



PERSONNEL AND
READINESS

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

01 OCT 2015

MEMORANDUM FOR THE SECRETARY OF DEFENSE

THROUGH: Brad R. Carson, Acting Under Secretary of Defense for Personnel and Readiness

SUBJECT: Recommendation from the Defense Advisory Committee on Women in the Services Regarding Women in Combat

I am honored to serve as Chair of your Defense Advisory Committee on Women in the Services (DACOWITS). The Committee was established in 1951 with a mandate to provide the Secretary of Defense with independent advice and recommendations on matters and policies relating to women in the Armed Forces of the United States. Individual members of the Committee are appointed by the Secretary of Defense and serve in a voluntary capacity for one-to-four year terms. Throughout the year, the members work to prepare an annual report for the Secretary of Defense with substantive recommendations on pressing women's issues based on research and analysis. This annual report is normally published during January of each year.

Due to the upcoming decision you will be making in the near future regarding women serving in combat (e.g., the opening of all positions and units to women), to include the review of potential exceptions to policy request(s) by the Services, the Committee wanted to ensure you were provided our views on this issue in a timely manner. To that end, I have enclosed our recommendation and reasoning for your consideration.

We strongly and unanimously recommend that you open, without exception, all closed units, occupational specialties, positions and training to Service members who meet the requisite qualifications, regardless of gender. DACOWITS has studied this issue over many years and has recommended the opening of all positions and units annually since 2010.

I also request the opportunity, at your convenience, to meet and discuss this recommendation with you.

A handwritten signature in cursive script that reads "F. C. Wilson".

Very respectfully,
F. C. Wilson Lt Gen, USMC (Ret)
Chair, DACOWITS

Enclosure:
As stated

ENCLOSURE

DACOWITS 2015 RECOMMENDATION

EFFECTIVE AND FULL INTEGRATION OF WOMEN INTO CLOSED POSITIONS AND UNITS

Recommendation: The Secretary of Defense should open all closed units, occupational specialties, positions and training to Service members who meet the requisite qualifications, regardless of gender. No exceptions should be granted that would continue any restrictions on the service of women.

Reasoning: Since 2010, DACOWITS has recommended that the Secretary of Defense completely eliminate the discriminatory exclusion of women solely based on gender, from any and all positions and occupational specialties, including those in direct combat. The Committee has studied the issue of disparate opportunities afforded to women in the Services under the Ground Combat Exclusion Rule, and its deleterious impact on women's accessions and career advancement. Employment discrimination against civilian women based solely on gender has been outlawed for decades in any other positions in government or the private sector, including law enforcement, firefighting, and other non-traditional career fields. Cases of gender discrimination are examined under the "intermediate scrutiny" standard. In order to be constitutional, a discriminatory law must further an important governmental interest or objective, and the means of discrimination must be substantially related to that government interest. Because gender-neutral standards are being implemented, any gender-based exclusion of women from combat positions and occupational specialties is likely to fail this legal test.

The Department of Defense (DoD) contracted with the RAND Corporation to conduct a study to describe best-practice methodologies for establishing gender neutral standards for physically demanding jobs, tailored to address the needs of the military. In September 2013, RAND issued a draft report which was provided to the Services. RAND's 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. The Services appear to have taken various approaches toward conducting studies and analysis regarding establishing gender neutral standards and opening positions to women. The Marine Corps has given great weight to their study comparing the average performance results of men and women. The Army, in contrast, appears to have focused its analysis on individual performance and the individual's contribution as a member of a team. It is DACOWITS' belief that the Army's focus on individual performance standards is the best approach for determining the eligibility to serve in all positions and career fields. This strengthens the overall readiness and combat effectiveness of the Armed Forces. Studies comparing the relative strength of the average female to the relative strength of the average male are irrelevant. They are not responsive to the guidance issued by the Secretary of Defense and Chairman of the Joint Chiefs to develop and implement occupational standards to measure whether an individual is qualified to perform a certain position. These studies provide no rational basis for barring qualified

women from a previously closed position. Indeed, these conclusions instead demonstrate a gender bias against all qualified females (even higher scoring females) in favor of any qualified male. In order to have the strongest fighting force, less qualified males should not be favored over equally or more qualified women.

