

February 7<sup>th</sup> 2020

Dear Defense Advisory Committee on Women in the Service Members:

Thank you for the time, dedication and representation you offer women in military service. The opportunities given to women through careers in the military and the undeniable, countless contributions and sacrifices they make to the United States is of utmost value to our institution and should rightfully be preserved and protected in the face of potentially damaging policies. I applaud your service in maintaining the retention and safe keeping of this valuable asset to our military.

The Army's new Combat Fitness Test (ACFT) has drawn both praise and scorn from military members and leaders alike. No doubt your committee is already aware of these upcoming policy changes and the nature of the new gender-neutral combat test. I would like to address some concerns I have regarding the specific impacts on retention, recruitment, career advancement and injury potential for females who will be required to take the new gender-neutral test to maintain their military career.

While I understand the desire and need for gender-neutral testing, I am concerned that the specific events of the ACFT put women at a disadvantage that does not equate to their effectiveness and success in military occupations. The 6 event test includes:

1. Three-rep [deadlift](#) of between 140 pounds (64 kg) and 340 pounds (150 kg)
2. A 10 pounds (4.5 kg) backward and overhead [medicine ball](#) throw
3. Hand-release [push-ups](#) over a period of two minutes
4. 25 metres (82 ft) shuttle run referred to as the "sprint-drag-carry" (Weights of 90lb and 80lb)
5. Hanging leg tucks over a period of two minutes
6. 2 miles (3.2 km) run<sup>[1][2]</sup>

For the large majority of women to lift the deadlift, the weight minimum will be well over their bodyweight. In MOS categories with higher requirements, some women will be lifting 2x their bodyweight – this will not be the case for men in any category. Due to the nature of the deadlift, this discrepancy will put women at more risk of fractures, muscle ruptures, various low back injuries, damage of the vertebral ligaments and meniscus tears leading to an indirect impact on female soldier MEB and retention. Currently the deadlift is a required event that cannot be passed with a profile.

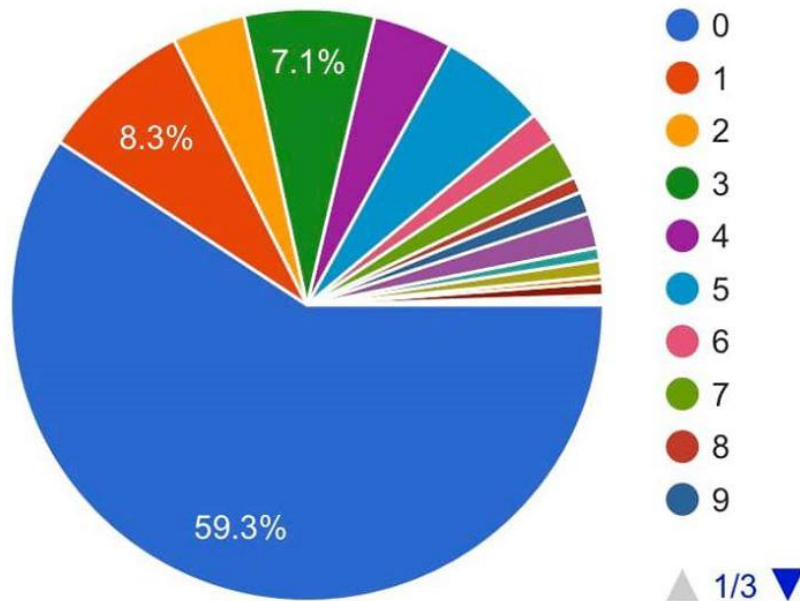
The Standing Power Throw has been identified as an event that's success directly correlates with height. A soldier who is 5'3 will not be able to throw the medicine ball as far as a soldier who is 6'0 – strictly due to height alone. Generally speaking, women are shorter and regardless of technique or strength will be at a disadvantage in this event and may even be the cause of their PT failure and loss of military career.

