INFORMATION PAPER

DAPE-MPC
3 June 2015

SUBJECT: DACOWITS RFI A5 for June 2015

1. Issue: The Committee requested a written response from the Army since DACOWITS continues to be interested in the Services implementation plans to further integrate women into previously closed positions and units.

2. DACOWITS Questions/Answers:

Q1) Update DACOWITS on the current progress and review being conducted, as well as potential exceptions to policy (ETPs) that have been drafted and the rationale.

A1) The Army remains on track with its plan for integrating women in previously closed opportunities in response to the elimination of the Direct Ground Combat Definition and Assignment Rule (DGCDAR). The Army continues with an incremental and methodical approach to opening positions; scientifically validating gender neutral occupational standards and completing gender integration study. TRADOC is completing its validation of gender neutral physical demands ICW US Army Research Institute of Environmental Medicine and FORSCOM. This work will inform decisions on opening the 13 remaining closed occupations. TRADOC also continues executing the gender integration study and will provide recommendations to Army leaders in Spring 2015. It will complete all actions to meet OSD requirements prior to January 1, 2016 and will seek exceptions from the Secretary of Defense through the CJCS, only if absolutely necessary.

Q2) Explain the methodology being used to validate occupational performance standards for each occupational specialty (physical and mental). Are the occupational performance standards for initial screening only or have they been rank/age adjusted?

A2) The Army is validating occupational performance standards for each occupational specialty (physical and mental). Proponent Managers across the Army have been tasked to provide a written report regarding validation of individual occupational standards, to include 1) A complete listing of all officer and enlisted military occupations/ ratings/ specialties and date the associated occupational standards were validated; 2) An explanation of the methodology used to validate occupational standards, both mental and physical, for selecting, training, and continuing personnel in individual occupations; and 3) Statements certifying the following: Occupational standards are gender-neutral, in accordance with Public Laws 103-160 and 113-66; Occupational standards meet criteria outlined in Public Law 113-291, Section 524, specifically that occupational

standards "accurately predict performance of actual, regular, and recurring duties of a military occupation; and are applied equitably to measure individual capabilities", and Validated occupational standards are in use, or will be in use by September 30, 2015, at Military Occupational Specialty schools and training. Until the validations have been completed and are certified by the Secretary of the Army, individual methodologies are unavailable. Occupational performance standards will be used for initial screening and may also be dependent on the rank held. All occupations are gender-neutral.

Q3) What efforts are being made to ensure women are given the opportunity to succeed in these newly opened career paths?

A3) The Army is improving its flexibility to respond to diverse missions by ensuring all Soldiers are provided full career opportunities to reach their highest potential and enhance overall Army readiness. To ensure successful integration, the Army has placed NCOs and junior female officers into units prior to assessing junior level Soldiers into newly opened occupations, unit, and positions.

Prepared by: LTC Diana Hare, Chief, Women in the Army/703-695-7370
Approved by: COL Linda Sheimo, Chief, CPPD

RFI Category and Number:

Assignments Working Group RFI #5

RFI Question:

In accordance with SECDEF's February 2013 memo, DACOWITS continues to be interested in the Services implementation plans to further integrate women into previously closed positions and units.
The Committee requests the **Services** provide a **written response** on the following:

- Update on the current progress and review being conducted, as well as potential exceptions to policy (ETPs) that have been drafted and the rationale.
- Explanation of the methodology being used to validate occupational performance standards for each occupational specialty (physical and mental).
    - Are the occupational performance standards for initial screening only or have they been rank/age adjusted?
- What efforts are being made to ensure women are given the opportunity to succeed in these newly opened career paths?

RFI Response:

Navy Progress

Since the delivery of the Navy's Implementation Plan executing the rescission of the Direct Ground Combat Definition and Assignment Rule, the Department of the Navy has made significant strides to execute the Secretary of Defense guidance to increase future assignment opportunities for women opening over 17,000 positions to women.

