



December 2021

MILITARY HAZING

DOD Should Address Data Reporting Deficiencies, Training Limitations, and Personnel Shortfalls



A Century of Non-Partisan Fact-Based Work

GAO@100 Highlights

Highlights of [GAO-22-104066](#), a report to congressional committees

Why GAO Did This Study

According to DOD's Harassment Prevention Strategy, incidents of harassment—including hazing—jeopardize combat readiness and weaken trust within the ranks. DOD established a harassment prevention and response program that includes hazing to address these behaviors.

House Report 116-120 accompanying a bill for the National Defense Authorization Act for Fiscal Year 2020 included a provision for GAO to review DOD's efforts to implement hazing prevention and response programs. This report addresses the extent to which DOD has: (1) visibility over hazing and reported complete hazing complaint data to Congress; (2) assessed servicemember harassment prevention and response training for compliance, sufficiency, and effectiveness and reinforced training; and (3) provided MEO professionals with required certification training. GAO evaluated the completeness of DOD's hazing reports to Congress, compared training data to billets, and conducted a generalizable survey of MEO professionals, among other things.

What GAO Recommends

GAO is making a matter for congressional consideration to require DOD to continue to report hazing complaint data to Congress, including more complete data on all complaints, to Congress. GAO is also making 12 recommendations to DOD, including that it take steps to improve data quality in its reports, assess and reinforce servicemember training, and fill vacant MEO professional billets. DOD generally concurred with the recommendations.

View [GAO-22-104066](#). For more information, contact Brenda S. Farrell at (202) 512-3604 or farrellb@gao.gov.

December 2021

MILITARY HAZING

DOD Should Address Data Reporting Deficiencies, Training Limitations, and Personnel Shortfalls

What GAO Found

From fiscal year 2017 through fiscal year 2020, the Department of Defense (DOD) was required to report information on hazing incidents to Congress. However, its reports did not contain complete information. Specifically:

- DOD reported there were between 183 and 299 hazing complaints in a given year from fiscal years 2017- 2020. However, data from a 2018 DOD survey suggests this significantly understated the number of hazing incidents by potentially tens of thousands of incidents. Prevalence is important because decision makers can use it as a starting point to determine if efforts to prevent and respond to hazing are effective. In 2016, GAO recommended DOD evaluate the prevalence of hazing. DOD concurred, but has not yet implemented it and GAO still believes this recommendation is valid.
- DOD's reports to Congress did not include information on informal hazing complaints or required information on complaints from National Guard personnel operating under the command of the Governor, but funded by the federal government. Its reports also did not have data required by DOD policies, and the congressional requirement that it submit reports has lapsed.

Better data that accurately reports the number of hazing incidents, includes data on informal hazing complaints and complaints from National Guard personnel in Title 32 status, and complete data will better position DOD and Congress to make decisions on how to prevent and respond to hazing in the military.

The Defense Equal Opportunity Management Institute (DEOMI) has not assessed servicemember harassment prevention and response training. DEOMI officials told GAO that they did not proactively review the services' training plans because DEOMI did not have the resources to execute this responsibility. As of October 2021, a DOD official said funding had been approved, but did not provide information on how or when DEOMI would review the training plans. Additionally, the services may not be reinforcing this training frequently enough and officials said they have not assessed the effectiveness of this training. Until DOD ensures that servicemember training is reviewed for sufficiency, reinforced at a minimum frequency, and assessed for effectiveness, it will be limited in its ability to ensure that training achieves its objectives.

DOD certifies Military Equal Opportunity (MEO) professionals by training them to respond to harassment complaints, among other things. As of 2021, approximately 76 percent (1,459 of 1,924) of MEO professional billets in DOD were filled with MEO professionals. However, as of July 2021 the Army National Guard had filled 226 of 408 billets (55 percent) and the Army Reserve had filled 120 of 266 billets (45 percent). Army and Army Reserve officials said that vacant billets are a result of commanders not providing soldiers, or submitting the documentation needed, to staff their MEO programs. Additionally, neither component has developed a plan for filling their vacant MEO billets. Until commanders in the Army National Guard and the Army Reserve provide soldiers for MEO professional positions, and the Army National Guard and Army Reserve plan to address shortfalls in MEO professionals, these organizations will be limited in their abilities to support commanders and respond to harassment complaints.

Contents

Letter		1
	Background	5
	DOD Lacks Visibility into Hazing Prevalence and Has Reported Incomplete Data to Congress	12
	Servicemember Harassment Training Has Not Been Reviewed or Assessed and Aspects May Need to Be Reinforced	21
	Not All Military Service Components Have Filled Their MEO Professional Billets	28
	Conclusions	33
	Matter for Congressional Consideration	34
	Recommendations for Executive Action	34
	Agency Comments	36
Appendix I	Objectives, Scope, and Methodology	39
Appendix II	Status of Prior GAO Recommendations Related to DOD's Harassment Prevention Strategy	47
Appendix III	Hazing Complaint Data Reported to Congress	61
Appendix IV	Selected Questions from the Military Equal Opportunity Professional Survey Questionnaire	62
Appendix V	Military Equal Opportunity Professional Survey Responses	69
Appendix VI	Comments from Department of Defense	83
Appendix VII	GAO Contact and Staff Acknowledgments	88

Related GAO Products

89

Tables

Table 1: Responsibilities for Selected Department of Defense (DOD) Officials Pertaining to Harassment Prevention and Response	7
Table 2: Military Equal Opportunity (MEO) Professional Billets Filled with Certified MEO Professionals by Service Component as of 2021	29
Table 3: Final Sample Disposition	42
Table 4: Status of Implementing Prior GAO Report Recommendations Related to DOD's Harassment Prevention Strategy, as of September 2021	48

Figures

Figure 1: Summary of the Military Equal Opportunity Harassment Complaint Process	9
Figure 2: Military Equal Opportunity (MEO) Professionals' Perceptions of Servicemember Hazing Prevention and Response Training Frequency as of December 2020	26
Figure 3: Military Equal Opportunity Professionals Perceptions on the Frequency of Servicemember Hazing Prevention and Response Training as of December 2020	27
Figure 4: Army National Guard and U.S. Army Reserve Military Equal Opportunity Professional Billets Filled with DEOMI-Certified Personnel as of July 2021	31
Figure 5: Hazing Complaint Data Reported to Congress, Fiscal Years 2017–2020	61

Abbreviations

DEOMI	Defense Equal Opportunity Management Institute
DMOC	Diversity Management Operations Center
DOD	Department of Defense
MEO	Military Equal Opportunity
ODEI	Office for Diversity, Equity, and Inclusion
OSD	Office of the Secretary of Defense

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.

December 15, 2021

The Honorable Jack Reed
Chairman
The Honorable James M. Inhofe
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Adam Smith
Chairman
The Honorable Mike Rogers
Ranking Member
Committee on Armed Services
House of Representatives

According to DOD's Harassment Prevention Strategy, incidents of harassment—including hazing—jeopardize combat readiness and mission accomplishment, weaken trust within the ranks, and erode unit cohesion. The Department of Defense (DOD) and the military services have a rich tradition of initiation ceremonies and rites of passage that at times have included inappropriate, cruel, or abusive behavior that placed servicemembers at risk. For example, the media reported that in 2016 a Marine recruit at Parris Island jumped to his death reportedly because of hazing by his drill instructor. Similarly, the media reported that in 2017 an Army Green Beret staff sergeant was killed during an alleged hazing incident in Africa. Due in part to concerns that the extent of hazing incidents in DOD is not fully known, Congress passed a law requiring the military department secretaries to submit an annual report to Congress that describes their efforts to prevent and track hazing incidents and implement anti-hazing policies.¹

According to DOD Instruction 1020.03, the military department secretaries are responsible for establishing and overseeing military harassment prevention and response programs, which include hazing for

¹National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 114-328, § 549 (2016). This reporting requirement expired on January 31, 2021.

active duty, reserve, and National Guard personnel.² Additionally, Army policy states that the Military Equal Opportunity (MEO) policy and program—including the harassment complaints process—for members of the Army National Guard are governed by regulations issued by the Chief, National Guard Bureau, unless servicemembers are on active duty Title 10 orders for 30 days or more.³ Air Force policy states that for Title 32 Air National Guard complaints, MEO professionals will process complaints using Chief, National Guard Bureau Memorandum 9601.01, *National Guard Discrimination Complaint Process*.⁴ As DOD has developed programs to address harassment behaviors, including hazing, it has relied on MEO professionals—personnel whose primary mission is to provide instruction, assistance, and advice on MEO matters—to help implement these programs.⁵

House Report 116-120 accompanying a bill for the National Defense Authorization Act for Fiscal Year 2020 included a provision for us to review DOD's efforts to implement hazing prevention and response programs.⁶ This report addresses the extent to which DOD has (1) visibility over hazing and reported complete hazing complaint data to Congress; (2) assessed servicemember harassment prevention and response training for compliance, sufficiency, and effectiveness and reinforced training; and (3) provided MEO professionals with required certification training.

We focused our analysis on DOD Instruction 1020.03, which is applicable to servicemembers who are victims of hazing.⁷ In support of all of our objectives, we obtained the perceptions of MEO professionals on training and data collection using a web-based survey of a generalizable, stratified random sample of MEO professionals. For the purposes of our

²Department of Defense Instruction 1020.03, *Harassment Prevention and Response in the Armed Forces* (Feb. 8, 2018, Change 1 effective Dec. 29, 2020). (Hereafter DOD Instruction 1020.03).

³Army Regulation-600-20, *Army Command Policy* (July 24, 2020)

⁴Air Force Instruction 36-2710, *Equal Opportunity Program* (June 18, 2020)

⁵GAO has assessed DOD's harassment programs in previous reports. A listing of these reports, among others, is included in the Related GAO Products page at the end of this report.

⁶H.R. Rep. No. 116-120 at 127-128 (2019).

⁷DOD Instruction 1020.03.

survey, MEO professionals include equal opportunity advisors (Marine Corps), MEO professionals (Army), command climate specialists (Navy), and equal opportunity practitioners (Air Force).⁸ Our survey had an unweighted response rate of 45 percent and a weighted response rate, which controls for disproportionate sample design, of 43 percent. We analyzed our survey results to identify potential sources of nonresponse bias and used nonresponse weighting class adjustments to mitigate potential nonresponse bias. We conducted the survey from October 19, 2020, through December 15, 2020.

For all of our objectives we interviewed officials from the Office of the Secretary of Defense (OSD)—including the Office for Diversity, Equity, and Inclusion (ODEI) and Diversity Management Operations Center—the military services’ headquarters MEO offices, the National Guard Bureau, and the Defense Equal Opportunity Management Institute (DEOMI).⁹ Our review included the Army, the Navy, the Marine Corps, the Air Force, each service’s reserves, the Army National Guard, and the Air National Guard.

For our first objective, we compared OSD and military service hazing data collection procedures and reports to DOD Instruction 1020.03 and military service policies.¹⁰ We also compared DOD’s annual hazing reports to

⁸In addition to these positions, Air Force Instruction 90-5001, *Special Management Integrated Resilience* (Jan. 25, 2019), discusses the violence prevention integrator position, which is intended to provide primary prevention of interpersonal and self-directed violence and stop an incident before it occurs. According to Air Force officials, the roles and responsibilities of violence prevention integrators and equal opportunity technicians/directors differ in that equal opportunity personnel provide secondary prevention after an incident has occurred and the violence prevention integrators focus on early detection and prompt intervention. Given the focus of the violence prevention integrators on preventing incidents and their not having responsibilities for training personnel on how to respond to an incident, we did not include personnel in these positions in our survey.

⁹The Director, Office for Diversity, Equity, and Inclusion is responsible for developing DOD’s harassment prevention and response policy. DOD Instruction 1020.03.

¹⁰DOD Instruction 1020.03; Air Force Instruction 36-2710; Marine Corps Order 5354.1F, *Marine Corps Prohibited Activities and Conduct (PAC) Prevention and Response Policy* (Apr. 20, 2021); Chief of Naval Operations Instruction 5354.1G, *Navy Equal Opportunity Program* (July 24, 2017); and Secretary of the Navy Instruction 1610.2A, *Department of the Navy (DON) Policy on Hazing* (July 15, 2005).

statutory reporting requirements from fiscal years 2017 through 2020 and DOD's guidance to assess their completeness.¹¹

For our second objective, we compared DOD and military service policies on harassment prevention and response training requirements to Equal Employment Opportunity Commission training attributes and GAO identified best practices for assessing training to determine if the policies incorporated these attributes and practices.¹² We also interviewed seven current servicemembers from the Marine Corps and one former servicemember from the Army who reported they had been hazed after 2015. We conducted the interviews to understand the complaint reporting and investigation process from the military servicemember's perspective as a victim and whether they had the information they needed to report the incident. These servicemembers contacted us in response to advertisements that we posted on GAO social media accounts and DOD related websites.

For our third objective, we reviewed information from the Army, the Navy, the Marine Corps, the Air Force, and the National Guard Bureau on the number of MEO professional billets filled as of 2021 to determine whether billets were filled with certified MEO professionals.¹³ We also collected information on the number of DEOMI trained MEO professionals from DEOMI. Based on responses to data reliability questions from DEOMI and military services officials, as well as our examination of the data, we determined that DEOMI certification training data and MEO professional billet fill rate data were sufficiently reliable for use in our report. Appendix I provides additional details about our objectives, scope, and methodology.

We conducted this performance audit from February 2020 through December 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the

¹¹See section 549 of the National Defense Authorization Act for Fiscal Year 2017.

¹²The Equal Employment Opportunity Commission issued a report summarizing the findings and recommendations of the Select Task Force on the Study of Harassment in the Workplace. It identified a number of attributes of effective training. U.S. Equal Employment Opportunity Commission, *Select Task Force on the Study of Harassment in the Workplace* (June 2016) and GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2004).

¹³Certified MEO professional refers to a servicemember who has completed MEO professional training at DEOMI and who is certified to perform MEO professional duties.

audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

DOD Definition of Harassment and Hazing

DOD Instruction 1020.03 addresses many types of harassment—including discriminatory harassment, sexual harassment, hazing, bullying, and stalking—and their associated behaviors.¹⁴ According to this instruction, hazing includes conduct through which servicemembers or DOD civilians physically or psychologically injure, or create a risk of injury to servicemembers for the purpose of initiation or admission into, affiliation with, or change in status or continued membership within any military or DOD civilian organization. Hazing does not include properly directed command or organizational activities that serve a proper military or other governmental purpose, or the requisite training activities required to prepare for such activities. Examples of hazing include, but are not limited to:

- Initiation or congratulatory acts that involves physically striking or threatening to strike another person.
- Pressing any object into another person’s skin, regardless of whether it pierces the skin, such as “pinning” or “tacking on” rank insignia, aviator wings, medals, or other objects.
- Oral or written berating of another person with the purpose of belittling or humiliating.
- Forcing another person to consume food, alcohol, drugs, or any other substance.

Continuum of Harm

In 2017, we reported that studies by DOD and the RAND Corporation suggested that unwanted behaviors do not exist in isolation, but are part

¹⁴According to DOD Instruction 1020.03, harassment behaviors may include offensive jokes, epithets, ridicule or mockery, insults or put-downs, displays of offensive objects or imagery, stereotyping, intimidating acts, veiled threats of violence, threatening or provoking remarks, racial or other slurs, derogatory remarks about a person’s accent, or displays of racially offensive symbols.

of a “continuum of harm.”¹⁵ In addition, we reported that DOD acknowledged that connections exist across the continuum of harm and that the department reflected this idea in key documents that guide the department’s prevention and response activities. This includes DOD Instruction 1020.03, which established DOD’s harassment prevention and response policy and addresses harassment behaviors, including hazing, that are connected to the continuum. Section 540D of the National Defense Authorization Act for Fiscal Year 2020 required DOD’s comprehensive policy on the prevention of sexual assault to include several elements, such as processes and mechanisms designed to address behaviors among members of the Armed Forces that are included in the continuum of harm that frequently results in sexual assault. The statute defines the continuum of harm that frequently results in sexual assault as including hazing, sexual harassment, and related behaviors (including language choices, off-hand statements, jokes, and unconscious attitudes or biases) that create a permissive climate for sexual assault.

Policies Pertaining to Harassment Prevention and Response and DOD Component Roles and Responsibilities

In August 1995, the Office of the Under Secretary of Defense for Personnel and Readiness established department-wide standards for discrimination complaint processing and resolution and provided standard terms and definitions pertaining to the MEO program by issuing DOD Directive 1350.2.¹⁶ The directive assigned DEOMI responsibility for providing primary training for all DOD military and civilian personnel assigned as a MEO professional.¹⁷

In February 2018, the Office of the Under Secretary of Defense for Personnel and Readiness issued DOD Instruction 1020.03, *Harassment Prevention and Response in the Armed Forces*, which was updated and

¹⁵GAO, *Sexual Violence: Actions Needed to Improve DOD’s Efforts to Address the Continuum of Unwanted Sexual Behaviors*. [GAO-18-33](#). (Washington, D.C.: Dec. 18, 2017).

¹⁶DOD Directive 1350.2 *Department of Defense Military Equal Opportunity Program* (Aug. 18, 1995). This directive was cancelled and replaced by DOD Instruction 1350.02, *DoD Military Equal Opportunity Program* (Sep. 4, 2020).

¹⁷The MEO professional’s primary mission is to provide instruction, assistance, and advice on all MEO matters to commanders at all levels. MEO professional refers to equal opportunity advisors (Marine Corps), MEO professionals (Army), command climate specialists (Navy), and equal opportunity technicians/directors (Air Force).

revised in December 2020.¹⁸ This policy applies to the military departments and includes servicemembers in the active and reserve components, including members of the National Guard operating in Title 10 status or Title 32 status.¹⁹ In September 2020, the Office of the Under Secretary of Defense for Personnel and Readiness issued DOD Instruction 1350.02 reinforcing DEOMI’s responsibility as the primary provider of training for all MEO professionals.²⁰ DOD Instruction 1020.03 and DOD Instruction 1350.02 outline responsibilities, procedures, and mechanisms for preventing and responding to all types of harassment, and specify the roles and responsibilities for various officials, which we summarize in Table 1.

Table 1: Responsibilities for Selected Department of Defense (DOD) Officials Pertaining to Harassment Prevention and Response

Under Secretary of Defense for Personnel and Readiness

- Establishes and oversees DOD-wide policies and programs for military harassment prevention and response.

Director, Office for Diversity, Equity, and Inclusion:

- Serves as the DOD principal responsible for developing DOD harassment prevention and response policy.
 - Directs and manages implementation of the DOD harassment prevention and response program.
 - Makes recommendations to the Under Secretary of Defense for Personnel and Readiness, after receiving annual reports from the military departments, to establish, update, and maintain harassment prevention and response policies and programs.
 - Collects, assesses, and analyzes information and data regarding harassment complaints received by the military departments and compiles reports.
 - Ensures that DOD component harassment prevention and response programs incorporate, long-term goals, objectives, milestones, and results-oriented performance measures to assess effectiveness.
-

¹⁸In 1997, the Secretary of Defense issued a policy memorandum on hazing that was replaced in 2015. The 2015 policy memorandum required more detailed training, established reporting requirements, and clarified definitions of hazing behaviors. See Secretary of Defense Memorandum, *Hazing* (Aug 28, 1997) and Deputy Secretary of Defense Memorandum, *Hazing and Bullying Prevention and Response in the Armed Forces*, (Dec 23, 2015). The 2015 policy memorandum was later incorporated into DOD Instruction 1020.03, *Harassment Prevention and Response in the Armed Forces* (Feb. 8, 2018, Change 1, Dec. 29, 2020). The 2020 change to this instruction changed the name of the Office of Diversity Management and Equal Opportunity to the Office for Diversity, Equity, and Inclusion (ODEI), among other things.

¹⁹National Guard members operating under Title 10 of the United States Code are commanded by the president and are entitled to the same pay, benefits and legal protections as active duty military members. National Guard members operating under Title 32 of the United States Code are mobilized under the command and control of their state’s governor but with pay and benefits provided by the federal government.

²⁰DOD Instruction 1350.02.

