



May 2018

MILITARY PERSONNEL

DOD Should Improve Its Oversight of the Exceptional Family Member Program

Why GAO Did This Study

Military families with special medical and educational needs face unique challenges because of their frequent moves. To help assist these families, DOD provides services plans, which document the support a family member requires. The National Defense Authorization Act for Fiscal Year 2017 included a provision for GAO to review the Services' EFMPs, including DOD's oversight of these programs.

This report examines the extent to which (1) each Service provides family support and (2) the Services monitor and DOD evaluates assignment coordination and family support.

GAO analyzed DOD and Service-specific EFMP guidance and documents; analyzed fiscal year 2016 EFMP data (the most recent available); visited seven military installations, selected for their large numbers of military-connected students; and interviewed officials responsible for implementing each Service's EFMP, as well as officials in OSN that administer DOD's EFM policy.

What GAO Recommends

GAO makes a total of three recommendations to DOD. DOD should assess and report to Congress on the extent to which each Service provides sufficient family support personnel and services plans, develop common performance metrics for assignment coordination and family support, and evaluate the results of the Services' monitoring activities. DOD agreed with these recommendations and plans to develop performance metrics for assignment coordination and develop plans to evaluate the Services' monitoring activities.

View [GAO-18-348](#). For more information, contact Jacqueline M. Nowicki at (617) 788-0580 or nowickij@gao.gov.

MILITARY PERSONNEL

DOD Should Improve Its Oversight of the Exceptional Family Member Program

What GAO Found

The support provided to families with special needs through the Department of Defense's (DOD) Exceptional Family Member Program (EFMP) varies widely for each branch of Military Service. Federal law requires DOD's Office of Special Needs (OSN) to develop a uniform policy that includes requirements for (1) developing and updating a services plan for each family with special needs and (2) resources, such as staffing, to ensure an appropriate number of family support providers. OSN has developed such a policy, but DOD relies on each Service to determine its compliance with the policy. However, Army and Navy officials said they have not received feedback from OSN about the extent to which their Service-specific guidance complies. Federal internal control standards call for developing clear policies to achieve agency goals. In addition, DOD's most recent annual reports to Congress do not indicate the extent to which each Service provides services plans or allocates sufficient resources for family support providers. According to GAO's analysis, the Military Services have developed relatively few services plans, and there is wide variation in the number of family support providers employed, which raises questions about potential gaps in services for families with special needs (see table).

Exceptional Family Member Program (EFMP) Personnel and Services Plans at Continental United States Installations, Fiscal Year 2016

Military Service	Total number of installations	Total number of exceptional family members	Total number of family support providers and related personnel	Total number of services plans (SP) created ^a
Air Force	58	34,885	58	160
Army	39	43,109	92	5,004
Marine Corps	13	9,150	88	552
Navy	50	17,533 ^b	74	31 ^c

Source: GAO analysis of the Military Services' fiscal year 2016 EFMP data. | GAO-18-348

^aCan include more than one enrolled family member.

^bAs of November 2016.

^cAdditional SPs may have been modified in fiscal year 2016, but could not be reported by the Navy.

Each Service uses various mechanisms to monitor how servicemembers are assigned to installations (assignment coordination) and obtain family support, but DOD has not established common performance measures to assess these activities. DOD has taken steps to better support families with special needs, according to the DOD officials GAO interviewed. For example, DOD established a working group to identify gaps in services. However, OSN officials said that DOD lacks common performance measures for assignment coordination and family support because the Services have not reached consensus on what those measures should be. In addition, OSN does not have a process to systematically evaluate the results of the Services' monitoring activities. Federal internal control standards call for assessing performance over time and evaluating the results of monitoring activities. Without establishing common performance measures and assessing monitoring activities, DOD will be unable to fully determine the effect of its efforts to better support families with special needs and the adequacy of the Services' EFMPs as required by federal law.

Contents

Letter		1
	Background	3
	Key Aspects of Support for Families with Special Needs Vary Widely Across the Services, Leading to Potential Gaps in Assistance for Families with Special Needs	8
	Each Service Has Mechanisms to Monitor EFMP Assignment Coordination and Family Support Activities, but DOD Lacks Common Performance Measures and a Process to Fully Evaluate These Activities	16
	Conclusions	24
	Recommendations for Executive Action	25
	Agency Comments and Our Evaluation	25
Appendix I	Objectives, Scope, and Methodology	27
Appendix II	Services' Fiscal Year 2016 Exceptional Family Member Program Data	31
Appendix III	Issues Identified by Discussion Group Participants	46
Appendix IV	Comments from the Department of Defense	51
Appendix V	GAO Contact and Staff Acknowledgments	53
Tables		
	Table 1: Selected Department of Defense (DOD) Procedural Requirements for the Assignment Coordination and Family Support Components of the Exceptional Family Member Program (EFMP)	7
	Table 2: Selected Service-Specific Requirements for Exceptional Family Member Program (EFMP) Family Support	9

Table 3: Number of Services Plans (SP) Created by Each Military Service at Continental United States (CONUS) Installations, Fiscal Year 2016	12
Table 4: Summary of Family Support Personnel by Continental United States (CONUS) Installations, Fiscal Year 2016	13
Table 5: Monitoring Mechanisms for Family Support Services Provided through the Department of Defense's (DOD) Exceptional Family Member Program (EFMP)	17
Table 6: Office of Special Needs (OSN) Standardization Efforts for Assignment Coordination and Family Support through the Exceptional Family Member Program (EFMP)	19
Table 7: Attributes of Effective Performance Metrics Identified by GAO	21
Table 8: Certification Processes for Family Support Services Provided through the Department of Defense's (DOD) Exceptional Family Member Program (EFMP)	23
Table 9: Fiscal Year 2016 Air Force Exceptional Family Member Program (EFMP) Data by Installation – Selected Categories, Continental United States (CONUS) and Outside the Continental United States (OCONUS)	32
Table 10: Fiscal Year 2016 Army Exceptional Family Member Program (EFMP) Data by Installation – Selected Categories, Continental United States (CONUS) and Outside the Continental United States (OCONUS)	36
Table 11: Fiscal Year 2016 Marine Corps Exceptional Family Member Program (EFMP) Data by Installation – Selected Categories, Continental United States (CONUS) and Outside the Continental United States (OCONUS)	40
Table 12: Fiscal Year 2016 Navy Exceptional Family Member Program (EFMP) Data by Installation – Selected Categories, Continental United States (CONUS) and Outside the Continental United States (OCONUS)	42