I. Opening all positions to women will make our military stronger.

A. Opening all positions to women ensures our military forces attain the highest readiness levels possible.

The Committee believes that the readiness of the U.S. military forces is the foremost consideration for all legislative and policy initiatives concerning women in combat. In order to attain maximum military readiness, the military must ensure that all Americans who are qualified and interested in serving their country in uniform have the opportunity to do so. With an all-volunteer force, this becomes even more essential to ensure that the most qualified and capable Service members are available to meet National Security objectives.

To deliberately exclude more than 50% of the American population, especially in front-line combat positions and occupational specialties, defies long established and fundamental principles of successful organizations. In view of the declining proportion of qualified youth to serve in the military, the military must be positioned to compete for the best young men and women to enlist or be commissioned.

The Committee believes that the ongoing development and implementation of gender-neutral standards will provide lasting readiness benefits as our military forces adapt to future combat environments, missions, technology and equipment. These standards should be based on a scientifically rigorous process, validated as job related (based on the actual, regular, and recurring duties to be performed using current technology and combat equipment), and determined to accurately measure individual, not average, performance.

Given such rigorous standards, there is no reason to exclude any Service member who can meet those standards. Only those individuals who can meet the standards should be recruited, retained and promoted; anything less will undermine military readiness. Gender is not relevant to this determination, any more than race, religion or sexual orientation. Performance is the only relevant criteria.

When the Committee has broached the topic of standards at committee meetings; in DACOWITS focus groups at military bases; and in several Committee members' interactions throughout their own military careers, the message from female Service members is very clear: they do not appreciate or desire different standards, nor do they benefit from them. To the contrary, lower standards impact readiness, are restrictive and counterproductive, and cause perceptions that are completely contrary to what these professionals aspire to.

B. Opening all positions to women establishes the Military Services as a true meritocracy.

The DoD Human Goals dated April 28, 2014 which were signed by the senior leadership of DoD, to include the Secretary of Defense, Service Secretaries, Chairman of the Joint Chiefs, and Service Chiefs, stated that it is the Department's goal; "[t]o make the Military Services in the Department of Defense a model of equal opportunity for all regardless of race, color, sex, religion, sexual orientation, or national origin;" and 'provide opportunity for everyone, military and civilian, to rise to as high a level of responsibility as possible, dependent only on individual talent and diligence.'" Unless every member of the Military Services, female or male, are allowed to hold any position for which he or she is qualified, the Department simply cannot achieve this goal. By opening all positions and military occupational specialties to women, DoD will become a true meritocracy where every individual can live up to his or her full potential.

C. Opening all positions to women enhances the military culture to be more inclusive and accepting of diversity.

The DoD Human Goals of April 28, 2014, states "The defense of the Nation requires a well-trained volunteer total force comprised of active and reserve military members and civilian personnel. We gain a strategic advantage through the diversity of our total force and create a culture of inclusion where individuals are drawn to serve, are valued, and actively contribute to overall mission success." This change in policy is consistent with the American values of fairness and diversity, which the military is charged to defend. Indeed, history is instructive on this point. In the past, when the DoD eliminated other discriminatory policies, such as racial segregation of Service members or the prohibition on service by gay and lesbian individuals, the Armed Forces have only been strengthened.

II. Not only will opening positions make our military stronger, arguments to the contrary are specious.

DACOWITS' studies of women's assignment restrictions, including years of extensive interviews and focus groups with troops at all ranks, in all Services, both women and men, show that none of the proffered reasons for discrimination against gender hold up either as a matter of policy or law – any more than they did when they were used to justify discrimination based on race or sexual orientation.

