



July 2015

# MILITARY PERSONNEL

## DOD Is Expanding Combat Service Opportunities for Women, but Should Monitor Long-Term Integration Progress

## Why GAO Did This Study

Since September 2001 more than 300,000 women have been deployed in Iraq and Afghanistan, where more than 800 women have been wounded and more than 130 have died. A 1994 rule prohibited women from being assigned to many direct ground-combat units, but on January 24, 2013, the Secretary of Defense and the Chairman of the Joint Chiefs of Staff rescinded the rule and directed the military services to open closed positions and occupations to women by January 1, 2016.

Senate Report 113-176 had a provision for GAO to review the services' progress in opening closed positions and occupations to women. This report assesses the (1) status of service efforts to open positions and occupations to women, including steps to identify and mitigate potential challenges; (2) extent the services' efforts to validate gender-neutral occupational standards are consistent with statutory and Joint Staff requirements; and (3) extent DOD is tracking, monitoring, and providing oversight of the services' integration plans. GAO analyzed statutes, DOD guidance, and service reports and plans, and interviewed DOD officials.

## What GAO Recommends

GAO recommends that DOD develop plans to monitor integration progress after January 2016. DOD concurred with GAO's recommendation. GAO previously recommended that DOD establish a process of periodically reevaluating DOD's requirements for the Selective Service System. DOD has not taken action but GAO continues to believe the recommendation is valid.

View [GAO-15-589](#). For more information, contact Brenda S. Farrell at (202) 512-3604 or [farrellb@gao.gov](mailto:farrellb@gao.gov).

## MILITARY PERSONNEL

### DOD Is Expanding Combat Service Opportunities for Women, but Should Monitor Long-Term Integration Progress

## What GAO Found

The military services and U.S. Special Operations Command (SOCOM) have opened selected positions and occupations to women since January 2013, as shown in the table below, and are determining whether to open the remaining closed positions and occupations. The services and SOCOM also are conducting studies to identify and mitigate potential integration challenges in areas such as unit cohesion, women's health, and facilities. As of May 2015, the Secretary of the Navy was the only military department Secretary to recommend an exception to policy to keep positions closed to women on three classes of ships that are scheduled to be decommissioned, due in part to high retrofit costs.

**Table: Changes in and Status of Military Service Opportunities for Women as of March 2015**

	Positions opened since January 2013	Positions closed as of March 2015	Percent of positions closed as of March 2015
<b>Army</b>	68,500	176,800	18%
<b>Air Force</b>	0	4,300	1%
<b>Navy</b>	17,100	9,200	2%
<b>Marine Corps</b>	6,000	54,800	25%
<b>Total</b>	<b>91,600</b>	<b>245,100</b>	—
<b>SOCOM</b>	7,000	25,700	41%

Source: GAO analysis of DOD data. | GAO-15-589

The services and SOCOM are working to address statutory and Joint Staff requirements for validating gender-neutral occupational standards. GAO identified five elements required for standards validation. GAO compared these elements to the services' and SOCOM's planned methodologies and determined that their study plans contained steps that, if carried out as planned, potentially address all five elements. However, the services' and SOCOM's efforts are still underway; therefore, GAO could not assess the extent that the studies will follow the planned methodologies or report how the study results will be implemented.

The Department of Defense (DOD) has been tracking, monitoring, and providing oversight of the services' and SOCOM's integration efforts, but does not have plans to monitor the services' implementation progress after January 2016 in integrating women into newly opened positions and occupations. While DOD requires the services and SOCOM to submit quarterly progress reports, this requirement ends in January 2016. Without ongoing monitoring of integration progress, it will be difficult for DOD to help the services overcome potential obstacles. Further, when opening positions to women, DOD must analyze the implications for how it meets certain resource needs. In 2012, GAO assessed the military necessity of the Selective Service System and examined alternatives to its structure. GAO recommended in 2012 that DOD establish a process of periodically reevaluating its requirements in light of changing threats, operating environments, and strategic guidance. DOD has not taken action to do this, but agreed that a thorough assessment of the issue was merited, and should include a review of the statutes and policies surrounding the registration process and the potential to include the registration of women. GAO continues to believe that DOD should establish a process of periodically reevaluating DOD's requirements for the Selective Service System.

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### Abbreviations

DOD	Department of Defense
OUSD(P&R)	Office of the Under Secretary of Defense for Personnel and Readiness
SOCOM	U.S. Special Operations Command

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July 20, 2015

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

The Honorable Mac Thornberry  
Chairman  
The Honorable Adam Smith  
Ranking Member  
Committee on Armed Services  
House of Representatives

Since September 2001, approximately 300,000 women have been deployed for contingency operations in Iraq and Afghanistan, where more than 800 women have been wounded and more than 130 have died. A 1994 rule<sup>1</sup> prevented women from serving in direct ground-combat positions, but on January 24, 2013, the Secretary of Defense and the Chairman of the Joint Chiefs of Staff rescinded the 1994 rule, and directed the military services to meet milestones for the full integration of women into these positions by January 1, 2016.<sup>2</sup> After the Department of

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<sup>1</sup>A Department of Defense (DOD) memorandum entitled *Direct Ground Combat Definition and Assignment Rule* (Jan. 13, 1994) prohibited the assignment of women to positions in units below the brigade level whose primary mission is to engage in direct combat on the ground. The memorandum permitted additional restrictions on several additional bases, and allowed the services to propose further restrictions on the assignment of women, together with justification for those proposed restrictions.

<sup>2</sup>DOD, memorandum from Secretary of Defense and Chairman of the Joint Chiefs of Staff, *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* (Jan. 24, 2013). This memorandum requires that the integration of women into newly opened positions and units occur as expeditiously as possible, considering good order and judicious use of fiscal resources, but must be completed no later than January 1, 2016. The memorandum also requires that any recommendation to keep an occupational specialty or unit closed to women must be personally approved first by the Chairman of the Joint Chiefs of Staff, and then by the Secretary of Defense. Any exceptions must also be narrowly tailored, and based on a rigorous analysis of factual data regarding the knowledge, skills and abilities needed for the position.

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Defense (DOD) issued the 1994 rule, we reported on various issues related to gender integration; see the list of related GAO products at the end of this report.

Senate Report No. 113-176,<sup>3</sup> which accompanied a proposed Senate bill for the National Defense Authorization Act for Fiscal Year 2015, included a provision for GAO to review the military services' progress in opening closed positions and occupations to women, and in developing and validating gender-neutral occupational standards. We assessed (1) the status of the services' efforts to open previously closed positions and occupations to women, including any steps to identify and mitigate potential challenges; (2) the extent to which the services' efforts to validate gender-neutral occupational standards are consistent with statutory requirements and Joint Staff guidance; and (3) the extent to which DOD is tracking, monitoring, and providing oversight over the military services' plans to complete the integration of women into direct combat positions by January 2016.

For the first objective, we reviewed military service<sup>4</sup> and U.S. Special Operations Command<sup>5</sup> (SOCOM) quarterly progress reports and congressional notifications, and interviewed officials to identify the positions and occupations that have been opened to women since January 2013, and timeframes for making recommendations about opening other positions and occupations to women, and to determine if any of the services plan to request an exception to policy to keep any positions or occupations closed to women. In addition, we requested and obtained data from the services and SOCOM on the total number of positions and occupations closed to women as of March 2015. To

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<sup>3</sup>Senate Report No. 113-176, at 116-117 (2014), which accompanied S. 2410, a proposed bill for the National Defense Authorization Act for Fiscal Year 2015.

<sup>4</sup>For purposes of this report, we use the terms military services or services when we are referring to the Air Force, the Army, the Marine Corps, and the Navy.

<sup>5</sup>SOCOM is a functional combatant command responsible for programming, budgeting, acquisition, training, organizing, equipping, and providing special operations forces and developing special operations forces strategy, doctrine, tactics, and procedures. SOCOM activities include counterterrorism operations, counterproliferation of weapons of mass destruction, security force assistance, counterinsurgency, and special reconnaissance, among others. SOCOM forces are active and reserve forces of the military services that are specifically organized, trained, and equipped to conduct and support special operations.

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determine the reliability of the data provided by DOD, we obtained information on how the data were collected, managed, and used through interviews with and questionnaires to relevant officials and determined that the data presented in our findings were sufficiently reliable for the purposes of this report. We also obtained and analyzed documentation and discussed with officials any potential challenges they have identified and whether they took steps or designed possible approaches to mitigating those challenges. For our second objective, we analyzed documentation describing the services' planned scope and methodology for their ongoing efforts to validate gender-neutral occupational standards and compared it to the requirements in the governing statutes<sup>6</sup> and the Joint Staff guidance for validating physically demanding occupational standards.<sup>7</sup> We also discussed these efforts with relevant officials. For our third objective, we obtained and analyzed documentation and discussed with officials from the Office of the Under Secretary of Defense for Personnel and Readiness (OUSDP&R) and the Joint Staff the nature and level of their tracking and monitoring, and their review of the military services' and SOCOM's efforts to integrate women into combat positions. We then compared these efforts to DOD guidance,<sup>8</sup> internal control standards, and statutory requirements. Appendix I provides a more detailed discussion of our scope and methodology.

We conducted this performance audit from September 2014 to July 2015 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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<sup>6</sup>Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for Fiscal Year 2015, Pub. L. No. 113-291 § 524(a) (2014); National Defense Authorization Act for Fiscal Year 1994, Pub. L. No. 103-160 § 543 (1993), as amended by the National Defense Authorization Act for Fiscal Year 2014, Pub. L. No. 113-66 § 523 (2013).

<sup>7</sup>DOD, memorandum from the Chairman of the Joint Chiefs of Staff, *Women in the Service Implementation Plan* (Jan. 9, 2013).

<sup>8</sup>DOD, memorandum from the Chairman of the Joint Chiefs of Staff, *Women in the Service Implementation Plan* (Jan. 9, 2013); Memorandum from the Under Secretary of Defense for Personnel and Readiness, *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* (Feb. 27, 2013).

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## Background

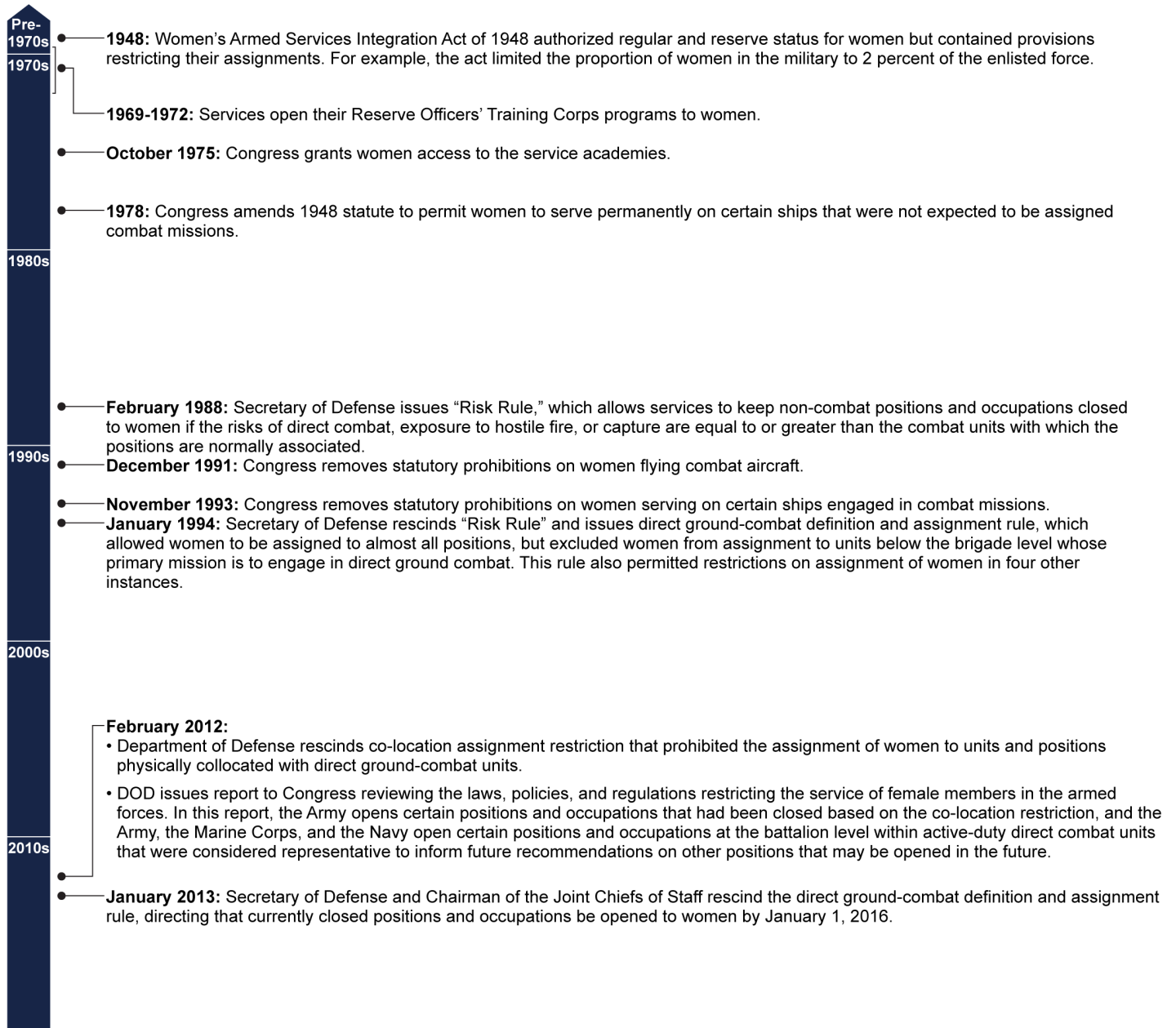
The role of women in the military has evolved from the Women's Armed Services Integration Act of 1948<sup>9</sup>— which afforded women the opportunity to serve in the military services—to January 2013, when the Secretary of Defense and the Chairman of the Joint Chiefs of Staff directed the services to open closed units and positions to women by January 1, 2016. Figure 1 provides details about changes in military service opportunities for women.