Commandant, Defense Equal Opportunity Management Institute:

- Reviews military department training plans for compliance with DOD Instruction 1020.03 and sufficiency of content, and report potential deficiencies to the Director, Office for Diversity, Equity, and Inclusion.
- Provides primary training for all DOD military and civilian personnel assigned as a Military Equal Opportunity professional.

Secretaries of the Military Departments:

- Oversees military department programs which include:
 - information regarding how to identify harassment, DOD standard definitions, and types of harassment;
 - information regarding reporting options, procedures, and applicable timelines to submit harassment complaints, including anonymous complaints and complaints involving a servicemember's commander or supervisor;
 - procedures for commanders and supervisors to receive, respond to, investigate, and resolve harassment complaints;
 - mechanisms to collect, track, assess, and analyze data and information related to harassment complaints;
 - mechanisms to maintain data regarding harassment complaints; and
 - a central program or function staffed with full-time qualified equal opportunity professionals to receive MEO prohibited discrimination complaints, including harassment.
- Responds to ODEI data calls, including data and reports to support annual congressional and DOD fiscal year reports.
- Ensures appropriate administrative or disciplinary action is taken against servicemembers in cases involving substantiated harassment complaints.
- Verifies that commanders conduct climate assessments and take appropriate action as required.

Military Commanders and Supervisors

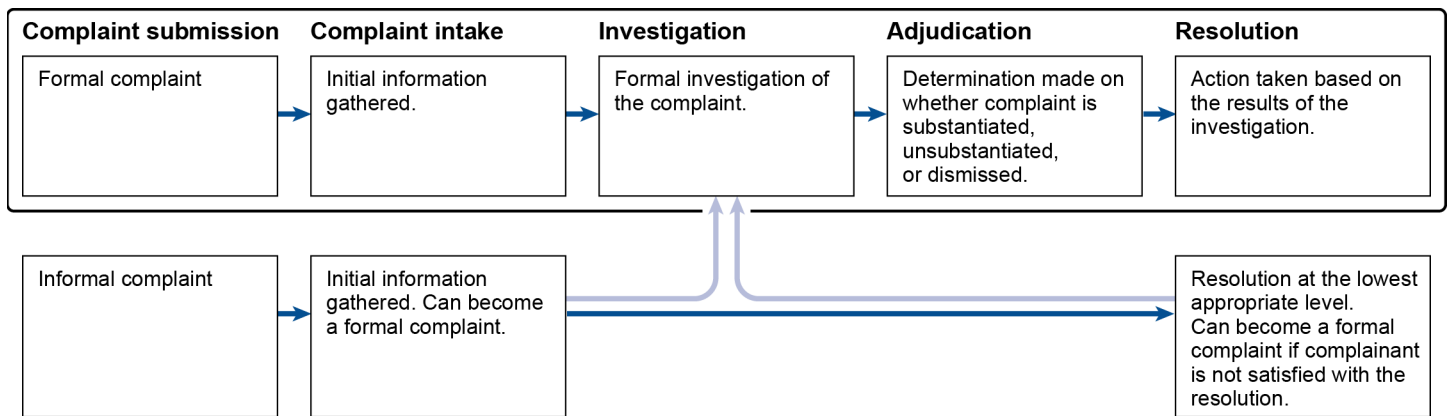
- Implement procedures for receiving, responding to, investigating, and resolving harassment complaints;
- Determine whether a climate assessment or additional unit training is required.
- Follow procedures and comply with requirements in service specific guidance.

Source: GAO analysis of Department of Defense guidance. | GAO-22-104066

**Military Equal Opportunity
Harassment Complaint
Process**

Servicemembers can make a harassment complaint, including a complaint of hazing, either formally or informally, as illustrated in figure 1.

Figure 1: Summary of the Military Equal Opportunity Harassment Complaint Process



Source: GAO analysis of Department of Defense information. | GAO-22-104066

Note: Formal complaints are reviewed by the next commander in the chain of command that has the authority to convene a general court-martial. A formal investigation is initiated and once it is complete the commander is notified of the results and any actions taken. Informal complaints should be addressed at the lowest appropriate level within the chain of command. Types of harassment include, but are not limited to, discriminatory harassment, sexual harassment, hazing, bullying, and stalking. Harassment complaints involving sexual assault allegations must be referred to a military criminal investigative organization for investigation.

A formal complaint is an allegation that is submitted in writing to the staff designated to receive such complaints in military department operating instructions and regulations; or an informal complaint that a commanding officer or other person in charge of the organization determines warrants formal investigation.²¹ An informal complaint is an allegation made orally, or in writing, to a person in a position of authority within the servicemember’s organization, or outside the servicemember’s organization, and should be addressed at the lowest appropriate level. This type of complaint is not processed or resolved as a formal complaint—meaning that there is no formal investigation or adjudication of the incident. Servicemembers who initially elect to resolve their complaints informally may submit a formal complaint if they are dissatisfied with the outcome of the informal process.

²¹Staff designated to receive complaints varies by military service. For example, the Army has designated MEO professionals and commanders as able to receive complaints and the Marine Corps has designated MEO professionals, commanders, and commander’s designee as able to receive complaints. DOD Instruction 1020.03 and DOD Instruction 1350.02, *Department of Defense Military Equal Opportunity Program* (Sep. 4, 2020).

Congressional Actions Related to Harassment Prevention and Response at DOD

Congress has taken steps to address challenges that DOD faced in preventing and responding to harassment in the military. For example, there are a number of statutory provisions in the National Defense Authorization Act for Fiscal Year 2014 and the Carl Levin and Howard P. ‘Buck’ McKeon National Defense Authorization Act for Fiscal Year 2015 related to the commander’s requirement to conduct command climate assessments. This includes one requirement that aligns with a recommendation we made in 2011 that the military service secretaries verify that commanders complete command climate assessments.²²

Additionally, two committee reports and the National Defense Authorization Act for Fiscal Year 2017 included a number of provisions that sought to address hazing in the Armed Forces. Specifically:

1. Senate Report 114-255, accompanying a bill for the National Defense Authorization Act for Fiscal year 2017, directed that the Secretary of Defense provide a report on DOD’s implementation of GAO recommendations on hazing in the Armed Forces to the Committees on Armed Services of the Senate and House of Representatives.²³ DOD provided a report that included updates to the implementation of GAO recommendations and updates on the department’s progress in implementing the 2015 hazing prevention and response policy memorandum.
2. House Report 114-537, accompanying a bill for the National Defense Authorization Act for Fiscal Year 2017, included direction for the Secretary of Defense to provide a briefing to the Committee on Armed Services of the House of Representatives on the implementation of the changes outlined in the December 23, 2015, “Hazing and Bullying Prevention and Response in the Armed Forces” policy memorandum.²⁴
3. Section 549 of the National Defense Authorization Act for Fiscal Year 2017 required the Secretaries of the military departments to submit an

²²See National Defense Authorization Act for Fiscal Year 2014, Pub. L. No. 113-66, §§ 1721, 587(a), and 587(c) (2013); Carl Levin and Howard P. ‘Buck’ McKeon National Defense Authorization Act for Fiscal Year 2015, Pub. L. No. 113-291, § 508 (2014); and GAO, *Preventing Sexual Assault: DOD Needs Greater Leadership Commitment and an Oversight Framework*, [GAO-11-809](#) (Washington, D.C.: Oct. 25, 2011). DOD concurred and has not taken action to address this recommendation.

²³See S. Rep. No. 114-255, at 157 (2016).

²⁴See H.R. Rep. No. 114-537, at 149 (2016).

annual report to the Committees on Armed Services of the Senate and the House of Representatives that includes, among other things, the scope of hazing in the Armed Forces.²⁵ In order to meet that requirement DOD prepared a DOD-wide hazing summary report for submission to Congress annually for fiscal years 2017 through 2020 that included hazing complaint data, among other information.

The William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, included requirements for the Secretary of Defense to develop and implement a strategy to hold leaders in the department accountable for promoting, supporting, and enforcing sexual harassment policies and programs and providing an oversight framework which corresponds to two of our recommendations from the 2011 report. The Secretary of Defense is required to submit a report on the actions taken to carry out this statutory provision no later than January 1, 2022.²⁶

Efforts to Address Harassment Behaviors at DOD

Over the past 10 years, we identified issues with DOD's efforts to prevent and respond to harassment behaviors in the military. Since 2011, we have issued three reports with 16 recommendations intended to help DOD strengthen leadership accountability, program oversight and implementation, and data collection. Of these 16 recommendations, DOD implemented nine recommendations, did not implement two recommendations, and has not taken action to address five recommendations as of September 2021. Additionally, we designated four of these 16 recommendations as priority recommendations warranting the Secretary of Defense's immediate attention. Two of these priority recommendations have not been addressed as of September 2021.²⁷

In May 2021, DOD issued its Harassment Prevention Strategy.²⁸ This strategy covers 5 years and is intended to guide DOD's efforts in preventing and responding to all categories of harassment. ODEI officials told us that DOD's strategy will better enable the department to

²⁵See Pub. L. No. 114-328, § 549 (2016).

²⁶See William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021. Pub. L. No. 116-283, § 539B (2021).

²⁷GAO, *Priority Open Recommendations: Department of Defense* [GAO-21-522PR](#), (Washington, D.C.: Aug. 2, 2021)

²⁸*Department Of Defense Harassment Prevention Strategy for the Armed Forces Fiscal Years 2021 – 2026* (May 2021).

implement open recommendations from our prior work. We evaluated DOD's strategy and found that the department took a number of positive steps—such as developing a mission statement and long-term goals—but that there are additional actions needed to address our recommendations. See appendix II for more detailed information on the status of our recommendations since 2011 and our evaluation of DOD's strategy.

DOD Lacks Visibility into Hazing Prevalence and Has Reported Incomplete Data to Congress

DOD Lacks Visibility into Hazing Prevalence

DOD data suggest that DOD has limited visibility into the prevalence of hazing within the military services and that complaints may significantly understate the number of hazing incidents. Prevalence is an important measure because decision makers can use it as a starting point to determine if their efforts to prevent and respond to incidents of hazing are effective. Additionally, understanding hazing prevalence is important because hazing, which is a part of the continuum of harm, can lead to more egregious behaviors. As such, increased hazing prevalence may result in an increase in incidents of these more egregious behaviors.

In 2016, we recommended that DOD evaluate the prevalence of hazing in the military services and DOD concurred. DOD has not implemented this recommendation.²⁹ An evaluation of prevalence would provide information on the extent of hazing beyond the limited data on reported incidents, and could be estimated based on survey responses, as DOD does in the case of sexual assault.

²⁹[GAO-16-226](#).

From fiscal year 2017 through fiscal year 2020, DOD reported there were between 183 and 299 hazing complaints in any given fiscal year.³⁰ Additionally, within that time period reporting varied. For example, in fiscal year 2020, the Army, with an end strength of 1,010,215 reported seven hazing complaints. The Marine Corps, with an end strength of 180,958 reported 152 hazing complaints.

Data from DOD's 2018 Workplace and Gender Relations Survey of Active Duty Members suggest that complaints significantly understate the scope of hazing occurring within the military services. DOD's 2018 survey, which is the latest available survey data, indicates that, during the 12 months prior to the survey, an estimated 19,500 servicemembers who experienced sexual harassment, 14,000 servicemembers who experienced gender discrimination, and 3,000 servicemembers who experienced sexual assault described the worst such incident they experienced as hazing.³¹ This means that these servicemembers stated in the survey that they experienced an incident that they considered to be hazing under DOD's definition.³²

Survey participants were asked questions on whether they experienced sexual harassment, gender discrimination, and/or sexual assault during the last 12 months. For those who answered that they had experienced at least one situation with such behaviors, participants were asked to think about the one that had the "biggest effect" on them and that they considered to be the "worst or most serious". They were then asked if they would describe that worst incident as hazing. For example, survey participants who stated they had experienced sexual assault during the last 12 months would then be asked to think about the sexual assault event that had the "biggest effect" on them and whether they would

³⁰In DOD's fiscal year 2017 report, DOD included data from April 23, 2016 through September 30, 2017. In DOD's reports for fiscal years 2018 through 2020, DOD included data for the respective fiscal years' report. DOD officials stated that its annual reports do not include hazing data that results in fatalities, including suicides. See appendix III for a summary of DOD's reports to Congress.

³¹DOD's 2018 survey included DOD's definition of hazing prior to asking these questions.

³²The Workplace and Gender Relations Survey of Active Duty Members is not designed to measure the prevalence of hazing. The numbers reported here from the 2018 survey indicate how many servicemembers felt an incident met the definition of gender discrimination, sexual harassment, or sexual assault and that was also a hazing incident. As such, these numbers are possibly lower bound estimates assuming that there are additional hazing incidents that are not incidents of gender discrimination, sexual harassment, or sexual assault and would therefore not be captured in these numbers.

describe it as hazing. It is possible that one servicemember experienced both a sexual harassment and sexual assault event that they would describe as hazing. Therefore, these three estimates should not be added together.³³ However, even with these data, OSD and the military services do not know the extent of hazing across the military services because these data focus on three specific types of harassment behaviors.

DOD's 2021 Harassment Prevention Strategy includes a performance measure titled "past year prevalence of DOD harassment," but this measure does not evaluate the prevalence of hazing because it includes reported complaints and many hazing incidents may go unreported. According to DOD's 2021 strategy, its prevalence measure will be the total number of harassment complaints reported by the military departments.³⁴

We believe that our recommendation to evaluate the prevalence of hazing is still valid. Without an evaluation of prevalence of hazing it is difficult to know whether the variation in reporting is due to a more or less effective military service hazing prevention and response programs.

Until DOD implements our recommendation, it will remain limited in its ability to effectively target its efforts to prevent and respond to hazing incidents and thereby potentially avoid more egregious behaviors in the continuum of harm.

DOD Reported Incomplete Information to Congress

DOD has made improvements in its hazing complaint data collection, but data reported to Congress from fiscal years 2017 through 2020 do not include all information required by DOD. In 2016, we reported that DOD had not articulated a consistent methodology for tracking hazing incidents, such as specifying and defining common data collection requirements.³⁵ As a result, we concluded there was an inconsistent and incomplete accounting of hazing incidents both within and across these

³³See Office of People Analytics *2018 Workplace and Gender Relations Survey of Active Duty Members Overview Report* (May 2019). Survey results were expressed as 95 percent confidence intervals with those reporting sexual harassment having a margin of error of +/- 1,300, those experiencing gender discrimination having a margin of error of +/- 1,100, and those experiencing sexual assault having a margin of error of +/- 500. At the time of the survey, there were nearly 1.3 million active-duty servicemembers in the DOD population.

³⁴For our detailed assessment of DOD's strategy, see appendix II.

³⁵[GAO-16-226](#).

services. To address these issues, we recommended that the Under Secretary of Defense for Personnel and Readiness, issue DOD-level guidance that specifies data collection and tracking requirements.³⁶ In December 2015, DOD issued a revised policy on hazing that specified the scope of data to be collected on hazing incidents by the military services.³⁷ DOD implemented its data collection process by developing and distributing data collection templates to the military services.

DOD's reports to Congress in fiscal years 2017 through 2020 included some required information, but do not include all information required by DOD Instruction 1020.03. Specifically, we found that DOD reports to Congress from fiscal years 2017 through 2020 did not include information on informal hazing complaints or on complaints from National Guard personnel in a Title 32 duty status. Additionally, for those formal complaints that were included in DOD's reports, the Marine Corps data generally included all required demographic data, but the Army, Navy, and the Air Force omitted required demographic data for some complainants and alleged offenders. As of January 2021, DOD is no longer required to report information on hazing incidents involving servicemembers to Congress.³⁸

Informal Hazing Complaints

The military services are not reporting informal hazing complaint data to ODEI. DOD Instruction 1020.03 requires the military departments, which include the Marine Corps to maintain data on harassment complaints, including informal (if applicable); formal; and anonymous (if provided).³⁹ However, in February 2021 we reported that DOD Instruction 1020.03 does not clearly define an informal complaint for tracking purposes, specify how such data should be maintained by the military departments

³⁶Data collection and tracking requirements include the scope of data to be collected, standard list of data elements, and definitions of the data elements to be collected.

³⁷After receiving our draft report containing this recommendation, in December 2015 DOD issued a revised policy on hazing, which specified the scope of data to be collected on hazing incidents by the military services. See Deputy Secretary of Defense Memorandum, *Hazing and Bullying Prevention and Response in the Armed Forces*, (Dec. 23, 2015). This was later incorporated into DOD Instruction 1020.03.

³⁸A provision in a bill for the National Defense Authorization Act for Fiscal Year 2022 would, if enacted, reinstate DOD's requirement to report hazing complaint data to Congress. The provision would also require DOD to report bullying complaint data, among other things. See S. 1605, 117th Cong. (2021) (section 549L) which was passed by the House of Representatives on Dec. 7, 2021 as this bill was being finalized.

³⁹DOD Instruction 1020.03.

(such as at the headquarters versus installation level), or indicate which informal complaints should be reported to ODEI.⁴⁰ We further reported that ODEI officials acknowledged that this is an area where they would benefit from increased visibility and stated that they anticipated issuing revised policy by the end of calendar year 2020 that more clearly defines and standardizes the definition of an informal complaint.

DOD revised DOD Instruction 1020.03 on December 29, 2020, but this update did not substantially revise the definition of an informal complaint or provide additional specificity with regard to how such complaints should be tracked and reported. In February 2021, we recommended that DOD clarify its instruction so that it has better visibility into the extent to which harassment complaints, including hazing, are resolved informally across the military services. DOD concurred with our recommendation, and as of October 2021 DOD had not taken action to address the recommendation.⁴¹ Without clarifying guidance regarding the requirement for the military departments to maintain data on informal complaints of harassment—including the definition of an informal complaint for tracking purposes, how such data should be maintained, and which informal complaints should be reported to ODEI on an annual basis—ODEI will continue to have limited visibility over the extent to which such complaints are resolved informally across the military services. We will continue to monitor any steps DOD takes to implement this recommendation.

Complaints from National Guard Personnel in Title 32 Status

DOD's reports to Congress include information on hazing complaints from National Guard personnel in Title 10 status, but do not include information about hazing complaints from National Guard personnel in a Title 32 duty status. ODEI receives information from the Army and the Air Force on hazing complaints from certain National Guard personnel because Army and Air National Guard members in Title 10 status are covered under Army and Air Force MEO policies and complaints are reported to ODEI by their respective active components.⁴²

DOD Instruction 1020.03 states that hazing is a type of harassment and requires the Chief, National Guard Bureau, to implement the policies and

⁴⁰GAO, *Sexual Harassment and Assault: Guidance Needed to Ensure Consistent Tracking, Response, and Training for DOD Civilians*, [GAO-21-113](#) (Washington, D.C.: Feb. 9, 2021).

⁴¹See [GAO-21-113](#).

⁴²See Army Regulation 600-20 and Air Force Instruction 36-2710.

procedures of the instruction to include the tracking and reporting of hazing complaints. DOD does not report on hazing complaints from National Guard personnel in a Title 32 duty status because the Chief, National Guard Bureau, has not established a policy that addresses how it should receive, track, and report on these complaints. According to a National Guard Bureau official, in the absence of such a policy, National Guard personnel in a Title 32 duty status have submitted hazing complaints to the Inspector General. As of August 2021, a National Guard Bureau official stated that they are updating one of their manuals to address hazing, but did not provide details on how they plan to incorporate hazing tracking and reporting nor did they include a timeline for when it expected the policy to be reissued.

By issuing a policy for addressing hazing complaints from National Guard personnel in a Title 32 duty status that includes a process for receiving and tracking those complaints, and reporting complaint data to ODEI, the National Guard Bureau will be better able to support DOD's efforts to prevent and respond to hazing in the military. Additionally, by ensuring that all hazing complaints from members of the military are reported, regardless of their duty status, ODEI will have better information on the number of hazing complaints coming from military personnel to inform decisions about DOD's programs.