Figure

Figure 1: Oversight of the Department of Defense's (DOD) Office of Special Needs and Its Relationship to the Military Services	6
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Abbreviations

AFFIRST	Air Force Family Integrated Results and Statistical Tracking System
CMS	Marine Corps Case Management System
CONUS	Continental United States
CTS	Army Client Tracking System
DOD	Department of Defense
EFM	Exceptional Family Member
EFMP	Exceptional Family Member Program
IEP	Individualized Education Program
SP	Services Plan
NDAAs	National Defense Authorization Act
NFAAS	Navy Family Accountability and Assessment System
OCONUS	Outside the Continental United States
OSN	Office of Special Needs

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May 8, 2018

The Honorable John McCain
Chairman
The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Mac Thornberry
Chairman
The Honorable Adam Smith
Ranking Member
Committee on Armed Services
House of Representatives

Military families with special medical or educational needs face a unique set of challenges due to their frequent moves within the United States and to overseas installations.¹ With each move, a family with special needs often must find new specialized medical care providers or a new school that can provide appropriate special education services. Recent executive branch, congressional, and advocacy group initiatives have focused on increasing support for these families, which the White House deemed a top national security policy priority in 2011. As of February 2018, the Services' Exceptional Family Member Programs (EFMP) collectively serve more than 132,500 enrolled military family members with special needs.

The National Defense Authorization Act (NDAA) for Fiscal Year 2017 included a provision for GAO to assess the effectiveness of the Services' EFMPs, including the Department of Defense's (DOD) role in providing guidance for these programs.² These programs include, among other things, family support services, such as referrals to military or community

¹In this report, we use the term "special needs" to encompass both family members with disabilities that receive special education services as well as family members that require special medical services. Throughout this document we refer to them as "families with special needs."

²National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 114-328, § 578, 130 Stat. 2000, 2144 (2016).

resources for families with special needs; and a process for considering the medical or educational needs of these families before they are relocated (known as assignment coordination.) This report examines (1) the extent to which each Service has provided family support as required by DOD and (2) the extent to which the Services monitor and DOD evaluates assignment coordination and family support.

To address the first objective, we obtained and reviewed documentation to assess how the Air Force, Army, Marine Corps, and Navy provide family support services in the continental United States (CONUS).³ In addition, we visited seven installations in five states to learn more about how service-specific guidance for the EFMP is implemented.⁴ We selected these installations because they serve a large segment of the total population of families with special needs enrolled in the Services' EFMPs, including high concentrations of military-connected children attending local schools and children attending U.S. DOD schools. At each installation we visited, we conducted group interviews with a self-selected group of military family members and caregivers enrolled in the EFMP that have used family support services (see app. III for more information about these interviews, which provide illustrative examples of issues raised by families with special needs regarding the EFMP). We also obtained program data from the Air Force, Army, Marine Corps, and Navy and interviewed representatives from each Service about the data to determine that the selected data variables from each service are sufficiently reliable for the purposes of providing summary results about family support for fiscal year 2016.⁵ Finally, we spoke with representatives from advocacy groups at the national level selected for their expertise on military families with special needs and the EFMP.

³According to DOD guidance, family support services include non-clinical case management assistance, such as documenting a family's current needs and identifying steps to achieve their desired outcome, and referral to additional resources for families with special needs who have serious or complicated medical issues. We did not assess procedures for assignment coordination and family support used by the Coast Guard because it is a component of the Department of Homeland Security.

⁴These seven installations are: (1) Marine Corps Base Quantico (Virginia), (2) Fort Bragg (North Carolina), (3) Camp Lejeune (North Carolina), (4) Fort Hood (Texas), (5) Joint Base San Antonio - Lackland (Texas), (6) Joint Base Lewis-McChord (Washington), and (7) Naval Base San Diego (California).

⁵The Navy provided EFMP family member data as of November 2016 because its current data system does not provide historical data prior to the second quarter of 2017, according to Navy officials.

To address the second objective, we reviewed each service's procedures for monitoring assignment coordination and family support, as well as DOD's efforts to monitor these EFMP components across the Services. Specifically, we reviewed policies and procedures included in Service-specific guidance related to monitoring, including DOD-required certifications for family support services and related quality assurance activities for assignment coordination, such as site-visits from each Service's headquarters. In addition, we discussed required monitoring activities with personnel from each Service's headquarters and EFMP managers at each installation we visited. Finally, we assessed these monitoring activities against DOD's monitoring requirements; standards for internal control in the federal government; and GAO's body of work on leading practices in performance measurement, which help federal agencies determine if their goals are being achieved.⁶

For both objectives, we interviewed agency officials and reviewed relevant federal laws and regulations. A more detailed discussion of our scope and methodology can be found in appendix I.

We conducted this performance audit from February 2017 to May 2018 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.

Background

The EFMP provides support to families with special needs at their current and proposed locations. Servicemembers relocate frequently, generally moving every 3 years if in the Army, Marine Corps, and Navy, and every 4 years if in the Air Force. In fiscal year 2016, the Military Services relocated approximately 39,000 servicemembers enrolled in the EFMP to CONUS installations.

To implement DOD's policy on support for families with special needs, DOD requires each Service to establish its own EFMP for active duty

⁶GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 2014). GAO, *Military Personnel: Additional Steps Are Needed to Strengthen DOD's Oversight of Ethics and Professionalism Issues*, [GAO-15-711](#) (Washington, D.C.: Sept. 3, 2015).

servicemembers.⁷ EFMPs are to have three components—identification and enrollment, assignment coordination, and family support.

