 30, 2017. Overall BCD: September 30, 2017.

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# Related GAO Products

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*Defense Health: Actions Needed to Help Ensure Combat Casualty Care Research Achieves Goals.* [GAO-13-209](#). Washington, D.C.: February 13, 2013.

*Veterans' Pension Benefits: Improvements Needed to Ensure Only Qualified Veterans and Survivors Receive Benefits.* [GAO-12-540](#). Washington, D.C.: May 15, 2012.

*Military and Veterans' Benefits: Analysis of VA Compensation Levels for Survivors of Veterans and Servicemembers.* [GAO-10-62](#). Washington, D.C.: November 13, 2009.

*Military Personnel: DOD Needs an Oversight Framework and Standards to Improve Management of Its Casualty Assistance Programs.* [GAO-06-1010](#). Washington, D.C.: September 22, 2006.

*Financial Management: Implications of Significant Recent and Potential Changes for the Actuarial Soundness of the Department of Defense Survivor Benefit Plan Program.* [GAO-06-837R](#). Washington, D.C.: July 26, 2006.

*Military Personnel: DOD Needs Better Controls over Supplemental Life Insurance Solicitation Policies Involving Servicemembers.* [GAO-05-696](#). Washington, D.C.: June 29, 2005.

*Military Personnel: Survivor Benefits for Servicemembers and Federal, State, and City Government Employees.* [GAO-04-814](#). Washington, D.C.: July 15, 2004.

*Military Personnel: Active Duty Benefits Reflect Changing Demographics, but Opportunities Exist to Improve.* [GAO-02-935](#). Washington, D.C.: September 18, 2002.

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