Formal Hazing Complaints

DOD based its report to Congress on data it collects from the military services. Each year, ODEI provides a data template to the services that requires the services to report demographic data for complainants and alleged offenders. ODEI's data template includes multiple data elements such as religion, age, gender, race, and ethnicity, among other things, that DOD was required to report to Congress. Each military service uses its own process for collecting and reporting these data to ODEI. The Army and the Navy use a spreadsheet and the Air Force and the Marine Corps use web-based databases. Generally, MEO professionals submit the data from their area of responsibility to the service headquarters through a spreadsheet or a database and then the headquarters MEO office for the service populates ODEI's data template.

DOD's reports to Congress have included incomplete data on formal hazing complaints. DOD's reports generally included required information

for the Marine Corps for fiscal years 2017 through 2020, but not for the Navy, the Army, and the Air Force.⁴³ For example:

- In fiscal year 2019, the Navy did not report the ethnicity for six out of nine offenders and eight out of 10 complainants and religion for seven offenders and five complainants. Additionally, in fiscal year 2020 the Navy did not report ethnicity for one of 19 offenders and one of its five complainants.
- In fiscal year 2019, the Army did not report the religion for its one offender or for all six complainants.
- In fiscal year 2020, the Air Force did not report race for three of its five offenders.

According to ODEI officials DOD's reports to Congress have included incomplete information because the Army, the Navy, and the Air Force have not fully filled out the data template and ODEI has not had enough time to fill in data gaps before the reports were submitted to Congress. Several factors contributed to these three services not fully filling out ODEI's template. Specifically, the Navy does not have a standard process for managing hazing complaints and its forms do not include hazing. Additionally, the Navy, the Army, and the Air Force have not consistently collected required data due to commanders and components not collecting required data.

- **Navy lacks a standard process.** The Navy does not handle hazing complaints through a standard process because its current policy does not address how hazing complaints should be received and processed. In 2013, the Navy issued a policy directing its commands to submit reports of substantiated hazing incidents to the Navy's Office of Hazing Prevention.⁴⁴ This policy also assigned to MEO professionals responsibility for tracking hazing complaints at the command level. However, a Navy official said that the Navy eliminated the Office of Hazing Prevention and does not use the 2013 policy.

⁴³The Marine Corps' percentages of unknown values for the variables we reviewed range from 0% to 6.6%. Additionally, demographic data is reported only for substantiated complaints.

⁴⁴Chief of Naval Operations, *Navy Policy for Reporting Hazing and Assignment of Responsibility for Tracking Hazing Incidents* (February 2013).

Based on our survey, we estimate that about half of Navy MEO professionals who reported processing formal MEO hazing complaints believe that unclear service-level policy made it challenging for them.⁴⁵ For example, in the absence of having a policy that addresses hazing, complaints may not be routed through an MEO professional and instead could be addressed by the inspector general or a servicemember's supervisor. Consequently, complaints may not be tracked and reported to ODEI.

- **Navy form omits hazing from its intake forms.** In addition, Navy officials said that some hazing complaints may not be tracked because the Navy's MEO complaint intake form does not contain a response option for hazing. Navy MEO professionals we surveyed and interviewed indicated that in the absence of having a response option for hazing, they may hand write on the intake form that a hazing complaint had been made or categorize the hazing complaint under a different category of harassment.
- **Commanders and components are not collecting required data.** The secretaries of the military departments have not ensured that all entities that receive hazing complaints track information specified in DOD Instruction 1020.03 and ODEI's data reporting template. Specifically, Army officials said that commanders have not been held accountable for ensuring that MEO data submitted to ODEI contains required information. Officials from headquarters Army and headquarters Navy stated that commanders are not ensuring that all information required by ODEI's template related to hazing complaints are being documented and tracked. Air Force officials stated that MEO professionals do not consistently capture certain demographic data, such as religion or age, if in a MEO professional's view it does not pertain to the complaint; however, the DOD Instruction and ODEI's template do not allow for this type of discretion.

Additionally, not all Army components are following the same guidance when managing hazing complaints. Army Criminal Investigation Division and Army Inspector General officials told us that they do not track all fields required by ODEI because data element requirements in their respective databases are outlined in separate guidance.

⁴⁵Approximately 46 percent of Navy MEO professionals responded that unclear service policy made it challenging for them to process formal MEO hazing complaints and approximately 46 percent responded that it did not. These estimates have a margin of error of +/- 14 percentage points, at the 95 percent confidence level.

Officials from the Army, Navy, and Air Force said that they were aware the information they provided to ODEI did not include all required data elements. They agreed that the above factors contributed to them not fully filling out ODEI's data template, but said that in their view this could be addressed by ODEI developing a DOD-wide database for collecting and submitting data. ODEI officials said that they believe that a uniform case management tracking system could provide a cost effective means of strengthening the department's ability to efficiently track compliance and maintain vigilance over all forms of complaints. However, officials stated that DOD has not provided funds to procure and deploy this type of case management tracking system.

DOD Instruction 1020.03 requires all military services to establish and oversee military harassment prevention and response programs that collect and track information related to harassment complaints, including formal hazing complaints. Additionally, DODI 1020.03 requires the military departments, including the Marine Corps as part of the Department of the Navy, to report data through a DOD approved automated data collection interface. This information should include, among other data, the demographics (e.g., race/ethnicity, gender, and grade) of the complainant and alleged offender and should be reported to ODEI annually. Additionally, the Army's policy requires commanders to ensure that hazing complaint data are tracked and the Air Force's policy requires MEO professionals to ensure that hazing complaint data are tracked.⁴⁶ Although the military departments, which includes the Marine Corps, are required to report through a DOD approved automated data collection interface, ODEI does not have such an interface nor is it required to develop and implement one.

The Navy, by updating its MEO policy and complaint form to address the receipt, processing, and tracking of hazing complaints, will be better positioned to track and report on its formal hazing complaints. Additionally, the Army, and the Air Force, by taking action to track required information and report this information to ODEI, will provide decision makers with more complete information to inform their oversight of DOD's hazing prevention and response programs.

Congressional Reporting Requirements

Congress has long expressed interest in DOD acting to address hazing within the military services and has sought to increase visibility into

⁴⁶See Army Regulation 600-20 and Air Force Instruction 36-2710.

DOD's hazing prevention and response programs. From fiscal year 2017 through fiscal year 2020, DOD was required to report to Congress on the scope of the problem of hazing within the Armed Forces, but that requirement expired as of January 2021.⁴⁷ Congress required DOD to report data on hazing in the military services in part due to concern that the extent of hazing incidents in DOD is not fully known. DOD still does not know the extent to which hazing is taking place in the military services and, as we previously stated, DOD's data suggests that it is significantly undercounting these incidents.

Due to the deficiencies we identified in DOD's prior reports to Congress, Congress has had limited visibility into the extent to which hazing is occurring within the military services. This may have limited its ability to oversee DOD's efforts to implement its hazing prevention and response program. Given the expiration of the requirement that DOD submit reports to Congress, Congress' visibility into this important issue may be further degraded.

Servicemember Harassment Training Has Not Been Reviewed or Assessed and Aspects May Need to Be Reinforced

⁴⁷Pub. L. No. 114-328, § 549 (2016). Section 549 required the military department secretaries to provide a report containing a description of hazing prevention efforts during the previous year not later than January 31 of each year through January 31, 2021. In addition, section 549 directs that the report include the elements required by section 534 of the National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239, § 534 (2013).

DEOMI Has Not Reviewed Servicemember Harassment Prevention and Response Training for Policy Compliance or Sufficiency

A Diversity Management Operations Center official told us that even though DEOMI was required to proactively review servicemember harassment prevention and response training plans, it had not done so as of October 2021. Prior to 2018, DEOMI was responsible for developing and providing training related to equal opportunity, sexual harassment, and human relations. In 2018, DOD issued DOD Instruction 1020.03, which assigned a number of additional responsibilities to DEOMI.⁴⁸ Specifically, it added a mandate for DEOMI to proactively review military department harassment prevention and response training plans, which includes the Marine Corps, for compliance with the instruction and sufficiency of content.⁴⁹

DEOMI officials told us that after DOD issued DOD Instruction 1020.03, DEOMI would review servicemember harassment prevention and response training plans if that review were requested by one of the military services. According to Marine Corps officials, they submitted a request for DEOMI to review the Marine Corps' annual training plan in August 2021. However, a Diversity Management Operations Center official told us that, as of October 2021, DEOMI had not performed a formal review of any military department harassment prevention and response training plans.

DEOMI officials told us that they chose not to proactively review the services' harassment prevention and response training plans, as required by DOD's instruction, because DEOMI did not have the resources it needed to execute this and other responsibilities given to it under DOD Instruction 1020.03. As of October 2021, a Diversity Management Operations Center official said that the Deputy Secretary of Defense approved additional funding for DEOMI to review the military service training plans. A Diversity Management Operations Center official stated that they anticipate the additional funding allocation in early calendar year 2022 and once they receive it, they will execute a review of military service harassment prevention and response training plans. However, as of October 2021, this official had not provided information about how DEOMI would execute this responsibility once it received the funds or

⁴⁸DOD Instruction 1020.03.

⁴⁹DOD Instruction 1020.03 also established requirements for DEOMI to establish standards, core competencies, and learning objectives for DOD component harassment prevention and response training and education programs and specifies content that must be included in training materials and curriculum, such as prevention strategies and risk and protective factors.

when DEOMI would be in compliance with DOD Instruction 1020.03. Until DEOMI executes its responsibilities to review harassment prevention and response training, it will not be positioned to ensure that training aligns with DOD Instruction 1020.03 and that training content is sufficient.

The Military Services Have Not Assessed the Effectiveness of Servicemember Harassment Prevention and Response Training

In addition to DEOMI not reviewing servicemember harassment prevention and response training, according to military service officials they have not assessed their training's effectiveness. Our work examining best practices for assessing training states that agencies need credible information on how training and development programs affect organizational performance, including having agreed-upon measures to ascertain progress toward training goals.⁵⁰

The Equal Employment Opportunity Commission, in its report summarizing the findings and recommendations of the Select Task Force on the Study of Harassment in the Workplace, reported that harassment training should be routinely evaluated.⁵¹ The commission identified a number of attributes of effective training including that assessments of effectiveness:

- are most effective regarding training if they are done some time after the training and participants are asked questions such as whether the training changed their own behaviors or behaviors they have observed in the workplace;
- should occur on a regular basis so that the training can be modified, if needed; and
- should incorporate feedback from all levels of an organization.

The military services have not assessed whether harassment prevention and response training is achieving its intended goals, in part because they have not been provided with measures that exhibit the best practices specified in our prior work and the attributes identified by the Equal Employment Opportunity Commission. DOD recognizes the importance of assessing the effectiveness of harassment prevention and response training programs and in its May 2021 harassment strategy tasked ODEI and the Diversity Management Operations Center with developing a long-term evaluation plan for harassment prevention and response training.

⁵⁰GAO-04-546G.

⁵¹U.S. Equal Employment Opportunity Commission, *Select Task Force on the Study of Harassment in the Workplace* (June 2016).

Specifically, this strategy tasks these organizations with establishing a plan of training that incorporates metrics and data elements related to process, output, and outcomes of associated prevention strategies. ODEI officials stated that an implementation memorandum and plan was being formally coordinated with the military services and timelines and associated actions will soon be established. However, as of September 2021 the implementation memorandum and plan had not been finalized, including the development of measures and timeframes for completing this work.

Until ODEI and the Diversity Management Operations Center develop measures that exhibit the characteristics specified in our best practices and the attributes specified in the Equal Employment Opportunity Commission's report on harassment in the workplace, OSD and the military services will continue to have limited information on whether servicemember harassment prevention and response training programs are meeting their stated goals.

Servicemember Hazing Prevention and Response Training May Not Be Appropriately Reinforced

Each military service requires that servicemembers receive harassment prevention and response training, which includes hazing, but they vary on how frequently training should be reinforced.⁵² Specifically, Army and Marine Corps guidance requires that servicemembers be trained on hazing prevention and response annually.⁵³ In 2018, the Secretary of the Army provided direction that commanders incorporate training on an annual basis in an effort to enhance readiness and welfare.⁵⁴ Marine Corps officials stated that they require annual training because of high-profile hazing events that have occurred in the past. In contrast, servicemembers in the Air Force and Navy are not required to receive this training as frequently. Air Force guidance requires that this training be provided at servicemembers' first duty station and after a permanent change of station.⁵⁵ Navy officials stated that this training is provided after boot camp and prior to starting their occupational school. Additionally,

⁵²According to DOD Instruction 1322.31, *Common Military Training* (Feb. 20, 2020) the military services have discretion to determine the frequency of military equal opportunity training, which includes harassment and hazing.

⁵³Army Regulation-600-20; Marine Corps Order 5354.1F.

⁵⁴Army Directive 2018-23, *Improving the Effectiveness of Essential and Important Army Programs: Sexual Harassment/Assault Response and Prevention, Equal Opportunity, Suicide Prevention, Alcohol and Drug Abuse Prevention, and Resilience* (Nov. 8, 2018).

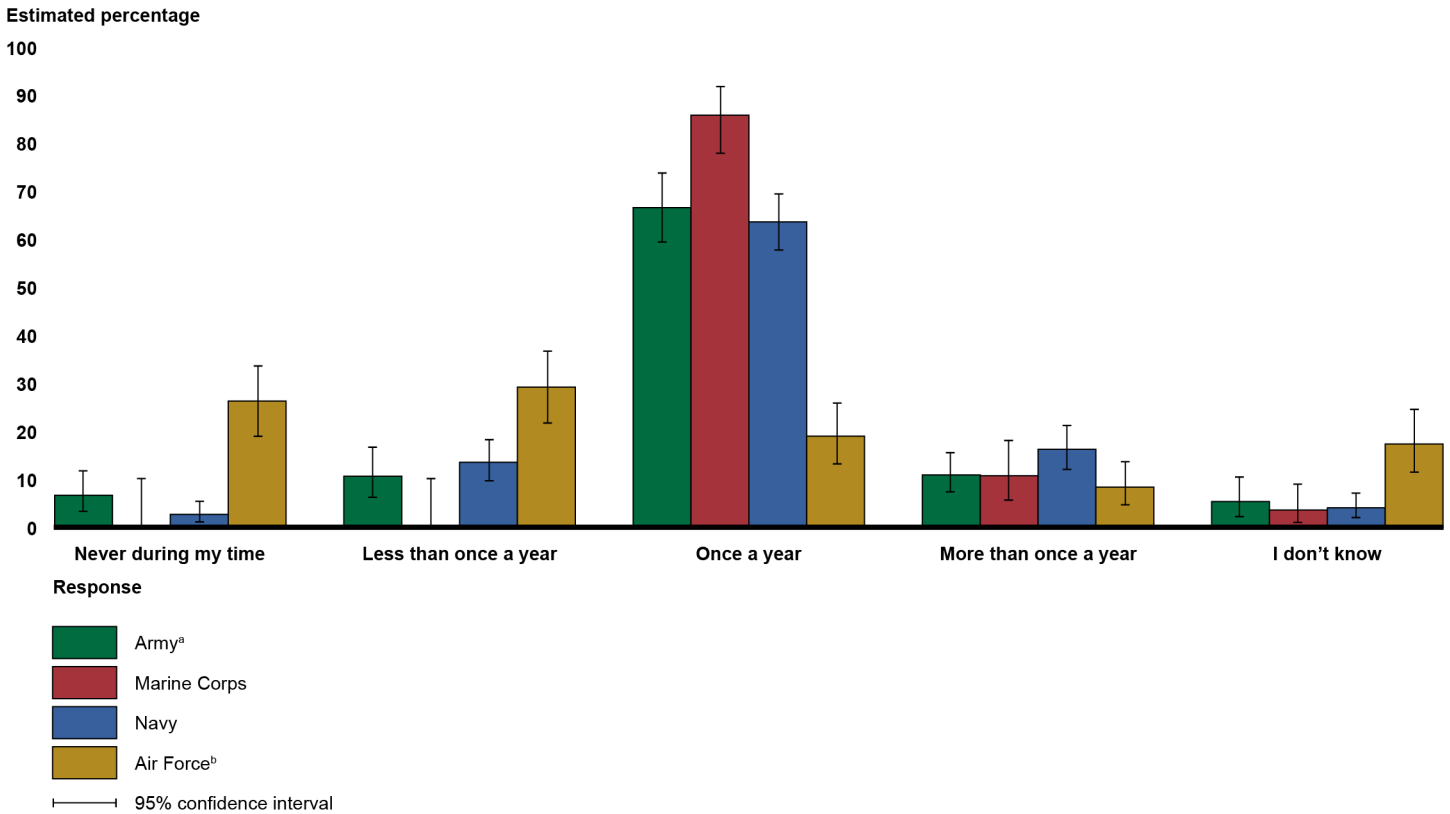
⁵⁵Air Force Instruction 36-2710.

officials from both the Air Force and the Navy stated that commanders can request training more frequently.

Our survey of MEO professionals' perceptions also shows that the frequency with which servicemembers receive hazing prevention and response training varies by service. We estimate that more than 50 percent of MEO professionals in the Army, the Navy, and the Marine Corps said that servicemembers for whom they are responsible received hazing prevention and response training at least once a year. In contrast, an estimated 29 percent of Air Force MEO professionals said servicemembers receive training less than once a year and an estimated 26 percent said never (see fig. 2).⁵⁶ The Air Force updated its MEO policy in June 2020 and subsequently updated its training to incorporate hazing, which may have contributed to relatively lower proportions of Air Force personnel having received this training as of December 2020. Additionally, Air Force officials stated that non-MEO professionals conduct violence prevention training that includes hazing and as a result MEO professionals may not have been aware of servicemembers having received this training when responding to our survey.

⁵⁶For a partial list of survey questions posed to MEO professionals, see appendix IV. For analysis of MEO professional responses to selected survey questions, see appendix V.

Figure 2: Military Equal Opportunity (MEO) Professionals' Perceptions of Servicemember Hazing Prevention and Response Training Frequency as of December 2020



Source: GAO analysis of survey data. | GAO-22-104066

Notes:

The survey question asked, “During your time as an Equal Opportunity Advisor/Command Climate Specialist, how often, on average, have servicemembers in the units that you support received Military Equal Opportunity (MEO) training that includes hazing?”

All estimates in this figure have a margin of error—at the 95 percent confidence level—of +/- 10.1 percentage points or fewer.

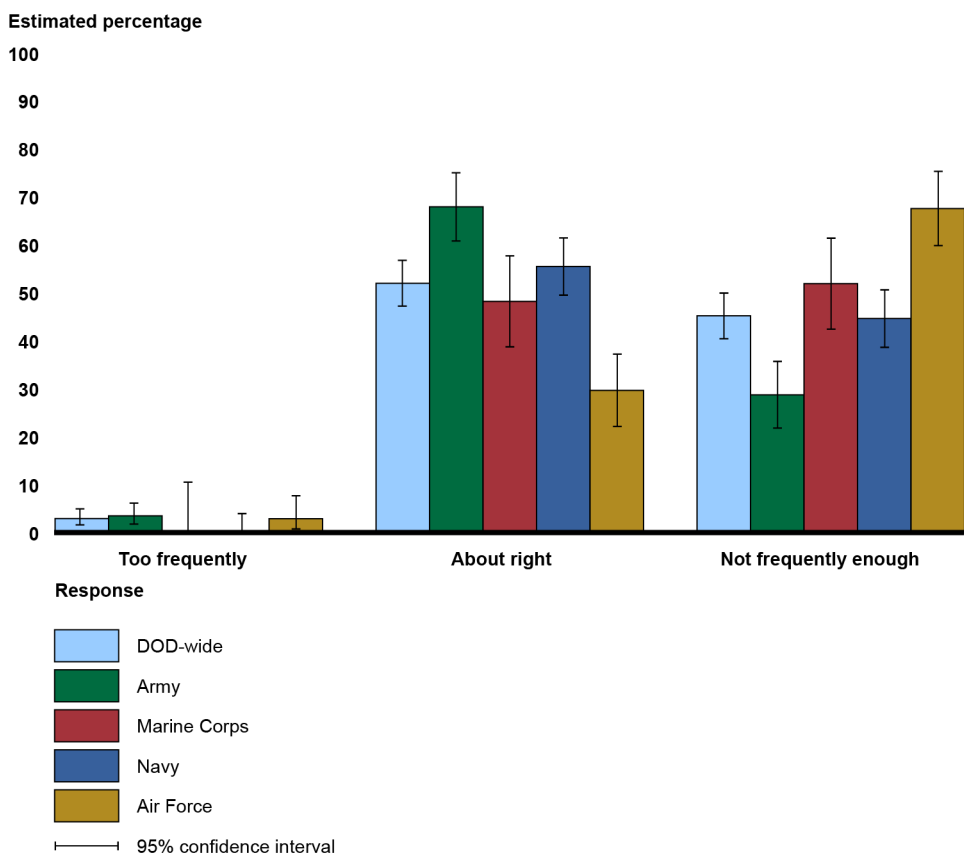
^aIn 2020, hazing training responsibilities were transferred to MEO professionals. Officials stated that prior to the change in responsibility, MEO professionals may not have had visibility over all training occurrences.