- **Identification and enrollment:** Medical and educational personnel at each installation are responsible for identifying eligible family members with special medical or educational needs to enroll in the EFMP.⁸ Once identified by a qualified medical provider, active duty servicemembers are required to enroll in their service’s EFMP.⁹ Servicemembers are also required to self-identify when they learn a family member has a qualifying condition.
- **Assignment coordination:** Before finalizing a servicemember’s assignment to a new location, DOD requires each Military Service to consider any family member’s special needs during this process, including the availability of required medical and special educational services at a new location.¹⁰
- **Family support:** DOD requires each Military Service’s EFMP to include a family support component through which it helps families

⁷DOD Instruction (DODI) 1315.19, *The Exceptional Family Member Program (EFMP)* (Apr. 19, 2017), para. 2.5.a. DOD guidance uses the term Military Department, but for purposes of this report we use the term Service. Servicemembers assigned to a joint base installation will generally receive family support from the Service that is responsible for running that installation.

⁸DOD defines a family member as a dependent of a servicemember, including a spouse and children, who is eligible to receive a DOD identification card, medical care in a DOD medical treatment facility, and command sponsorship or DOD-sponsored travel. In certain cases this may also include other nondependent family members of a servicemember. DODI 1315.19, para. G.2. Individuals with special medical and educational needs include those with a potentially life-threatening or chronic physical condition (such as diabetes or multiple sclerosis), current and chronic mental health condition, asthma, attention deficit disorder, or a chronic condition that requires adaptive equipment or technology devices; or a child (birth through 21 years) with special educational needs who is eligible for, or receives, special education services through an Individualized Education Program (IEP), or early intervention services through an Individualized Family Service Plan (IFSP). DODI 1315.19, sec. 3. According to DOD officials, special medical or educational needs are identified and updated through the use of Service-specific forms, the DD 2792 and DD 2792-1, with accompanying IEP or IFSP.

⁹DODI 1315.19, para. 2.5.d.

¹⁰DODI 1315.19, para. 1.2.a.b. Our review did not assess the extent to which medical providers have the capacity to provide required services at proposed locations. For example, we did not review the extent to which waitlists and staff availability affected servicemembers’ access to required services to meet their special needs. According to DOD officials, a portion of this process is conducted under the authority of the Military Medical Departments.

with special needs identify and gain access to programs and services at their current, as well as proposed, locations.¹¹ Servicemembers assigned to a joint base would receive family support from the Service that is responsible for leading that installation. For example, an Airman assigned to a joint base where the Army is the lead would receive family support from the Army installation's EFMP.

As required by the NDAA for Fiscal Year 2010, DOD established the Office of Community Support for Military Families with Special Needs (Office of Special Needs or OSN) to develop, implement, and oversee a policy to support these families.¹² Among other things, this policy must (1) address assignment coordination and family support services for families with special needs; (2) incorporate requirements for resources and staffing to ensure appropriate numbers of case managers are available to develop and maintain services plans that support these families¹³; and (3) include requirements regarding the development and continuous updating of a services plan for each military family with special needs.¹⁴ OSN is also responsible for collaborating with the Services to standardize EFMP components as appropriate and for monitoring the Services' EFMPs.¹⁵ OSN has been delegated the responsibility of implementing DOD's policy for families with special needs by the Undersecretary of Defense for Personnel and Readiness through the Assistant Secretary for Manpower and Reserve Affairs according to DOD officials. Currently, OSN is

¹¹DODI 1315.19, para. 6.1.

¹²National Defense Authorization Act for Fiscal Year 2010, Pub. L. No. 111-84, § 563, 123 Stat. 2190, 2304 (2009) (codified at 10 U.S.C. § 1781c). This provision requires DOD to develop, and update from time to time, a "uniform policy" regarding military families with special needs. 10 U.S.C. § 1781c(d)(1). DOD officials stated that they met this requirement by issuing DODI 1315.19. The policy applies to members of the armed forces without regard to their location, whether within or outside the continental United States.

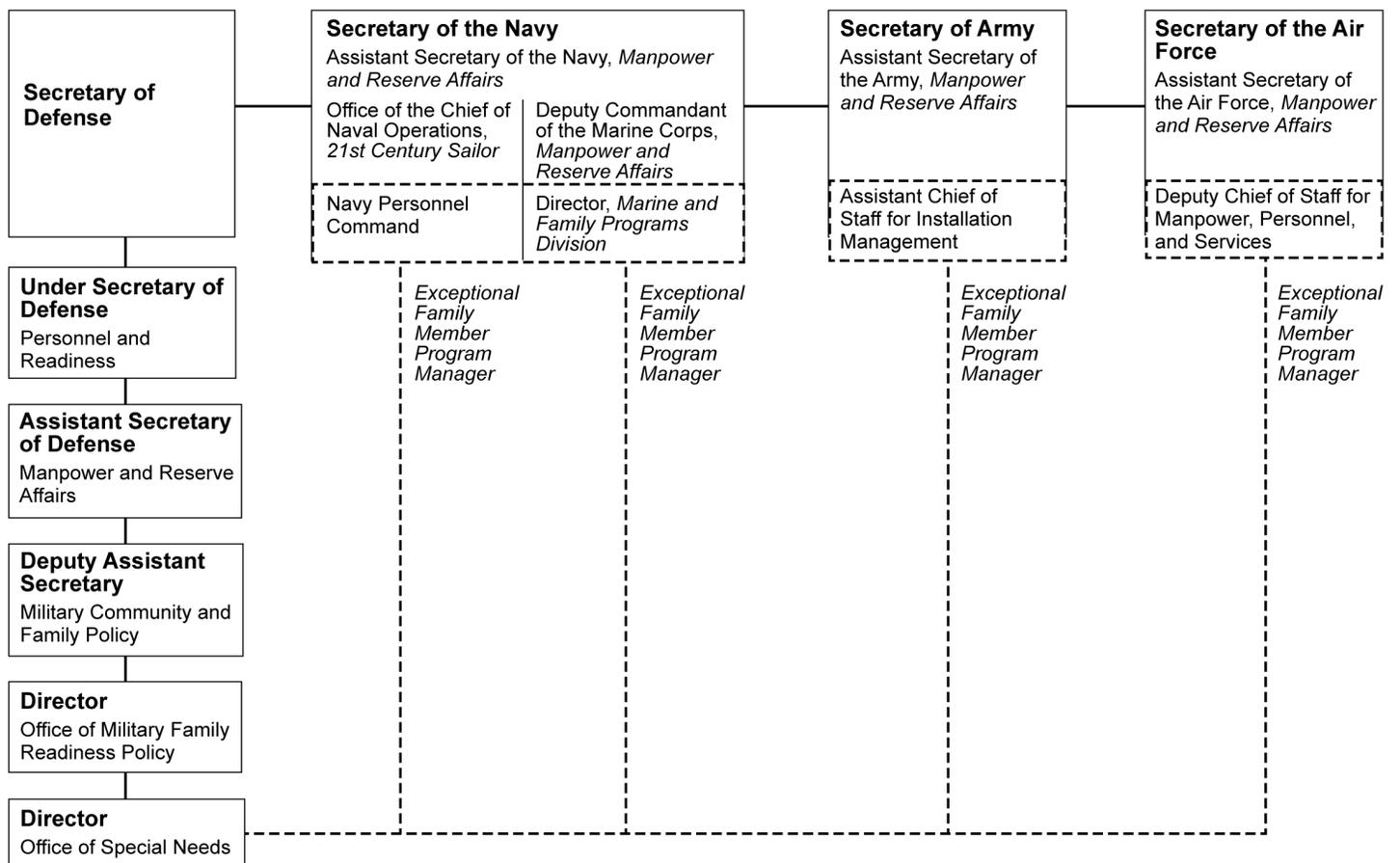
¹³10 U.S.C. § 1781c(d)(4)(E). The NDAA for Fiscal Year 2010 refers to these plans as "individualized services plans." However, DOD officials with whom we spoke said they refer to these plans as "services plans" to avoid confusion with individualized family services plans (IFSP). For purposes of this report we refer to these plans as "services plans." A services plan describes the necessary services and support for a family with special needs, as well as documents and tracks progress toward meeting related goals. It also helps families identify family support services and plan for the continuity of these services during the relocation process by providing a record for the gaining installation. According to DOD, the most effective plan will meet its service goals and identify resources and information for the family.