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<sup>9</sup>Pub. L. No. 80-625, 62 Stat. 356-75 (June 12, 1948).



**Figure 1: Timeline of Changes in Military Service Opportunities for Women**



Source: GAO analysis. | GAO-15-589

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In January 1994, the Secretary of Defense issued the Direct Ground Combat Definition and Assignment Rule,<sup>10</sup> which allowed women to be assigned to almost all positions, but excluded women from assignment to units below the brigade level whose primary mission was to engage in direct ground combat.<sup>11</sup> The memorandum establishing the 1994 rule also permitted restrictions on assignment of women in four other instances where: (1) the service secretary attests that the costs of appropriate berthing and privacy arrangements are prohibitive; (2) the units and positions are doctrinally required to physically collocate and remain with direct ground-combat units that are closed to women; (3) the units are engaged in long-range reconnaissance operations and special operations forces missions; and (4) job-related physical requirements would necessarily exclude the vast majority of women service members. The memorandum also permitted the services to propose further restrictions on the assignment of women, together with justification for those proposed restrictions.

In 2012, DOD issued a report to Congress reviewing the laws, policies, and regulations restricting the service of female members in the armed forces.<sup>12</sup> In this report, the Secretary of Defense and the Chairman of the Joint Chiefs of Staff rescinded the co-location assignment restriction that had allowed the military services to prohibit the assignment of women to units and positions physically collocated with direct ground-combat units.<sup>13</sup> The report also contained notifications to Congress of the department's intent to open positions and occupations that had been closed under this restriction. Specifically, the Army opened 6 enlisted occupations (9,925 positions) and 3,214 positions in 80 units that had been closed to women based on the co-location restriction. Additionally,

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<sup>10</sup>DOD memorandum, *Direct Ground Combat Definition and Assignment Rule* (Jan. 13, 1994).

<sup>11</sup>Direct ground combat was defined as “engaging an enemy on the ground with individual or crew-served weapons, while being exposed to hostile fire and to a high probability of direct physical contact with the hostile force’s personnel. Direct ground combat takes place well forward on the battlefield while locating and closing with the enemy to defeat them by fire, maneuver, or shock effect.”

<sup>12</sup>DOD, Office of the Under Secretary of Defense for Personnel and Readiness, *Report to Congress on the Review of Laws, Policies and Regulations Restricting the Service of Female Members in the U.S. Armed Forces* (February 2012).

<sup>13</sup>At the time of DOD’s report, only the Army had designated restricted positions based solely on the co-location criterion.

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the Army, Marine Corps, and Navy requested exceptions to policy and DOD notified Congress of its intent to open positions and occupations at the battalion level within active-duty direct combat units to inform future recommendations on other positions with the potential to be opened in the future. In its report, DOD explained that the experience gained by assigning women to these positions would help the department assess the suitability and relevance of the direct ground-combat prohibition and inform future policy decisions.

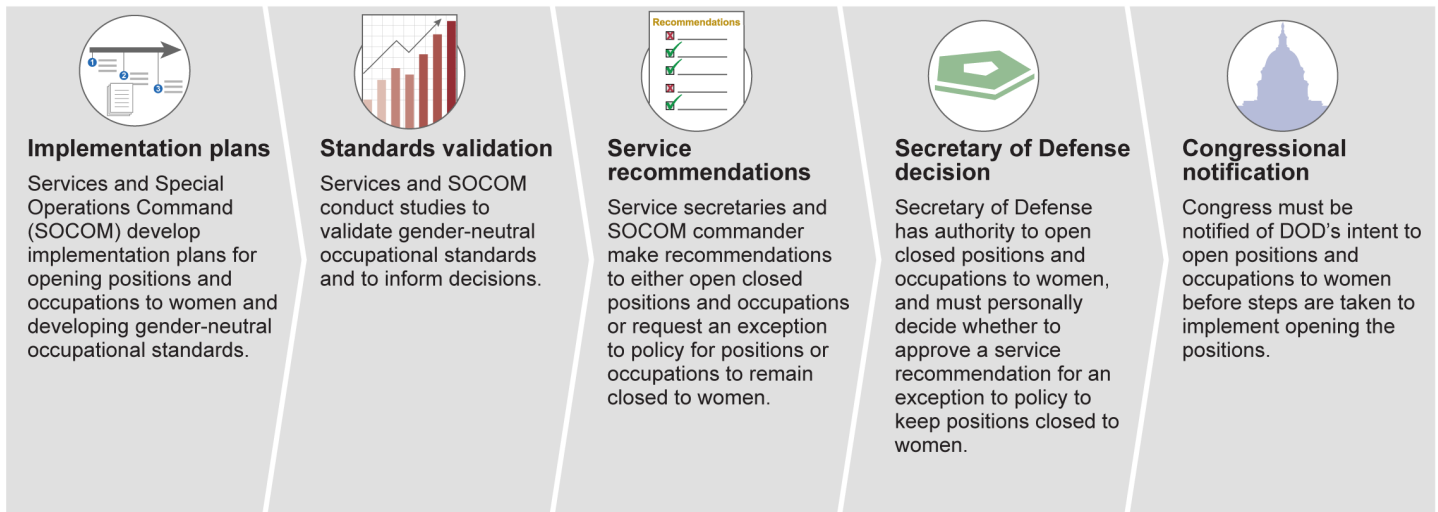
In July 2013, DOD issued a subsequent report to Congress that discussed the department's implementation of these February 2012 policy changes, the services' progress regarding elimination of gender-restrictive policy, and the rescission of the ground-combat assignment rule.<sup>14</sup> This report also included the total number of positions open and closed to women in each of the military services. At the time, the Navy and the Air Force had the most positions open to women (91 and 99 percent, respectively), while the Army and the Marine Corps had fewer open positions (68 and 69 percent, respectively). SOCOM also stated that in July 2013, around 46 percent of its positions were open to women.

Figure 2 generally illustrates the process used to implement the Secretary's direction to open positions and occupations that have been closed to women.

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<sup>14</sup>DOD, Office of the Under Secretary of Defense Personnel and Readiness, *Report to Congress on Women in the Services Review* (July 2013).

**Figure 2: Overview of the Department of Defense (DOD) Process to Open Positions and Occupations to Women**



Source: GAO analysis of Department of Defense (DOD) information. | GAO-15-589

The military services traditionally have established two types of physical performance requirements. First, the military services have established general physical fitness standards to promote overall health and physical fitness among military personnel. These fitness standards apply to active and reserve servicemembers regardless of occupation and are not required by statute to be gender neutral. These standards are not intended to ensure performance in a particular occupation. Second, the services set job-specific physical performance standards to ensure that servicemembers are capable of performing the particular jobs to which they have been assigned. These job-specific standards refer to occupation-specific criteria that applicants must meet to enter or remain in a particular career field or specialty, and by statute these occupational performance standards must be gender neutral.<sup>15</sup>

<sup>15</sup>National Defense Authorization Act for Fiscal Year 1994, Pub. L. No. 103-160 § 543 (1993), as amended by Pub. L. No. 113-66 § 523 (2013) (appended as a note below 10 U.S.C. § 113).

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## Services Have Opened Selected Positions and Occupations to Women, Are Determining Whether to Integrate Direct Ground-Combat Occupations, and Are Taking Steps to Identify and Mitigate Potential Challenges

The military services and SOCOM have opened selected positions and occupations to women since January 2013, and are in the process of determining whether to open the remaining direct ground-combat positions and occupations. As an alternative to opening a position or occupation, the Secretary of Defense permitted the services to recommend an exception to policy to keep positions or occupations closed to women; to date, the Navy is the only service to have recommended an exception to policy. The services are also conducting studies to identify integration challenges and ways to mitigate these challenges in areas such as unit cohesion, women's health, equipment, facilities (e.g., separate restrooms and sleeping quarters), women's interest in serving in ground-combat positions, and international issues. We also examined the issue of sexual assault and harassment in the integration process.

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## Most Services and SOCOM Have Opened Selected Positions and Occupations to Women

In response to the January 2013 memorandum, most of the services—except for the Air Force<sup>16</sup>—and SOCOM have opened selected positions and occupations, and the openings to date largely involve closed positions in open occupations.<sup>17</sup> The memorandum directed the military departments to submit detailed plans by May 15, 2013, to implement this direction to open closed positions to women, and required the implementation plans to be consistent with a set of guiding principles, goals, and milestones for the integration process. The memorandum also required the military departments to submit quarterly progress reports on

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<sup>16</sup>More than 99 percent of the Air Force's occupations were open to women as of January 2013.

<sup>17</sup>There are two types of positions that are closed to women in the services and SOCOM. The first is a closed position in a closed occupation, meaning no positions under that occupation (e.g., infantry) are open to women. The second is a closed position in an open occupation, meaning that while the occupation is open to women, specific positions within certain units are closed to women (e.g., administration clerk in a tank battalion).

implementation.<sup>18</sup> All four services and SOCOM developed implementation plans, including goals and milestones, which were subsequently reviewed by the Secretary of Defense in May 2013. The services and SOCOM also provided quarterly progress reports on their efforts to open closed positions and occupations to women, starting with the third quarter of fiscal year 2013. In July 2014, OUSD(P&R) granted a request by the Joint Chiefs to change the progress report cycle from quarterly to biannual. However, an OUSD(P&R) official stated that the Chairman of the Joint Chiefs of Staff continued to receive quarterly updates, and the Under Secretary of Defense for Personnel and Readiness continued to provide the Secretary of Defense with verbal quarterly updates.

As of March 2015, the services have opened positions and occupations to women as shown in table 1.

**Table 1: Positions and Occupations Opened to Women by Military Service, January 2013 through March 2015**

	Percent of positions open as of April 30, 2013 <sup>a</sup>	Positions opened since January 2013	Occupations opened since January 2013
Army	73%	68,500	1 <sup>b</sup>
Air Force	99%	0	0 <sup>c</sup>
Navy	92%	17,100	9 <sup>d</sup>
Marine Corps	67%	6,000	12 <sup>e</sup>
<b>Total</b>	<b>—</b>	<b>91,600</b>	<b>22</b>
SOCOM <sup>f</sup>	46% <sup>g</sup>	7,000	0

Source: GAO analysis of Department of Defense (DOD) congressional notifications. | GAO-15-589.

Note: Table includes rounded active and reserve component position data. The number of positions opened includes previously closed positions in open occupations and positions in newly opened occupations.

<sup>a</sup>Data on percentage of positions opened as of April 30, 2013, are what DOD reported to Congress in July 2013. See DOD, *Report to Congress on Women in the Services Review* (July 2013).

<sup>18</sup>DOD, memorandum from the Secretary of Defense and Chairman of the Joint Chiefs of Staff, *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* (Jan. 24, 2013). The Chairman and Under Secretary of Defense for Personnel and Readiness provided further guidance on the content of the quarterly progress reports. See DOD, memorandum from the Chairman of the Joint Chiefs of Staff, *Women in the Service Implementation Plan* (Jan. 9, 2013); and DOD, memorandum from the Under Secretary of Defense for Personnel and Readiness, *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* (Feb. 27, 2013).

<sup>b</sup>The Army has opened its combat engineer occupation since January 2013.

<sup>c</sup>More than 99 percent of the Air Force's occupations were open as of January 2013; its remaining closed occupations are in its battlefield airmen group, whose members are employed alone or as part of a special operations unit, joint, interagency, or coalition force.

<sup>d</sup>Examples of Navy occupations opened since January 2013 include sonar technicians and machinist mate auxiliary.

<sup>e</sup>Examples of Marine Corps occupations opened since January 2013 include ground intelligence officer and targeting acquisition officer.

<sup>f</sup>Service positions and occupations that are affiliated with SOCOM are included in the totals listed above for each service; they are also broken out here to show the proportion of opened positions and occupations that are special operations. All SOCOM-affiliated positions that have been opened during this period were Army positions.

<sup>g</sup>This percentage is as reported by SOCOM to GAO as of July 2013.

The services are working on integration plans for these positions and occupations that have been opened to women. For example, the Army is actively recruiting women to fill recently opened positions across the force, in order to place the best qualified soldiers, regardless of gender, in positions. Further, the Navy is expanding assignment opportunities for enlisted women to specific submarine classes and is participating in surveys and questionnaires to assess integration success and gather lessons learned.

## Services and SOCOM Are Determining Whether to Open Remaining Closed Positions and Occupations

At the time of this report, the services and SOCOM were in the process of determining whether to open the remaining closed positions and occupations, and the timeframe for many of these recommendations was postponed until September 2015. As of March 2015, the positions and occupations that remain closed to women are shown in table 2.