^bThe Air Force updated its MEO policy in June 2020 and subsequently updated its training to incorporate hazing, which may have contributed to the relatively lower proportions of Air Force personnel having received training. Additionally, Air Force officials stated that non-MEO professionals conduct violence prevention training that includes hazing and as a result MEO professionals may not have been aware of servicemembers having received this training when responding to our survey.

Our survey also indicated that the military services may not be reinforcing servicemember hazing prevention and response training frequently enough to maximize its effectiveness. We estimated that 45 percent of

DOD's MEO professionals believed hazing prevention and response training for servicemembers in the units they support was not administered frequently enough, about 52 percent believed the frequency was about right, and about 3 percent believed it was too frequently. We estimated that 67 percent of Air Force MEO professionals and 51 percent of Marine Corps MEO professionals said training was not frequent enough, as shown in figure 3.

Figure 3: Military Equal Opportunity Professionals Perceptions on the Frequency of Servicemember Hazing Prevention and Response Training as of December 2020



Source: GAO analysis of survey data. | GAO-22-104066

Notes: The survey question was, "In your opinion, in general, is Military Equal Opportunity training that includes hazing for servicemembers in the units you support provided too frequently, not frequently enough, or at about the right frequency?" All estimates in this figure have a margin of error—at the 95 percent confidence level—of +/- 10.5 percentage points or fewer.

The Equal Employment Opportunity Commission's Promising Practices for Preventing Harassment state that effective harassment training (which

includes hazing) may be most effective if it is, among other things, repeated and reinforced regularly. According to DOD Instruction 1020.03, the Director of ODEI is responsible for directing and managing implementation of the DOD harassment prevention and response program and directing the Commandant of DEOMI to establish standards for DOD component harassment prevention and response training and education programs. Additionally, DOD's Harassment Prevention Strategy includes a strategic goal to provide regular, interactive harassment training that includes a description of prohibited harassment, which includes hazing, and is tailored to the audience and organization.

The services may not be reinforcing hazing prevention and response training frequently enough because DOD Instruction 1020.03 does not specify a minimum frequency for servicemembers to receive this training. ODEI officials told us that specifying a minimum frequency for hazing prevention and response training would be beneficial and could help reinforce the training across the services. However, as of September 2021, ODEI had not directed DEOMI to determine the minimum frequency with which hazing training should be reinforced nor has it directed the services to provide this training at a minimum frequency. Until ODEI directs DEOMI to determine a minimum frequency for providing hazing prevention and response training to servicemembers and directs the military services to provide training at least at this frequency, it will be limited in its ability to ensure that these training programs are appropriately reinforced and are effective.

Not All Military Service Components Have Filled Their MEO Professional Billets

Components Filled 76 Percent of MEO Billets with Certified Professionals

DEOMI, as DOD's training provider for MEO professionals, provides certification training for eligible MEO professionals. DEOMI's curriculum includes a range of topics including harassment, prejudice and discrimination, command climate assessment and improvement, and general MEO professional duties. DEOMI's certification training is conducted through multiple training courses during each year.

Prior to fiscal year 2021, DEOMI allocated classroom seats on an annual basis to each component based on the numbers of MEO professionals

the service component provided to support DEOMI. For example, DEOMI would allocate approximately four seats to active service components for each servicemember assigned to support DEOMI. Similarly, DEOMI would allocate 36 seats to service reserve components (Reserve and National Guard) for each servicemember assigned to support DEOMI. These allocations were made regardless of the component's actual training need.

DEOMI officials told us that starting in fiscal year 2021 they used a formula to determine how much training capacity each service component needs annually to fully staff its MEO professional workforce. The formula is based on the number of billets each service component has for MEO professionals and assumes each component has 100 percent of its billets filled.⁵⁷ Officials told us that they anticipate that use of this formula will increase the total training capacity that DEOMI will need to provide relative to prior fiscal years. These officials also said that DEOMI intends to adjust the number of courses and increase its capacity to train students to address the increased demand for training.

Officials from the Army, Navy, Marine Corps, and the Air Force stated that DEOMI has generally provided enough training capacity for their respective needs. As of 2021, these components reported that they had between 65 percent and 97 percent of their billets filled by DEOMI-certified MEO professionals, as shown in table 2.

Table 2: Military Equal Opportunity (MEO) Professional Billets Filled with Certified MEO Professionals by Service Component as of 2021

Military service (component)	Number of MEO professional billets	Number of certified Defense Equal Opportunity Management Institute MEO professionals	Percent of billets filled
Army (Active)	428	414	97
Army (Reserve)	266	120	45
Army (National Guard) ^a	408	226	55
Navy (Active)	124	108	87

⁵⁷The DEOMI-developed formula is Annual Training Requirement = Total number of MEO professional billets divided by the average number of years personnel remain in a billet. For example, if a service had 900 MEO billets that had 3 year rotations, the annual training requirement would be 300 classroom seats (300 = 900/3).

Military service (component)	Number of MEO professional billets	Number of certified Defense Equal Opportunity Management Institute MEO professionals	Percent of billets filled
Navy (Reserve) ^b	4	3	75
Marine Corps ^c	37	36	97
Air Force (Active) ^d	399	364	91
Air Force (Reserve) ^d	80	75	94
Air Force (National Guard) ^e	178	113	65 ^d
Total	1,924	1,459	76

Source: GAO analysis of Department of Defense data. | GAO-22-104066

^aA National Guard Bureau official said that recent changes in the types of Army National Guard units that are required to have assigned MEO personnel affects the precision of the Army National Guard's data. However, this official also said that this lack of precision does not significantly affect the proportion of MEO professional billets that are unfilled.

^bNavy policy requires commands at certain levels within the department (echelon 2 and echelon 3) to have assigned MEO professionals. Navy officials stated that the U.S. Navy Reserve Forces Command is an echelon 2 command with three echelon 3 commands, which is why the U.S. Navy Reserve has only four assigned MEO professionals.

^cActive-duty Marines perform MEO professional duties for the Marine Corps Reserve.

^dAir Force MEO professionals process both MEO and civilian equal employment opportunity complaints.

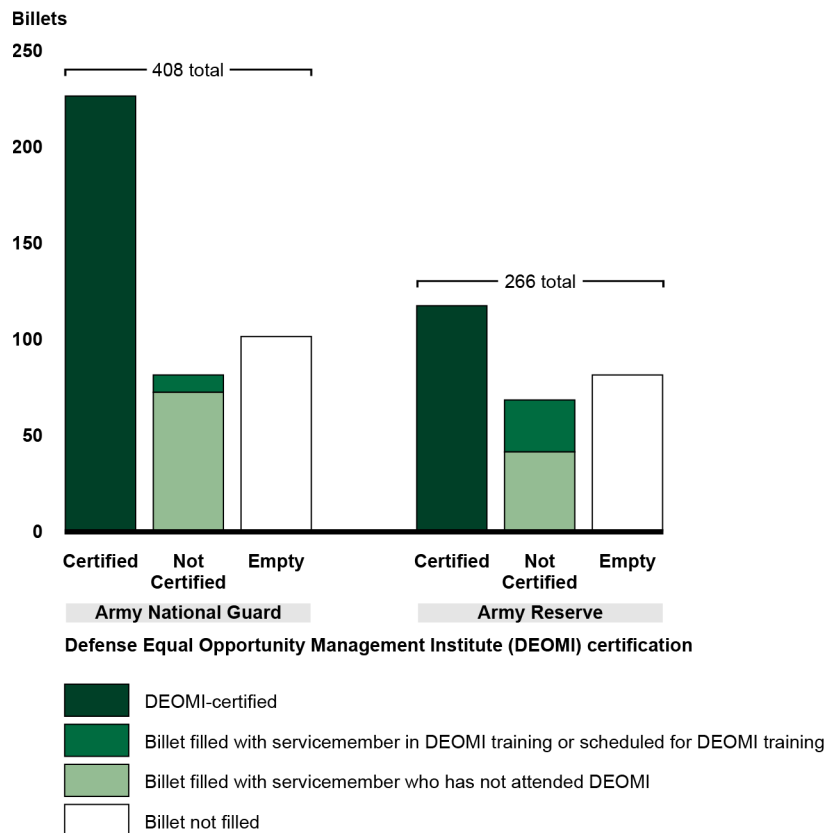
^eAn Air National Guard official said that 45 servicemembers are in training or on a waitlist for training as of August 2021 and that these servicemembers are expected to complete their training in calendar year 2022. This will increase the percentage of MEO professional billets filled to 89 percent.

The Air National Guard reported that it had 65 percent of its billets filled by DEOMI-certified MEO professionals, but had 45 servicemembers who were in training or on a waitlist as of August 2021. A National Guard Bureau official responsible for both the Air National Guard and the Army National Guard stated that once these individuals completed training the Air National Guard would have approximately 89 percent of its billets filled by DEOMI-certified MEO professionals. This official also said that the Air National Guard intended to fill all of its MEO professional billets in calendar year 2022.

In contrast, the Army's reserve component (Army National Guard and Army Reserve) has filled about half (51 percent) of its MEO professional billets with certified professionals. As of July 2021, the Army National Guard had filled 226 of 408 MEO professional billets (55 percent) and the U.S. Army Reserve (Army Reserve) had filled 120 of 266 MEO

professional billets (45 percent) with DEOMI-certified personnel, as shown in figure 4.⁵⁸

Figure 4: Army National Guard and U.S. Army Reserve Military Equal Opportunity Professional Billets Filled with DEOMI-Certified Personnel as of July 2021



Source: GAO analysis of Department of Defense data. | GAO-22-104066

Note: A National Guard Bureau official said that recent changes in the types of Army National Guard units that are required to have assigned MEO personnel affects the precision of the Army National Guard's data. However, this official also said that this lack of precision does not significantly affect the proportion of MEO professional billets that are unfilled.

MEO professionals are required to complete training at DEOMI prior to becoming certified to perform duties. Army Regulation 600-20 requires

⁵⁸A National Guard Bureau official said that recent changes in the types of Army National Guard units that are required to have assigned MEO personnel affects the precision of the Army National Guard's data. However, this official also said that this lack of precision does not significantly affect the proportion of MEO professional billets that are unfilled.

each brigade, or equivalent unit, to have at least one full-time MEO professional, among other requirements. Additionally, Army Regulation 600-20 states that commanders of brigades, or equivalent units, are responsible for allocating and providing personnel and funding to resource the MEO program. Further, Army Regulation 600-20 requires MEO professionals to meet minimum standards to become a MEO professional, such as a record of outstanding duty performance and a favorable criminal records check, among many other requirements.⁵⁹ We found that there are two challenges for the Army National Guard and Army Reserve in filling their billets with certified MEO professionals.

- **Vacant billets and unverified personnel.** The Army National Guard and the Army Reserve have vacant billets and billets filled with soldiers who have not been verified as meeting the minimum standards to execute MEO professional responsibilities. Specifically, as of July 2021, 25 percent of Army National Guard and 30 percent of Army Reserve MEO professional billets were vacant. Additionally, the Army National Guard and Army Reserve each had about 15 percent of its billets filled with soldiers who had not been verified as meeting Army regulation requirements for MEO professionals and therefore were unable to receive MEO training. Army officials told us that there have been instances when soldiers have been assigned to MEO professional billets for over a year without their units providing required documentation demonstrating that the soldiers meet Army regulation requirements.

Headquarters Army and Army Reserve MEO officials stated that having vacant billets and billets filled with unverified soldiers has been an ongoing issue because commanders have not been complying with Army Regulation 600-20's requirement that they provide soldiers for MEO professional billets. Further, in some cases, once commanders provided soldiers for these billets, they have not been submitting necessary packages for official review to determine whether provided soldiers met Army regulation requirements and were eligible to be trained at DEOMI. Army officials stated that they will not schedule soldiers for DEOMI certification training until after they verify the soldiers meet Army regulation requirements.

- **Limited understanding of needed supplemental training capacity and timeframes.** According to DEOMI officials they do not have

⁵⁹Army Regulation 600-20.

visibility into the Army National Guard and Army Reserve's need for supplemental training capacity because neither component has developed a plan for filling their vacant MEO billets that includes information on the timeframe over which they would like to fill these billets and the number of additional personnel that will need to receive training during that period of time.

A National Guard Bureau official responsible for National Guard MEO (including both the Air National Guard and the Army National Guard) and Army Reserve officials stated that shortfalls in certified MEO professionals have been detrimental to implementing a successful MEO program. Until commanders in the Army National Guard and the Army Reserve provide soldiers for MEO billets and submit required paperwork, they will have a limited pool of personnel who are eligible to be trained at DEOMI. Additionally, until these two components develop plans specifying the timeframe over which they will fill vacant MEO professional billets and the additional personnel that need to receive training at DEOMI during that period of time, the components will continue to be limited in their abilities to ensure that commanders have access to personnel certified to provide guidance and advice to commanders on MEO issues. Additionally, these components will remain limited in their abilities to provide military personnel with access to an MEO professional who is qualified to collect information should they experience hazing or other harassment behaviors.

Conclusions

High-profile hazing instances within DOD underscore the need for an effective prevention and response program. While DOD has improved its policies by specifying the scope of data the military services collect on hazing incidents and its reporting to Congress, DOD and Congress continue to have limited visibility into the degree to which DOD's hazing prevention and response program is working. DOD lacks visibility into the extent of hazing incidents or the prevalence of hazing, and the disparity between its survey data and the data reported to Congress suggests that DOD has not been collecting information on the vast majority of hazing incidents. Further, because DOD has not developed an estimate of prevalence, it is difficult to determine whether data reported by a military service reflects an effective program or one that is not operating as intended. DOD—by estimating the prevalence of hazing in the military, ensuring that the services report informal complaint data, tracking hazing complaints from National Guard personnel in a Title 32 duty status, and tracking complete formal complaint data—will be in a better position to make decisions on how to prevent and address hazing in the military. Because hazing can lead to more egregious behaviors within the

continuum of harm, sound decisions in its prevention are key. Additionally, Congress has not received complete information about DOD's efforts to implement its hazing prevention and response programs and may benefit from receiving reports moving forward so long as DOD takes steps to address the deficiencies that we identified in this report.

Additionally, each military service requires harassment prevention and response training for servicemembers, but it is unclear whether that training complies with DOD policy, is sufficient, is effective, or if aspects of it are reinforced frequently enough to maximize its benefits. By ensuring that servicemember harassment prevention and response training is reviewed for compliance with DOD Instruction 1020.03 and sufficiency of content, developing assessment measures to evaluate the effectiveness of training, and determining a minimum frequency for reinforcing hazing prevention and response training, DOD will be better able to ensure that training achieves its objectives.

Finally, DOD has taken steps to better understand the services' MEO professional training needs, but the Army National Guard and the Army Reserve have not addressed shortfalls in almost half of their MEO professional billets. Until the Army National Guard and Army Reserve take the actions needed to ensure that their respective MEO professional billets are filled with certified MEO professionals, they will remain limited in their abilities to implement DOD's harassment prevention and response program, support unit commanders, and document potential incidents of harassment.

Matter for Congressional Consideration

Congress should consider requiring the Department of Defense to report hazing complaint data on an annual basis that would include information on formal and informal complaints, complaints from all military personnel to include National Guard personnel operating under Title 32 U.S. Code, and complete demographic information on complainants and alleged offenders. (Matter for Consideration 1)

Recommendations for Executive Action

We are making a total of 12 recommendations, including four to the Secretary of Defense, five to the Secretary of the Army, two to the Secretary of the Navy, and one to the Secretary of the Air Force.

The Secretary of Defense should ensure that the Chief, National Guard Bureau, in coordination with the Secretaries of the Army and Air Force and the Director, ODEI, establishes a policy that addresses procedures to receive, track, and report hazing complaints by National Guard servicemembers in a title 32 duty status. (Recommendation 1)

The Secretary of the Navy should take actions to ensure that the Navy's MEO policy is updated to address hazing complaints using a standard process that details how hazing complaints should be received, processed, and tracked. (Recommendation 2)

The Secretary of the Navy should take actions to ensure that the Navy's MEO complaint intake form is updated to include a response option for hazing complaints. (Recommendation 3)

The Secretary of the Army should take actions to ensure commanders, the Army Criminal Investigation Division, and the Army Inspector General track the information specified in DOD Instruction 1020.03 and ODEI's data template. (Recommendation 4)

The Secretary of the Air Force should take actions to ensure MEO professionals who receive hazing complaints track the information specified in DOD Instruction 1020.03 and ODEI's data template. (Recommendation 5)

The Secretary of Defense should take actions to ensure that DEOMI executes its proactive review of harassment prevention and response training for compliance with the instruction and sufficiency of content. (Recommendation 6)

The Secretary of Defense should take actions to ensure that the Office for Diversity, Equity, and Inclusion and the Diversity Management Operations Center provide the military services with training measures that exhibit the characteristics specified in best practices that GAO identified for developing training programs and the attributes specified in the Equal Employment Opportunity Commission's report on harassment in the workplace. (Recommendation 7)

The Secretary of Defense should take actions to ensure that the Director of the Office for Diversity, Equity, and Inclusion and the Commandant of DEOMI determines the minimum frequency with which hazing prevention and response training should be reinforced and direct the military services to provide such training at least at this minimum frequency. (Recommendation 8)

The Secretary of Army, in consultation with the Chief, National Guard Bureau, should direct the Director, Army National Guard, to enforce Army Regulation 600-20's requirements that commanders provide soldiers for MEO professional billets and provide documentation to Headquarters,

Army National Guard, demonstrating that these soldiers meet regulation requirements. (Recommendation 9)

The Secretary of Army should direct the Chief, Army Reserve enforce Army Regulation 600-20's requirements that commanders provide soldiers for MEO professional billets and provide documentation to Headquarters, Army Reserve demonstrating these soldiers meet regulation requirements. (Recommendation 10)

The Secretary of the Army, in consultation with that the Chief, National Guard Bureau, should take actions to ensure that the Director, Army National Guard, provides the Defense Equal Opportunity Management Institute with a plan for filling MEO professional billets that includes information on the timeframe within which the Army National Guard plans to fill all billets and the number of additional Army National Guard personnel that will need to be trained during that period of time. (Recommendation 11)

The Secretary of the Army should take actions to ensure that the Chief, Army Reserve, provides DEOMI with a plan for filling MEO professional billets that includes information on the timeframe within which the Army Reserve plans to fill all billets and the number of additional Army Reserve personnel that will need to be trained during that period of time. (Recommendation 12)

Agency Comments

We provided a draft of this report to DOD for review and comment. In its written comments, reproduced in their entirety in appendix VI, DOD concurred with 10 of our recommendations and partially concurred with two. In some cases DOD described planned actions to address our recommendations, as discussed below.

In concurring with recommendation 4 that the Secretary of the Army should take actions to ensure commanders, the Army Criminal Investigation Division, and the Army Inspector General track the information specified in DOD Instruction 1020.03 and ODEI's data template, DOD stated that the Army is currently working to incorporate all required data fields into the new Military Equal Opportunity database. This action may implement our recommendation as long as the Army ensures that commanders, the Army Criminal Investigation Division, and the Army Inspector General are implementing this requirement once the database is operational. We will review the sufficiency of this change as part of our standard recommendation follow-up process.