¹⁴10 U.S.C. § 1781c(d)(4)(F).

¹⁵DODI 1315.19, sec. 7.

administered under the direction of the Deputy Assistant Secretary of Defense for Military Community and Family Policy through the Office of Military Family Readiness Policy. In addition, each Military Service has designated a program manager for its EFMP who is also responsible for working with OSN to implement its EFMP (see fig. 1).¹⁶

Figure 1: Oversight of the Department of Defense’s (DOD) Office of Special Needs and Its Relationship to the Military Services



Source: GAO analysis of DOD documents. | GAO-18-348

¹⁶DOD is also required to submit an annual report to the congressional defense committees on the activities of the OSN, including identification of any gaps in services for families with special needs and actions being taken or planned to address such gaps. 10 U.S.C. § 1781c(g). DOD has delegated this task to the Undersecretary of Defense for Personnel and Readiness.

DOD’s guidance for the EFMP (1) identifies procedures for assignment coordination and family support services; (2) designates the Assistant Secretary of Defense for Manpower and Reserve Affairs as being responsible for monitoring overall EFMP effectiveness; (3) assigns the OSN oversight responsibility for the EFMP, including data review and monitoring; and (4) directs each Service to develop guidance for overseeing compliance with DOD requirements for their EFMP. Table 1 provides an overview of the procedures each Service must establish for the assignment coordination and family support components of the EFMP.

Table 1: Selected Department of Defense (DOD) Procedural Requirements for the Assignment Coordination and Family Support Components of the Exceptional Family Member Program (EFMP)

DOD Required Procedures for Assignment Coordination	DOD Required Procedures for Family Support
<p>Prior to relocation, each service must</p> <ul style="list-style-type: none"> • consider the needs of the armed forces when addressing assignment or stabilization requests from families with special needs;^a • consider the needs of family members enrolled in the EFMP when coordinating assignments for active duty servicemembers; • consider the career development of the servicemember when addressing assignment or stabilization requests from families with special needs; and • permit servicemembers from families with special needs to be stabilized in Alaska, Hawaii, or a continental U.S. assignment location for a minimum of 4 years under certain conditions. <p>After relocation, each Service must</p> <ul style="list-style-type: none"> • update the status of family members with special needs when conditions occur, change, or no longer exist, and when required by Service-specific guidance; • coordinate the availability of medical and educational services; and • maintain records on the effectiveness of assignment coordination procedures including any problems that result from the inadequacy or failure to comply with Service-specific guidance. 	<ul style="list-style-type: none"> • Educate military family members about the EFMP • Provide information and referrals to families with special needs • Provide assistance to families with special needs through the development and maintenance of a services plan that identifies current needs and documents the support provided • Refer families with special needs who have serious or complicated medical issues for medical case management • Conduct ongoing outreach with military units, individuals and their families, other service providers, and military and community organizations to promote an understanding of the EFMP and to encourage families with special needs to seek support services when needed • Serve as the point of contact with leadership in identifying and addressing the community support requirements of families with special needs • Collaborate with military, federal, state, and local agencies to share and exchange information for developing a comprehensive program • Provide assistance before, during, and after relocation, including coordination of services with the gaining installation’s family support personnel

Source: GAO analysis of DOD Instruction 1315.19. | GAO-18-348

^aStabilization refers to assigning a servicemember for an extended period of time to a location that has the required medical and/or educational services available for a family member enrolled in the EFMP.

As a part of its guidance for monitoring military family readiness programs, DOD also requires each Military Service to certify or accredit its family readiness services, including family support services provided through the EFMP.¹⁷ In addition, DOD states that each Service must balance the need for overarching consistency across EFMPs with the need for each Service to provide family support that is consistent with their specific mission. To accomplish this, each Service is required to jointly work with DOD to develop a performance strategy, which is a plan that assesses the elements of cost, quality, effectiveness, utilization, accessibility, and customer satisfaction for family readiness services.¹⁸ In addition, each Military Service is required to evaluate their family readiness services using performance goals that are linked to valid and reliable measures such as customer satisfaction and cost. DOD also requires each Service to use the results of these evaluations to inform their assessments of the effectiveness of their family readiness services for families with special needs.