**Table 2: Positions and Occupations That Remain Closed to Women by Military Service as of March 2015**

	Closed positions in open occupations	Closed positions in closed occupations	Total positions	Percent of positions closed	Closed occupations	Total occupations	Percent of overall occupations closed
Army	1,700 <sup>a</sup>	175,100	1,000,000	18%	21 <sup>b</sup>	465	5%
Air Force	25	4,300	464,900	1%	6 <sup>c</sup>	374	2%
Navy	5,300	3,900	381,600	2%	5 <sup>d</sup>	171	3%
Marine Corps	16,700	38,100	223,300	25%	21 <sup>e</sup>	336	6%
<b>Total</b>	<b>23,725</b>	<b>221,400</b>	-	-	<b>53</b>	-	-
SOCOM <sup>f</sup>	7,100	18,600	63,200	41%	17 <sup>g</sup>	17	100% <sup>h</sup>

Source: GAO analysis of military service data. | GAO-15-589

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Note: Table includes rounded active and reserve component position data for closed primary occupations. A closed position in an open occupation means that while the occupation is open to women, specific positions within certain units are closed to women (e.g., administration clerk in a tank battalion). A closed position in a closed occupation means that no positions under that occupation (e.g., infantry) are open to women.

<sup>a</sup>All of the Army's closed positions in open occupations are in special forces units and in its Ranger regiment.

<sup>b</sup>Examples of Army occupations that remain closed include infantry, artillery, and armor. This number does not include the combat engineer occupation, as DOD notified Congress of its intent to open this occupation on March 4, 2015.

<sup>c</sup>Examples of Air Force occupations that remain closed include special operations weather (enlisted), combat rescue, and tactical air control party. Air Force occupation data is as of April 30, 2015.

<sup>d</sup>Examples of Navy occupations that remain closed include Navy Sea, Air, and Land (SEALs) and Special Warfare Combatant-Craft Crewmen.

<sup>e</sup>Examples of Marine Corps occupations that remain closed include infantry, artillery, armor, and critical skills operators.

<sup>f</sup>Service positions and occupations that are affiliated with SOCOM are included in the totals listed above for each service; they are also broken out here to show the proportion of closed positions and occupations that are special operations.

<sup>g</sup>Examples of occupations affiliated with SOCOM that remain closed include Navy Sea, Air, and Land (SEALs) and Army Special Forces.

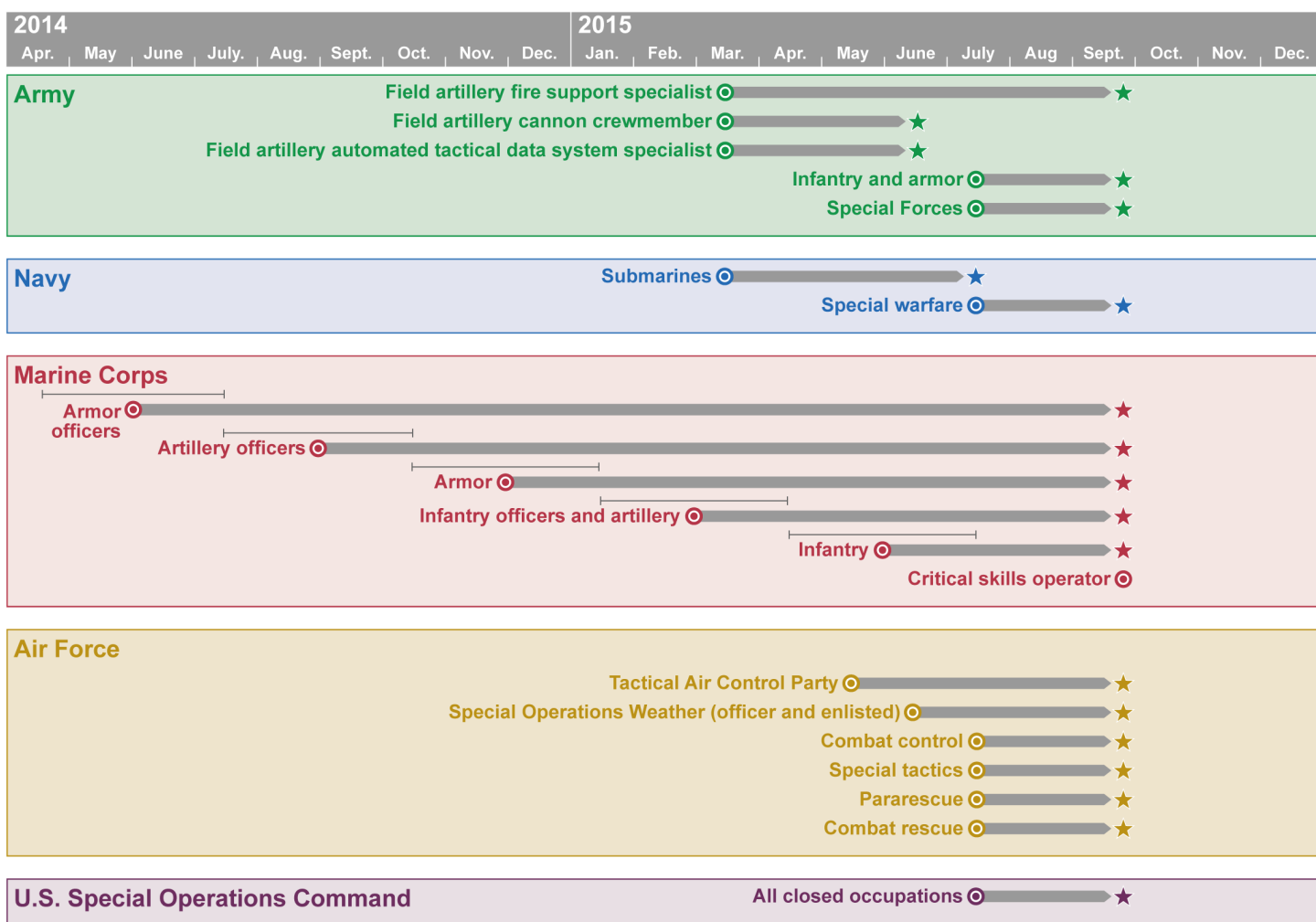
<sup>h</sup>Percentage of closed occupations for SOCOM includes occupations that are only for special operations; it does not include occupations that are also used outside of SOCOM.

As of April 2015, all of the military services and SOCOM were working on efforts, such as the standards validation studies discussed below, to inform their recommendations on whether to open the remaining closed positions and occupations to women. The services' implementation plans included timelines for making recommendations on whether to open positions and occupations to women or to request exceptions to keep positions or occupations closed. Initially, these timelines were established independently by each service and different services were scheduled to make recommendations about similar occupations at different times. For example, the Army was scheduled to make its recommendation about armor occupations in July 2015, while the Marine Corps was scheduled to make its recommendations about armor occupations in late 2014 and early 2015. Subsequently, service officials have stated that some of those recommendation timeframes have shifted to a later point to synchronize with the Marine Corps recommendations that are now scheduled to occur in late September and early October 2015, as shown in figure 3. One reason provided by Air Force officials to support the timeline shifts was to consider impacts of another services' recommendation to open a closed occupation or position, such as when there is no viable career path in an occupation because the majority of positions serve with another services' closed unit. Another reason expressed by Army officials was that the service heads recognize the need for coordination when making recommendations about similar occupations such as infantry. An



OUSD(P&R) official explained that there has always been a desire to align the recommendation timelines, and that when service timelines started to shift in 2014, the topic was extensively discussed in various meetings.

**Figure 3: Changes in Timelines for Military Service and SOCOM Recommendations About Whether to Open Closed Positions and Occupations to Women (as of May 2015)**



● Original timeframe  
★ Adjusted timeframe

Source: GAO analysis of Department of Defense (DOD) information. | GAO-15-589

Note: These timeframes represent when Secretaries of the military departments will make their recommendations to the Secretary of Defense about whether to open closed positions and occupations. The positions and occupations will not be officially opened to women until DOD subsequently notifies Congress of its intent to open the positions and the waiting period passes.

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## Services and SOCOM Permitted to Recommend an Exception to Policy to Keep Positions Closed to Women

As an alternative to opening a position or occupation, the Secretary of Defense has permitted the services to recommend that the Chairman of the Joint Chiefs of Staff and Secretary of Defense approve an exception to policy to keep positions or occupations closed to women.<sup>19</sup> As of May 2015, the Secretary of the Navy was the only military department Secretary to have recommended approval of an exception to policy. The Secretary of the Navy has recommended keeping specific positions closed to the assignment of enlisted women on three classes of ships (frigates, mine countermeasure ships, and patrol coastal craft) that are scheduled to be decommissioned. The rationale for keeping these ship platforms closed to women is in part because they do not have appropriate berthing and because planned decommissioning schedules would mean that modifications would not be a judicious use of resources. Navy officials stated that, while these closed platforms would cause some positions to remain closed to enlisted women, it would not close any occupations to women as there are alternative positions within those occupations on different platforms that are open to women and which provide equal professional opportunity.

As of May 2015, none of the other services have requested an exception to keep positions or occupations closed to women or have stated that they plan to request an exception, but the services have all retained the right to request an exception later in the process if they believe there are conditions under which it would be warranted.

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## Services Are Conducting Studies to Identify Potential Challenges to Integration and Ways to Mitigate These Challenges

The services and SOCOM are conducting studies focused on identifying potential integration challenges and developing ways to mitigate these challenges, as shown in figure 4. The studies address issues such as unit cohesion, women's health, equipment, facilities (e.g., separate restrooms and sleeping quarters), women's interest in serving in ground-combat positions, and international issues. Most of these studies are ongoing, so it is too early to determine the extent to which the services and SOCOM will follow their planned methodologies for identifying challenges and mitigation strategies, or how the services will implement the findings of the studies. See appendix II for a listing of the studies that each service and SOCOM are conducting in their efforts to integrate women.

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<sup>19</sup>This option was included in the January 24, 2013, memo where the Secretary of Defense and the Chairman of the Joint Chiefs of Staff rescinded the 1994 rule restricting women from serving in direct ground-combat positions.

**Figure 4: Areas Where Military Services and SOCOM Are Conducting or Have Conducted Studies to Identify and Mitigate Challenges (as of May 2015)**

Issue	 Army	 Navy	 Marine Corps	 Air Force	 U.S. Special Operations Command
Unit cohesion	✓		✓		✓
Women’s health	✓		✓	✓	
Equipment, gear, and uniforms	✓		✓	✓	
Facilities modifications	✓	✓	✓	✓	✓
Interest in serving (propensity)	✓	✓	✓	✓	
International issues	✓		✓		✓

Source: GAO analysis of Department of Defense (DOD) information. | GAO-15-589

Note: Most of the closed Navy and Air Force occupations are associated with SOCOM, and unit cohesion for these positions would be examined under the SOCOM studies.

### Unit Cohesion and Military Culture

A common challenge cited in integrating women into previously closed positions and occupations is the potential impact on unit cohesion.<sup>20</sup> Some services are performing studies examining various elements that contribute to unit cohesion. For example, SOCOM, the Army, and the Marine Corps are conducting studies to gauge attitudes toward working with women in integrated units. SOCOM is conducting three studies

<sup>20</sup>For example, The RAND Corporation—a nonprofit institution whose mission is to help improve policy and decision making through research and analysis—has reported that unit cohesion is built through propinquity (meaning people who happen to be around us), shared group membership, attitude similarity, success experiences, shared threat, and leadership and training. See RAND National Defense Research Institute, *Sexual Orientation and U.S. Military Personnel Policy: An Update of RAND’s 1993 Study* (2010). RAND’s report distinguishes between two types of cohesion—task cohesion and social—to better analyze how interpersonal dynamics affect performance of small organizations such as military units. Task cohesion is defined as the shared commitment among members to achieving a goal that requires the collective efforts of the group. A group with high task cohesion is composed of members who share a common goal and who are motivated to coordinate their efforts as a team to achieve that goal. Social cohesion is the extent that group members like each other, prefer to spend their social time together, enjoy each other’s company, and feel emotionally close to one another.

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related to unit cohesion, and SOCOM officials stated that the goal of these studies is to identify potential obstacles and steps to undertake to mitigate those obstacles in an effort to increase their chances of successfully integrating women. For example, SOCOM tasked the RAND Corporation to administer a survey to personnel in closed special operations occupations to discover the attitudes of special operations personnel on the integration of women, including barriers to successful integration and actions to increase the likelihood of success. SOCOM officials stated that initial steps to address concerns raised in the surveys included the Commander of SOCOM holding discussions with his subordinate commanders to provide them information to pass on to their personnel as well as sending an email to all SOCOM personnel to educate the force about what they are doing to validate the standards for special operations positions and why they are validating the standards, and to explain the Joint Staff's guiding principles that govern the integration effort. The first two of the three studies have been completed, and the RAND study is expected to be completed by July 2015.

The Army Research Institute is conducting activities such as surveys, interviews, and focus groups with male and female soldiers assigned to units with newly opened positions and occupations. According to an Army Research Institute official, the institute found that opinions expressed by male soldiers in units assessed at different times since 2012 were less negative a year after female soldiers' integration, and showed a general shift to more neutral and positive perceptions.<sup>21</sup> The official stated that information from these activities is regularly provided to the Army. These activities will likely be conducted until 2018 as additional occupations are opened, according to an Army Research Institute official. As part of its efforts to identify the potential impacts of integration on unit performance, unit cohesion, and unit members' individual interactions, the Marine Corps also is conducting a study through the RAND Corporation. The tasks in this study include a review of literature on integration of women in ground combat and other physically demanding occupations, analysis to identify issues most likely to arise with gender integration of Marine Corps infantry as well as initiatives that might be taken to address them, and development of an approach for monitoring implementation of gender

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<sup>21</sup>We did not review or assess the validity of these survey results because—while Army officials said that the survey results are regularly communicated to Army leadership—the surveys are part of a larger ongoing effort that has not been completed, so the results were not available for our review.

