
A Review of the Implementation Plans for the Elimination of the Direct Ground Combat Assignment Rule

Introduction: The Combat Integration Initiative (CII) is a working group composed of veterans, servicemembers, lawyers, scholars, and members of civil society who are committed to the full integration of women across all branches and occupational specialties of the Armed Services.

Each of the military departments and the U.S. Special Operations Command (SOCOM) submitted their proposed plans for eliminating the remaining restrictions imposed by the now rescinded direct ground combat assignment rule in writing to the Office of the Secretary of Defense (OSD) in June, 2013.¹ On June 27, 2013, CII teams reviewed the plans for their clarity, specificity, and transparency; their analysis is presented below.

General Observations: As required by OSD's order rescinding the direct ground combat assignment rule, each branch has submitted a separate plan for opening to women career fields that formerly were closed. In its review, CII studied each plan, and, in sections below, we offer commentary and questions about each of the plans as a standalone effort. However, it also is essential to study the plans as a whole and to compare, even closely cross-reference, their provisions for consistency. In a number of crucial instances, decisions made in one plan will affect decisions made by others. Thus, there will be a need to identify and reconcile potential conflicts between the plans to ensure that they support, rather than undercut, each other. To pick just one salient example, it is clear that SOCOM's policies will directly affect each of the service's implementation plans because all of the services' special operations forces (SOF) will have to work for SOCOM at varying points in their careers in order to ensure career progression. Likewise, it seems to be the case that the standards for employment in some Navy specialties may conflict with Marine Corps policies and implementation timelines. At this point, it is not clear how these conflicts will be managed. In order to avoid confusion and unnecessary duplication of effort down the road, OSD must recognize this problem up front and develop a process for identifying and resolving these inherent conflicts.

Each plan contains provisions that explicitly rely on the "guiding principles" invoked by the Chairman of the Joint Chiefs of Staff in his memorandum of January 9, 2013, entitled "Women in the Service Implementation Plan." As tends to be the case with general guidelines, some of the terms used in the Chairman's "guiding principles" are abstract and/or not clearly defined. In more than one instance in the implementation plans, some of these crucial terms have been given different and potentially conflicting interpretations by different departments. We highlight some of the significant points of difference here, together with additional general remarks.

First, the Chairman stated that the implementation plans should ensure "that a sufficient cadre of midgrade/senior women enlisted and officers are assigned to commands at the point of introduction to ensure success in the long run." This directive raises some important questions.

¹ All of the implementation plans as well as the General Dempsey's Memorandum regarding Women in the Service Implementation Plan of 9 January 2013 are available for review at:
<http://wiisglobal.org/wordpress1/combat-integration-initiative/dod-implementation-plans-and-announcements/>

(a) What constitutes “a sufficient cadre” of midgrade and senior women? The Chairman does not define that term, and the implementation plans contain varying interpretations of the requirement.

(b) What happens in the short term if there is no “sufficient cadre” of mid-level and senior women available “at the point of introduction”? Most crucially, will women who satisfy all other qualifications for elite positions be barred from serving in those positions on the grounds that the cadre is insufficient?

(c) The answer to the prior question depends, in turn, on the reason for imposing the cadre requirement in the first place. Why does “success in the long run” depend on having a sufficient cadre of senior women in place before junior women arrive? We fear that the cadre requirement itself may prove to be one of the “unnecessary gender-based barriers to service” that the Chairman declares must be eliminated. That is, the requirement seems to rest on the assumption that men either are unwilling or cannot be trained to support the introduction of small numbers of well-qualified women into their ranks. This premise is belied by the experiences of many servicewomen and veterans in CII, including those of us who served as combat pilots when no “cadre” existed and those of us who deployed to Iraq and Afghanistan as parts of small teams of women accompanying large, all-male units of ground combat troops. At a minimum, therefore, the cadre requirement must be closely monitored so that it does not make it impossible for women to enter some of the formerly closed occupational fields at all.