Key Aspects of Support for Families with Special Needs Vary Widely Across the Services, Leading to Potential Gaps in Assistance for Families with Special Needs

According to DOD officials, each Military Service provides family support services in accordance with DOD guidance as well as Service-specific guidance. However, we found wide variation in each Service's requirements for family support personnel as well as the practices and expectations of EFMP staff. As a result the type, amount, and frequency of assistance enrolled families receive varies from Service to Service and when a servicemember from one Service is assigned to a joint base led by another Service (see table 2).

¹⁷DOD Instruction 1342.22, *Military Family Readiness* (April 11, 2017).

¹⁸DODI 1342.22, encl. 3, para. 6.

Table 2: Selected Service-Specific Requirements for Exceptional Family Member Program (EFMP) Family Support

Military Service ^a	Provides information and referral	Provides enhanced assistance to families with special needs (promotes support groups and develops services plans, etc.)	EFMP personnel can attend individualized education program (IEP) meetings ^b	Provides a minimum amount of contact for families with special needs enrolled in the EFMP	Provides special education legal services	Conducts outreach and collaborates with various EFMP stakeholders	Conducts training	Provides relocation services ^c
Air Force	●	●	○	○	○	●	○	○
Army	●	◐	◐	○	○	●	●	◐
Marine Corps	●	●	●	●	●	●	●	●
Navy	●	◐	○	◐	○	●	●	○

Legend:

- Provides
- ◐ Partially provides
- Does not provide

Source: GAO analysis of Military Service-specific documents and responses from agency officials. | GAO-18-348

^aWith the exception of attending individualized education program (IEP) meetings, providing a minimum amount of contact, and providing special education legal services, all other types of support are required by Department of Defense guidance.

^bAn IEP under the Individuals with Disabilities Education Act describes a child’s present levels of academic achievement, goals for progress, and the special education and related services needed to attain those goals.

^cThese services refer to providing to families with special needs that are in the process of relocating information about and referral to various services at their new installation.

For example, in terms of a minimum level of contact for families with special needs enrolled in the EFMP, the Services vary in the frequency with which they require family support providers to contact families with special needs:¹⁹

¹⁹10 U.S.C. § 1781c(d)(4)(E). Each Service employs “family support providers” who are primarily responsible for assisting families with special needs. The statute uses the term case managers, while the Services use the following terms: in the Air Force, they are Family Support Coordinators; in the Marine Corps, they are Family Case Workers; and in the Navy, they are Regional Case Liaisons and Case Liaisons. In the Army, personnel responsible for providing family support varies based on the number of exceptional family members enrolled in the program at each installation and may include Exceptional Family Member Program Managers, Coordinators, and/or System Navigators. In this report, we use the term “family support providers” to refer to these individuals.

-
- The Marine Corps specifies a frequency (quarterly) with which families with special needs should be contacted by their family support providers.
 - The Air Force has each installation obtain a roster of families with special needs enrolled in the EFMP on a monthly basis, but it does not require family support providers to, for example, use this information to regularly contact these families.
 - The Navy assigns one of three service levels to each family member enrolled in the EFMP. These service levels are based on the needs of each family with special needs; family support providers are responsible for assigning a “service level” that directs the frequency with which the family must be contacted.²⁰
 - The Army has no requirements for how often families with special needs should be contacted.

The Services also vary as to whether they offer legal assistance to families with special needs as follows:

- The Marine Corps employs two attorneys who can represent families with special needs who fail to receive special education services from local school districts, as specified in their children’s individualized education programs (IEP).²¹ They can also advise EFMP-enrolled families on their rights and options if a family believes their child needs special education services from a local school district (e.g., an IEP).
- The Air Force, Army, and Navy choose not to employ special education attorneys. Officials with whom we spoke said families with special needs in these Services can receive other types of assistance that may help them resolve special education legal issues. For example, Air Force officials said servicemembers and their families can receive support from attorneys that provide general legal assistance on an installation, Army officials said installation EFMP managers can refer families with special needs to other organizations that provide legal support, and Navy officials said families can find

²⁰Level 1 – Administrative: Family member does not require any services; Level 2 – Situational: Follow-up based on the provision of information and/or referral services; and Level 3 – Sustained: Ongoing monitoring and follow-up.

²¹An individualized education program (IEP) under the Individuals with Disabilities Education Act describes a child’s present levels of academic achievement, goals for progress, and the special education and related services needed to attain those goals.

support through working with their installation's School Liaison Officers.

Services Plans

The NDAA for Fiscal Year 2010 requires DOD's policy to include requirements regarding the development and continuous updating of a services plan (SP) for each family with special needs, and DOD has specifically required these plans as part of the provision of family support services.²² These plans describe the necessary services and support for a family with special needs and document and track progress toward meeting related goals. According to DOD guidance, these plans should also document the support provided to the family, including case notes.²³ In addition, the DOD reference guide for family support providers emphasizes that timely, up-to-date documentation is especially important each time a family relocates, as military families regularly do.²⁴ Therefore, SPs are an important part of providing family support during the relocation process, and provide a record for the gaining installation. Requiring timely and up-to-date documentation is consistent with federal internal control standards, which state that agencies should periodically review policies, procedures, and related control activities for continued relevance and effectiveness in achieving their objectives.²⁵ SPs follow families with special needs each time they relocate and without timely and up-to-date documentation, DOD cannot ensure that all families continue to receive required medical and/or special educational services once they relocate to another installation.

For every Service the number of SPs was relatively few when compared to the number of servicemembers (known as sponsors) or the number of family members enrolled in the EFMP (see table 3).

²²10 U.S.C. § 1781c(d)(4)(F). DOD specifically requires that family support services must include the provision of non-clinical case management, including services plans (SP). DODI 1342.22, encl. 3, para. 3h(1)(b). Family members enrolled in the EFMP must have a sponsor (i.e. servicemember) to be eligible for family support services. These family members are referred to as "exceptional family members," and more than one family member can be associated with a sponsor. Our review focuses on exceptional family members enrolled in the EFMP for each Service because these are the primary recipients of family support services, including the development and maintenance of SPs.