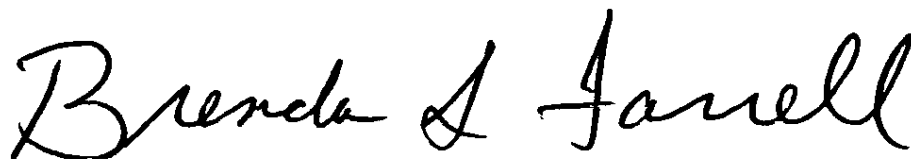
In partially concurring with recommendation 8 that the Secretary of Defense should take actions to ensure that the Director of the Office for Diversity, Equity, and Inclusion and the Commandant of DEOMI determines the minimum frequency with which hazing prevention and response training should be reinforced and direct the military services to provide such training at least at this minimum frequency, DOD stated that it will not instruct the Commandant of DEOMI to determine the minimum frequency for which hazing prevention and response training should be enforced. Instead, the Director of the Office for Diversity, Equity and Inclusion will update DOD Instruction 1020.03 to include a minimum frequency with which hazing prevention and response training should be reinforced and direct the military services to provide such training at least at this minimum frequency. We believe that this action may address our recommendation so long as the guidance is updated in a timely manner and DOD takes actions to ensure that training is delivered at the minimum frequency specified in the updated instruction. We will review the sufficiency of this change as part of our standard recommendation follow-up process.

In partially concurring with recommendation 9 that the Secretary of Army, in consultation with the Chief, National Guard Bureau, should direct the Director, Army National Guard to enforce Army Regulation 600-20's requirements that commanders provide soldiers for MEO professional billets and provide documentation to Headquarters, Army National Guard demonstrating these soldiers meet regulation requirements, the Army concurred and the National Guard Bureau partially concurred with our recommendation. Specifically, the Army agreed that Army Regulation 600-20's requirement needs to be enforced. The Army noted that the Army National Guard's Director of Personnel is working on this requirement. The National Guard Bureau clarified that commanders should provide documentation to the National Guard Bureau, which is the organization delegated by the Chief, National Guard Bureau for Headquarters, Army National Guard equal opportunity plans, programs, and policy. These actions may address our recommendation so long as the documentation is provided to officials responsible for determining whether soldiers meet Army regulation requirements for review. We will review any actions taken in response to our recommendation as part of our standard recommendation follow-up process.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Defense, the Under Secretary of Defense for Personnel and Readiness, the Secretaries of the Army, the Navy, and the Air Force, the Chief, National Guard Bureau, and the Commandant of

the Marine Corps. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-3604 or farrellb@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix VII.

A handwritten signature in black ink that reads "Brenda S. Farrell". The signature is written in a cursive, flowing style.

Brenda S. Farrell
Director, Defense Capabilities and Management

Appendix I: Objectives, Scope, and Methodology

This report addresses the extent to which DOD has: (1) visibility over hazing and reported complete hazing complaint data to Congress; (2) assessed servicemember harassment prevention and response training for compliance, sufficiency, and effectiveness and reinforced training; and (3) provided MEO professionals with required certification training.¹

For our first objective, we reviewed Office of the Secretary of Defense (OSD), military service, and National Guard Bureau policies to understand DOD's hazing data collection procedures.² We reviewed DOD's annual hazing reports to Congress from fiscal years 2016 through 2020. We compared OSD, military service, and National Guard Bureau MEO policies to data contained in OSD's reports for consistency and completeness. Additionally, we reviewed reported results from DOD's 2018 Workplace and Gender Relations Survey to identify whether servicemembers who reported being a victim of sexual assault, sexual harassment, or gender discrimination described at least one event as hazing over the previous 12 months.³

For our second objective, we reviewed DOD and military service-level policies that include hazing training requirements for servicemembers.⁴ We compared the training requirements included in these policies to

¹For the purposes of this report we, refer to equal opportunity advisors (Marine Corps), MEO professionals (Army), Command Climate Specialists (Navy), and equal opportunity practitioners (Air Force) as MEO professionals.

²DOD Instruction 1020.03, *Harassment Prevention and Response in the Armed Forces* (February 2018, Change 1 effective Dec. 29, 2020); Air Force Instruction 36-2710, *Equal Opportunity Program* (June 18, 2020); Army Regulation 600-20, *Army Command Policy* (July 24, 2020); Marine Corps Order 5354.1F, *Marine Corps Prohibited Activities and Conduct (PAC) Prevention and Response Policy* (Apr. 20, 2021); Chief of Naval Operations Instruction 5354.1G, *Navy Equal Opportunity Program* (July 24, 2017); and Secretary of the Navy Instruction 1610.2A, *Department of the Navy (DON) Policy on Hazing* (Jul.15, 2005); Chief National Guard Bureau Manual 9601.01, *National Guard Discrimination Complaint Process* (Apr.25, 2017).

³Office of People Analytics *2018 Workplace and Gender Relations Survey of Active Duty Members Overview Report* (May 2019).

⁴DOD Instruction 1020.03, *Harassment Prevention and Response in the Armed Forces* (February 2018, Change 1 effective Dec. 29, 2020); Air Force Instruction 36-2710, *Equal Opportunity Program* (June 18, 2020); Army Regulation 600-20, *Army Command Policy* (July 24, 2020); Marine Corps Order 5354.1F, *Marine Corps Prohibited Activities and Conduct Prevention and Response Policy* (Apr. 20, 2021); Chief of Naval Operations Instruction 5354.1G, *Navy Equal Opportunity Program* (July 24, 2017); and Secretary of the Navy Instruction 1610.2A, *Department of the Navy (DON) Policy on Hazing* (July15, 2005).

Equal Employment Opportunity Commission training attributes and GAO identified best practices for assessing training to determine if the policies incorporated these attributes and practices.⁵ In addition, we surveyed MEO professionals for their perceptions on the frequency of training provided to servicemembers (see additional information below).

For our third objective, we reviewed OSD and military service-level MEO policies and we reviewed historical DEOMI certification training seat allocation information and training data as well as fiscal year 2022 DEOMI certification training seat allocation information.⁶ We also obtained and reviewed military service MEO professional billet fill rates and training status to determine whether their billets are filled with certified MEO professionals. Based on responses to data reliability questions from DEOMI and military services officials, as well as our examination of the data, we determined that DEOMI certification training data and MEO professionals billet fill rate data were sufficiently reliable for the purpose of understanding MEO professional billet fill rate with certified professionals.

In support of all of our objectives, we obtained the perceptions of MEO professionals on training and data collection using a web-based survey of a generalizable, stratified random sample of MEO professionals. We selected MEO professional positions that were primarily responsible for providing instruction, assistance, and advice on MEO matters and required that personnel complete DEOMI certification training prior to performing their duties. For the purposes of our survey, MEO professionals include equal opportunity advisors (Marine Corps), MEO professionals (Army) command climate specialists (Navy), and equal

⁵U.S. Equal Employment Opportunity Commission, *Select Task Force on the Study of Harassment in the Workplace* (June 2016); and GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2004).

⁶DOD Instruction 1020.03, *Harassment Prevention and Response in the Armed Forces* (February 2018, Change 1 effective Dec. 29, 2020); Air Force Instruction 36-2710, *Equal Opportunity Program* (June 18, 2020); Army Regulation-600-20, *Army Command Policy* (July 24, 2020); Marine Corps Order 5354.1F, *Marine Corps Prohibited Activities and Conduct Prevention and Response Policy* (Apr. 20, 2021); Chief of Naval Operations Instruction 5354.1G, *Navy Equal Opportunity Program* (July 24, 2017), and Secretary of the Navy Instruction 1610.2A, *Department of the Navy (DON) Policy on Hazing* (July 15, 2005).

opportunity practitioners (Air Force).⁷ The target population for this survey included all active-duty MEO professionals from the military services, MEO professionals from the Army and Air Force reserve, and the Army National Guard and Air National Guard. MEO professionals were eligible to participate in our survey if they had separated no more than 6 months prior to our survey.⁸

To conduct the survey, we developed questions covering, among other things, MEO professional perceptions of DOD and military service definitions of hazing, training MEO professionals received prior to assuming MEO professional duties, MEO professionals perceptions on the frequency of hazing specific training provided to servicemembers, and data collection related to hazing complaints. For a partial list of survey questions posed to MEO professionals, see appendix IV. For analysis of MEO professional responses to select survey questions, see appendix V. The military services and National Guard Bureau provided a list of all MEO professionals assigned to billets. We identified a sample frame of 1,528 MEO professionals throughout DOD and selected a stratified sample of 868 MEO professionals from this sample frame. We stratified the sampling frame into six strata by active Army, Army National Guard and Reserve, active Navy, active Air Force, Air National Guard and Air Force Reserve, and active United States Marine Corps. We computed sample sizes necessary to obtain a precision of at least plus or minus 10 percentage points, at the 95 percent confidence level, for each stratum. Finally, we inflated sample sizes within each stratum to compensate for an expected response rate of 40 percent.

To minimize errors that might occur from respondents interpreting our questions differently than we intended, we developed the survey with the

⁷In addition to these positions, Air Force Instruction 90-5001 *Special Management Integrated Resilience* (Jan. 25, 2019), discusses the violence prevention integrator position, which is intended to provide primary prevention of interpersonal and self-directed violence and stop an incident before it occurs. According to Air Force officials, the roles and responsibilities of violence prevention integrators and equal opportunity technicians/directors differentiate in that equal opportunity personnel provide secondary prevention after an incident has occurred and the violence prevention integrators focus on early detection and prompt intervention. Given the focus of the violence prevention integrators in preventing incidents and their not having responsibilities for training personnel on how to respond to an incident, we did not include personnel in these positions in our survey.

⁸The Navy reserve has four MEO professionals and the Marine Corps reserve uses active-duty MEO professionals; therefore, we did not develop a separate strata for these components and our results do not apply to the Navy reserve.

assistance of a survey specialist and incorporated feedback on a draft from a separate survey specialist. We provided a draft of the questions to six subject matter experts from all of the military services and a mix of active and reserve components for their review and made changes as appropriate. Furthermore, we pretested our survey with nine current MEO professionals, including at least one from each of four military services, and a mix of active, reserve, and National Guard personnel, including both uniformed and civilian personnel. During each pretest, all of which were conducted by phone, we tested whether (1) the instructions and questions were clear and unambiguous, (2) the terms we used were accurate, and (3) pretest participants could offer a potential solution to any problems identified in the wording of the questions. We noted any potential problems identified by the reviewers and through the pretests and modified the questionnaire based on the feedback received.

We conducted the survey from October 19, 2020, through December 15, 2020. To maximize our response rate, we sent notification emails and up to three reminder emails to encourage MEO professionals to complete the survey. In total, the survey received responses from 392 of the 868 MEO professionals selected in our sample, for an unweighted response rate of 45 percent. The adjusted sample frame and number of respondents are shown in table 3.

Table 3: Final Sample Disposition

Stratum definition	Population size	Sample size	Respondents	Unweighted response rate (%)
01) Army, Active	377	191	105	55
02) Army, Guard/Reserve	424	194	58	30
03) Navy, Active	102	102	74	73
04) Air Force, Active	296	175	80	46
05) Air Force, Guard/Reserve	292	169	47	28
06) Marine Corps, Active	37	37	28	76
Total	1,528	868	392	45

Source: GAO | GAO-22-104066

The weighted response rate, which controls for disproportionate sample design, was 43 percent. We conducted an analysis of our survey results to identify potential sources of nonresponse bias using two methods. First, we examined the response propensity of the sampled MEO professionals by several demographic characteristics. The characteristics

available to us for this analysis were limited and included service, component, grade/rank, and region. Our second methodology consisted of comparing weighted estimates from respondents and nonrespondents to known population values for these demographic characteristics. We conducted statistical tests of differences, at the 95 percent confidence level, between estimates and known population values, and between respondents and nonrespondents.

Based on this analysis, we observed significant differences in response propensities for all of the characteristics we examined. Specifically, we found that MEO professionals serving in the Guard/Reserve, Air Force, officers, and those in the northeast had significantly lower response rates. Additionally, we found significant differences between weighted estimates from the respondents when compared to known population values for MEO professionals serving in the West region. When weighted, we did not find evidence of significant differences for grade/rank when compared to known population values.

To ensure that the survey results appropriately represented the population of MEO professionals, we calculated weights to adjust for the differential response propensities we observed. Specifically, we weighted the results from the 392 respondents by the inverse of the probability of selection (base weight) and a nonresponse adjustment factor to account for nonresponse and the differences in response propensities we identified. The nonresponse adjustment factor was calculated using a propensity based weighting class adjustment where adjustment cells were based on quintiles of the predicted response propensities estimated by a logistic regression model that included service, component, and region. We applied the propensity weighting class adjustments to adjust the sampling weights in order to account for potential bias due to nonresponse. To compute the final adjusted sampling weight, we applied a simple raking procedure to ensure adjusted weights summed to the number of MEO professionals in the population and by stratum.

We repeated the nonresponse bias analysis using the adjusted weights and found no significant differences with known population values and the weighed estimates for all of the characteristics we examined. This provided us with evidence that the nonresponse weighting class adjustments help mitigate any potential nonresponse bias introduced by the differences in response propensities we identified for the characteristics we included in this analysis.

Because the number and type of characteristics we included in this analysis were limited, the results of the nonresponse bias analysis does not indicate that the weighting adjustments account for all potential sources of nonresponse bias in the final weighted estimates. Additionally, since the sample sizes in several subpopulation of interest were smaller than expected, we did not present estimates made to the Guard and Reserve given the systemic lower response rates for the strata. Based on our analysis, we determined that estimates made to the full population, service level, and active duty components are sufficiently reliable for the purposes of this report.

In addition, to gain insight and context of MEO professionals' survey responses, we conducted confidential interviews with five MEO professionals who indicated in the survey that they were willing to be interviewed. We interviewed MEO professionals who had experience processing hazing complaints and providing training to servicemembers. Additionally, we interviewed selected MEO professionals who completed certification training at DEOMI and one who was in a MEO professional billet who had not yet completed certification training at DEOMI. We selected MEO professionals to interview from those who volunteered by prioritizing those MEO professionals who reported processing complaints. Specifically, we conducted five confidential interviews including MEO professionals from the Air Force, Navy, Marine Corps, Army National Guard, and Army to gain further insight on their experiences processing hazing complaints and conducting hazing training to servicemembers. Results from these interviews are not generalizable to other MEO professionals but provide some context for the quantitative survey results.

To obtain the perspectives of servicemembers who were self-identified victims of hazing, we interviewed seven current servicemembers from the Marine Corps and one former servicemember from the Army by phone that volunteered to speak with us about their perspectives on general awareness of hazing and complaint processes; rationale for reporting or

not reporting the hazing event; and investigation of the hazing event, if applicable.⁹

To develop the interview protocol for self-identified victims, we reviewed DOD and service policies, and interviewed DOD officials. We also consulted with a GAO mental health professional on the appropriateness of our questions as well as guidance on resources to offer participants if relevant. A survey specialist helped design the interview questions, and an attorney reviewed it for legal terminology and any other issues. Prior to interviewing victims, we pretested the interview protocol with three GAO analysts who had experience as a military servicemember. We used the pretests to determine whether: (1) the questions were clear, (2) the terms used were precise, (3) respondents were able to provide information that we were seeking, and (4) the questions were unbiased. We made changes to the content and format of the interview questions based on the results of our pretesting.

Further, each team member was trained on the interview questions to assure its consistent implementation across interviewers and participants. Due to the sensitivity of the information being discussed, we took several steps to help ensure a confidential and safe environment during the phone interviews. All information provided was handled confidentially—callers' names and contact information were not recorded in our notes and we did not audio record the interviews. We conducted the interviews in June 2021. Results from these interviews are not generalizable to other military survivors of hazing.

We interviewed officials, or where appropriate, obtained documentation at the organizations listed below:

⁹We announced our interest in confidentially interviewing self-identified victims of hazing and provided a toll-free telephone number and email address for volunteers to contact us. DOD Military Community and Family Policy officials, who are responsible for Military OneSource—a 24/7 connection for military families to information, answers and support—agreed to post our announcement on the Military OneSource website. Officials from the Marine Corps, who are responsible for Marine OnLine, also agreed to post our announcement on Marine OnLine, which is a resource for unit training and pay and compensation, among other things. Officials from the Air Force who are responsible for the Air Force Portal—the Air Force's intranet resource site—agreed to post our announcement on the Air Force Portal. We also posted our announcement on our agency's social media platforms and through a press release.

Office of the Secretary of Defense:

- Office for Diversity, Equity and Inclusion
- Diversity Management Operations Center
- Defense Equal Opportunity Management Institute
- Office of People Analytics

Department of the Navy

- Navy 21st Century Sailor Office
- Marine Corps Manpower and Reserve Affairs

Department of the Army

- Army Equity and Inclusion Agency
- U.S. Army Criminal Investigation Division
- Army Inspector General

Department of the Air Force

- Air Force Equal Opportunity

National Guard Bureau

- Military Programs Branch
- Complaints Management and Adjudication

We conducted this performance audit from February 2020 through December 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Status of Prior GAO Recommendations Related to DOD's Harassment Prevention Strategy

OSD officials told us that they have sought to address issues with the department's programs through DOD Instruction 1020.03 and its May 2021 Harassment Prevention Strategy.¹ This strategy covers five-years and is intended to guide DOD's efforts in preventing and responding to all categories of harassment, including discriminatory harassment, sexual harassment, hazing, bullying, stalking, and retaliation. OSD officials told us that this strategy will also better enable DOD to implement some of our prior recommendations.² We assessed DOD's efforts to address our prior recommendations and evaluated this strategy as part of our efforts to update our list of related recommendations.

We selected for review, the 16 recommendations included in our September 2011 report on sexual harassment incidents involving military servicemembers, our February 2016 report on hazing incidents involving military servicemembers, and our December 2017 report on the continuum of harm.³ These recommendations were intended to help DOD strengthen leadership accountability, program oversight and implementation, and data collection. We obtained and analyzed available documentation pertaining to the department's actions to address each of the remaining open recommendations.⁴ DOD generally concurred with the recommendations when the reports were issued. As of September 2021, DOD has implemented nine of the 16 recommendations. Two

¹DOD Instruction 1020.03; Department Of Defense Harassment Prevention Strategy for the Armed Forces Fiscal Years 2021 – 2026 (May 2021).

²ODEI officials said that the strategy and other related guidance documents will help implement open recommendations from [GAO-11-809](#), [GAO-16-226](#), and [GAO-18-33](#).

³[GAO-11-809](#), [GAO-16-226](#), and [GAO-18-33](#).

⁴This included analyzing information included in DOD's Harassment Prevention Strategy and DOD Instruction 1020.03. We compared information on the actions that the department took to address the recommendations to our prior work, which has demonstrated the importance of establishing an oversight framework and has shown that having an effective plan for implementing programs and measuring progress can help decision makers. See [GAO-11-809](#), [GAO-08-924](#), [GAO-06-1010](#), [GAO-04-38](#). Additionally, we compared information from our prior work, which has demonstrated that the prevalence of hazing could be estimated based on survey responses. See [GAO-16-226](#). Further, we compared information from our prior work, which has demonstrated the following six elements that are key for establishing a long-term, results-oriented strategic planning framework. The elements are (1) a mission statement, (2) long-term goals, (3) strategies to achieve goals, (4) external factors that could affect goals, (5) use of metrics to gauge progress, and (6) evaluations of the plan to monitor goals and objectives. See [GAO-18-33](#) and [GAO-11-523](#). Lastly, we compared information from the principles in the Centers for Disease Control's framework for sexual violence prevention, including risk and protective factors, risk domains, and tertiary strategies. See [GAO-18-33](#).

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

recommendations have been closed as not implemented since the actions were not taken by DOD. DOD did not take action to address five other recommendations, as summarized in table 4.