Second, the Chairman directed the services to develop, validate, and implement gender- neutral “occupational performance standards, both physical and mental, for all military occupational specialties (MOSs), specifically those that remain closed to women.” Once again, the implementation plans take inconsistent positions with respect to this crucial directive. Some plans propose to satisfy this requirement by conducting rigorous research. Other plans assert that there is no need to follow this directive because the branch in question already has in place valid, gender-neutral occupational standards. For example, SOCOM and the Marine Corps assert that their standards are already gender neutral because they are task based. However, at this juncture, it is critical for each department to follow the Chairman’s directive carefully, to take a fresh look at all standards to assess their occupational relevance, and to develop and validate new standards as necessary. To say the least, a decision to rely on the current standards creates a significant risk that the branches will reinforce unnecessary gender-based obstacles to service. It is likely that traditional, invalid, and outmoded notions of warrior competencies have heavily influenced the current standards. If that is the case, the current standards are unlikely to satisfy the Chairman’s mandate, and a decision to keep them in place could result in not only criticism but also potential legal challenges.

Third, the Chairman’s memo established several clear benchmarks for the timing of integration. The dates are:

1. 15 May 2013: Implementation Plans due (completed and released to the public on 17 June 2013)
2. September 2015: Gender neutral occupational standards set
3. December 2015: All studies complete
4. January 2016: All positions open unless an exception to policy is requested

5. Quarterly update reports are due NTL 10 days after the end of each quarter: 10 July 2013, 10 OCT 2013, 10 Jan 2014, 10 APR 2014, 10 JUL 2014, 10 OCT 2014, 10 JAN 2015, 10 APR 2015, 10 JUL 2015, 10 OCT 2015

By contrast, the timelines provided in the plans themselves are unclear and difficult to decipher. Indeed, the various plans present varying timelines, with some steps being completed in advance of set deadlines, others coming after deadlines, and still others impossible to pin down with any precision. This lack of clarity creates confusion, as well as the potential for inconsistent results, which will impair military readiness.

Finally, none of the plans details a mechanism or process for obtaining external input to support the necessary studies for data collection, the creation of best practices, and so forth. Likewise, none of the plans identifies any mechanism for communicating to the force or to the public the results of the studies, research, and decisions made along the road to integration. Soliciting external input and engaging in strategic communications could reduce the risks of methodological errors, limit the spread of misinformation, facilitate getting buy-in from the force by increasing servicemember confidence in the process, and ease Congress' oversight duties.

Recommendations/Questions for OSD:

- a) The plans should follow a common timeline format for ease and clarity of understanding. These plans are interdependent and cannot succeed if they are or appear to be in conflict with each other.
- b) OSD should establish a process for ensuring that the plans are transparent in their progression, including making the quarterly reports and lessons learned available for general review and to allow the services to share best practices. Are there any plans to provide this kind of oversight and support to the services?**
- c) OSD needs to reconcile the inherent conflicts between the services and SOCOM. All of the services are dependent upon SOCOM's decisions because they are the force providers to SOCOM. If the services provide qualified female SOF operators, will SOCOM be allowed to restrict their service/employability?
- d) OSD must clarify whether the services or SOCOM will develop and validate gender-neutral SOF occupational standards.**
- e) Will OSD require the service branches to recognize and build upon the combat experience that current servicewomen gained in Afghanistan and Iraq? Will servicewomen who were attached to or otherwise served alongside combat units in Afghanistan and Iraq be eligible for leadership positions requiring combat specialties? Will the service branches develop a plan to enable such women to cross-train and compete for leadership positions in combat units?
- f) Will OSD require each service to brief OSD and Congress on how it is developing its gender neutral occupational standards? Will OSD also ask them to provide a briefing on their use of

social science or “cultural” studies in the development of gender-neutral occupational standards?

- g) **Currently, women are being allowed to serve in previously closed units in open specialties in some units. This practice is being inconsistently applied across the services. For example, women in the Army are being assigned down to the battalion level in open specialties but not to the company level in combat arms units. In the USMC women are still prohibited from being assigned to the battalion level in most combat arms units. Will OSD establish a policy on women serving in previously closed combat units in currently open MOSs? This inconsistent application of policy and practice is likely to lead to legal challenges in the future.**
- h) Has DOD established any guiding principles for how the services should proceed as they develop gender-free occupationally driven standards?

Analysis of Individual Plans:

1. Air Force (AF) Implementation Plan

The AF has less than 1% of its specialties closed to women. The AF plan clearly outlines a path to full integration along a logical sequence of tasks beginning with updating policies to reflect the new openings. Additionally, it assigns responsibilities for completing each task in the process to specific AF organizations and it provides deadlines for completing the required tasks. However, the AF does not plan to begin to recruit women into these new specialties until the end of 2015 and they don't expect to graduate any newly qualified women until early 2018.