Navy has opened all remaining previously closed positions in the Coastal Riverine Force, including all Navy Joint Terminal Attack Controller positions, to the assignment of women. Women officers now have the opportunity to serve on all submarine types (SSN, SSBN, SSGN) and enlisted billets on Virginia (VA) and Ohio (OH) class submarines and officer billets on Seawolf class submarines are now open to the assignment of women. Female officers currently serve on OH (SSBN and SSGN) and VA (SSN) submarines. Navy is in the process of reviewing applications submitted for enlisted female conversions into the Submarine Force and recruiting new female accessions for submarine ratings. Medical and religious support billets in USMC units have been opened to the assignment of Navy servicewomen. Navy is also participating in the Exception to Policy (ETP) requested in the 9 Feb 12 Report to Congress, which expanded the base of billets open to the gender-neutral assignment of men and women, making 60 Medical Officer, Chaplain, Hospital Corpsmen Chief and First Class Petty Officer billets available for the

assignment of women in Marine Corps ground combat units. Navy's remaining positions to open are in special operations, SEAL/SWCC and enablers. Additionally, as the USMC opens units, Navy medical and religious support positions will also open.

Navy recommended an Exception to Policy to keep Frigates, Mine Counter Measure, and Patrol Craft closed to women. That ETP was routed through the Tank process and is currently awaiting Service Chief endorsement before leaving the Joint Staff for OSD P&R. The Navy does not expect to submit any other ETPs.

Occupational Standards

- Navy does not restrict the assignment of women based on physical requirements. All occupational physical requirements in the Navy are gender neutral.
- NAVMAC analysts reviewed OCCSTDs and Naval Standards to identify ratings which potentially required physically demanding tasks.
- NAVMAC analysts consulted with Naval Education and Training Command (NETC) Learning Centers to identify physically demanding NECs. NETC Learning Center Subject Matter Experts (SMEs) ranked tasks from least physically demanding to most physically demanding. Eight of 14 NETC Learning Centers provided input.
- The data collected suggest the following conclusions:
  - OCCSTDs are gender-neutral and focus on tasks, not how tasks are performed.
  - Of 14,149 total OCCSTD tasks, 354 tasks have physically demanding attributes, mainly characterized by lifting/carrying, protective services (e.g., police), construction, and maintenance
  - Eleven ratings had potential for significantly physically demanding work and could benefit from further study. In addition to the Special Warfare Operator (SO) and Special Warfare Boat Operator (SB) ratings (which are closed to women), ratings which have significantly demanding tasks are: Aircrew Survival Equipmentman (PR); Aviation Boatswain's Mate (Handling) (ABH); Interior Communications Electrician (IC); Equipment Operator (EO); Master at Arms (MA); Aviation Ordnanceman (AO); Builder (BU); Naval Aircrewman (Operator) (AWO); and Fire Controlman (FC).
  - NAVMAC analysts and NETC Learning Center SMEs identified 65 physically demanding NECs. Thirty-two of the 65 deemed extremely physically demanding are associated with Special Operations.
  - NAVMAC periodically and systematically reviews standards. These standards are updated with research, subject matter expert input, data analysis, and feedback from the Fleet and learning centers.
- NAVMAC develops OCCSTDs through a rigorous combination of research, subject matter expert interviews, and data analysis. OCCSTD process phases are:
  - Phase 1 (Preliminary): Analysts perform a detailed review of the current task inventory list with the cognizant NETC learning center. Analysts review and analyze any changes in the rating since the last publication of the OCCSTD to include manning changes, new equipment/technology for which the rating is responsible (e.g., new NECs), and the expected career path for a Sailor in this rating.

- Phase 2 (Data Phase): The analyst convenes a subject matter expert (SME) panel composed of Sailors in the rating currently performing the work in an operational environment. During the panel, the analysts review all tasks contained in the existing OCCSTD. Analysts ensure the task is written correctly, reflects the actual nature of the work performed, and is assigned the appropriate paygrade. Analysts ensure the proposed OCCSTD is updated to include any work not previously captured.
- Phase 3 (Computation): The analyst performs analysis of data collected during the SME panel. The analyst presents the findings to a panel of NAVMAC experts for verification. This process aligns the proposed standard with NAVMAC guidelines for standardization across the Manpower, Personnel, Training and Education enterprise. These changes are then arbitrated between the analyst and the learning center resulting in a completed document for submission.
- Phase 4 (Assessment): NAVMAC chain of command reviews proposed OCCSTD.
- Phase 5 (Endorsement): NAVMAC releases proposed OCCSTD to OPNAV Resource Sponsor for endorsement.
- Phase 6 (Approval/Implementation): NAVMAC submits proposed OCCSTD to OPNAV (N13) for approval and quarterly publication in NAVPERS 18068 (Navy Enlisted Occupational Classification System Manual), Volume I.