Table 4: Status of Implementing Prior GAO Report Recommendations Related to DOD's Harassment Prevention Strategy, as of September 2021

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
GAO-11-809 : Preventing Sexual Harassment: DOD Needs Greater Leadership Commitment and an Oversight Framework	Priority Recommendation 1: To improve leadership's commitment to preventing and responding to incidents of sexual harassment, the Secretary of Defense should direct the Under Secretary of Defense for Personnel and Readiness to develop a strategy for holding individuals in positions of leadership accountable for promoting, supporting, and enforcing the department's sexual harassment policies and programs. (Note: "Priority" recommendations are those that GAO believes warrant priority attention from a department or agency.)	Open: In February 2018, DOD took action toward addressing this recommendation and released DOD Instruction 1020.03, <i>Harassment Prevention and Response in the Armed Forces</i> , that directs DOD's Office of Diversity, Equity, and Inclusion (ODEI), to ensure that DOD components' harassment prevention and response programs incorporate, at a minimum, compliance standards for promoting, supporting, and enforcing policies, plans, and programs. The instruction was updated in December 2020. As of March 2021, DOD had not completed development of a strategy with the compliance standards. In the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Pub. L. No. 116-283 (2021) Congress required the Secretary of Defense to provide a report to the defense committees on the actions taken to implement this recommendation not later than one year after enactment. Specifically, it requires the Secretary of Defense to develop and implement a DOD-wide strategy to hold individuals in positions of leadership in the department accountable for the promotion, support, and enforcement of the department's policies and programs on sexual harassment. In May 2021, DOD issued its Harassment Prevention Strategy for the Armed Forces for fiscal years 2021-2026, which is to be used for holding individuals in positions of leadership accountable. In reviewing the strategy, we found that it includes the long-term goals element of strategic planning. However, it does not fully include other key elements, which are needed as part of the leadership accountability strategy, including objectives, milestones, strategies to accomplish goals, criteria for measuring progress, adequate resources, and performance measures. Additionally, we found that the strategy contains performance measures,

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
		<p>but when we compared these measures to relevant criteria, we found that they lacked key characteristics such as balance, clarity, core program activities, linkage, measurable targets, reliability, or baseline and trend data.^a Further, the strategy is not a formal tasking or directive and thus the offices responsible for addressing key elements such as objectives, milestones, strategies to accomplish goals, criteria for measuring progress, and adequate resources, may not carry them out. DOD has drafted an implementation memo, which it plans to attach to its strategy to send out to the military departments. Once the final memo is issued, we will review it to determine if the elements associated with this recommendation have been fully implemented.</p>

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
	<p>Recommendation 2: To improve implementation of the department's sexual harassment policies and programs, the Secretary of Defense should direct the service secretaries to verify or track military commanders' compliance with existing requirements that commanders periodically determine their organizational health and functioning effectiveness by periodically assessing their equal opportunity climate through "command climate" assessments.</p>	<p>Open: DOD stated that it would implement the recommendation through revisions to its guidance. According to DOD, a 2013 memorandum from the Secretary of Defense on sexual assault prevention and response outlined requirements addressing leadership accountability for preventing sexual harassment. The memorandum included a requirement that the results of command climate surveys be provided to the next level up in the chain of command and directed service chiefs, through their respective military department secretaries, to develop methods to assess the performance of commanders in establishing command climates of dignity and respect. In February 2020, DOD's ODEI stated that the department had refocused its efforts to address this recommendation and will be issuing revised policies no later than September 30, 2020. In May 2021, DOD issued its Harassment Prevention Strategy for the Armed Forces for fiscal years 2021-2026 in which it directs the service secretaries to verify or track military commanders' compliance with existing requirements that commanders periodically determine their organizational health and functioning effectiveness by periodically conducting command climate assessments. However, the strategy is not a formal tasking or directive and therefore the office responsible for each objective may not carry it out. As of July 2021, DOD has drafted an implementation memo and template that it plans to release for the military departments to fill out that will provide additional context for the required actions. Once the final memo is issued, we will review it to determine if this recommendation has been fully implemented.</p>

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
	<p>Recommendation 3: To improve implementation of the department's sexual harassment policies and programs, the Secretary of Defense should direct the Under Secretary of Defense for Personnel and Readiness to develop guidance on how incidents of sexual harassment should be handled in environments wherein two or more of the services are operating together.</p>	<p>Closed – Not Implemented: DOD has updated its guidance on sexual harassment, but has not implemented the recommendation. DOD concurred with this recommendation and stated that it would collaborate with the military services to propose specific guidance on how incidents of sexual harassment should be handled in joint environments (where more than one service is operating). According to DOD, a 2013 memorandum from the Secretary of Defense on sexual assault prevention and response outlined requirements addressing leadership accountability for preventing sexual harassment. The Secretary of Defense also issued a memorandum addressing prevention and response of sexual harassment in 2014, and DOD updated its guidance on sexual harassment in 2015. In 2016, DOD stated that its revised guidance had significantly improved standardization and accountability across all the services, as well as the National Guard Bureau, on the handling of sexual harassment incidents in joint environments. However, DOD has not issued specific guidance on handling sexual harassment incidents in joint environments.</p>

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
	<p>Recommendation 4: To improve DOD's visibility over formal sexual harassment complaints involving active-duty servicemembers, the Secretary of Defense should direct the Under Secretary of Defense for Personnel and Readiness to take steps to ensure that the services' complaint data are complete and accurate and establish reporting requirements specifying uniform data elements that the services should use when collecting and reporting information on formal sexual harassment complaints.</p>	<p>Closed – Not Implemented: DOD has enhanced its data collection on sexual harassment complaints, but has not implemented the recommendation. DOD concurred with the recommendation and stated that it would collaborate with the military services to improve complaint data and develop uniform data elements. In 2014, in response to a provision of the defense authorization act, DOD issued a report to Congress on sexual harassment complaints covering fiscal year 2013. According to DOD's report, the complaint data was compiled based on a standard template that was developed in conjunction with the military services. The Secretary of Defense also issued a memorandum addressing prevention and response of sexual harassment in 2014, and DOD updated its guidance on sexual harassment in 2015. In 2016, DOD stated that its revised guidance requires the services to provide complete and accurate data on sexual harassment incidents and to capture this information with uniform data and reporting requirements. Although DOD has taken some steps toward better data collection, DOD has not instituted procedures to ensure that complaint data are accurate and complete and that services collect and report this information using uniform data elements.</p>

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
	<p>Priority Recommendation 5: To enhance oversight of the department's program to help prevent and to address incidents of sexual harassment involving servicemembers, the Secretary of Defense should direct the Under Secretary of Defense for Personnel and Readiness to ensure that the Office of Diversity Management and Equal Opportunity develops and aggressively implements an oversight framework to help guide the department's efforts. At a minimum, such a framework should contain long-term goals, objectives, and milestones; strategies to accomplish goals; criteria for measuring progress; and results-oriented performance measures to assess the effectiveness of the department's sexual harassment policies and programs. Such a framework should also identify and include a plan for ensuring that adequate resources are available to carry out the office's oversight responsibilities.</p>	<p>Open: DOD stated that as part of its revised guidance it proposed to strengthen and institutionalize the responsibilities and authorities needed for successful implementation of the department's sexual harassment policies. In February 2018, DOD took action toward addressing this recommendation and issued DOD Instruction 1020.03, <i>Harassment Prevention and Response in the Armed Forces</i>, that directs DOD's Office of Diversity, Equity and Inclusion (ODEI) (formerly the Office of Diversity Management and Equal Opportunity) to ensure that DOD components' harassment prevention and response programs incorporate at a minimum, (1) long-term goals, objectives, and milestones; (2) results-oriented performance measures to assess effectiveness; and (3) compliance standards for promoting, supporting, and enforcing policies, plans, and programs. As of March 2021, DOD has not developed and aggressively implemented an oversight framework, as we recommended. However, officials with DOD's ODEI are planning to issue a new sexual harassment prevention strategy sometime in 2021. Further, in the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Congress required the Secretary of Defense to provide a report to the defense committees on the actions taken to implement this recommendation not later than one year after enactment. Specifically, it requires the Secretary of Defense to develop and implement a strategy that consists of an oversight framework for the department's efforts to promote, support, and enforce policies and programs on sexual harassment. In May 2021, DOD issued its Harassment Prevention Strategy for the Armed Forces for fiscal years 2021-2026, which is to be used as an oversight framework to guide the department's efforts. In reviewing the strategy, we found that it includes the long-term goals element of an oversight framework. However, it does not fully include other key elements which are needed in an oversight framework, including objectives, milestones, strategies to accomplish goals, criteria for measuring progress, adequate resources, and performance measures. Additionally, we found that the strategy contains performance measures, but when we compared these measures to relevant criteria, we found that they lacked key characteristics such as balance, clarity, core program activities, linkage, measurable targets, reliability, or baseline and trend data.^b Further, the strategy is not a formal tasking or directive and thus the offices responsible for addressing</p>

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
GAO-16-226 : DOD and Coast Guard: Actions Needed to Increase Oversight and Management Information on Hazing Incidents Involving Servicemembers	<p>Recommendation 1: To enhance and to promote more consistent oversight of efforts within the department to address the incidence of hazing, the Secretary of Defense should direct the Under Secretary of Defense for Personnel and Readiness to regularly monitor the implementation of DOD's hazing policy by the military services.</p>	<p>implementation memo, which it plans to attach to its strategy to send out to the military departments. Once the final memo is issued, we will review it to determine if the elements associated with this recommendation have been fully implemented.</p>
	<p>Recommendation 2: To enhance and to promote more consistent oversight of efforts within the department to address the incidence of hazing, the Secretary of Defense should direct the Under Secretary of Defense for Personnel and Readiness to require that the secretaries of the military departments regularly monitor implementation of the hazing policies within each military service.</p>	<p>Closed – Implemented: In February 2018, DOD issued a policy on harassment prevention and response in the armed services that defined hazing as one form of harassment, and required each military department secretary to provide a plan to implement the policy. In 2018, DOD began assessing these military department plans for compliance, and conducted the latest assessment in April 2021. In addition, in May 2021, DOD issued a harassment prevention strategy for the armed forces, in which it included an objective to assess the anti-harassment policies of the military departments to ensure they are aligned with DOD policies, and to monitor the implementation of these policies. Taken together these actions demonstrate implementation of our recommendation to regularly monitor implementation of DOD's hazing policy by the military services.</p>
		<p>Closed – Implemented: In February 2018, DOD issued a policy on <i>Harassment Prevention and Response in the Armed Forces</i>, which included hazing as one form of harassment covered under the policy. The policy required the secretaries of the military departments to take various steps to oversee implementation of their anti-harassment programs, including, among other things, maintain mechanisms to track and analyze information on harassment complaints, verify that commanders conduct climate assessments and take appropriate action, and submit reports on hazing and bullying data. As a result, the military departments will be required to monitor implementation of their own hazing policies, and they and DOD will be better positioned to identify and respond to hazing-related issues.</p>

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
	<p>Recommendation 3: To improve the ability of servicemembers to implement DOD and service hazing policies, the Secretary of Defense should direct the Under Secretary of Defense for Personnel and Readiness to establish a requirement for the secretaries of the military departments to provide additional clarification to servicemembers to better inform them as to how to determine what is or is not hazing. This could take the form of revised training or additional communications to provide further guidance on hazing policies.</p>	<p>Closed – Implemented: After receiving our draft report containing this recommendation, in December 2015 DOD issued a revised policy on hazing that stated that hazing training in the military services must differentiate between hazing (as well as bullying), on the one hand, and appropriate administrative corrective measures, extra military instruction, and command-authorized physical training. As a result, servicemembers will have additional clarification to be able to distinguish prohibited hazing and bullying behaviors from accepted military activities.</p>
	<p>Recommendation 4: To promote greater consistency in and visibility over the military services' collection of data on reported hazing incidents and the methods used to track them, the Secretary of Defense should direct the Under Secretary of Defense for Personnel and Readiness, in coordination with the secretaries of the military departments, to issue DOD-level guidance on the prevention of hazing that specifies data collection and tracking requirements, including the scope of data to be collected and maintained by the military services on reported incidents of hazing.</p>	<p>Closed – Implemented: After receiving our draft report containing this recommendation, in December 2015 DOD issued a revised policy on hazing that specified the scope of data to be collected on hazing incidents by the military services. In addition, DOD subsequently issued a report on hazing in the armed forces covering the period December 23, 2015 to April 25, 2016, which provided a data collection template for hazing, which further elaborates on the intent of our recommendation. As a result, DOD will have more consistent, complete, and comparable data on hazing incidents.</p>
	<p>Recommendation 5: To promote greater consistency in and visibility over the military services' collection of data on reported hazing incidents and the methods used to track them, the Secretary of Defense should direct the Under Secretary of Defense for Personnel and Readiness, in coordination with the secretaries of the military departments, to issue DOD-level guidance on the prevention of hazing that specifies data collection and tracking requirements, including a standard list of data elements that each service should collect on reported hazing incidents.</p>	<p>Closed – Implemented: After receiving our draft report containing this recommendation, in December 2015 DOD issued a revised policy on hazing that specified the data elements to be collected on hazing incidents by the military services. In addition, DOD subsequently issued a report on hazing in the armed forces covering the period December 23, 2015 to April 25, 2016, which provided a data collection template for hazing, which further elaborates on the intent of our recommendation. As a result, DOD will have more consistent, complete, and comparable data on hazing incidents.</p>

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
	<p>Recommendation 6: To promote greater consistency in and visibility over the military services' collection of data on reported hazing incidents and the methods used to track them, the Secretary of Defense should direct the Under Secretary of Defense for Personnel and Readiness, in coordination with the secretaries of the military departments, to issue DOD-level guidance on the prevention of hazing that specifies data collection and tracking requirements, including definitions of the data elements to be collected to help ensure that incidents are tracked consistently within and across the services.</p> <p>Recommendation 7: To promote greater visibility over the extent of hazing in DOD to better inform DOD and military service actions to address hazing, the Secretary of Defense should direct the Under Secretary of Defense for Personnel and Readiness, in collaboration with the secretaries of the military departments, to evaluate prevalence of hazing in the military services.</p>	<p>Closed – Implemented: After receiving our draft report containing this recommendation, in December 2015 DOD issued a revised policy on hazing that specified the data to be collected on hazing incidents by the military services, and DOD subsequently issued a report on hazing in the armed forces covering the period December 23, 2015 to April 25, 2016, which provided a data collection template for hazing, including definitions of each of the data elements to be collected. As a result, DOD will have more consistent, complete, and comparable data on hazing incidents.</p> <p>Open: In May 2021, DOD issued its Harassment Prevention Strategy in which it identified “past year prevalence of DOD harassment” as a metric that it will use to assess the effect of prevention activities. However, this does not address our recommendation because DOD has not evaluated prevalence, which is an estimate of all hazing incidents. Further, DOD cannot develop a metric using prevalence of hazing incidents until they evaluate the extent of hazing in DOD. We will continue to monitor DOD's efforts to address our recommendation.</p>
<p>GAO-18-33 Sexual Violence: Actions Needed to Improve DOD's Efforts to Address the Continuum of Unwanted Sexual Behaviors</p>	<p>Recommendation 1: The Under Secretary of Defense for Personnel and Readiness should fully include in the new policy for sexual harassment the principles in the Centers for Disease Control's framework for sexual violence prevention, including risk and protective factors, risk domains, and tertiary strategies.</p>	<p>Closed – Implemented: In April 2020, officials with the Office of the Under Secretary of Defense for Personnel and Readiness stated that development of a new sexual harassment prevention strategy was complete and going through DOD's internal review process. In May 2021, DOD's Office of Diversity, Equity, and Inclusion (ODEI) issued its Harassment Prevention Strategy, which includes principles from the Centers for Disease Control's framework for sexual violence prevention, including risk and protective factors, risk domains, and tertiary strategies. These actions will help DOD to address and potentially reduce incidents of sexual harassment in the military.</p>

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
	<p>Priority Recommendation 2: The Under Secretary of Defense for Personnel and Readiness should include in the new policy for sexual harassment mechanisms for anonymous reporting of incidents consistent with section 579 of the National Defense Authorization Act for FY 2013.</p>	<p>Closed – Implemented: In our December 2017 report, <i>Sexual Violence: Actions Needed to Improve DOD's Efforts to Address the Continuum of Unwanted Sexual Behaviors (GAO-18-33)</i>, we found that, DOD's sexual harassment policy did not include a process for anonymous reporting of incidents, an element required by section 579 of the National Defense Authorization Act for Fiscal Year 2013. In our report, we stated that, without including anonymous reporting of sexual harassment complaints in DOD's sexual harassment policy, the statutory requirement for anonymous reporting may be interpreted and applied inconsistently throughout the military services, or left unmet. Accordingly, we recommended that the Under Secretary of Defense for Personnel and Readiness should include in its policy for sexual harassment mechanisms for anonymous reporting of incidents consistent with section 579 of the National Defense Authorization Act for Fiscal Year 2013. In commenting on this recommendation, DOD concurred and stated that, the department will include these mechanisms in a forthcoming comprehensive policy on harassment. In February 2018, DOD published DOD Instruction 1020.03, <i>Harassment Prevention and Response in the Armed Forces</i>. The instruction defines what constitutes an anonymous complaint; updates procedures for servicemembers to submit an anonymous complaint; establishes requirements for responding to, processing, resolving, tracking, and reporting harassment complaints, including anonymous complaints; and establishes training and education requirements and standards that include anonymous complaints. These actions will improve DOD's efforts to prevent and respond to instances of harassment in the armed forces.</p>

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
	<p>Priority Recommendation 3: The Under Secretary of Defense for Personnel and Readiness should (1) direct the Office of Diversity Management and Equal Opportunity to develop standard data elements and definitions for maintaining and reporting information on sexual harassment incidents at the military service level, and (2) direct the military services to incorporate these data elements and definitions into their military service-specific databases.</p>	<p>Closed – Implemented: In our December 2017 report, <i>Sexual Violence: Actions Needed to Improve DOD's Efforts to Address the Continuum of Unwanted Sexual Behaviors (GAO-18-33)</i>, we found that DOD has processes for maintaining and reporting consistent data on incidents of unwanted sexual behaviors including sexual assault and incidents of domestic violence that involve sexual assault, but does not have similar processes for maintaining and reporting data on incidents of sexual harassment. We also found that DOD has not established standard data elements and definitions to guide the military services in maintaining and reporting data on sexual harassment. We stated that inconsistencies in data elements and definitions generally mean that one service may be maintaining data that is more or less detailed than, or that differs from, the data maintained by other services. Such inconsistencies may create difficulties in reporting department-wide sexual harassment data, since the individual service data must be adapted to fit reporting requirements. Accordingly, we recommended that the Under Secretary of Defense for Personnel and Readiness direct the Office of Diversity Management and Equal Opportunity to (1) develop standard data elements and definitions for maintaining and reporting information on sexual harassment incidents at the military service level, and (2) direct the military services to incorporate these data elements and definitions into their military service-specific databases. In commenting on this recommendation, DOD partially concurred and stated that the Office of Diversity Management and Equal Opportunity will conduct a review to determine compliance with DOD reporting requirements and identify emerging policy modifications or changes/additions to standard definitions. In February 2018, DOD published DOD Instruction 1020.03, <i>Harassment Prevention and Response in the Armed Forces</i>. The instruction establishes that the secretaries of the military departments will annually report data through a DOD-approved automated data collection interface that will include, at a minimum, data elements such as the type of complaint, the demographics of the complainant and alleged offender, the relationship between the complainant and the alleged offender at the time of the incident, a narrative description of the alleged incident, the location of the alleged incident, and the timeline of events from the date</p>

**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

GAO report	Recommendation:	Status of implementing GAO recommendation, as of September 2021
		of complaint to final disposition, and reason for any delays. These actions will enable DOD to better track and report on instances of harassment in the armed forces
	<p>Recommendation 4: The Under Secretary of Defense for Personnel and Readiness should direct the Assistant Secretary of Defense for Readiness to incorporate in its continuum of harm prevention strategy all the elements that are key for establishing a long-term, results-oriented strategic planning framework. The elements are (1) a mission statement, (2) long-term goals, (3) strategies to achieve goals, (4) external factors that could affect goals, (5) use of metrics to gauge progress, and (6) evaluations of the plan to monitor goals and objectives.</p>	<p>Open: According to officials with the Office of the Under Secretary of Defense for Personnel and Readiness, development of a new prevention strategy is complete and going through DOD's internal review process. In May 2021, the Office of the Under Secretary of Defense for Personnel and Readiness published DOD's harassment prevention strategy. DOD officials told us that this May 2021 strategy is partly in response to this recommendation of what to incorporate in its continuum of harm prevention strategy. In reviewing DOD's strategy, we found that it includes some elements of a results-oriented strategic framework, such as a mission statement and long-term goals. However, we found that it did not include elements such as objectives or strategies to accomplish goals, external factors that could affect goals, an evaluation plan to monitor goals and objectives, and performance metrics, and that the harassment prevention strategy does not constitute a continuum of harm prevention strategy, as we recommended. Additionally, we found that the strategy contains performance measures, but when we compared these measures to relevant criteria, we found that they lacked key characteristics such as balance, clarity, core program activities, linkage, measurable targets, reliability, or baseline and trend data.^c In September 2021, we received new information about DOD's progress in developing a continuum of harm prevention strategy and we are following up with DOD officials to determine whether their efforts will address our recommendation. We will update the status of this recommendation as more information becomes available.</p>

Source: GAO Analysis of DOD Documents. | GAO-22-104066

Note: "Priority" recommendations are those that GAO believes warrant priority attention from heads of key departments or agencies.