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integration of the Marine Corps infantry. This study was scheduled to be completed in March 2015.

## Women's Health and Injury Issues

The Marine Corps, the Army, and the Air Force are assessing specific health effects on women when operating in a combat environment. Service officials stated that as women enter direct combat positions, the military will need to make accommodations to address specific health and medical concerns to prevent health problems and to maintain military readiness. For example, the Marine Corps is studying injury prevention and performance enhancement for its training program, including identifying risk factors for injury. This study is scheduled to be completed in August 2015. In addition, according to an Army official, the Army has created a group to review research and data on physical and mental health issues, load carriage,<sup>22</sup> attrition, and performance. Further, the Air Force verified the availability of appropriate medical and psychological support at training locations, and evaluated the medical retention standards for its closed occupations and determined that the existing medical standards were appropriate for both male and female airmen.<sup>23</sup>

## Equipment, Gear, and Uniforms

According to officials from the Defense Advisory Committee on Women in the Services, proper combat equipment is essential to overall military readiness; women suffer injuries and do not perform up to their full potential when wearing ill-fitting equipment and combat gear designed for men's bodies. The Marine Corps is conducting a study to identify how adapting equipment design, gear weight, physical fitness composition, or standard operating procedures may support successful completion of required tasks. Marine Corps officials explained that these adaptations could potentially remove impediments to success and thereby enable successful integration. For example, the study may be able to identify alternative methods for loading rounds in armored vehicles so that the task does not require as much upper-body strength. This study is scheduled to be completed by June 30, 2015. Further, according to an Army official, the Army has recently redesigned protective gear items and uniforms with specific fits for female soldiers. In addition, the Air Force

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<sup>22</sup>Load carriage refers to the equipment and ammunition that individual soldiers carry while undertaking military operations.

<sup>23</sup>The Air Force review identified 7 disqualifying medical conditions that were applicable only to female airmen (including pregnancy), and 10 conditions applicable only to male airmen. It also identified one standard, for anemia, that is enforced differently between males and females due to underlying physiologic differences and baselines.

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has identified training locations that will need female-sized equipment and other equipment such as footgear, clothing, and swimsuits. In June 2015, the Under Secretary of Defense for Acquisition, Technology and Logistics issued guidance directing that the Secretaries of the military departments ensure that combat equipment for female servicemembers is properly designed and fitted, and meets standards for wear and survivability.<sup>24</sup>

## Facilities Modifications

The Navy, the Army, the Marine Corps, the Air Force, and the special operations components<sup>25</sup> are assessing the impact on their facilities to integrate women into newly opened positions and occupations. The Navy's proposed Exception to Policy request is based in part on concerns over costs to retrofit the facilities and habitability of three classes of ships (frigates, mine countermeasure ships, and patrol coastal craft) to accommodate women. While many services' facilities are capable of accommodating privacy and berthing needs of women, the services are identifying any changes needed if closed positions are opened to women. For example, if the Army recommends opening its Ranger school to women, the Army may need to make changes to accommodate women into its barracks.<sup>26</sup> Similarly, the Marine Corps is examining potential overall costs to upgrade facilities due to integration requirements, and has projected that costs will be incurred in some buildings due to the need for separate bathrooms and billets, but officials said that the cost will be minimal. The Marine Corps estimated that this effort will be completed in the second quarter of fiscal year 2016. The Air Force also has identified potential facilities changes that would be needed if closed Air Force occupations are opened to women, such as adding or expanding locker

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<sup>24</sup>DOD, memorandum from Under Secretary of Defense for Acquisition, Technology and Logistics, *Guidance on Combat Equipment for Female Military Members* (June 26, 2015). The Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for Fiscal Year 2015 § 524(b) (2014) directs the Secretary of Defense to direct the Secretaries of the military departments to ensure that female combat equipment is: (1) properly designed and fitted, and (2) meets required standards for wear and survivability.

<sup>25</sup>These studies are not being conducted by SOCOM, but instead are being conducted by the services' special operations components: Army Special Operations Command, Naval Special Warfare Command, Marine Corps Special Operations Command, and Air Force Special Operations Command.

<sup>26</sup>The Ranger school is currently conducting a one-time assessment of an integrated course to inform its decision on whether to permanently open its Ranger school to women. This assessment is expected to be completed in 2015. If the Ranger special qualification identifier were opened to women, the school would need facility modifications, such as bathrooms and showers, to accommodate women.

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rooms for women. Further, all four of the special operations components conducted assessments that determined whether any facilities changes were needed to integrate women.<sup>27</sup>

### Women's Interest in Serving in Ground-Combat Positions

All services are studying the propensity (i.e., interest or tendency) of women to serve in selected closed positions and occupations. Officials from the services noted concerns that large numbers of women may not be interested in serving in currently closed ground-combat positions and occupations. Officials from all of the services stated that the integration of women into previously closed positions and occupations would be an asset in finding the best person for the job, and that outreach and recruitment of women for the officer corps is critical to ensuring that our nation's military has the strongest possible leaders. For example, the Marine Corps conducted a study using surveys, market research, available literature and other information to determine the interest of men and women in both the Marine Corps overall and in ground-combat specialties to better understand potential changes in the recruiting market due to the opening of ground-combat arms specialties and units. This study was completed in November 2014.<sup>28</sup> The Army has joined other services in creating advertising campaigns to increase women's interest in selected positions and occupations.<sup>29</sup>

### International Issues

SOCOM, the Marine Corps, and the Army are conducting or have conducted international studies analyzing various integration issues. Army Special Operations Command is studying the roles of women to determine how local forces and communities may react to female special forces soldiers. One of the tasks of this study is to provide insights on how the roles of women in different regions and countries may affect the response of local forces and communities to females as Army special forces soldiers. This study is scheduled to be completed before SOCOM

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<sup>27</sup>The results of these studies are currently for official use only, and thus cannot be disclosed in our report.

<sup>28</sup>The results of this study are currently for official use only, and thus cannot be disclosed in our report.

<sup>29</sup>The Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for Fiscal Year 2015, Pub. L. No. 113-291 § 524(c) (2014) included a provision for GAO to review outreach and recruitment efforts focused on representation of women in the officer corps, including identifying and evaluating current initiatives the armed forces are using to increase accession of women into the officer corps. We expect to report on this issue in the fall of 2015.

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is expected to submit its recommendations to the department in September 2015. The Marine Corps also worked with RAND to study other countries with gender-integrated militaries and the practices those countries used for their integration processes. This study was completed in March 2015. According to an Army official, the Army has worked with the U.S. Army Training and Doctrine Command on international comparisons with other countries with integrated armies. This effort was part of the Army's gender-integration study, which is scheduled to be completed in September 2015.

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## Sexual Assault and Harassment in the Gender-Integration Process

In addition to the challenges reviewed by the services in their studies, we examined the issue of sexual assault and harassment in the integration process. This issue was raised in materials from the Defense Advisory Committee on Women in the Services as a continuing concern related to tracking servicemembers who committed a sex-related offense. According to officials from all services and DOD's Sexual Assault and Prevention Response Office—which has authority, accountability, and oversight of the department's sexual assault prevention and response program—sexual assault and harassment are not inhibitors to the integration of women into previously closed positions and occupations. Officials from all of the services consistently noted that prevention of sexual assault and harassment is a department-wide effort and is not a specific focus of integration efforts. They noted that they consider it to be more of a leadership challenge than an integration challenge. DOD officials said that sexual assault and harassment is not a function of integration and is not gender specific only for women; it affects men and women, and exists in male-only units. In March 2015, we reported that based on survey data, it is estimated that in 2014, about 9,000 to 13,000 male active-duty servicemembers were sexually assaulted, and we also estimated that a much lower percentage of men report their sexual assaults compared to women.<sup>30</sup>

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<sup>30</sup>GAO has recently reported on sexual assaults of male servicemembers. See GAO, *Military Personnel: Actions Needed to Address Sexual Assaults of Male Servicemembers*, [GAO-15-284](#) (Washington, D.C.: Mar. 19, 2015).



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## Services and SOCOM Have Studies Underway to Validate Gender-Neutral Occupational Standards

The military services and SOCOM are working to address statutory requirements and Joint Staff guidance for validating physically demanding occupational standards by initiating several studies. We identified five elements<sup>31</sup> that the services and SOCOM must address as part of the standards validation process. We compared the five elements to the services' and SOCOM's planned steps and methodologies in their studies and determined that their study plans contained steps that, if carried out as planned, potentially address all five elements, as summarized in figure 5. However, the studies had not yet been completed at the time of our review; therefore, we could not assess the extent to which the studies will follow the planned steps and methodologies or report how results of the studies will be implemented. See appendix II for a complete listing of the planned studies that each service and SOCOM are conducting in their efforts to integrate women.

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<sup>31</sup>Two elements are from statutory requirements, and three elements are from Joint Staff guidance.

**Figure 5: Military Services' Plans to Validate Gender-Neutral Occupational Standards**

Gender validation requirement	Source	Steps services have taken to satisfy requirement	Army	Navy	Marine Corps	Air Force	SOCOM
1. Ensure gender-neutral evaluation	Statutory requirement <sup>a</sup>	Developing one set of occupational standards for each position	✓	✓	✓	✓	✓
2. Ensure standards reflect job tasks	Statutory requirement <sup>b</sup>	Performing detailed job analysis to identify and define critical physically demanding tasks and the physical abilities needed	✓	✓	✓	✓	✓
		Observing performance of the tasks and surveying subject-matter experts to confirm the specific tasks required for each occupation	✓	✓	✓	✓	✓
3. Validate performance standards	Guiding principles <sup>c</sup>	Conducting studies	✓	✓	✓	✓	✓
4. Ensure eligibility reflects job tasks	Guiding principles <sup>c</sup>	Designing physical task simulations and measures of performance to ensure that simulations are good approximations of job tasks	✓	✓	✓	✓	✓
5. Integrate while preserving readiness, cohesion, and morale	Guiding principles <sup>c</sup>	Efforts will ensure service members in newly opened occupations are able to perform mission and thus maintain readiness	✓	✓	✓	✓	✓
		Conducting studies to determine the potential effect of integration on unit cohesion and identify steps to overcome any obstacles identified	✓		✓		✓

Source: GAO analysis of service and U.S. Special Operations Command (SOCOM) information. | GAO-15-589

Note: Most closed Navy and Air Force occupations are associated with SOCOM, and unit cohesion for these positions would be examined under the SOCOM studies.

<sup>a</sup>National Defense Authorization Act for Fiscal Year 1994, Pub. L. No. 103-160 § 543 (1993), as amended.

<sup>b</sup>Carl Levin and Howard P. “Buck” McKeon National Defense Authorization Act for Fiscal Year 2015, Pub. L. No. 113-291 § 524 (2014).

<sup>c</sup>DOD, memorandum from Chairman of the Joint Chiefs of Staff, *Women in the Service Implementation Plan* (Jan. 9, 2013).

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Ensure Gender-Neutral Evaluation (Statutory Requirement)

The statutory requirements for validating gender-neutral occupational standards direct that any military career designator<sup>32</sup> open to both men and women may not have different standards on the basis of gender.<sup>33</sup> The statute further states that for military career designators where specific physical requirements for muscular strength and endurance and cardiovascular capacity are essential to the performance of duties, those requirements must be applied on a gender-neutral basis. To address this requirement, according to service and SOCOM officials and their respective plans, officials will develop one set of occupational standards for each position that will be applicable to both men and women. One example of this type of effort is the Marine Corps' Ground Combat Element Integrated Task Force, which is to provide the Marine Corps the opportunity to review and refine gender-neutral occupational standards as it evaluates the performance of men and women in integrated units. All of the services' efforts are to be completed by the end of September 2015.

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Ensure Standards Reflect Job Tasks (Statutory Requirement)

By statute, the Secretary of Defense must ensure that the gender-neutral occupational standards accurately predict performance of the actual, regular, and recurring job tasks of a military occupation, and are applied equitably to measure individual capabilities.<sup>34</sup> The services' and SOCOM's plans for studies to validate operationally relevant and gender-neutral occupational standards involve identifying the physically demanding tasks required for the specific occupation under study. To address this requirement, all of the services' and SOCOM's plans that we reviewed are taking steps to identify the physically demanding tasks required for each occupation. For example, the Army and the Air Force have undertaken detailed job analyses to identify and define the critical

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<sup>32</sup>As defined by the National Defense Authorization Act for Fiscal Year 1994, Pub. L. No. 103-160 § 543 (1993), as amended by Pub. L. No. 113-66 § 523 (2013), a military career designator refers to, in the case of enlisted members and warrant officers of the armed forces, military occupational specialties, specialty codes, enlisted designators, enlisted classification codes, additional skill identifiers, and special qualification identifiers; and in the case of commissioned officers (other than commissioned warrant officers), officer areas of concentration, occupational specialties, specialty codes, additional skill identifiers, and special qualification identifiers.

<sup>33</sup>National Defense Authorization Act for Fiscal Year 1994, Pub. L. No. 103-160 § 543 (1993), as amended by Pub. L. 113-66 § 523 (2013) (appended as a note below 10 U.S.C. § 113).