²³DODI 1315.19, para. 6.1b(2).

²⁴Department of Defense, *EFMP: Family Support Reference Guide*, (<http://download.militaryonesource.mil/12038/MOS/ResourceGuides/EFMP-Family-Support-Reference-Guide.pdf>)

²⁵GAO-14-704G.

Table 3: Number of Services Plans (SP) Created by Each Military Service at Continental United States (CONUS) Installations, Fiscal Year 2016

Military Service	Total number of CONUS installations ^a	Total number of servicemembers enrolled in the Exceptional Family Member Program (EFMP) (sponsors) ^b	Total number of exceptional family members (EFM)	Total number of SPs created (can include more than enrolled family member) ^c
Air Force	58	N/A ^d	34,885	160
Army	39	33,436	43,109	5,004
Marine Corps	13	7,396	9,150 ^e	552
Navy	50	13,319 ^f	17,533 ^g	31 ^h

Source: GAO analysis of the Military Services' fiscal year 2016 EFMP data. | GAO-18-348

^aAs defined by the Department of Defense (DOD), Alaska and Hawaii are not included in CONUS installations.

^bFamily members enrolled in the EFMP must have a sponsor (i.e. servicemember) to be eligible for family support services. DOD guidance requires that each family or family member have a SP.

^cA SP covers all enrolled family members and documents current needs and steps to achieve desired outcomes. Because some families have more than one enrolled family member, the total number of SPs created will be less than the total number of enrolled family members.

^dThe Air Force officials with whom we spoke could not provide EFMP sponsor data for fiscal year 2016 because its data system does not report on historical EFMP data. Currently, its data system can only provide information on the current number of servicemembers enrolled in the EFMP.

^eAccording to Marine Corps officials, nine of the EFMs enrolled in the program were not eligible to have services plans created for them because they were in the process of being discharged.

^fThe Navy could not provide EFMP sponsor data for all of fiscal year 2016 because of reporting limitations related to its current data system. Instead it provided these data as of March 2016, according to Navy officials.

^gThe Navy provided EFMP family member data as of November 2016 because of reporting limitations with its current data system, according to Navy officials.

^hAccording to Navy officials, additional SPs may have been modified in fiscal year 2016 but could not be reported because of limitations with its current data system.

The Services and OSN provided a range of reasons as to why the Services do not develop and maintain a SP for each family with special needs. For example, Air Force officials said their family support providers consider the needs of each family with special needs before determining whether a SP will help them receive the required services. In addition, Army and Marine Corps officials said they may not develop these plans if families do not request them. Further, according to a Navy official, some families lack the required SPs because installations may not have the staff needed to develop them—even though DOD requires the Services to maintain sufficient staff and certify their EFMPs. OSN officials with whom we spoke also said that the Services may not have developed many SPs during fiscal year 2016 because DOD had not yet approved a

standardized form that could be used to meet this requirement.²⁶ Finally, OSN officials also said that each family with special needs enrolled in the EFMP may not need a SP because their condition does not require this type of family support.

Resources

To meet requirements of the NDAA for Fiscal Year 2010, in April 2017, DOD issued to the Services guidance that directed them to “[p]rogram, budget, and allocate sufficient funds and other resources, including staffing,” to meet DOD’s policy objectives for the EFMP.²⁷ According to OSN officials, DOD relies on each Service to determine what level of funds and resources is sufficient and what constitutes an appropriate number of family support personnel. To determine family support providers and related personnel staffing levels, the Service officials with whom we spoke said they consider a number of factors, including the number of families with special needs enrolled in the EFMP at any given installation (see app. II for more information about the EFMP data by installation). See Table 4 for a summary of EFMP family support providers and other key personnel at CONUS installations.

Table 4: Summary of Family Support Personnel by Continental United States (CONUS) Installations, Fiscal Year 2016

Military Service	Total number of CONUS installations ^a	Total number of exceptional family members	Total number of family support providers and related personnel at CONUS installations ^b
Air Force	58	34,885	58
Army	39	43,109	92
Marine Corps	13	9,150	88
Navy	50	17,533 ^c	74

Source: GAO analysis of the Military Services’ fiscal year 2016 Exceptional Family Member Program (EFMP) data. | GAO-18-348

Examples of Family Support Personnel That Services Employ at Selected

²⁶DOD currently has a sample SP that can be used by family support providers to assist families with special needs. However, DOD, as of April 2017, was in the process of developing a standardized family needs assessment form that includes a family services plan, which helps identify goals and coordinate support services, as well as an Inter-Services transfer summary that helps document special needs during the relocation process. However, as of February 2018, DOD has yet to approve this form for use by the Services.

²⁷DODI 1315.19.

Installations

- The Air Force employs or contracts family support coordinators that are the primary staff responsible for administering individualized support to families with special needs at all of its continental United States (CONUS) installations. No other personnel are dedicated to assisting family support providers at these installations.
- The Army employs system navigators who provide individualized support services to families with special needs at selected CONUS installations. In addition, the Army employs program managers, coordinators, specialists, social service assistants, support assistants, or other assistants at all of its CONUS installations.
- The Marine Corps employs family case workers at most of its CONUS installations to administer individualized support to families with special needs. In addition, the Marine Corps employs program managers, administrative assistants, as well as training and education outreach specialists.
- The Navy contracts regional case liaisons and case liaisons at selected CONUS installations to administer individualized support to families with special needs. In addition, the Navy employs collateral duty case liaisons who assist with the delivery of family support services at all other CONUS installations.

Source: GAO analysis of Service-specific documents. | GAO-18-348

^aAs defined by the Department of Defense, Alaska and Hawaii are not included in CONUS installations.

^bEach Military Service employs family support providers who primarily assist families with special needs as well as other personnel that support the EFMP.

^cThe Navy provided EFMP family member data as of November 2016 because its current data system does not provide historical data prior to the second quarter of 2017, according to Navy officials.