All of the Air Force's closed specialties are within the special operations career fields. While these occupational specialties are utilized within the Air Force, career progression requires assignment opportunities within SOCOM. Therefore, for career development purposes female officers and enlisted personnel within these specialties must be allowed to cross flow between SOF and non-SOF assignments to ensure career progression. Success of AF women is contingent upon SOCOM's policy.

The AF plan is generally clear and provides sufficient detail. Providing a deliberate plan to communicate benchmarked progress as well as the status and methodologies of the ongoing research and findings within the three outlined tasks would enhance transparency.

Recommendation/Questions:

The AF plan should offer a specific plan to make the process transparent and open for outside consideration, debate or input. Many women are waiting for their first opportunity to apply to closed positions, and having a clear timeline for application to closed specialties is important to prevent the service from losing women who may become frustrated and leave the service as a result of missed opportunities.

2. Navy Implementation Plan

The Navy plan is very brief and it generally lacks clarity and specificity. It is replete with unexplained acronyms and terms. Much of the document is provided as a power point briefing that is written in a bullet format that leaves the reader unclear on the content. The Navy and the USMC cross assign

servicemembers. The Navy is limited in its ability to cross assign qualified women to USMC Ground Combat Element positions by the USMC's policies that currently prohibit women's assignment to many units.

Recommendation/Questions:

- a) This document should be revised and provided as a written report with complete sentences. All acronyms and Navy specific terms should be defined somewhere in the document.
- b) The Navy plan should offer a specific plan to make the process transparent and open for outside consideration, debate or input.
- c) Who is responsible for development/validation of SEAL gender-neutral occupational standards? Navy, SOCOM or both?
- d) **Submarine integration plans address allowing women—both Officers and Enlisted—to serve aboard Virginia Class Attack Submarines and also the potential for women officers to be assigned aboard older Los Angeles Class and Sea Wolf Class Attack Submarines. What's missing is the Navy's plan for integrating enlisted women aboard the already-opened-to-women-officers Ballistic Missile Submarines (SSBN) and Guided Missile Submarines (SSGN). In FY 2010, Navy promised to open these to enlisted women eventually. This has not been done yet. Why isn't this addressed in the Navy's integration plan?**
- e) Will the Navy keep Frigates, Mine Counter Measure Ships and Coastal Patrol Craft closed to enlisted women since they are scheduled for decommissioning and too costly to overhaul to provide berthing/ privacy?
- f) Will Navy keep Los Angeles and Seawolf Class Attack Submarines closed to both women officers and enlisted women because they are too costly to overhaul to provide berthing privacy?

3. SOCOM Plan

This plan is very short and generally lacks clarity, specificity and transparency. The two-page document advances "concerns" but fails to identify what those concerns are relative to integrating women into SOF units. The document does advance the idea that having women operate on small, self-contained teams that live in austere environments might be problematic but SOCOM has been imbedding women on such teams in austere environments for the past three years in remote locations in Afghanistan. Have concerns developed based on those deployments? And if so, what are the concerns?

Recommendations/Questions:

- a) Who is leading the DOTMLPF-P analysis?
- b) Clarify the timeline. Terms in the timeline are not defined or do not correspond to the narrative. For example, the acronym DEF REQS is undefined, "sufficient" cadre is not defined, personnel processes is blocked as a key event but there is no detail. Categories of closure are advanced but not defined.

- c) Two different timelines are provided with no explanation for the different timelines.
- d) What role, if any, does SOCOM have in validating service specific qualification standards?
- e) **Can SOCOM describe the “social science assessments” referenced in the plan and how it intends to use them to assess the “psychological and social impacts of integrating women into small SOF units”?**
- f) How will SOCOM account for the work that women have already done alongside Special Operations Forces in Afghanistan and Iraq? Will they rely on field experience from these operations?

4. The Army Plan

The Army has the largest number of positions that must be integrated. The plan is presented as a phased process that will open positions in closed units and then follow on with opening closed occupations across the Army. The plan does provide specific agencies as lead for research and studies. However, while the plan promises to make the process transparent it doesn't offer a plan or a mechanism for ensuring transparency.