<sup>34</sup>Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for Fiscal Year 2015, Pub. L. No. 113-291 § 524 (2014).

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physically demanding tasks and the physical abilities needed to perform them. By observing performance of the tasks and surveying subject-matter experts to confirm the specific tasks required for each occupation, the planned approach intends to confirm that the appropriate tasks have been identified and described. Additionally, the Marine Corps' Ground Combat Element Integrated Task Force plans to quantify tasks, conditions, and standards for job tasks that have previously been qualitative. In March 2015, the Under Secretary of Defense for Personnel and Readiness provided implementing guidance for this statutory requirement,<sup>35</sup> and directed the Secretaries of each military department to provide a written report regarding their validation of individual occupational standards by September 30, 2015,<sup>36</sup> and to require each military department's Inspector General to implement a compliance inspection program to assess whether the services' occupational standards and implementing methodologies are in compliance with statutory requirements.<sup>37</sup>

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### Validate Performance Standards (Joint Staff Guidance)

Joint Staff guidance directs the services to validate their occupational performance standards. One of the Chairman's guiding principles stated that the services must validate occupational performance standards, both physical and mental, for all military occupational specialties, specifically those that remain closed to women.<sup>38</sup> To address this requirement, all of the services and SOCOM are conducting studies to validate the

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<sup>35</sup>DOD, memorandum from Under Secretary of Defense for Personnel and Readiness, *Implementation Guidance for Statutory Changes to Occupational Standards* (Mar. 2, 2015), implementing Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for Fiscal Year 2015, Pub. L. No. 113-291 § 524 (2014).

<sup>36</sup>These written reports must include a complete listing of all officer and enlisted occupations and the date the occupational standards associated with each were validated; explanation of the methodology used to validate occupational standards, both mental and physical, for selecting, training, and continuing personnel in each occupation, rating, or specialty; and statements certifying that (1) the occupational standards are gender-neutral, as required by statute; (2) occupational standards meet criteria outlined in statute; accurately predict performance of actual, regular, and recurring duties; and are applied equitably to measure individual capabilities; and (3) validated occupational standards are in use by September 30, 2015, at military occupational specialty schools and training.

<sup>37</sup>These compliance inspections are to be conducted no less frequently than every three years, with the first inspection to be conducted in fiscal year 2016.

<sup>38</sup>See DOD, memorandum from the Chairman of the Joint Chiefs of Staff, *Women in the Service Implementation Plan* (Jan. 9, 2013).

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occupational standards for the positions that have been closed to women. The Army's Training and Doctrine Command and Research Institute of Environmental Medicine are planning to complete by September 2015 the development and validation of gender-neutral occupational testing procedures for entry into the seven military occupational specialties that are closed to women. The Marine Corps opened certain entry-level training schools that previously were closed to women, such as Infantry Training Battalion and Infantry Officer Training,<sup>39</sup> to obtain data on the physical and cognitive/academic demands on female volunteers in these schools. According to Marine Corps officials, this effort will be completed in June 2015. Another Marine Corps effort, projected for completion in June 2015 with a final report by August 2015, is the Ground Combat Element Integrated Task Force.<sup>40</sup> This effort is expected to train female Marine volunteers in skills and tasks performed in closed occupations skills while a dedicated research team observes their performance in both entry-level training and operational environments. Both of these efforts are expected to assist the Marine Corps in validating its standards. In July 2014, the Navy Manpower Analysis Center reviewed all Navy positions to identify those that are physically demanding, and independently reviewed and updated occupational standards for all positions to ensure gender neutrality. The Air Force Air Education and Training Command is planning to complete by July 2015 a study that analyzes and validates physical tests and standards on Battlefield Airmen career fields. A second Air Force study is expected to revalidate physical and mental occupational entry standards across specialties; this study is expected to be completed in September 2015. The special operations components—the Army Special Operations Command, Naval Special Warfare Command, Marine Corps Special Operations Command, and Air Force Special Operations Command—are validating standards for those military occupational

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<sup>39</sup>According to Marine Corps officials, as of May 2015, for Infantry Training Battalion, 350 women started the training and 136 have graduated; 4,249 men started the training and 4,128 graduated. For Infantry Officer Training, 29 women attempted the course but none graduated. Of the 29 women who attempted the course, 24 of them did not complete the combat endurance test on the first day of training. From fiscal years 2013 through April 17, 2015, 913 men started Infantry Officer Training, and 716 men graduated; of the men who did not graduate, 86 did not complete the combat endurance test.

<sup>40</sup>According to Marine Corps officials, as of May 2015, 75 women joined the Ground Combat Element Integrated Task Force, of which 23 dropped from the study; 284 men joined, of which 117 have dropped from the study. Of the 23 women who dropped, 13 of them dropped for medical reasons; of the 117 men who dropped, 27 dropped for medical reasons.

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specialties that deploy with SOCOM; this is expected to be completed by the end of July 2015.

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**Ensure Eligibility Reflects Job Tasks (Joint Staff Guidance)**

The Chairman's guiding principles also require that eligibility for training and development within designated occupational fields consist of qualitative and quantifiable standards reflecting the knowledge, skills, and abilities necessary for each occupation. To address this requirement, the services and SOCOM have planned studies that aim to validate and select tests to ensure the tests are measuring what they intend to. Further, these plans aim to ensure that scores or results from a test can be used to select individuals for a particular occupation or task. For example, the Air Force is designing physical task simulations, such as climbing a ladder (to simulate entering and exiting a helicopter, according to officials) and lifting and holding objects at different heights (to simulate holding an item to bolt onto an airframe, according to officials). These planned measures of performance are intended to ensure that simulations are good approximations of job tasks. Air Force officials explained that the Air Force's planned approach is to use the operationally-relevant, occupationally-specific critical tasks it identifies as the anchor to develop appropriate physical tests and standards to evaluate the ability to successfully perform operational requirements. This study is expected to be completed by the end of fiscal year 2015.

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**Integrate While Preserving Readiness, Cohesion, and Morale (Joint Staff Guidance)**

Another Chairman's guiding principle requires the services to take action to ensure the success of the warfighting forces by preserving unit readiness, cohesion, and morale. To address this requirement, the services and SOCOM are taking steps to ensure that the integration of women maintains readiness. For example, officials from each of the services stated that the standards-validation efforts will ensure that service members in newly opened occupations are able to perform the mission and thus maintain readiness, operational capability, and combat effectiveness. By observing performance of the tasks and surveying subject-matter experts to confirm that specific tasks are required for each occupation, the services and special operations components plan to confirm those specific tasks that are required for each occupation. Further, as discussed earlier, the Army, Marine Corps, and SOCOM are conducting studies to determine the potential effect of integration on unit

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cohesion.<sup>41</sup> According to the Defense Advisory Committee on Women in the Services, a common challenge cited in integrating women into previously closed positions and occupations is the potential effect on unit cohesion. Unit cohesion contributes to strong morale and commitment to a mission. By taking steps to identify and address challenges related to unit cohesion, these services are working to ensure that readiness is maintained throughout the integration process.

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## DOD Is Providing Oversight of Integration Efforts, but Has Not Developed Plans to Monitor Long-Term Progress in Integrating Women into Combat Positions

DOD has been tracking, monitoring, and providing oversight over the services' and SOCOM's efforts to integrate women into ground-combat positions, but has not developed plans to monitor long-term integration progress. Service requests for an exception to policy to keep positions closed to women receive attention from the Chairman of the Joint Chiefs of Staff and the Secretary of Defense. OUSD(P&R) and Joint Staff manage the statutorily required congressional notification process, which is part of a longer process before women can begin serving in newly opened positions and occupations.

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## OUSD(P&R) and Joint Staff Have Taken Actions to Oversee Services' and SOCOM's Integration Efforts

To oversee the services' and SOCOM's efforts to integrate women into combat positions, OUSD(P&R) and the Chairman of the Joint Chiefs of Staff have issued guidance, commissioned studies, and facilitated coordination and communication through regular meetings among the services and SOCOM. The Secretary of Defense's memorandum rescinding the 1994 rule directed the military departments to submit implementation plans and quarterly progress reports to the Chairman of the Joint Chiefs of Staff and to the Under Secretary of Defense for Personnel and Readiness.<sup>42</sup> Further, Standards for Internal Control in the Federal Government states that ongoing monitoring should be performed continually in the course of normal operations, and should include regular management and supervisory activities, separate evaluations, and

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<sup>41</sup>These studies have varying completion dates, which are discussed earlier.

<sup>42</sup>DOD, memorandum from Secretary of Defense and Chairman of the Joint Chiefs of Staff, *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* (Jan. 24, 2013).

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policies and procedures to ensure that findings of reviews are promptly resolved.<sup>43</sup>

Both OUSD(P&R) and the Chairman of the Joint Chiefs of Staff have issued guidance to facilitate their efforts to track, monitor, and provide oversight over the services' integration efforts.<sup>44</sup> For example, in January 2013, the Chairman of the Joint Chiefs of Staff issued guidance that established goals and milestones for the services' integration efforts—including validation of gender-neutral occupational standards by September 2015, completion of all studies by the first quarter of fiscal year 2016, and periodic updates in each quarter—and that also established five guiding principles to successfully integrate women into the remaining closed occupational fields.<sup>45</sup> In addition, in February 2013, the Under Secretary of Defense for Personnel and Readiness issued a memorandum directing that quarterly progress reports contain information such as progress on positions that will be opened to women and that are still being evaluated, an assessment of positions that have already been opened, and the development status of gender-neutral occupational

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<sup>43</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

<sup>44</sup>DOD, memorandum from the Under Secretary of Defense for Personnel and Readiness, *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* (Feb. 27, 2013); DOD, memorandum from the Chairman of the Joint Chiefs of Staff, *Women in the Service Implementation Plan* (Jan. 9, 2013).

<sup>45</sup>DOD, memorandum from the Chairman of the Joint Chiefs of Staff, *Women in the Service Implementation Plan* (Jan. 9, 2013). The five guiding principles are: (1) Ensuring the success of the nation's warfighting forces by preserving unit readiness, cohesion, and morale; (2) Ensuring all service men and women are given the opportunity to succeed and are set up for success with viable career paths; (3) Retaining the trust and confidence of the American people to defend this nation by promoting policies that maintain the best quality and most qualified people; (4) Validating both physical and mental occupational performance standards for all military occupational specialties, especially those that remain closed to women; eligibility for training and development within designated occupational fields should consist of qualitative and quantitative standards reflecting the knowledge, skills, and abilities necessary for each occupation; and occupational performance standards for specialties open to women must be gender neutral; (5) Ensuring a sufficient cadre of midgrade/senior enlisted and officers are assigned to commands at the point of introduction to ensure success in the long run; adjust recruiting, assignment processes, and personnel policies if needed; engage in continual in-stride assessments and pilot efforts to inform the assimilation of women into previously closed units.



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standards.<sup>46</sup> An OUSD(P&R) official stated that when reviewing these reports as part of its normal oversight process, OUSD(P&R) has discussed with the services topics such as past and upcoming milestones, recommendation timelines, and the status and progress of ongoing studies. A Joint Staff official explained that the reports are reviewed to ensure progress is being made in accordance with the services' implementation plans. After the reports are reviewed by OUSD(P&R) and Joint Staff, the Chairman provides these reports to the Secretary of Defense.

Further, to help in its oversight of the services' and SOCOM's standards validation efforts, OUSD(P&R) tasked the RAND Corporation to conduct a study concerning validation of gender-neutral occupational standards within the services and SOCOM; an OUSD(P&R) official stated that the study will provide an independent analysis of the services' efforts to validate standards. The first objective of the RAND study is to describe best-practice methodologies for establishing gender-neutral standards for physically demanding jobs, tailored to address the needs of the military.<sup>47</sup> The second objective is to review and evaluate the methodologies used by the services to set gender-neutral standards. In September 2013, RAND issued a draft report addressing the first objective; an OUSD(P&R) official stated that OUSD(P&R) provided a draft of this report to all of the services. In June 2015, RAND officials said that a draft of the second report, which will cover both objectives, is forthcoming.

Moreover, OUSD(P&R) has regular quarterly meetings with the services to discuss topics such as developing the quarterly reports and how others are handling any issues with integration. The Joint Staff also has a meeting process with two different levels of meetings devoted solely to integration efforts: (1) a Joint Chiefs of Staff (four-star level) group, and (2) an Operations Deputies (three-star level) group. A Joint Staff official explained that these meetings provide a forum for the services to share implementation updates, discuss potential barriers, and highlight issues.

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<sup>46</sup>As discussed earlier, the reporting requirement was changed from quarterly to biannual in July 2014.

<sup>47</sup>RAND's draft report identified as best practices a six-step process for establishing requirements for physically demanding occupations. These six steps are: (1) identify physical demands; (2) identify potential screening tests; (3) validate and select tests; (4) establish minimum scores; (5) implement screening; and (6) confirm tests are working as intended.

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The meetings occur at least once every quarter, but can occur more often if needed. OUSD(P&R) and Joint Staff officials stated that there are also frequent communications by other means for the same purposes. For example, in September 2014, SOCOM hosted a workshop for all of the services to review the standards validation process for special operations and the services. SOCOM officials stated that the purpose of this workshop was to ensure that all the services were using similar processes, that no one was working at cross purposes, and that there was no duplication of effort. Officials stated that a follow-up workshop was held in May 2015.