As required by DOD, all of the Services employ family support providers to assist families with special needs.²⁸ In addition, some Services employ additional personnel to support implementation of the EFMP (see sidebar).²⁹ For example, the Air Force employs family support coordinators to administer its EFMP and no other personnel are dedicated to assisting these coordinators or enrolled families. The Army employs “system navigators” who provide individualized support to families with special needs at selected installations through its EFMP, as well as other personnel to administer the EFMP.

Senior OSN officials said they rely on each Service to determine the extent to which its EFMP complies with DOD’s policy for families with special needs because they consider OSN to be a policy-making organization that is not primarily responsible for assessing compliance. In addition, these officials said the Services need flexibility to implement DOD’s policy for families with special needs because they each have unique needs and the number of enrolled families in the EFMP is constantly changing. However, DOD has not developed a standard for determining the sufficiency of funding and resources each Service allocates for family support. Air Force officials at one of the installations we visited said the Air Force identified the lack of staff and funding to provide individualized support to most families with special needs as an issue. In addition, officials from the Army and Navy said they have not received any guidance from OSN officials about their Service-specific guidance, including requirements for resources and services plans. Further, the Services may not know the extent to which their Service-

²⁸DODI 1342.22, encl. 3, para. 3h(1)(b). OSN is required to provide support to each Service in the establishment and sustainment by the Services of a program which includes appropriate numbers of case managers for the development and oversight of SPs. 10 U.S.C. § 1781c(e)(3)(B). GAO is not making a determination regarding what number of family support providers is appropriate for the Services.

²⁹In addition to family support providers, each Service employs school liaison officers who assist all military families, including those enrolled in the EFMP, with school-related matters. Among other things, school liaison officers coordinate with local school systems and develop partnerships between the military and schools with military-connected students.

specific guidance complies with DOD's policy for families with special needs.

The NDAA for Fiscal Year 2010 requires DOD to identify and report annually to the congressional defense committees on gaps in services for military families with special needs and to develop plans to address these gaps. However, DOD's most recent reports to the congressional defense committees did not address the relatively few SPs being created for families with special needs, or whether the Services are providing sufficient resources to ensure an appropriate number of family support providers.³⁰ Federal internal control standards require that agencies establish control activities, such as developing clear policies, in order to accomplish agency objectives such as those of the Services' EFMPs.³¹ Without fully identifying and addressing potential gaps in family support across these programs, some families with special needs may not get the assistance they require, particularly when they relocate.

³⁰DOD has issued eight reports to the congressional defense committees since the enactment of this reporting requirement. We assessed reports published in April 2015, 2016, and 2017.

³¹[GAO-14-704G](#).

Each Service Has Mechanisms to Monitor EFMP Assignment Coordination and Family Support Activities, but DOD Lacks Common Performance Measures and a Process to Fully Evaluate These Activities

Each Service monitors EFMP assignment coordination and family support using a variety of mechanisms, such as regularly produced internal data reports. However, DOD has not yet established common performance measures to track the Services' progress in implementing its standard procedures over time or developed a process to evaluate the overall effectiveness of each Service's assignment coordination and family support procedures.

Each Service Has Mechanisms to Monitor Assignment Coordination and Family Support

DOD requires each Service to monitor implementation of their EFMP, including their procedures for assignment coordination and family support.³² To comply with this requirement, each Service has developed guidance that establishes monitoring protocols and assigns oversight responsibilities. Officials from each Service told us they use internal data reports from each installation to monitor assignment coordination and family support.

- To monitor assignment coordination, officials from each Service told us their headquarters reviews proposed assignment locations for families with special needs enrolled in the EFMP. These officials said monitoring proposed assignment locations helps ensure that enrolled families will be able to access required services at their new installations. In addition, Army officials said each Army unit commander is responsible for tracking the number of families with special needs that have expired enrollment paperwork because it affects assignment coordination worldwide. Several years ago, the Army determined that 25 percent of soldiers (over 13,000) enrolled in

³²DODI 1315.19, para. 2.5(a).

the EFMP had expired enrollment paperwork, complicating the task of considering each enrolled family's special medical or educational needs as part of proposed relocations. In response, in August 2011, the Army revised its policies and procedures for updating enrollment paperwork which would help ensure a family member's special needs are considered during the assignment coordination process.

- To monitor family support provided by installations worldwide, each Military Service told us they use a variety of mechanisms (see table 5).

Table 5: Monitoring Mechanisms for Family Support Services Provided through the Department of Defense's (DOD) Exceptional Family Member Program (EFMP)

Service	Monitoring Mechanisms
Air Force	Each Air Force installation uses the Air Force Family Integrated Results and Statistical Tracking System (AFFIRST) to monitor the family support services it provides. The data in this system includes the number of one-on-one consultations conducted and information on resources provided to family members enrolled in the EFMP. According to Air Force officials, this data helps Air Force headquarters identify implementation challenges across its installations.
Army	Each Army installation uses the Army Client Tracking System (CTS) to monitor the family support services it provides. According to Army officials, each Army installation is also required to provide a monthly management report that helps Army headquarters monitor the provision of family support services such as training and outreach. In addition, some Army installations monitor System Navigators ^a who confirm they have, for example, developed a services plan (SP) within three business days of being contacted by an enrolled family with special needs and document contacts with each family in CTS within 1 business day.
Marine Corps	Each Marine Corps installation uses the Case Management System (CMS) to monitor the family support services it provides. According to Marine Corps officials, Marine Corps headquarters uses the information in this system to, among other things, monitor staffing levels and help ensure each installation does not exceed its recommended staffing ratio of 1 Family Case Worker for every 225 Marines enrolled in the EFMP .
Navy	Each Navy installation uses the Navy Family Accountability and Assessment System (NFAAS) to monitor the family support services it provides. According to Navy officials, Navy headquarters uses the information in this system on a bi-monthly basis to, among other things, help ensure each installation has an appropriate number of family support personnel.

Source: GAO analysis of DOD documents and interviews with officials. | GAO-18-348

^aThe Army employs System Navigators as part of its family support personnel at selected installations to provide enhanced family support services such as the development and maintenance of SPs.