^{a, b, c} Key attributes of successful performance measures: (1) Balance: A suite of measures ensures that an organization's various priorities are covered. (2) Clarity: Measure is clearly stated, and the name and definition are consistent with the methodology used to calculate it. (3) Core program activities: Measures cover the activities that an entity is expected to perform to support the intent of the program. (4) Government-wide priorities: Each measure covers a priority such as quality, timeliness, and cost of service. (5) Limited overlap: Measures provide new information beyond that provided by other measures. (6) Linkage: Measure is aligned with division- and agency-wide goals and mission and is clearly communicated throughout the organization. (7) Measurable target: Measure has a numerical goal. (8) Objectivity: Measure is reasonably free from significant bias or

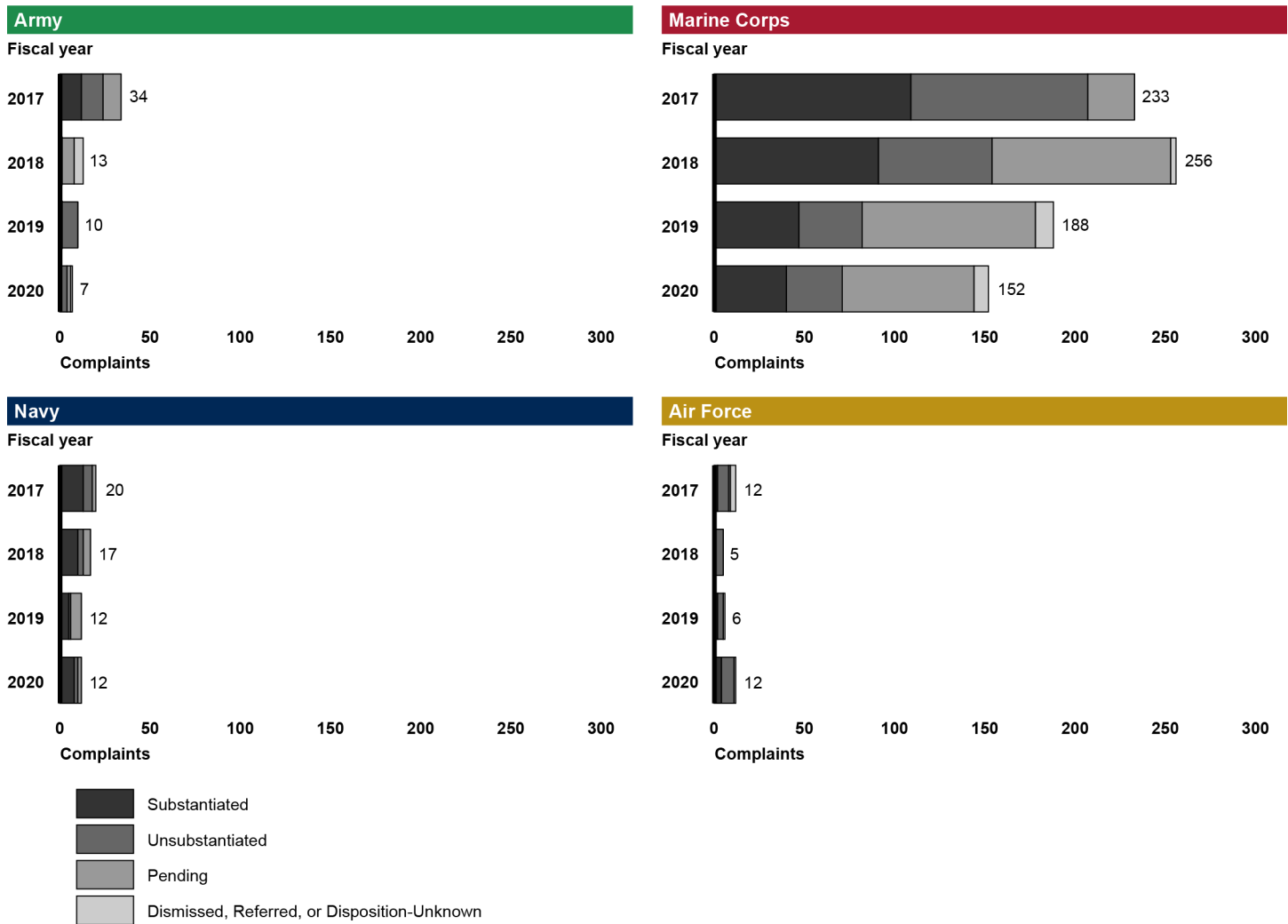
**Appendix II: Status of Prior GAO
Recommendations Related to DOD's
Harassment Prevention Strategy**

manipulation. (9) Reliability: Measure produces the same result under similar conditions. (10) Baseline and trend data: Measure has a baseline and trend data associated with it to identify, monitor, and report changes in performance and to help ensure that performance is viewed in context. See [GAO-03-143](#), [GAO-13-432](#), [GAO-11-646SP](#), and [GAO/GGD/AIMD-99-69](#) and [GAO/GGD-96-66R](#).

Appendix III: Hazing Complaint Data Reported to Congress

From fiscal years 2017 through 2020, the secretaries of the military departments have been required to report to Congress on the scope of hazing within the armed forces. DOD submitted these reports for each of these fiscal years, reporting that DOD-wide there were between 52 and 136 substantiated, or confirmed, hazing incidents of servicemembers each year as shown in the figure 5.

Figure 5: Hazing Complaint Data Reported to Congress, Fiscal Years 2017–2020



Source: GAO analysis of Department of Defense information. | GAO-22-104066

Appendix IV: Selected Questions from the Military Equal Opportunity Professional Survey Questionnaire

This appendix contains selected questions from our web-based generalizable survey of 868 military equal opportunity (MEO) professionals to understand their perceptions about training and data collection. The format of the questions and responses options have been changed for readability. All response “checkboxes” below were radio buttons that allowed only one selection in the web survey. We administered the survey questions shown in this appendix to learn more about MEO professional experiences related to assessing potential hazing incidents, training, and the clarity of military service policies, among other things. Survey questions without response options were open-ended. The survey included over 50 questions, and additional questions outside of the aforementioned experiences were omitted from the text below. Terms used in the survey were defined at their first appearance in the survey and were provided to respondents through pop-up windows in subsequent questions. For more information about our methodology for designing and administering the survey, see appendix I.

10. How easy or difficult has it been for you to make an initial assessment of whether an alleged MEO incident involved hazing?

- Very easy → SKIP to Question 12
- Somewhat easy..... → SKIP to Question 12
- Somewhat difficult
- Very difficult.....

12. When was the last time you personally reviewed a MEO incident that included alleged bullying, if ever?

- In the last 30 days
- More than 30 days ago but within the last 12 months.....
- 1-3 years ago
- More than 3 years ago
- Never.....

13. How easy or difficult has it been for you to distinguish between whether an alleged MEO incident involved hazing rather than bullying?

- Very easy → SKIP to Question 15
- Somewhat easy..... → SKIP to Question 15
- Somewhat difficult
- Very difficult

N/A: I have not reviewed either → SKIP to Question 15
an alleged hazing or alleged
bullying incident...

16. **Based upon the first time you interacted with each commander on hazing-related matters over the last 24 months, about how many commanders accurately understood what behaviors constitute hazing?**

- All
- Most
- Some
- Few
- None.....
-
- I do not know.....

19. **Based on the hazing training you received during the Equal Opportunity Advisor Course or the Equal Opportunity Reserve Component Course at the Defense Equal Opportunity Management Institute, how prepared did you feel to complete your MEO duties related to hazing, if at all?**

- Completely prepared
- Mostly prepared
- Somewhat prepared.....
- Minimally prepared.....
- Not at all prepared.....
-
- I did not receive training on hazing at DEOMI.....
- I don't remember.....

22. **After the additional training identified in question 21, how prepared did you feel to complete your MEO duties related to hazing, if at all?**

- Completely prepared.....
- Mostly prepared
- Somewhat prepared.....
- Minimally prepared.....
- Not at all prepared.....
-
- I don't remember

24. During your time as an Equal Opportunity Advisor/Command Climate Specialist, how often, on average, have servicemembers in the units that you support received MEO training that includes hazing?

Never during my time as an Equal Opportunity Advisor/Command Climate Specialist	<input type="checkbox"/>	→ SKIP to Question 29
Less than once a year	<input type="checkbox"/>	
Once a year	<input type="checkbox"/>	
More than once a year.....	<input type="checkbox"/>	
I don't know	<input type="checkbox"/>	

27. In your opinion, in general, is MEO training that includes hazing for servicemembers in the units you support provided too frequently, not frequently enough, or at about the right frequency?

Too frequently
 About right.....
 Not frequently enough.....

30. During fiscal years 2018 through 2020, about how many formal MEO hazing complaints did you process as an Equal Opportunity Advisor/Command Climate Specialist? Please select one answer for each year.

	FY 2018	FY 2019	FY 2020
None	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 - 2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3 - 5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6 or more	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I don't know	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please explain in the comment box below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For any fiscal years for which you selected "Other" in the question above, please explain in the box below.

31. How clear or unclear is your service's current policy for processing formal MEO hazing complaints (i.e., AFI 36-2710, AR-600-20, MCO 5354.1E, or SECNAVIST 1610.2A)?

- Completely clear
- Not clear at all
- Somewhat clear
- Very clear

33. Have any of the following made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome the challenge or not? Select one answer for each row.

	Yes	No	N/A
Lack of support from servicemembers' leaders regarding hazing prevention and response	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unclear DOD policy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unclear service-level policy (AFI 36-2710, AR-600-20, MCO 5354.1E, or SECNAVIST 1610.2A)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unclear service-level guidance (e.g., SOPs, memos, other written guidance but not policy documents)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unclear state guidance (for the Air and Army National Guard only)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unclear guidance below service-level (e.g., command, installation)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of cooperation from complainant, alleged victim, witnesses, and/or alleged offender	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Insufficient information from necessary personnel (e.g., complainant, commander, inspector general, law enforcement) resulting from reasons other than lack of cooperation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Appendix IV: Selected Questions from the
Military Equal Opportunity Professional Survey
Questionnaire**

Lack of willingness of commanders to substantiate behaviors as hazing even when they recognize the behavior	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of, or insufficient training for, Equal Opportunity Advisor/Command Climate Specialist on the formal hazing complaint process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please explain in the comment box below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you indicated that “Other” factors made it challenging for you to process formal MEO hazing complaints as an **Equal Opportunity Advisor/Command Climate Specialist**, please explain in the box below.

37. During fiscal years 2018 through 2020, about how many informal MEO hazing complaints did you process as an Equal Opportunity Advisor/Command Climate Specialist? Please select one answer for each year.

	FY 2018	FY 2019	FY 2020
None	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1 - 2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3 - 5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6 or more	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I don't know	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please explain in the comment box below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For any fiscal years for which you selected “Other” in the question above, please explain in the box below.

38. How clear or unclear is your service’s current policy for processing informal MEO hazing complaints (i.e., AFI 36-2710, AR-600-20, MCO 5354.1E, or SECNAVIST 1610.2A)?

**Appendix IV: Selected Questions from the
Military Equal Opportunity Professional Survey
Questionnaire**

- Completely clear → SKIP to Question 40
 Very clear → SKIP to Question 40
 Somewhat clear
 Not at all clear

 My service does not have a current policy
 for processing informal MEO hazing
 complaints → SKIP to Question 40

40. Have any of the following made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not? Select one answer for each row.

	Yes	No	N/A
Lack of support from servicemembers' leaders regarding hazing prevention and response	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unclear DOD policy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unclear service-level policy (AFI 36-2710, AR-600-20, MCO 5354.1E, or SECNAVIST 1610.2A)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unclear service-level guidance (e.g., SOPs, memos, other written guidance but not policy documents)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unclear state guidance (for the Air and Army National Guard only)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unclear guidance below service level (e.g., command, installation)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of cooperation from complainant, alleged victim, witnesses, and/or alleged offender	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Insufficient information from necessary personnel (e.g., complainant, commander, inspector general, law enforcement) resulting from reasons other than lack of cooperation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of willingness of commanders to substantiate behaviors as hazing even when they recognize the behavior	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Appendix IV: Selected Questions from the
Military Equal Opportunity Professional Survey
Questionnaire**

Lack of, or insufficient training for, Equal Opportunity Advisor/Command Climate Specialist on the informal hazing complaint process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please explain in the comment box below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you indicated that “Other” factors made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, please explain in the box below.

43. If there is any additional guidance or information you believe you need to process informal or formal MEO hazing complaints, please explain what is needed and why. Please specify if the additional guidance/information needed is related to informal complaints, formal complaints, or both.

47. If you have any comments regarding the MEO hazing complaint process, please provide them in the box below.

Appendix V: Military Equal Opportunity Professional Survey Responses

We administered the survey questions shown in Appendix IV to learn more about MEO professional experiences related to the definitions of hazing, training, and data collection. This appendix shows the number of responses we received regarding selected web-based survey questions and their estimated population values at a precision of at least plus or minus 10 percentage points, at the 95 percent confidence level. The format of the questions below have been changed for readability. For more information about our methodology for designing and administering the survey, see appendix I.

10. How easy or difficult has it been for you to make an initial assessment of whether an alleged MEO incident involved hazing?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Very easy	58	34.0	26.5	41.4
Somewhat easy	85	53.0	45.1	61.0
Somewhat difficult	17	10.8	6.5	16.5
Very difficult	2	2.3	0.4	7.2
Total	162	100.0		

12. When was the last time you personally reviewed a MEO incident that included alleged bullying, if ever?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
In the last 30 days	85	19.2	15.6	22.9
More than 30 days ago but within the last 12 months	104	25.4	21.1	29.7
1-3 years ago	46	11.3	8.3	15.0
More than 3 years ago	9	2.2	0.9	4.3
Never	143	41.9	36.9	46.8
Total	387	100.0		

**Appendix V: Military Equal Opportunity
Professional Survey Responses**

13. How easy or difficult has it been for you to distinguish between whether an alleged MEO incident involved hazing rather than bullying?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Very easy	114	26.9	22.6	31.2
Somewhat easy	138	33.4	28.7	38.1
Somewhat difficult	30	7.3	4.9	10.3
Very difficult	3	0.8	0.2	2.3
N/A: I have not reviewed either an alleged hazing or alleged bullying incident	104	31.6	26.7	36.4
Total	389	100.0		

16. Based upon the first time you interacted with each commander on hazing-related matters over the last 24 months, about how many commanders accurately understood what behaviors constitute hazing?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
All	70	34.3	27.8	40.9
Most	72	34.3	27.7	40.9
Some	40	18.4	13.3	24.4
Few	17	7.8	4.6	12.2
None	2	1.0	0.1	4.0
I don't know	8	4.1	1.9	7.7
Total	209	100.0		

19. Based on the hazing training you received during the Equal Opportunity Advisor Course or the Equal Opportunity Reserve Component Course at the Defense Equal Opportunity Management Institute, how prepared did you feel to complete your MEO duties related to hazing, if at all?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Completely prepared	68	19.8	15.6	23.9
Mostly prepared	90	24.9	20.3	29.4
Somewhat prepared	76	19.5	15.5	23.6
Minimally prepared	27	5.7	3.7	8.4
Not at all prepared	10	2.8	1.4	4.9
I did not receive training on hazing at DEOMI	83	24.3	20.4	28.2
I don't remember	12	3.0	1.5	5.3
Total	366	100.0		

22. After the additional training identified in question 21, how prepared did you feel to complete your MEO duties related to hazing, if at all?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Completely prepared	40	35.9	26.7	45.1
Mostly prepared	42	42.5	32.5	52.4
Somewhat prepared	16	14.3	7.8	23.4
Minimally prepared	6	6.5	2.5	13.5
Not at all prepared	1	0.7	0.0	3.4
I don't remember	0	0.0	0.0	2.8
Total	105	100.0		

24. During your time as an Equal Opportunity Advisor/Command Climate Specialist, how often, on average, have servicemembers in the units that you support received MEO training that includes hazing?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Never during my time as an Equal Opportunity Advisor/Command Climate Specialist	40	13.7	10.4	17.6
Less than once a year	63	17.6	13.8	21.5
Once a year	204	48.7	44.2	53.1
More than once a year	51	10.3	7.8	13.2
I don't know	32	9.8	6.9	13.3
Total	390	100.0		

27. In your opinion, in general, is MEO training that includes hazing for servicemembers in the units you support provided too frequently, not frequently enough, or at about the right frequency?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Too frequently	11	2.9	1.6	4.9
About right	201	51.9	47.2	56.7
Not frequently enough	176	45.1	40.4	49.9
Total	388	100.0		

**Appendix V: Military Equal Opportunity
Professional Survey Responses**

30U1. During fiscal year 2018, about how many formal MEO hazing complaints did you process as an Equal Opportunity Advisor/Command Climate Specialist?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
None	15	30.7	18.3	45.6
1 - 2	15	31.6	17.9	48.1
3 - 5	8	10.6	5.4	18.3
6 or more	6	7.6	3.7	13.5
I don't know	1	1.1	0.3	2.8
Not applicable	7	18.4	6.9	36.2
Other (please explain in the comment box below)	0	0.0	0.0	5.6
Total	52	100.0		

30U02. During fiscal year 2019, about how many formal MEO hazing complaints did you process as an Equal Opportunity Advisor/Command Climate Specialist?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
None	17	45.4	31.2	59.7
1 - 2	12	23.6	13.4	36.8
3 - 5	7	8.4	5.2	12.8
6 or more	9	10.9	7.0	16.0
I don't know	1	1.2	0.3	3.1
Not applicable	3	9.2	2.1	24.1
Other (please explain in the comment box below)	1	1.2	0.3	3.1
Total	50	100.0		

Appendix V: Military Equal Opportunity
Professional Survey Responses

30U03. During fiscal year 2020, about how many formal MEO hazing complaints did you process as an Equal Opportunity Advisor/Command Climate Specialist?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
None	13	27.3	15.0	42.8
1 - 2	25	47.9	34.3	61.6
3 - 5	4	8.4	2.3	20.4
6 or more	13	14.4	8.9	21.7
I don't know	0	0.0	0.0	5.1
Not applicable	1	1.0	0.3	2.5
Other (please explain in the comment box below)	1	1.0	0.3	2.5
Total	57	100.0		

31. How clear or unclear is your service's current policy for processing formal MEO hazing complaints (i.e., AFI 36-2710, AR-600-20, MCO 5354.1E, or SECNAVIST 1610.2A)?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Completely clear	9	17.6	7.7	32.3
Very clear	27	39.6	26.7	52.5
Somewhat clear	20	33.6	21.2	48.0
Not at all clear	6	9.2	3.1	20.1
Total	62	100.0		

33U01. Has lack of support from servicemembers leaders regarding hazing prevention and response made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	17	23.2	13.8	35.2
No	41	71.0	58.5	81.5
N/A	4	5.7	1.9	13.0
Total	62	100.0		

33U02. Has unclear DoD policy made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	10	17.9	8.8	30.6
No	46	76.2	63.1	86.4
N/A	4	5.9	1.9	13.4
Total	60	100.0		

33U03. Has unclear service-level policy (AFI 36-2710, AR-600-20, MCO 5354.1E, or SECNAVIST 1610.2A) made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	19	24.4	14.9	36.2
No	38	71.3	59.1	81.7
N/A	3	4.2	1.1	10.9
Total	60	100.0		