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### Requests for Exceptions to Policy Receive High-Level Management Attention

The Secretary of Defense and Chairman of the Joint Chiefs of Staff directed that any recommendation for an exception to policy to keep an occupation or position closed to women must be personally approved first by the Chairman and then by the Secretary of Defense.<sup>48</sup> The memorandum states that this approval authority may not be delegated. OUSD(P&R) and Joint Staff officials explained that before such requests are submitted to the Chairman, they are first reviewed for sufficiency by OUSD(P&R) and the Joint Staff. When reviewing any requests for an exception to policy to keep positions closed to women, the Secretary of Defense's January 2013 memorandum states that "[e]xceptions must be narrowly tailored and based on a rigorous analysis of factual data regarding the knowledge, skills and abilities needed for the position."<sup>49</sup> According to OUSD(P&R) and Joint Staff officials, if an exception to policy is requested, they will request all related supporting data and studies and review the request considering all of the factors involved. They stated that once they are satisfied that the Secretary's criteria have been met, they will present the request to the Chairman and then the Secretary to determine whether the request meets the criteria for an exception. According to OUSD(P&R) and Joint Staff officials, they made a conscious decision not to provide or develop specific additional criteria or a format for exception to policy requests—beyond the guidance in the Secretary's

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<sup>48</sup>DOD, memorandum from Secretary of Defense and Chairman of the Joint Chiefs of Staff, *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* (Jan. 24, 2013).

<sup>49</sup>DOD, memorandum from Secretary of Defense and Chairman of the Joint Chiefs of Staff, *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* (Jan. 24, 2013).

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memorandum—because they did not want it to appear that there was a checklist for requesting an exception to policy.

When OUSD(P&R) and Joint Staff first reviewed the Navy's July 2014 exception to policy request for the three different ship classes, they jointly requested additional information from the Navy, such as actual modification costs to enable the ships to provide berths for women, officer assignment information, and information on the professional development impact if women do not serve on those ships. An OUSD(P&R) official explained that OUSD(P&R) and Joint Staff worked with the Navy so the Navy would better understand the additional analytical rigor being requested, and they established a deadline for the Navy to provide the requested information in February 2015. The Navy submitted the requested information, and as of April 2015, OUSD(P&R) and Joint Staff officials said the exception to policy request was under review by the Chairman of the Joint Chiefs of Staff, who will then forward his recommendation to the Secretary of Defense.

SOCOM's status as an operational command results in a slightly different process for any exception requests for positions associated with SOCOM. SOCOM officials explained that for any positions associated with SOCOM—whether there is a recommendation to open a position or a request for an exception to policy to keep a position closed to women—there are two recommendations provided. One recommendation comes from the position's parent department Secretary. The second recommendation comes from the SOCOM Commander, and since SOCOM is not a military service that recommendation is then reviewed and approved by the Assistant Secretary of Defense for Special Operations and Low-Intensity Conflict, who serves a military department secretary function for SOCOM. The officials stated that to date there have not been differences between the recommendations from the services and from SOCOM. SOCOM officials explained that there is regular collaboration with the services about recommendations, but that in the event that there was a difference in the two recommendations, the Secretary of Defense would make the decision.

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## OUSD(P&R) Has Not Developed Plans to Monitor the Services' Progress in Integrating Women into Newly Opened Positions and Occupations after January 2016

As of May 2015, OUSD(P&R) had not developed plans for a mechanism or process to monitor the services' progress in their efforts to integrate newly opened positions and occupations after January 1, 2016. As noted earlier, Standards for Internal Control in the Federal Government states that ongoing monitoring should be performed continually in the course of normal operations.<sup>50</sup> An OUSD(P&R) official stated that OUSD(P&R) will continue to provide oversight as part of its normal responsibilities, and make associated changes in applicable DOD guidance. Further, as discussed earlier, the Under Secretary of Defense for Personnel and Readiness issued guidance that directed each military department to report on its validation of occupational standards, and to implement an inspection program to assess whether the services' occupational standards comply with statutory requirements.<sup>51</sup> However, according to an OUSD(P&R) official, that office does not envision undertaking a formal role in the implementation of the services' recommendations to open closed positions following January 2016.

Further, a Joint Staff official stated that an initial Joint Staff meeting would be held after the January 1, 2016 announcement, and it would be determined at that time whether any additional meetings would be held. OUSD(P&R)'s requirement for the services to submit quarterly progress reports ends in January 2016, and the services have varying plans to monitor implementation after that date. For example, Army officials stated that they have developed an implementation and follow-up plan for beyond 2016 that is being reviewed by senior leaders. Marine Corps officials explained that they have long-term research that will track integration of females, to help understand and shape institutional and individual success, while Navy officials explained that they had not developed any plans to monitor implementation after 2016 and were waiting for direction from OUSD(P&R). However, OUSD(P&R) and Joint Staff officials did not identify any plans to provide such direction for the services to monitor implementation.

After the decisions have been made to open positions and occupations to women, there is a lengthy implementation process before women will be

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<sup>50</sup>[GAO/AIMD-00-21.3.1](#).

<sup>51</sup>DOD, memorandum from Under Secretary of Defense for Personnel and Readiness, *Implementation Guidance for Statutory Changes to Occupational Standards* (Mar. 2, 2015).

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able to serve in the newly opened occupations. Officials from all of the services and SOCOM stated that before women can serve in newly opened positions and occupations they must first be recruited, accessioned, trained, tested, and assigned. As an example of the time involved in just one part of the implementation process, according to OUSD(P&R) officials, the general training timelines can vary by service and the position and occupation, but typically may require less than half a year to almost two years to complete the training part of the implementation process. Without ongoing monitoring of the services' and SOCOM's implementation progress in integrating previously closed positions and occupations, it will be difficult for DOD to have visibility over the extent to which the services and SOCOM are overcoming potential obstacles to integration and DOD will not have information for congressional decision makers about the department's integration progress.

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### OUSD(P&R) and Joint Staff Manage Congressional Notification Process

OUSD(P&R) and Joint Staff manage the congressional notification process when positions and occupations are being opened to women. By statute, the Secretary of Defense must provide Congress with a report prior to implementing any proposed changes that would result in opening or closing any category of unit or position, or military career designator to women.<sup>52</sup> As part of the process for opening formerly closed positions and occupations, an OUSD(P&R) official explained that OUSD(P&R) analyzes information provided by the military department secretaries and the Assistant Secretary of Defense for Special Operations and Low-Intensity Conflict<sup>53</sup> and verifies items such as the correct occupational specialties (if applicable), that all appropriate additional skill identifiers are included, and that the correct number of positions to be opened is reflected. OUSD(P&R) officials then create a packet to send to Congress after they prebrief the House and Senate Armed Services Committees. A Joint Staff official stated that Joint Staff also reviews the notifications, and provides comments on the briefings given to Congress.

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<sup>52</sup>10 U.S.C. § 652.

<sup>53</sup>According to officials, the service Secretary makes a recommendation to open a position or occupation and forwards a package to OUSD(P&R) that details positions and occupations they are requesting to open, verifies the occupational standards, and includes the required detailed analysis of the legal implication of the proposed change with respect to the constitutionality of the application of the Military Selective Service Act (50 U.S.C. App. § 451 et seq.) to males only.

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In the congressional notifications of the department's intent to open positions and occupations to women, DOD is required to provide a detailed legal analysis regarding the legal implications of the proposed change with respect to the constitutionality of the application of the 1948 Military Selective Service Act<sup>54</sup> to males only.<sup>55</sup> This act empowers the President to require the registration of every male citizen and resident alien between the ages of 18 and 26.<sup>56</sup> In 1981, the Supreme Court upheld the constitutionality of the male-only registration requirement.<sup>57</sup> Currently, women serve voluntarily in the U.S. armed forces, but are not required to register with the Selective Service and would not be subject to a draft. DOD's legal analyses in the congressional notifications submitted since January 2013 have not found that opening the positions and occupations to women would affect the constitutionality of the act. Officials from OUSD(P&R), the services, and the Defense Advisory Committee on Women in the Services have stated that if DOD decides to open ground-combat occupations such as infantry, artillery, and armor, DOD's required legal analysis could raise concerns about the constitutionality of the act. DOD's legal analysis in the March 2015 congressional notification to open the Army combat engineer occupation stated that "[o]ver time, however, the opening of additional combat positions to women may further alter the factual backdrop to the Court's decision in *Rostker*. Should the constitutionality of the [Military Selective Service Act] be challenged at a later date, the reasoning behind the exclusion of women from registration may need to be reexamined." An OUSD(P&R) official explained that even if DOD's legal analysis raises

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<sup>54</sup>Pub. L. No. 80-759 (1948), as amended (codified as amended at 50 U.S.C. App. § 451 et seq).

<sup>55</sup>10 U.S.C. § 652.

<sup>56</sup>Section 3 of Pub. L. No. 80-759, codified as amended at 50 U.S.C. App. § 453.

<sup>57</sup>*Rostker v. Goldberg*, 453 U.S. 57 (1981). In this case, the Court found that the purpose of the Selective Service System was to produce a ready group of combat troops, and that, under then-existing law and military guidance, women could not serve in combat. The Court found that the Constitution required that it accord a very high level of deference to Congress' decision, because raising armies is a central function of Congress. The Court also noted that Congress had extensively considered the issue of registering women, finding that the registration of women would not fill a military need because they could not serve as combat troops. The Court therefore found that women were not similarly situated for purposes of the Due Process Clause of the Fifth Amendment to the Constitution with respect to registration under the act, and thus the male-only registration requirement was constitutional.

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constitutionality concerns about the act, DOD could still submit the notification to Congress and take actions to implement opening those positions to women after completion of the waiting period.

After a notification is provided to Congress, the Secretary of Defense is prohibited from implementing any proposed changes until “after the end of a period of 30 days of continuous session of Congress (excluding any day on which either house of Congress is not in session) following the date on which the report is received.”<sup>58</sup> This waiting period allows Congress time to take any legislative actions that it deems necessary based on the notification and report provided by DOD. However, the congressional calendar has resulted in an average time period of about 90 calendar days before planned changes could be implemented; three of the twelve congressional notifications DOD submitted between April 2013 and July 2014 have taken almost 5 months.<sup>59</sup> After the waiting period has passed, OUSD(P&R) notifies the appropriate elements within a service so that they can begin implementing actions to open the positions. Since the services are allowed to take actions to open positions only after the waiting period is over, Army and Navy officials said that the delays and unpredictability associated with the waiting period pose challenges in beginning the recruiting, accession, and training processes, and aligning assignments to newly opened positions with service promotion cycles. An OUSD(P&R) official stated that in 2014 DOD was requested to provide drafting assistance on a legislative proposal for a change that would have modified the waiting period from 30 days of continuous session of Congress to 60 calendar days, but said that Congress did not act at that time.

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<sup>58</sup>10 U.S.C. § 652(a)(1). For purposes of this provision, the continuity of a session of Congress is broken only by an adjournment sine die, which is to say when either house adjourns without a specific date on which they will return. This typically occurs only at the end of each session of Congress.

<sup>59</sup>The OUSD(P&R) 2014 tracking calendar shows that both houses of Congress were in session for 16 days in July, 14 days in March and June, 13 days in January and May, 11 days in February, 10 days in April and December, 8 days in September, 6 days in November, 1 day in August, and 0 days in October.

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In 2012, we assessed the military necessity of the Selective Service System and examined alternatives to its current structure.<sup>60</sup> We found that because of its reliance and emphasis on the All Volunteer Force, DOD had not reevaluated requirements for the Selective Service System since 1994, even though the national security environment had changed significantly since that time. The registration system in fiscal year 2014 had an annual budget of \$22.9 million;<sup>61</sup> DOD officials stated that the system provides a low-cost insurance policy in case a draft is ever necessary. In our 2012 report, we recommended that DOD (1) evaluate DOD's requirements for the Selective Service System in light of recent strategic guidance and report the results to Congress; and (2) establish a process of periodically reevaluating DOD's requirements for the Selective Service System in light of changing threats, operating environments, and strategic guidance.

In responding to these recommendations, DOD stated in February 2013 that there was no longer an immediate military necessity for the Selective Service System, but there was a national necessity because the registration process provides the structure for mobilization that would allow the services to rapidly increase in size if needed. DOD's assessment was limited to a reevaluation of mission and military necessity for the Selective Service System. Regarding the second recommendation, DOD had not taken action as of June 2015, but agreed that a thorough assessment of the issue was merited, and should include a review of the statutes and policies surrounding the current registration process and the potential to include the registration of women. However, DOD officials stated that such a review should be part of a broader national discussion and should not be determined only by DOD.<sup>62</sup> As we

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<sup>60</sup>GAO, *National Security: DOD Should Reevaluate Requirements for the Selective Service System*, [GAO-12-623](#) (Washington, D.C.: June 7, 2012). The Selective Service System is an independent agency in the executive branch. Our report reviewed estimated costs and savings for two alternatives to the current structure of the Selective Service System: (1) placing it in a deep standby mode where active registration is maintained, and (2) disestablishing the agency. In addition to the potential costs and savings of these alternatives, our report also noted that if either alternative were pursued, other factors, with both tangible and intangible costs and benefits, may need to be considered.

<sup>61</sup>Selective Service System, *Annual Report to the Congress of the United States Fiscal Year 2014*.

<sup>62</sup>Memorandum from Assistant Secretary of Defense for Readiness and Force Management, Feb. 26, 2013.