Recommendations/Questions:

- a) How many women have been assigned to the newly opened Brigade Combat Teams and to Special Operations Aviation Regiment (SOAR) and what problems have been encountered with those assignments?
- b) LOE 1 identifies a template that is being used to integrate units. Can the Army make that template available for general review and use across the services?
- c) **What cadre requirements were established before junior officers and enlisted personnel were allowed into the newly opened units? Is this the standard that will be used going forward with full integration?**
- d) What organization is responsible for capturing lessons learned and how will they communicate those lessons to the force at large?
- e) **The Army has committed to keeping Congress, Soldiers, and the American public informed throughout the process. What mechanisms will the Army use to keep the community of interest informed? What information will be routinely communicated? Will the quarterly reports be available for review?**
- f) What are the quantitative research methods being used by USARIEM to validate or establish gender neutral occupational standards?
- g) What methodology is TRAC using to conduct their research and can they make their methodology generally available for review? Will TRAC make survey results available to the public?

- h) **The plan makes note of “mitigation strategies” that are being used as units are integrated. What are those strategies?**
- i) The plan identifies LOE 4 as SOF operations but provides no enclosure or detail toward opening the 18 series (SF), closed specialties. Who is working on this plan for the Army and what does the plan entail?
- j) **When will the Army open Ranger School, a non-MOS dependent course that is billed as a leadership training course, to women?**

5. The Marine Corps Plan

The USMC’s plan provides some specificity and clarity but is lacking in transparency. The plan outlines a sequenced process to open closed units to women serving in open specialties by CY15. This effort, called the “pilot program,” began in CY12 and is well under way. The plan to open closed occupational specialties is less clear and appears dependent on the results of the pilot program

- a) **Will the USMC share the results of the surveys and studies that were completed this summer relative to the pilot program? Specifically, the plan notes that invaluable feedback has already been received that indicates that “certain conditions” must be met prior to further expansion. What are those conditions?**
- b) **What additional studies is the USMC conducting relative to the pilot program? The plan suggests that facilities modification and education for unit members may be required before a decision to open the positions in previously closed units can be made. Would the USMC explain what facilities changes and education might be required and how long that is expected to take?**
- c) The plan also states the USMC will request exceptions to policy to keep positions and units closed by the end of CY13. This is a process that was initiated in CY12 and it appears that there is already a plan underway to request exceptions to policy. What positions and specialties are going to the requested as exceptions to the policy?
- d) Will validated occupational standards become part of the fitness tests rather than used to determine the qualifications for a particular MOS or group of MOSs? If so, how would this work?
- e) **The plan indicates that observation of the performance of a handful of women volunteers, less than 10, in the Infantry Officer Course (IOC) is being factored into the decision on whether to open previously closed MOSs. What is the purpose of allowing entry-level women to volunteer for the IOC course? What research organization is conducting this study and what is their research methodology? Have the physical tests in the IOC been validated as part of an occupational standards review for infantry officers? And, if so, can you describe the validation process including how the IOC tasks test the validated infantry officer occupational standards?**

- f) Knowing they cannot become Infantry officers even if they complete the Infantry Officer Course and meet the standards, as well as being subjected to extreme scrutiny by their peers, the USMC and the media will discourage women from applying to and completing this pilot program. The CII believes this significant factor may invalidate this “pilot” program.
- g) In deciding whether to open closed MOSs to women, will the Marine Corps draw upon experiences from the battlefield concerning female Marines who served alongside infantry and other combat units as members of Female Engagement Teams and otherwise? Will the Marine Corps draw upon this real-world experience of women’s performance on the battlefield?
- h) Will the Marine Corps require mid-level female Marines to serve in an MOS before entry-level female Marines are assigned to that MOS? How will such requirements affect the timeline for opening occupational specialties and units to servicewomen? Does the USMC anticipate that any positions will be closed to junior Marines because there are no available senior women to take leadership positions?
- i) For positions requiring combat specialties for which women have been ineligible, how will mid-level and senior women be assigned? Will Marines who served alongside combat units in Iraq and Afghanistan be eligible for these positions, regardless of their official MOS?

Conclusion: The main problem with all of the plans is that they lack clarity and invite little to no external input to the ongoing studies and plans. Furthermore, none of the plans address how they will communicate the results of studies, research, lessons learned and decisions to the force or to the general public.

Contact: For questions or to provide input to this report please email cii@wiisglobal.org or call 202-552-5404.