33U04. Has unclear service-level guidance (e.g., SOPs, memos, other written guidance but not policy documents) made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	20	30.0	19.0	43.0
No	37	65.0	51.8	76.8
N/A	4	5.0	1.6	11.2
Total	61	100.0		

Appendix V: Military Equal Opportunity
Professional Survey Responses

33U05. Has unclear state guidance (for the Air and Army National Guard only) made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	3	6.7	1.3	19.2
No	22	42.9	29.2	56.5
N/A	35	50.4	36.7	64.1
Total	60	100.0		

33U06. Has unclear guidance below service-level (e.g., command, installation) made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	12	19.8	10.5	32.4
No	45	74.4	61.5	84.7
N/A	4	5.8	1.9	13.1
Total	61	100.0		

33U07. Has lack of cooperation from complainant, alleged victim, witnesses, and/or alleged offender made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	19	23.9	14.6	35.5
No	37	64.9	50.7	77.4
N/A	5	11.2	3.2	26.0
Total	61	100.0		

**Appendix V: Military Equal Opportunity
Professional Survey Responses**

33U08. Has insufficient information from necessary personnel (e.g., complainant, commander, inspector general, law enforcement) resulting from reasons other than lack of cooperation made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	17	22.2	13.1	33.8
No	38	65.8	51.5	78.2
N/A	6	12.1	3.9	26.5
Total	61	100.0		

33U09. Has a lack of willingness of commanders to substantiate behaviors as hazing even when they recognize the behavior made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	22	37.7	24.5	52.5
No	34	52.5	38.6	66.4
N/A	4	9.8	2.2	25.4
Total	60	100.0		

33U10. Has a lack of, or insufficient training for, Equal Opportunity Advisor/Command Climate Specialist on the formal hazing complaint process made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	20	39.2	25.8	54.0
No	38	57.5	43.9	71.0
N/A	2	3.3	0.5	10.3
Total	60	100.0		

**Appendix V: Military Equal Opportunity
Professional Survey Responses**

33U11. Have other things made it challenging for you to process formal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist, whether you have overcome these challenges or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	6	6.1	3.5	9.7
No	23	48.1	33.1	63.1
N/A	24	45.8	30.7	60.9
Total	53	100.0		

37U01. During fiscal year 2018, about how many informal MEO hazing complaints did you process as an Equal Opportunity Advisor/Command Climate Specialist?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
None	24	51.2	37.2	65.3
1 - 2	16	36.2	22.6	51.7
3 - 5	3	2.6	1.2	4.7
6 or more	0	0.0	0.0	5.9
I don't know	2	1.7	0.7	3.6
Not applicable	4	8.2	2.4	19.4
Other (please explain in the comment box below)	0	0.0	0.0	5.9
Total	49	100.0		

Appendix V: Military Equal Opportunity
Professional Survey Responses

37U02. During fiscal year 2019, about how many informal MEO hazing complaints did you process as an Equal Opportunity Advisor/Command Climate Specialist?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
None	16	36.7	23.1	52.1
1 - 2	21	41.8	28.2	55.3
3 - 5	8	11.6	5.4	20.9
6 or more	3	2.4	1.1	4.4
I don't know	1	0.8	0.2	2.2
Not applicable	2	5.2	0.8	16.2
Other (please explain in the comment box below)	1	1.5	0.1	6.8
Total	52	100.0		

37U03. During fiscal year 2020, about how many informal MEO hazing complaints did you process as an Equal Opportunity Advisor/Command Climate Specialist?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
None	17	25.4	15.5	37.6
1 - 2	29	60.1	48.0	72.2
3 - 5	4	6.7	2.2	15.0
6 or more	5	5.8	2.1	12.3
I don't know	1	0.7	0.2	1.9
Not applicable	0	0.0	0.0	5.1
Other (please explain in the comment box below)	1	1.3	0.1	6.0
Total	57	100.0		

Appendix V: Military Equal Opportunity
Professional Survey Responses

38. How clear or unclear is your service’s current policy for processing informal MEO hazing complaints (i.e., AFI 36-2710, AR-600-20, MCO 5354.1E, or SECNAVIST 1610.2A)?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Completely clear	9	15.7	7.7	27.2
Very clear	35	54.5	42.2	66.8
Somewhat clear	16	24.8	14.7	37.3
Not at all clear	3	2.3	0.7	5.5
My service does not have a current policy for processing informal MEO hazing complaints	1	2.7	0.1	12.6
Total	64	100.0		

40U01. Has lack of support from servicemembers’ leaders regarding hazing prevention and response made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	13	23.7	13.4	36.9
No	45	66.4	52.9	78.1
N/A	6	9.9	3.8	20.1
Total	64	100.0		

40U02. Has unclear DoD policy made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	13	20.4	11.6	31.8
No	47	71.9	58.7	82.9
N/A	3	7.7	1.8	20.2
Total	63	100.0		

Appendix V: Military Equal Opportunity
Professional Survey Responses

40U03. Has unclear service-level policy (AFI 36-2710, AR-600-20, MCO 5354.1E, or SECNAVIST 1610.2A) made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes				
No	43	65.7	52.6	77.3
N/A	3	7.6	1.7	19.9
Total	64	100.0		

40U04. Has unclear service-level guidance (e.g., SOPs, memos, other written guidance but not policy documents) made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	18	31.0	19.8	44.3
No	42	61.3	48.8	73.7
N/A	3	7.7	1.8	20.2
Total	63	100.0		

40U05. Has unclear state guidance (for the Air and Army National Guard only) made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	5	12.8	4.6	26.4
No	24	41.2	28.6	53.9
N/A	32	46.0	33.4	58.5
Total	61	100.0		

**Appendix V: Military Equal Opportunity
Professional Survey Responses**

40U06. Has unclear guidance below service level (e.g., command, installation) made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	12	21.7	11.8	34.7
No	47	67.3	53.5	79.2
N/A	5	11.0	3.9	23.1
Total	64	100.0		

40U07. Has lack of cooperation from complainant, alleged victim, witnesses, and/or alleged offender made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	16	20.6	11.5	32.5
No	43	68.7	55.4	80.0
N/A	5	10.7	3.8	22.7
Total	64	100.0		

40U08. Has insufficient information from necessary personnel (e.g., complainant, commander, inspector general, law enforcement) resulting from reasons other than lack of cooperation made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	18	30.3	18.9	43.9
No	41	58.9	46.4	71.5
N/A	5	10.7	3.8	22.7
Total	64	100.0		

**Appendix V: Military Equal Opportunity
Professional Survey Responses**

40U09. Has lack of willingness of commanders to substantiate behaviors as hazing even when they recognize the behavior made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	16	26.5	15.9	39.5
No	42	60.1	47.6	72.5
N/A	6	13.5	5.4	26.2
Total	64	100.0		

40U10. Has a lack of, or insufficient training for, Equal Opportunity Advisor/Command Climate Specialist on the informal hazing complaint process made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	18	34.1	22.1	47.9
No	40	56.3	43.7	69.0
N/A	4	9.5	2.8	21.9
Total	62	100.0		

40U11. Have other factors made it challenging for you to process informal MEO hazing complaints as an Equal Opportunity Advisor/Command Climate Specialist — whether you have overcome the challenge or not?

	Unweighted Count	Estimated Percent	95 Percent Confidence Interval - Lower Bound	95 Percent Confidence Interval - Upper Bound
Yes	3	8.4	1.9	22.0
No	26	42.0	29.1	54.9
N/A	28	49.6	36.3	62.9
Total	57	100.0		

43. If there is any additional guidance or information you believe you need to process informal or formal MEO hazing complaints, please explain what is needed and why. Please specify if the additional guidance/information needed is related to informal complaints, formal complaints, or both.

47. If you have any comments regarding the MEO hazing complaint process, please provide them in the box below.

Appendix VI: Comments from Department of Defense



FORCE RESILIENCY

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

DEC 31 2021

Ms. Brenda S. Farrell
Director, Defense Capabilities and Management
441 G St NW
Washington, DC 20548

Dear Ms. Farrell:

This transmits the Department of Defense (DoD) response to the Government Accountability Office (GAO) Draft Report GAO-22-104066, "MILITARY HAZING: DoD Should Address Data Reporting Deficiencies, Training Limitations, and Personnel Shortfalls," dated December 2021 (GAO Code 104066). My point of contact is Mr. Cyrus Salazar, who may be reached at cyrus.a.salzar.civ@mail.mil, or (703) 347-2768.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elizabeth B. Foster", with a long horizontal flourish extending to the right.

Elizabeth B. Foster
Executive Director, Force Resiliency

Enclosure(s):
As stated

GAO Draft Report Dated November 4, 2021
GAO-22-104066 (GAO CODE 104066)

“MILITARY HAZING: DOD SHOULD ADDRESS DATA REPORTING DEFICIENCIES, TRAINING LIMITATIONS, AND PERSONNEL SHORTFALLS”

DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATION

RECOMMENDATION 1: The GAO recommends that the Secretary of Defense should ensure that the Chief, National Guard Bureau, in coordination with the Secretaries of the Army and Air Force and the Director, ODEI, establishes a policy that addresses procedures to receive, track, and report hazing complaints by National Guard servicemembers in a title 32 duty status. (Recommendation 1)

DoD RESPONSE: Concur. The Office for Diversity, Equity and Inclusion will update DoD Instruction 1020.03, “Harassment Prevention and Response in the Armed Forces” to state that the Chief, National Guard Bureau will identify procedures to receive, track, and report hazing complaints made by National Guard servicemembers in a title 32 duty status

RECOMMENDATION 2: The GAO recommends that the Secretary of the Navy should take actions to ensure that the Navy’s MEO policy is updated to address hazing complaints using a standard process that details how hazing complaints should be received, processed, and tracked. (Recommendation 2).

DoD RESPONSE: Concur. The Secretary of the Navy will take actions to ensure that the Navy’s MEO policy is updated to address hazing complaints using a standard process that details how hazing complaints should be received, processed, and tracked.

RECOMMENDATION 3: The GAO recommends that the Secretary of the Navy should take actions to ensure that the Navy’s MEO complaint intake form is updated to include a response option for hazing complaints. (Recommendation 3)

DoD RESPONSE: Concur. The Secretary of the Navy will take actions to ensure that the Navy’s MEO complaint intake form is updated to include a response option for hazing complaints.

RECOMMENDATION 4: The GAO recommends that the Secretary of the Army should take actions to ensure commanders, the Army Criminal Investigation Command, and the Army Inspector General track the information specified in DOD Instruction 1020.03 and ODEI’s data template. (Recommendation 4)

DoD RESPONSE: Concur. The Army is currently working to incorporate all required data fields into the new MEO Database. However, the Technology and Business Architecture Integration Directorate (TBAI) extended the current Authorization to Operate (ATO) which

pushes the Army's MEO database "go live date" to June 2022. Ms. Terry Watson, SES, TBAI, approved this extension. The Army is currently working with contractors and TBAI on what impacts and or delays this decision will create for the new ATO which was scheduled to take place 1 OCT 2021 which would allow work to begin on the new MEO database. (Expected Spring 2022)

RECOMMENDATION 5: The GAO recommends that the Secretary of the Air Force should take actions to ensure MEO professionals that receive hazing complaints track the information specified in DOD Instruction 1020.03 and ODEI's data template. (Recommendation 5)

DoD RESPONSE: Concur. The Secretary of the Air Force will take actions to ensure MEO professionals are compliant with the tracking of hazing complaints in accordance with DoD Instruction 1020.03 and ODEI's data template.

RECOMMENDATION 6: The GAO recommends that the Secretary of Defense should take actions to ensure that DEOMI executes its proactive review of harassment prevention and response training for compliance with the instruction and sufficiency of content. (Recommendation 6)

DoD RESPONSE: Concur. DEOMI is awaiting additional resources to conduct the proactive review of harassment prevention and response training for compliance to meet DoDI 1020.03 requirements that expand beyond DEOMI's current mission.

RECOMMENDATION 7: The GAO recommends that the Secretary of Defense should take actions to ensure that the Office for Diversity, Equity, and Inclusion and the Diversity Management Operations Center provide the military services with training measures that exhibit the characteristics specified in best practices GAO identified for developing training programs and the attributes specified in the Equal Employment Opportunity Commission's report on harassment in the workplace. (Recommendation 7)

DoD RESPONSE: Concur. The Office for Diversity, Equity and Inclusion will update the DoD Harassment Prevention Strategy, to ensure inclusion and implementation of training measures that exhibit the characteristics specified in best practices GAO identified for developing training programs and the attributes specified in the Equal Employment Opportunity Commission report on harassment in the workplace.

RECOMMENDATION 8: The GAO recommends that the Secretary of Defense should take actions to ensure that the Director of the Office for Diversity, Equity, and Inclusion and the Commandant of DEOMI determines the minimum frequency with which hazing prevention and response training should be reinforced and direct the military services to provide such training at least at this minimum frequency. (Recommendation 8)

DoD RESPONSE: Partially concur. The Director, Office for Diversity, Equity and Inclusion will not instruct the Commandant of DEOMI to determine the minimum frequency for which

hazing prevention and response training should be enforced. Instead, the Director of the Office for Diversity, Equity and Inclusion will update DoDI 1020.03 to include a minimum frequency with which hazing prevention and response training should be reinforced and direct the military services to provide such training at least at this minimum frequency.

RECOMMENDATION 9: The GAO recommends that the Secretary of Army, in consultation with the Chief, National Guard Bureau, should direct the Director, Army National Guard to enforce Army Regulation 600-20's requirements that commanders provide soldiers for MEO professional billets and provide documentation to Headquarters, Army National Guard demonstrating these soldiers meet regulation requirements. (Recommendation 9)

DoD RESPONSE:

Army: Concur. The Army National Guard's Director of Personnel is working this requirement as outlined in AR 600-20.

NGB: Partially Concur. Commanders should provide documentation to NGB-DEI, which is the organization delegated by the Chief, NGB for Headquarters, Army National Guard equal opportunity plans, programs, and policy.

RECOMMENDATION 10: The GAO recommends that the Secretary of Army should direct the Chief, Army Reserve enforce Army Regulation 600-20's requirements that commanders provide soldiers for MEO professional billets and provide documentation to Headquarters, Army Reserve demonstrating these soldiers meet regulation requirements. (Recommendation 10)

DoD RESPONSE: Concur. The Army Human Resources Command (HRC) MEO assignment managers and the U.S. Army Reserves are currently working and refining their selection process as directed by AR 600-20.

RECOMMENDATION 11: The GAO recommends that the Secretary of the Army, in consultation with that the Chief, National Guard Bureau, should take actions to ensure that the Director, Army National Guard, provides the Defense Equal Opportunity Management Institute with a plan for filling MEO professional billets that includes information on the timeframe within which the Army National Guard plan to fill all billets and the number of additional Army National Guard personnel that will need to be trained during that period of time. (Recommendation 11)

DoD RESPONSE: Concur. The Army National Guard and DEOMI are already working this recommendation to ensure MEO professionals are arriving in a timely manner.

RECOMMENDATION 12: The GAO recommends that the Secretary of the Army should take actions to ensure that the Chief, Army Reserve provides DEOMI with a plan for filling MEO professional billets that includes information on the timeframe within which the Army Reserve

plan to fill all billets and the number of additional Army Reserve personnel that will need to be trained during that period of time. (Recommendation 12)

DoD RESPONSE: Concur. The Army Reserve and HRC are already working this recommendation to ensure MEO professionals are arriving in a timely manner.

Appendix VII: GAO Contact and Staff Acknowledgments

GAO Contact

Brenda S. Farrell, (202) 512 -3604 or farrellb@gao.gov

Staff Acknowledgments

In addition to the contact named above, GAO staff who made key contributions on this report include Alex Winograd, Assistant Director, Jim Ashley, Tracy Barnes, Garrick Donnelly, Serena Lo, Stephanie Moriarty, Michael Silver, Norris "Traye" Smith (Analyst-in-Charge), Kristen Pinnock, and Richard Powelson.

Related GAO Products

Sexual Harassment and Assault: Guidance Needed to Ensure Consistent Tracking, Response, and Training for DOD Civilians. [GAO-21-113](#). Washington, D.C.: February 9, 2021.

Sexual Violence: Actions Needed to Improve DOD's Efforts to Address the Continuum of Unwanted Sexual Behaviors. [GAO-18-33](#). Washington, D.C.: December 18, 2017.

Sexual Assault: Better Resource Management Needed to Improve Prevention and Response in the Army National Guard and Army Reserve. [GAO-17-217](#). Washington, D.C.: February 27, 2017.

Military Personnel: DOD Has Processes for Operating and Managing Its Sexual Assault Incident Database. [GAO-17-99](#). Washington, D.C.: January 10, 2017.

Sexual Violence Data: Actions Needed to Improve Clarity and Address Differences Across Federal Data Collection Efforts. [GAO-16-546](#). Washington, D.C.: July 19, 2016.

DOD and Coast Guard: Actions Needed to Increase Oversight and Management Information on Hazing Incidents Involving Servicemembers. [GAO-16-226](#). Washington, D.C.: February 9, 2016.

Sexual Assault: Actions Needed to Improve DOD's Prevention Strategy and to Help Ensure It Is Effectively Implemented. [GAO-16-61](#). Washington, D.C.: November 4, 2015.

Military Personnel: Actions Needed to Address Sexual Assaults of Male Servicemembers. [GAO-15-284](#). Washington, D.C.: March 19, 2015.

Military Personnel: DOD Needs to Take Further Actions to Prevent Sexual Assault during Initial Military Training. [GAO-14-806](#). Washington, D.C.: September 9, 2014.

Military Personnel: DOD Has Taken Steps to Meet the Health Needs of Deployed Servicewomen, but Actions Are Needed to Enhance Care for Sexual Assault Victims. [GAO-13-182](#). Washington, D.C.: January 29, 2013.

Military Personnel: Prior GAO Work on DOD's Actions to Prevent and Respond to Sexual Assault in the Military. [GAO-12-571R](#). Washington, D.C.: March 30, 2012.

Preventing Sexual Harassment: DOD Needs Greater Leadership Commitment and an Oversight Framework. [GAO-11-809](#). Washington, D.C.: September 21, 2011.

Military Justice: Oversight and Better Collaboration Needed for Sexual Assault Investigations and Adjudications. [GAO-11-579](#). Washington, D.C.: June 22, 2011.

Military Personnel: DOD's and the Coast Guard's Sexual Assault Prevention and Response Programs Need to Be Further Strengthened. [GAO-10-405T](#). Washington, D.C.: February 24, 2010.

Military Personnel: Additional Actions Are Needed to Strengthen DOD's and the Coast Guard's Sexual Assault Prevention and Response Programs. [GAO-10-215](#). Washington, D.C.: February 3, 2010.

Military Personnel: DOD's and the Coast Guard's Sexual Assault Prevention and Response Programs Face Implementation and Oversight Challenges. [GAO-08-924](#). Washington, D.C.: August 29, 2008.

Military Personnel: The DOD and Coast Guard Academies Have Taken Steps to Address Incidents of Sexual Harassment and Assault, but Greater Federal Oversight Is Needed. [GAO-08-296](#). Washington, D.C.: January 17, 2008.

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through our website. Each weekday afternoon, GAO posts on its [website](#) newly released reports, testimony, and correspondence. You can also [subscribe](#) to GAO's email updates to receive notification of newly posted products.

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).
Subscribe to our [RSS Feeds](#) or [Email Updates](#). Listen to our [Podcasts](#).
Visit GAO on the web at <https://www.gao.gov>.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/about/what-gao-does/fraudnet>

Automated answering system: (800) 424-5454 or (202) 512-7700

Congressional Relations

A. Nicole Clowers, Managing Director, ClowersA@gao.gov, (202) 512-4400, U.S. Government Accountability Office, 441 G Street NW, Room 7125, Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800
U.S. Government Accountability Office, 441 G Street NW, Room 7149
Washington, DC 20548

Strategic Planning and External Liaison

Stephen J. Sanford, Managing Director, spel@gao.gov, (202) 512-4707
U.S. Government Accountability Office, 441 G Street NW, Room 7814,
Washington, DC 20548