Additionally, Navy is working with the Navy Health Research Center to evaluate and validate gender neutral standards for SEAL/SWCC selection criteria and evaluate the physical demands underlying SEAL/SWCC operations. In Navy's coordination with USMC and USSOCOM, Navy service members serving in USMC and USSOCOM positions will comply with any occupational standards as reviewed and validated by USMC and USSOCOM.

Five Navy occupations require physical screening testing, three of which are open to women: Explosive Ordnance Disposal (EOD), Navy Diver (ND), Aviation Rescue swimmer (AWR/AWS). These screening requirements are gender neutral. The other two occupations, SEAL and SWCC, are currently closed to assignment of women.

Female Integration Efforts

The Navy has used lessons learned from integration throughout its history. Strong leadership, open communication, high expectations of professionalism and competency are all important to success. Women have been successfully serving side by side their male counterparts for hundreds of years. The Navy is removing gender barriers and promoting equity for both sexes. As new opportunities open to women, it's important to communicate that decision and for all members of the crew to be well trained and competent.

A5: In accordance with SECDEF's February 2013 memo, DACOWITS continues to be interested in the Services implementation plans to further integrate women into previously closed positions and units.

The Committee requests the **Services** provide a **written response** on the following:

1. Update on the current progress and review being conducted, as well as potential exceptions to policy (ETPs) that have been drafted and the rationale.

   - The Marine Corps is on track to complete the collection of data along all four lines of effort within their Marine Corps Force Integration Plan. The synchronization and integration of all the research conducted during the course of the past few years is occurring during June and July 2015. Concurrently, planning for the implementation of the DoD gender integration policy continues.
   - At this time, there are no recommendations for an exception to policy in draft.

2. Explanation of the methodology being used to validate occupational performance standards for each occupational specialty (physical and mental).

   - Physical Standards Development. The Marine Corps' Training and Education Command (TECOM) uses the Systems Approach to Training (SAT) as the overarching process for developing training standards and training curricula. The SAT process follows a 5-phase "ADDIE" model: Analyze, Design, Develop, Implement, and Evaluate. For every Occupational Field /MOS, TECOM coordinates essential support from the OccFld Sponsor and select Subject Matter Experts from operational forces during the "Analyze" and "Develop" phases of SAT. TECOM coordination is broken down into three sub-processes: Job Analysis, Task Analysis, and Instructional Setting Determination.
     - Via the SAT, the Marine Corps conducts analysis to determine what tasks Marines within an MOS are required to perform, what tasks are actually being done, the order and frequency in which tasks are performed , and the standards of performance necessary to adequately perform each task to accomplish the mission. The end results are a validation of Marine Corps skills defined in the MOS Manual. This document provides the basis for all individual MOS instruction, sustainment training, and proficiency assessments as well as unit training and unit training readiness assessments.

   a. Are the occupational performance standards for initial screening only or have they been rank/age adjusted?

      - All standards are age and gender neutral.
      - For each occupational specialty, the Marine Corps is developing standards for four distinct steps in the training and education continuum:
        - Standards for screening applicants prior to contracting for a ground combat arms program.
        - Standards for classifying a recruit from a ground combat arms program for training in an entry-level ground combat arms specialty.
        - Standards for a Marine in entry-level ground combat arms training to qualify for a ground combat arms MOS.
        - Standards for a ground combat arms MOS Marine to continue to serve in that specialty.