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noted in our 2012 report, a reevaluation of the department's personnel needs for the Selective Service System in light of current national security plans would better position Congress to make an informed decision about the necessity of the Selective Service System or any other alternatives that might substitute for it. For example, a 2013 Congressional Research Service report noted the Selective Service issue could become moot by terminating Selective Service registration or expanding registration requirements to include women.<sup>63</sup> We agree that this is a broader issue. DOD is the agency that would use the Selective Service System in the event a draft was needed. Thus, we continue to believe that our 2012 recommendation has merit—that DOD should take the lead in conducting an evaluation of requirements for the Selective Service System and should establish a process of periodically reevaluating DOD's requirements for the Selective Service System in light of changing threats, operating environments, and strategic guidance.

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## Conclusions

The Secretary of Defense and the Chairman of the Joint Chiefs of Staff have ordered that women, to the extent possible, be integrated into direct ground-combat positions and occupations by January 2016. Although OUSD(P&R) and Joint Staff have been tracking, monitoring, and providing oversight of the services' and SOCOM's integration efforts, they do not have plans to monitor the services' implementation progress after January 2016, as newly opened positions are integrated. Without ongoing monitoring of the services' and SOCOM's progress in integrating previously closed positions and occupations after January 2016, it will be difficult for DOD to have visibility over the extent that the services and SOCOM are overcoming potential obstacles to integration and DOD may not be able to provide current information for congressional decision makers about the department's progress. Further, DOD has not established a process to reevaluate its requirements for the Selective Service System that could enable it to take into account these changes in expanding combat service opportunities for women. If DOD conducted a comprehensive reevaluation of the department's personnel needs for the Selective Service System, the analysis would better position Congress to make an informed decision about the necessity of the Selective Service System or any other alternatives that might substitute for it.

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<sup>63</sup>Congressional Research Service, *Women in Combat: Issues for Congress*, CRS R42075 (May 9, 2013), p. 13.

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## Recommendation for Executive Action

To help ensure successful integration of combat positions that have been opened to women, we recommend that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to develop plans for monitoring after January 2016 the services' implementation of their integration efforts and progress in opening positions to women, including an approach for taking any needed action.

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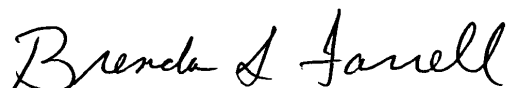
## Agency Comments

We provided a draft of this report to DOD for review and comment. In written comments, which are reprinted in their entirety in appendix III, DOD concurred with our recommendation. DOD noted that they recognize the importance of monitoring long-term implementation progress of expanding combat service opportunities for women. DOD also provided technical comments, which we have incorporated in the report where appropriate.

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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, and the Secretaries of the military departments. The report also is 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 IV.



Brenda S. Farrell  
Director, Defense Capabilities and Management

# Appendix I: Scope and Methodology

This report assesses the Department of Defense’s (DOD) efforts to expand combat service opportunities for women. Our scope included efforts of the four military services in DOD and U.S. Special Operations Command (SOCOM) since January 2013, when the Secretary of Defense eliminated the prohibition on women serving in combat positions. We did not include the Coast Guard in our review. Table 3 contains a list of the agencies we contacted during our review.

**Table 3: Agencies Contacted during Review**

Office of the Secretary of Defense	Office of the Undersecretary of Defense, Personnel and Readiness
	Office of the Undersecretary of Defense, Special Operations and Low Intensity Conflict
Joint Chiefs of Staff	Joint Staff, Personnel and Readiness Division
	Command Policy Division Directorate Military Personnel Management
Department of the Army	Training and Doctrine Command
	Army Research Institute for the Behavioral and Social Sciences
Department of the Air Force	Air Force Assignments and Women in Service Review Branch office
	Air Education and Training Command
	Accessions and Training Division
Department of the Navy	Navy Office of Women’s Policy
	Enlisted Women in Submarines Task Force
	Navy Education Training Command
	Naval Health Research Center
U.S. Marine Corps	Navy Manpower Analysis Center
	Marine Corps Force Innovation Office
	Operations Analysis Division
	Marine Corps Operational Test and Evaluation Activity
U.S. Special Operations Command	Marine Corps Training and Education Command
	Special Operations Command Women in Service Review Office
	Army Special Operations Command
Defense Advisory Committee on Women in the Services	Marine Corps Special Operations Command
	Naval Special Warfare Command
Sexual Assault Prevention and Response Office	
RAND Corporation	

Source: GAO. | GAO-15-589

To determine the status of service efforts to open previously closed positions and occupations and the extent potential challenges have been identified and mitigated, we analyzed documentation and spoke with officials to identify the positions and occupations that have been opened to women, that remain closed, timeframes for making decisions, whether any services planned to keep any positions or occupations closed to women, and any steps taken to identify potential challenges and develop approaches to overcome any such challenges. Specifically, we reviewed guidance provided to the services from the Secretary of Defense,<sup>1</sup> the Chairman of the Joint Chiefs of Staff,<sup>2</sup> and the Under Secretary of Defense for Personnel and Readiness<sup>3</sup> to determine what the services were required to do as part of their efforts to determine whether to open closed positions and occupations to women. We determined that the services were required to, among other things, develop implementation plans, follow five guiding principles when opening positions and occupations to women, and create and submit quarterly progress reports starting in the third quarter of fiscal year 2013. At the department level, the military departments were required to submit detailed implementation plans consistent with the guiding principles and goals and milestones provided by the Chairman.<sup>4</sup>

To determine whether the services and SOCOM met these requirements, we obtained and analyzed the services' and SOCOM's respective implementation plans, quarterly progress reports, congressional notifications, and Navy exception to policy documents, and discussed these documents with officials from the services, SOCOM, and the Office of the Under Secretary of Defense for Personnel and Readiness (OUSD(P&R)). To determine if the services and SOCOM met all of the

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<sup>1</sup>Memorandum from Secretary of Defense and Chairman of the Joint Chiefs of Staff, *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* (Jan. 24, 2013).

<sup>2</sup>Memorandum from the Chairman of the Joint Chiefs of Staff, *Women in the Service Implementation Plan* (Jan. 9, 2013).

<sup>3</sup>Memorandum from the Under Secretary of Defense for Personnel and Readiness, *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* (Feb. 27, 2013).

<sup>4</sup>Memorandum from the Chairman of the Joint Chiefs of Staff, *Women in the Service Implementation Plan* (Jan. 9, 2013). We found that the military services developed the implementation plans, so we have reviewed those plans based on the requirements provided by the Chairman.

implementation plan requirements, we analyzed the services' and SOCOM's implementation plans for required components—such as timelines and timeframes for opening positions and occupations to women, milestones for development of gender-neutral occupational standards, and consistency with the guiding principles. To determine if the services and SOCOM met all of the quarterly progress report requirements, we analyzed the quarterly and bi-annual reports for required components—such as updates on assessments and progress on positions that are slated for opening or currently being evaluated, analysis of any request for an exception to policy, discussion regarding the development status of gender-neutral standards, assessments of newly opened positions, identification of any limiting factors, and recommendations for additional openings. We analyzed how some of the timeframes changed through quarterly report progress updates and interviews with service officials, by comparing them to the original ones set in the implementation plans. To determine what positions and occupations had been opened to women since January 2013, we analyzed the congressional notifications that DOD had provided to Congress from January 2013 through March 2015, and discussed this data with officials from the services and OUSD(P&R).

To determine what positions and occupations remain closed to women and to determine the services' and SOCOM's timeframes for making decisions about whether to open these positions and occupations to women, we analyzed the services' and SOCOM's implementation plans, and quarterly and biannual progress reports and interviewed officials from the services, SOCOM, and OUSD(P&R). In addition, we requested and obtained data from the services and SOCOM on the total number of positions and occupations closed to women as of March 2015, as well as the total number of positions and occupations in each service and in SOCOM. We analyzed the reliability of this data by obtaining information on how the data were collected, managed, and used through interviews with and questionnaires to relevant officials and by reviewing supporting documentation. To corroborate this data, we cross-referenced it with documentation on closed positions and occupations provided by OUSD(P&R), as well as similar data provided by the services and SOCOM in their progress reports. This data was also verified by officials from OUSD(P&R), the services, and SOCOM. Although we found some discrepancies in some of the data regarding the number of closed positions reported by the services, which officials explained were due in part to changes in force structure, we determined that the data were sufficiently reliable to report on the general number and percentage of

positions and occupations that are closed to women in each of the services and in SOCOM.

To determine any steps that DOD and the services took to identify potential challenges and develop approaches to overcome any such challenges, we analyzed service and SOCOM implementation plans, quarterly reports, and studies and study documentation. We also interviewed officials at OUSD(P&R), Joint Staff, Defense Advisory Committee on Women in the Services, Sexual Assault Prevention and Response Office, and within each of the services and SOCOM, and discussed potential challenges they have identified and approaches to mitigating these challenges. In inquiring about challenges, we asked about challenges in general, as well as specific issues that we had identified in the services' implementation plans, reports by the Defense Advisory Committee on Women in the Services, and prior GAO work as potential areas of study. The specific issues that we asked about were the Military Selective Service Act, women's health, sexual harassment and assault, unit cohesion, facilities issues (e.g., berthing, privacy), promotion and retention, and equipment.

To determine the extent to which service efforts to validate gender-neutral occupational standards are consistent with statutory requirements and Joint Staff guidance, we identified requirements from statutes and Joint Staff guidance and compared these requirements against service plans for studies. To identify the requirements for validating gender-neutral occupational standards, we reviewed relevant laws as well as guidance issued by the Chairman of the Joint Chiefs of Staff. Specifically, to identify statutory requirements, we reviewed the National Defense Authorization Act for Fiscal Year 1994<sup>5</sup> and the Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for 2015.<sup>6</sup> To identify Joint Staff guidance, we reviewed the Chairman's January 2013 memorandum that laid out guiding principles for the services to follow in integrating women.<sup>7</sup> From these laws and guidance, we identified five specific elements the services must follow in validating their gender-neutral occupational standards. Two elements are from statutory requirements:

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<sup>5</sup>Pub. L. No. 103-160 § 543 (1993), as amended.

<sup>6</sup>Pub. L. No. 113-291 § 524 (2014).

<sup>7</sup>DOD, memorandum from the Chairman of the Joint Chiefs of Staff, *Women in the Service Implementation Plan* (Jan. 9, 2013).

(1) ensure gender-neutral evaluation and (2) ensure standards reflect job tasks. Three elements are from Joint Staff guidance: (1) validate performance standards; (2) ensure eligibility reflects job tasks, and (3) integrate while preserving readiness, cohesion, and morale. To determine if the services are following these requirements and guidance, we obtained plans for studies from each of the military services and SOCOM. These plans included descriptions of scope, methodology, and timeframes for completion. We then compared these plans against the requirements we identified to determine if these planned studies met the requirements for validating gender-neutral occupational standards. Two analysts independently reviewed and assessed the plans to determine whether they contain the two statutory elements provided by the National Defense Authorization Act for Fiscal Year 1994, as amended, and the Carl Levin and Howard P. “Buck” McKeon National Defense Authorization Act for Fiscal Year 2015 and the three elements provided by the Chairman’s memorandum. The analysts then compared their results to identify any disagreements and reached agreement on all items through discussion. However, the results from these studies are not yet completed; therefore, we could not assess the extent to which the completed studies will follow the planned steps and methodologies or report how results of the studies will be implemented. We also interviewed and discussed these requirements and studies with DOD and service officials, particularly officials involved in conducting these studies.

To determine the extent to which DOD is tracking, monitoring, and providing oversight over the military services’ plans to complete the integration of women in direct combat positions by January 2016, we obtained and analyzed documentation and discussed with officials from OUSD(P&R) and Joint Staff the nature and level of their tracking and monitoring, and their review of the military services’ and SOCOM’s efforts to integrate women into combat positions. Specifically, we assessed OUSD(P&R) and Joint Staff’s review of the military services’ and SOCOM’s implementation plans, and quarterly and biannual progress reports. We then compared these efforts to DOD guidance<sup>8</sup> and internal

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<sup>8</sup>DOD, memorandum from the Secretary of Defense and Chairman of the Joint Chiefs of Staff, *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* (Jan. 24, 2013); and memorandum from the Chairman of the Joint Chiefs of Staff, *Women in the Service Implementation Plan* (Jan. 9, 2013).

control standards.<sup>9</sup> Further, we reviewed documentation and discussed with OUSD(P&R) officials a study being performed by the RAND Corporation for OUSD(P&R) as part of their oversight of the services' and SOCOM's efforts to validate gender-neutral occupational standards, and we met with RAND officials to discuss their work on this study. We also obtained and analyzed documentation related to the Navy's request for an exception to policy to keep positions closed on three classes of ships, and we discussed with P&R, Joint Staff, and Navy officials the process and criteria used to review this request.

In assessing the oversight and review of DOD's congressional notifications when positions and occupations are being opened to women, we analyzed the applicable statutory requirements for these congressional notifications,<sup>10</sup> including the requirement to provide a detailed legal analysis of the constitutionality of the 1948 Military Selective Service Act.<sup>11</sup> In addition, we reviewed the Military Selective Service Act, its legislative history,<sup>12</sup> and associated Supreme Court case law.<sup>13</sup> We discussed with DOD and service officials the process for preparing this legal analysis and the extent to which their efforts to open additional positions and occupations to women could affect that legal analysis. We discussed with OUSD(P&R) officials the process for calculating the waiting period and their efforts to modify the statutory timeframe for the waiting period, and obtained data on the amount of time for each waiting period to pass since January 2013. We also analyzed prior reports from GAO,<sup>14</sup> DOD, the Congressional Research Service,<sup>15</sup>

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<sup>9</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: Nov. 1999).

