SUBJ: DACOWITS RFI #4 - March QBM

FROM: Personnel Service Center (PSC)

TO: DACOWITS Committee

THRU: Office of Diversity & Inclusion (CG-127)

CONSCIOUS AND UNCONSCIOUS GENDER BIAS

The Committee believes the Military Services are at various phases in eliminating conscious and unconscious bias from the various elements of Service member professional development. There have been independent studies conducted which indicate potential evidence of conscious and unconscious gender bias and language in military performance evaluations. For example, the 2018 Harvard Business Review study: "The Different Words We Use to Describe Male and Female Leaders."

The Committee requests a **WRITTEN RESPONSE** from the Military Services.

DACOWITS:

The Committee requests a written response from each of the Military Services on what actions have been taken to assess and mitigate (if necessary) the impact of conscious and unconscious gender bias and language on military performance evaluations and promotions? Additionally, include any processes built into your promotion and evaluation systems that facilitate equitable selection.

CG Response:

PSC-OPM: Officer Advancements and Evaluations:

Regarding evaluations, the Officer Accessions, Evaluations, and Promotions manual (COMDTINST M1000.3 (series)) provides the policy that the entire Coast Guard "shall comply" with regarding officer evaluations. COMDTINST M1000.3 (series) provides guidance to ensure that no consideration is given to the gender of the officer being evaluated. Chapter 5, paragraph I of COMDTINST M1000.3 (series) specifically states that, the officer evaluation rating chain must not:

NOTE: The **bolded**/red font words below are NOT listed this way in the manual.

"6. Mention pregnancy."

"7. Expressly evaluate, compare, or emphasize **gender**, religion, color, race, sexual orientation, or ethnic background."

- "8. Place emphasis upon a third party by **gender**, religion, color, race, sexual orientation, or ethnic background..."
- "9. Refer to the reported-on officer by first name in the comment blocks."
- "10. Refer to reported-on officer's marital or family status."

Additionally, in November 2018, the Coast Guard amended policy to completely prohibit the use of **gender** specific pronouns and member **names** (first and last) in the comments sections of both officer and enlisted evaluation reports.

The Officer Evaluations Branch (OPM-3) of the Coast Guard Personnel Service Center (PSC) reviews every Officer Evaluation Report (OER) to ensure compliance with the aforementioned policies.

Regarding promotions, the Coast Guard's statutory authority governing information provided to selection boards (14 U.S.C. 2115 and 14 U.S.C 2116) focuses on merit based criteria. Statutory criteria for competitive selection boards requires boards to select officers the board considers "best qualified." While specific direction may be provided to boards to consider the needs of the Coast Guard "for officers with particular skills" (14 U.S.C. 2116(a)), Coast Guard law, statutes, and policy do not permit for the consideration of **gender** or other demographics in board or panel selections. This is further emphasized by governing precepts which include standard language discussing the importance of board obligation to "confine themselves to facts of record." All Coast Guard boards and panels are monitored by a facilitator who ensures the integrity of the process through all phases of board and panel deliberations.

PSC-EPM: Enlisted Advancements and Evaluations:

Enlisted personnel compete for advancement within their rating using a numerical score combining six factors: (1) Service-wide Examination Score, (2) Performance Factor, (3) Time in Service, (4) Time in pay grade in present rating, (5) Medals and awards, and (6) Combination of sea/surf duty. Members are advanced in the order of this final multiple to meet service needs.

The USCG's enlisted advancement process is transparent and largely objective. While performance evaluations and medals and awards may introduce subjectivity, this has been further mitigated through the creation of a section of personnel devoted solely to validating Enlisted Employee Performance Evaluations. Under current policy, every Enlisted Evaluation reviewed is screened for gender specific pronouns. Member names and pronouns, such as: he, she, him, her or his are prohibited in the comment blocks of Enlisted Evaluation Reports. Enlisted Evaluations found in violation of policy (COMDT NOTICE ACN 125-18) are retuned to field unit for correction.