3. <u>What efforts are being made to ensure women are given the opportunity to succeed in these newly opened career paths?</u>

   - The Marine Corps is committed to enhancing combat readiness and setting all Marines, regardless of gender, up for success. To accomplish these goals, the Marine Corps is developing and validating ground combat arms MOS standards and assessments that match the Marine to the MOS in which they desire to serve and are best qualified. This approach will ensure that the Marines who make it into those specialties possess the physical aptitude required to be successful in their assigned MOS and unit.

   - As part of Line of Effort 1 in MCFIP, ground combat arms units have been assigned non-ground combat arms MOS female Marines to their headquarters and down to company/battery levels. Additionally, information and lessons learned throughout the research period, has been incorporated into a Commander's "toolkit". This web-based application is designed to provide the commander materials and resources for consideration and engagement with subordinate leaders and junior Marines. Education topics include an overview on integration efforts, leading organizational change, understanding bias, and interpersonal skills assessment tools. The Marine Corps remains committed to maintaining positive command climates across the force.

Assignments A5:

In accordance with SECDEF's February 2013 memo, DACOWITS continues to be interested in the Services implementation plans to further integrate women into previously closed positions and units.
The Committee requests the Services provide a written response on the following:

- *Update on the current progress and review being conducted, as well as potential exceptions to policy (ETPs) that have been drafted and the rationale.*

Response: The AF is progressing with tasks as outlined in our Women in Service Review High Level Implementation Plan, to include conducting our mental and physical standards studies. Currently, there are no anticipated ETPs, but the Air Force's currently closed occupations and positions are closely tied to SOCOM's and the other Services' recommendations and ultimately SECDEF decision.

- *Explanation of the methodology being used to validate occupational performance standards for each occupational specialty (physical and mental).*

Response: The methodology used to validate occupational performance standards for each occupational specialty (physical and mental) encompasses the RAND 6-step process.

A. For our Physical Standards Study for Battlefield Airmen, the AF is developing and validating occupationally specific, operationally relevant, science-based criterion performance physical fitness tests and standards for Battlefield Airmen (BA) AFSCs, employing Bona Fide Operational Requirements physical standards development process.

The study methodology involves four major steps and BA are integral to each study steps:
Step 1 Conducted a Physical Demand Analysis on each AFSC - developed AFSC-specific Critical Physical Tasks
Step 2 Developed Physical Test Battery and Physical Task (work) Simulations; presently conducted tests
Step 3 Validate and Set Physical Tests and Standards
Step 4 Implementation and Prototype Verification and regularly confirming standards are working as intended

B. For our Physical and Mental Entry Standards Study for all AFSCs, the AF is developing and validating pre-accession occupationally specific, operationally relevant standards to be used for selection and classification (entry into AFSC, including retraining).

The studies methodology involves validating measures against occupational performance (e.g.,training performance, where training is designed to simulate job demands; operational simulations, where simulations are designed to represent important physical components of the job). Methodology also involves analyzing average score differences for protected subgroups (e.g., by gender), and searching for alternative models (different combinations of tests; different cut scores) that maintain validity while minimizing differences in subgroup pass rates. Once initial standards are set, the AF will periodically (e.g., every six months to 1 yr) reassess criterion-related validity, adverse impact potential, and cut scores for all components

of the selection and classification system. This methodology is closely aligned with RAND's 6-step process and other best practice and legal guidelines including the Uniform Guidelines for Employee Selection Procedures (EEOC, 1978).

- *Are the occupational performance standards for initial screening only or have they been rank/age adjusted?*

Response:
Occupationally specific, operationally relevant physical fitness tests and standards for Battlefield Airmen are for selection, training, and operational levels. Standards are independent of gender, age, and rank.

The mental and physical entry occupational standards are pre-accession standards are to be used for selection and classification (entry into AFSC, including retraining) for all AFSCs. Standards are independent of gender, age, and rank.

- *What efforts are being made to ensure women are given the opportunity to succeed in these newly opened career paths?*

Response:
Through the AF High Level Implementation Plan, tasks listed look into each aspect of the personnel lifecycle (recruit, assess, select, train, develop) and eliminate gender-specific policies and assignment restrictions.