<sup>10</sup>10 U.S.C. § 652.

<sup>11</sup>Pub. L. No. 80-759 (1948), as amended (codified at 50 U.S.C. App. § 451 et seq).

<sup>12</sup>See S. Rep. No. 96-226 (1979); S. Rep. No. 96-826 (1980); S. Conf. Rep. No. 96-895 (1980); 126 Cong. Rec. 8601-8602, 8620 (1980); H. J. Res. No. 521 (1980).

<sup>13</sup>*Rostker v. Goldberg*, 453 U.S. 57 (1981).

<sup>14</sup>See, for example, GAO, *National Security: DOD Should Reevaluate Requirements for the Selective Service System*, [GAO-12-623](#) (Washington, D.C.: June 7, 2012); GAO, *Women in the Military: Impact of Proposed Legislation to Open More Combat Support Positions and Units to Women*, [GAO/NSIAD-88-197BR](#) (Washington, D.C.: July 15, 1988).

<sup>15</sup>Congressional Research Service, *Women in Combat: Issues for Congress*, CRS R42075 (May 9, 2013).



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the Defense Advisory Committee on Women in the Services,<sup>16</sup> and the Federal Advisory Committee on Gender-Integrated Training and Related Issues to identify changes in statutes and military guidance that have increased opportunities for women to serve in combat roles over the past several decades. We determined changes that have occurred in DOD's workforce and environment over the past several decades and assessed the extent that these changes could have an effect on the utility of the Military Selective Service Act in meeting the department's needs.

We conducted this performance audit from September 2014 to July 2015 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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<sup>16</sup>Defense Advisory Committee on Women in the Services, December 4-5, 2014 quarterly meeting minutes.

# Appendix II: Summary of Service and SOCOM Studies that Will Inform Integration Recommendations and Implementation Efforts

Organization Conducting Study	Study	Study Purpose
<b>Office of the Under Secretary of Defense for Personnel and Readiness</b>		
RAND Corporation	1. Defining Physical Standards for Physically Demanding Jobs: A Review of Methods	Identify best practices for validating standards in physically demanding occupations
	2. An Overview of the Services' Current Efforts to Establish Gender Neutral Physical Standards	Assess how the military services and Special Operations Command are aligned with the identified best practices in their respective validation efforts
<b>Department of the Army</b>		
U.S. Army Research Institute of Environmental Medicine	1. Development of Military Occupation-Specific Physical Employment Standards, Study 1	Standards validation
	2. Development of Military Occupation-Specific Physical Employment Standards, Study 2	Standards validation
	3. Development of Military Occupation-Specific Physical Employment Standards, Study 3	Standards validation
U.S. Army Research Institute for the Behavioral and Social Sciences	4. Expanded Positions for Women in Open Occupations for the Original Nine Exception to Policy Brigade Combat Teams <sup>a</sup>	Collect data, through surveys, interviews, and focus groups, on perceptions of the assignment of female soldiers serving in specialties open to women in select Brigade Combat Teams
	5. Expanded Positions for Female Soldiers in Open Occupations Assessment for administration with Field Artillery Brigades	Collect data, through surveys, interviews, and focus groups, on perceptions of the impact of the assignment of female soldiers to previously closed positions in select Field Artillery Brigades
	6. Expanded Positions for Women in Open Occupations in Deployed and National Guard Units	Online surveys with additional Active and National Guard Brigade Combat Teams.
	7. End of Training Assessment for Gender Integration Efforts	Provide assessment of potential issues associated with gender integration in newly opened occupations and currently closed occupations to be opened.
Naval Health Research Center	9. Validating Gender-Neutral Standards for U.S. Army Special Operations Command	Standards validation

**Appendix II: Summary of Service and SOCOM  
Studies that Will Inform Integration  
Recommendations and Implementation Efforts**

<b>Organization Conducting Study</b>	<b>Study</b>	<b>Study Purpose</b>
<b>U.S. Marine Corps</b>		
Operational Test and Evaluation Activity	1. Ground Combat Element Integrated Task Force <sup>b</sup>	The task force will train female Marine volunteers in closed military occupational specialty skills, and integrate them into a combat arms unit, while a dedicated research team observes the unit's performance in an operational environment
Training and Education Command	2. Collection and Assessment of Training Performance Data at Infantry Officers Course	To collect data on female training performance while undergoing infantry training at Infantry Officers Course
	3. Assessment of Training Performance of Female Enlisted Marines at Infantry Training Battalion	To assess the performance of female enlisted Marine volunteers assigned to the Infantry Training Battalion
	4. Assessment of Training Performance of Female Enlisted Marines Volunteers in the Combat Arms (Non-Infantry) Formal Learning Centers	To assess the performance of female enlisted Marine volunteers assigned to the artillery, tank, assault amphibian vehicle courses
Marine Corps Recruiting Command	5. Propensity Analysis	Determine the potential effects of lifting combat exclusion provisions on the propensity to enlist and commission both male and female applicants
Operations Analysis Division	6. Smart Adaptations for the Gender Integrated Marine Corps	Identify potential adaptations for the barriers to success, as well as the associated costs, implementation considerations, operational effectiveness, and the number of Marines potentially impacted
	7. Assessment of Marine Non-Deployability and the Effects of Readiness	Measure and evaluate the effects of non-deployable Marines and evaluate policies regarding non-deployability
	8. Study of Talent, Attrition, Retention, and Success	Multi-purpose research effort that will, among other goals, provide information and analysis concerning the reasons and/or personnel predictors for female officer attrition in the Marine Corps
Naval Health Research Center	9. U.S. Naval Unit Behavioral Health Needs Assessment Survey	Evaluate the behavioral and psychological health of integrated battalions in the Ground Combat Element Integrated Task Force

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<b>Organization Conducting Study</b>	<b>Study</b>	<b>Study Purpose</b>
Center for Naval Analyses	10. Study of historical U.S. Marine Corps integration efforts	Review the integration of women into Marine Corps aviation occupations and past studies on the performance of female Marines in aviation and logistics.
	11. Ground Combat Element Integrated Task Force surveys, focus groups and leadership interviews	To understand the effects of gender integration into a combat arms units using surveys, directed focus groups and leadership interviews to gain perspectives from all Marines
	12. Male and Female Marines' Performance in Aviation and Logistics Occupations	To understand the integration of women into the logistics and aviation communities
	13. Expand Unit Assignments Survey	Determine participants' experiences regarding gender integration in newly-integrated ground combat units particularly with respect to potential effects on readiness, morale, and unit cohesion.
RAND Corporation	14. Key Considerations in Assessing the Impact of Integrating Women into Marine Corps Infantry Units	Determine potential impact of integrating women into Marine Corps military occupational specialties, with a particular focus on the infantry.
University of Pittsburgh	15. Injury Prevention and Performance Enhancement in Army and Marine Personnel	Create a systematic and sustained injury prevention and performance enhancement training program.
Center for Strategic and International Studies	16. Red Team—Evaluating all Marine Corps Research and Assessment	Evaluate the Marine Corps' data collection plan/or the integration of females
Michigan State University	17. Decision-Making Study	To understand potential effects of gender in small team decision-making scenarios
<b>Department of the Navy</b>		
Center for Naval Analyses	1. Support for the Enlisted Women in Submarines Task Force	To build a model that could determine the timeline to sustainability of a proposed integration plan and to determine the effect of the integration plan on the gender mix in the rest of the Navy
Navy Manpower Analysis Center	2. Navy Manpower Analysis Center Periodic Review of Standards	Standards Validation
	3. Naval Manpower Analysis Center Review of all Enlisted Occupational Standards and Navy Enlisted Classifications	Determine the most physically demanding ratings and Navy Enlisted Classifications
Naval Health Research Center	4. Naval Special Warfare Standards Validation Study	Evaluating and validating gender-neutral standards for Sea, Air, and Land Teams (SEAL) and Special Warfare Combatant Crewman (SWCC) selection and the underlying physical demands of their operations

**Appendix II: Summary of Service and SOCOM  
Studies that Will Inform Integration  
Recommendations and Implementation Efforts**

<b>Organization Conducting Study</b>	<b>Study</b>	<b>Study Purpose</b>
<b>Department of the Air Force</b>		
Accessions and Training Division, Air Force Personnel Center with RAND Corporation	1. Initial Qualification Standards Validation Study	Mental and physical entry standards re-validation for all Air Force specialty codes
Air Education and Training Command with RAND Corporation	2. Physical Performance Tests and Standards Validation Study	Physical standards validation for Battlefield occupations for selection, training, and operations
<b>U.S. Special Operations Command</b>		
Joint Special Operations University	1. Special Operations Forces Mixed-Gender Elite Teams	Examine if changing the gender component of small, elite teams would affect team dynamics in a way that would compromise the ability of the team to meet a mission objective.
University of Kansas	2. Project Diane: Barriers and Benefits of Integration	Explore potential barriers and benefits of integrating females into Army Special Forces currently positions closed to females
RAND Corporation	3. Enabling an Efficient and Effective Global Special Operations Forces Network	Assess the range of potential obstacles to effective integration of women into Special Operations Forces, focusing on the unit- and team-level.
	4. The Roles of Women in Indigenous Cultures	Assess how indigenous definitions of women's roles could affect the response of local forces and communities to female Army Special Forces soldiers.
U.S. Army Special Operations Command	5. Doctrine, Organization, Training, Material, Leadership, and Education Analysis	Identify impacts, evaluate psychological and social considerations, and review gender neutral standards that may be impacted by opening all Army Special Operations Command occupations and positions to women.
U. S. Marine Corps Forces Special Operations Command	6. Doctrine, Organization, Training, Material, Leadership, and Education Analysis	Identify impacts, evaluate psychological and social considerations, and review gender neutral standards that may be impacted by opening all Marine Corps Forces Special Operations Command occupations and positions to women.
Naval Special Warfare Command	7. Doctrine, Organization, Training, Material, Leadership, and Education Analysis	Identify impacts, evaluate psychological and social considerations, and review gender neutral standards that may be impacted by opening all Naval Special Warfare occupations and positions to women.
U.S. Air Force Special Operations Command	8. Doctrine, Organization, Training, Material, Leadership, and Education Analysis	Identify impacts, evaluate psychological and social considerations, and review gender neutral standards that may be impacted by opening all Air Force Special Operations Command occupations and positions to women.

Source: GAO analysis of DOD information. | GAO-15-589.

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**Appendix II: Summary of Service and SOCOM  
Studies that Will Inform Integration  
Recommendations and Implementation Efforts**

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<sup>a</sup>In 2012, DOD approved an exception to the Direct Ground Combat Assignment Rule Policy for the Army, and enabled the Army to assign women to enlisted and officer positions at the battalion level in open occupations in nine Brigade Combat Teams.

<sup>b</sup>George Mason University is providing a peer review of the Ground Combat Element Integrated Task Force.

# 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

10 JUL 2015

Ms. Brenda Farrell  
Director, Defense Capabilities and Management  
United States Government Accountability Office  
441 G Street, N.W.  
Washington, DC 20548

Dear Ms. Farrell:

This is the Department of Defense (DoD) response to the GAO Draft Report, GAO-15-589SU, 'DOD is Expanding Combat Service Opportunities for Women, but Should Monitor Long-Term Integration Progress' dated June 19, 2015 (GAO Code 351985).

The Department concurs with the recommendation as stated in the GAO report. We recognize the importance of monitoring long-term implementation progress of expanding combat service opportunities for women.

Thank you for your review of this program and your assistance in making it more productive and effective for the Department. Should GAO have questions in the future, my point of contact, Lieutenant Colonel Robert Jackson, can be reached at (703) 614-2789 or [robert.j.jackson13.mil@mail.mil](mailto:robert.j.jackson13.mil@mail.mil).

Sincerely,

A handwritten signature in blue ink, appearing to read "Juliet M. Beyler".

Juliet M. Beyler  
Director, Officer and Enlisted Personnel  
Management (Military Personnel Policy)

Enclosure:  
DoD Comments

**GAO DRAFT REPORT DATED JUNE 19, 2015  
GAO 15-589SU (GAO CODE 351985)**

**“DOD IS EXPANDING COMBAT SERVICE OPPORTUNITIES FOR WOMEN, BUT  
SHOULD MONITOR LONG-TERM INTEGRATION PROGRESS”**

**DEPARTMENT OF DEFENSE COMMENTS  
TO THE GAO RECOMMENDATION**

**RECOMMENDATION 1:** To help ensure successful integration of combat positions that have been opened to women, we recommend that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness develop plans for monitoring after January 2016 the services’ implementation of their integration efforts and progress in opening positions to women including an approach for taking any needed action.

**DoD RESPONSE:** Concur.



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# Appendix IV: 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), Thomas Beall, Margaret A. Best, Renee S. Brown, Adam Hatton, Aaron D. Karty, Amie Lesser, Richard Powelson, Michael Silver, Alexander Welsh, and Michael Willems made major contributions to this report.

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# Related GAO Products

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*Military Personnel: DOD Has Taken Steps to Meet the Health Needs of Deployed Servicewomen, but Actions Are Needed to Enhance Care for Sexual Assault Victims.* [GAO-13-182](#). Washington, D.C.: January 29, 2013.

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