A. Opening all positions to women will have no negative impact on unit cohesion and morale.

Since 1948, women have been a permanent and integral part of the Armed Forces and their presence has never negatively impacted unit cohesion or morale in combat situations. During Desert Shield/Desert Storm, out of necessity, more than 40,000 women served in the war zone in support units, missile crews and aboard Navy ships, constituting seven percent of the combat force. During that conflict, 13 women were killed and two taken prisoner. More recently, during the Iraq and Afghanistan wars, nearly 300,000 women have served in the war zone, directly in harm's way, and engaging the enemy in

close combat. Over 9,000 women have received the combat action badge. Almost 1,000 women have been wounded in action and more than 150 have made the ultimate sacrifice. Two women were awarded the Silver Star.

The Committee has never received nor reviewed a scientifically validated study that proves gender integrated units experience a negative impact on unit cohesion or morale. To the contrary, throughout the past years of conducting focus groups across the country, the general consensus is the opposite – women bring fresh perspectives, unique leadership skills and relentless commitment to completing the mission.

B. Combat is high-risk to health, regardless of gender.

As long as women can meet the gender-neutral occupational standards for a job, they should be evaluated as individuals and not on a physiological average. Physical fitness standards are not occupational standards. Physical fitness standards are normed for both age and gender and are intended to provide a measurement of an individual's health and fitness for duty generally. Occupational standards are developed to ensure that an individual is capable of performing the functions of a position. Occupational standards for each position must be the same for men and women. Protective equipment and gear must be suitable for Service members of all sizes and shapes regardless of gender – these modifications are necessary to ensure all those who serve are properly equipped, trained and prepared for their mission.

C. Opening all positions to women would not require unreasonable modifications to facilities to accommodate women.

Facility modifications are not demanded or required by servicewomen. Women and men already serve in close quarters with minimal to no privacy while training and on deployment.

D. Opening all positions to women will pose no reasonable obstacle to integrating women in a multinational force.

The DoD should not permit other countries or cultures to dictate U.S. policies and regulations on gender integration, especially when such cultural mores directly impact U.S. military morale and unit cohesion; and undermine readiness by eliminating many potentially qualified Service members strictly based on gender. Moreover, today many of our allies already have women serving in combat positions, including the Republic of Korea, Canada, Australia, Sweden, and Israel.

E. Women have demonstrated a desire and ability to serve in combat positions.

This past year, scores of women have volunteered to participate in combat training programs and experiments to further gender integration. They have even in some cases delayed or negatively impacted their careers, in spite of being given no promise of earning the occupational specialty once they successfully completed the training. These women have volunteered because they passionately believe in the need to change DoD policy. Indeed, on August 21, two women completed the rigorous Army Ranger School.

Of note, a study conducted by Center of Naval Analysis for the Marine Corps in 2011, *Assessing the Implications of Possible Changes to Women in Service Restrictions*, indicated that 31% of the 1,558 female respondents would be interested in a lateral move to a combat occupational specialties if given the opportunity, 43% of the 2,083 female respondents would have chosen a combat arms occupational specialty when they joined the Marine Corps had it been an option, and 34% of the 1,636 female respondents would volunteer for a Ground Combat Element assignment if allowed. To date, over 140 female Marines have successfully completed the enlisted School of Infantry.

Until women have the same opportunity as men to serve in all positions and occupational specialties, with their performance evaluated by the same standards and criteria, women will never compete fairly “head to head” in selection and screening boards. This impacts their ability to promote to the most senior levels of responsibility and authority. This also creates a ripple effect back down the ranks and discourages junior women to continue their careers, and civilian women to consider military service.

It is an unfortunate fact that today some of the Services are having problems recruiting minority officers into the infantry and other combat arms branches. It would be unthinkable to argue that minorities should be restricted from such positions due to a low propensity to serve, lack of critical mass or most inflammatory, inability to meet standards. These arguments are no less specious when applied to women.