The Sprint-Drag-Carry has the same discrepancies as the deadlift, requiring women to carry and drag weight that will be closer to their bodyweight than their male counterparts. A standard female at 125 pounds will be dragging and carrying 66%-72% of her total bodyweight, compared to a standard 200 pound male carrying 40%-45% of his total bodyweight. The result is, again, more potential injury and PT failure for female soldiers, resulting in separation from the Army.

The leg tuck is the most failed event for women. Initial tests indicate a 74% failure rate in this event for female soldiers, below is an unofficial poll taken from 577 female soldiers in the ACFT training for Army Women Facebook group who have taken a diagnostic this fiscal year.

## Leg Tuck (reps)

577 responses

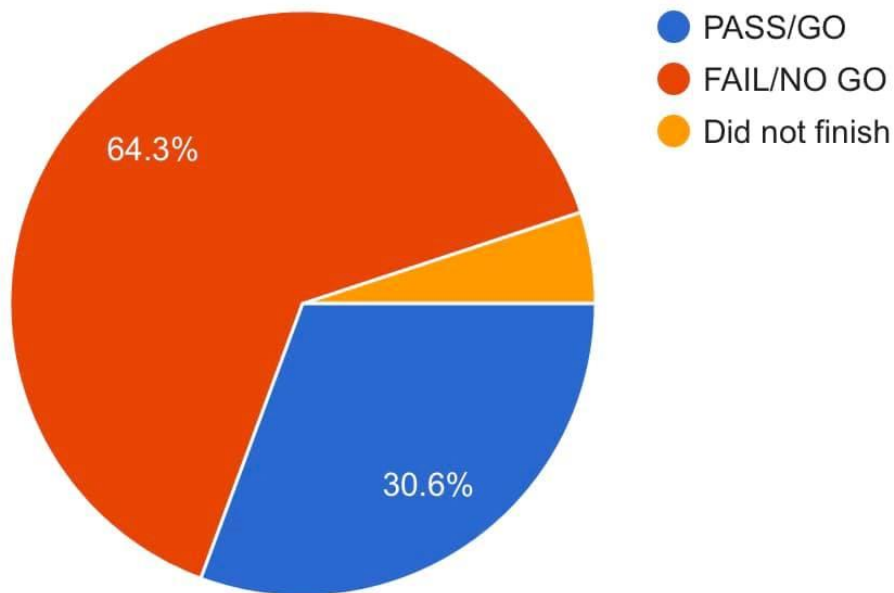


The leg tuck, again, favors male physiology. Army leadership's official stance states the leg tuck is a core exercise. The sit-up is also a core exercise and is gender-neutral, why was this removed and replaced with something that puts female soldiers at a disadvantage? If the answer is truly because of injury prevention, as per official statements, why add a required event that is renowned for its potential for injury, such as the deadlift?

The argument has been made that those with concerns about this test are simply, "lazy" and do not want to do the work, and that "women wanted equality – so here it is". Simply put, implementing a test that favors male physiology and directly negatively impacts women's retention and potential for injury is not equal. All one has to do is look to groups like the ACFT Training for Army Women Facebook group with 30,000 members to see that women are doing everything they can to meet this standard and the results still show a disproportionate failure rate for female soldiers. Below is an unofficial poll taken from 633 female soldiers in the ACFT Training for Army Women group who have taken a diagnostic this fiscal year.

## Did you overall Pass or Fail the ACFT

633 responses



Women are being forced to spend thousands of dollars on home gym equipment, CrossFit memberships and personal trainers to be able to meet the standard – something male counterparts will simply not have to do. These women are effective, valued and successful members in their MOS and military careers, and I believe this becomes an EO issue when this test is used to determine who can and can not remain a member of the U.S. Army.

For a test to be truly gender-neutral the events should not favor a specific gender and put another at an outright disadvantage. 80% of the military fills non-combat positions – with the inevitable negative impact on women’s retention, recruitment and potential for injury, the relevancy of these test events across the entire institution becomes questionable. The results of these policy changes are and will continue to specifically and categorically be felt in the female population of the Army.

Thank you again for your continued effort to support and represent women in the Armed Forces and the invaluable impact they have in our military. I appreciate your time and consideration.

Sincerely,

SSG Nicole R. Bouffard