The Marine Corps pays particular attention to customer satisfaction. Marine Corps officials told us that every three years Marine Corps headquarters administers a survey of family members enrolled in the EFMP. We previously reported that organizations may be able to increase customer satisfaction by better understanding customer needs and

organizing services around those needs.³³ This survey is one of the primary ways Marine Corps headquarters measures customer satisfaction with family support services at installations worldwide. Marine Corps officials also said this survey helps ensure its EFMP is based on the current needs of families with special needs.

DOD Has Not Developed Common Performance Measures or Fully Developed a Process for Evaluating the Results of the Services' Monitoring Activities

To improve its oversight of the EFMP and implement its policy for families with special needs, DOD, through OSN, has several efforts under way to standardize the Services' procedures for assignment coordination and family support. However, DOD has not developed common performance measures to monitor its progress toward these efforts and has not developed a process for assessing the Services' related monitoring activities. Federal internal control standards emphasize the importance of assessing performance over time and evaluating the results of monitoring activities.

DOD Has Begun to Standardize Procedures

To help improve family member satisfaction by addressing gaps in support that may exist between Services, OSN has begun to standardize procedures for assignment coordination and family support. To date, OSN's efforts have focused on ensuring each Service's EFMP considers the needs of family members during the assignment process and helps family members identify and gain access to community resources. According to OSN's April 2017 Report to Congress, the long-term goal of these efforts is to help ensure that all families with special needs enrolled in the EFMP receive the same level of service regardless of their Military Service affiliation or geographic location.³⁴ In addition, OSN officials told us its standardized procedures will also help DOD perform required oversight by improving its access to Service-level data and its ability to validate each Service's monitoring activities.

To date, efforts to standardize assignment coordination and family support have included efforts such as developing new family member travel screening forms which will be the official documents used during the assignment coordination process and completing a DOD-wide

³³GAO, *Managing for Results: Opportunities to Strengthen Agencies' Customer Service Efforts*, [GAO-11-44](#) (Washington, D.C.: Oct. 27, 2010).

³⁴Department of the Defense, *Annual Report to the Congressional Defense Committees on the Activities of the Office of Special Needs - 2016* (April 2017).

customer service satisfaction survey on EFMP family support (see table 6).

Table 6: Office of Special Needs (OSN) Standardization Efforts for Assignment Coordination and Family Support through the Exceptional Family Member Program (EFMP)

OSN Effort	Description
Family member travel screening forms	OSN and medical representatives from each Service developed five standardized family medical travel screenings forms that replaced nine Service-specific forms that were previously used to conduct family member traveling screenings. These standardized forms will be used by each Service to screen all family members for special medical and/or education needs who are permanently relocating to overseas and remote locations. According to OSN officials, these forms will help provide a more consistent travel screening process across the Services for families with special needs during the assignment coordination process.
Process and outcomes metrics study	Measured clients' satisfaction with family support services at eight installations that represent each Service. OSN officials said the results of this survey will help it make improvements to the EFMP and will be used to help develop metrics to capture feedback directly from families with special needs in the future.
EFMP data repository	To have comparable data across the Services, OSN centralized the management of EFMP data. These include identification and enrollment data for the family members in the EFMP, assignment coordination data to track the number of coordinated continental United States and outside the continental United States assignments, and family support data to track the number of family support staff available for each Service. ^a OSN also developed standard data terms for each component of the EFMP, which the Services are using to collect and submit data to OSN quarterly. For example, for family support, DOD has standardized data terms to track data regarding information and referral services and family needs assessments. As of September 2017, the Services were using 67 standard data terms developed by OSN. OSN officials said data from the repository can improve OSN's monitoring and reporting capabilities across the Services by providing it to senior leadership as they identify gaps in services for families with special needs.
On-site Monitoring	OSN said it is developing standards for monitoring the Services' EFMPs and plans to conduct on-site monitoring visits to selected installations in fiscal year 2018. Factors that will be considered when selecting installations include the number of family members enrolled in the EFMP, among others. According to OSN officials, the results of these visits could also be used to develop an annual report about how each Service administers its EFMP.
Family support working group	OSN hosts monthly meetings for agency officials from each Service to share insights, identify gaps in support, and develop and execute initiatives intended to improve and standardize family support services. Recent initiatives have included an EFMP family support reference guide and enhanced training for family support personnel. The reference guide provides guidance for all family support providers on how they can deliver information and resources to military families with special needs.

Source: GAO analysis of Department of Defense (DOD) documents and interviews with agency officials. | GAO-18-348

^aCoordinated assignments occur when the Military Services consider any military family member's special needs, including the availability of required medical and special educational services at a new location. According to DOD officials, the family member travel screening process is mandatory for all family members traveling to overseas and remote locations regardless of enrollment in the EFMP and is conducted under the authority of the Military Medical Departments.

DOD Has Not Developed Common Performance Measures

Despite its efforts to begin standardizing assignment coordination and family support services, DOD is unable to measure its progress in standardizing assignment coordination and family support procedures for families with special needs and assessing the Services' performance of these processes because it has not yet developed common metrics for

doing so. Federal internal control standards emphasize the importance of agencies assessing performance over time.³⁵ We have also reported on the importance of federal agencies engaging in large projects using performance metrics to determine how well they are achieving their goals and to identify any areas for improvement.³⁶ By using performance metrics, decision makers can obtain feedback for improving both policy and operational effectiveness. Additionally, by tracking and developing a baseline for all measures, agencies can better evaluate progress made and whether or not goals are being achieved—thus providing valuable information for oversight by identifying areas of program risk and causes of risks or deficiencies to decision makers. Through our body of work on leading performance management practices, we have identified several attributes of effective performance metrics relevant to OSN’s work (see table 7).³⁷

³⁵[GAO-14-704G](#).

³⁶[GAO-12-542](#) discusses the value of federal agencies engaging in large projects, including consolidating management functions, to use performance measures. These criteria were developed by reviewing GAO reports on consolidating initiatives and literature on public-sector consolidations, and interviewing a number of officials selected for their expertise in public management and government reform, among other things.

³⁷GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002); *GPRA Performance Reports*, [GAO/GGD-96-66R](#) (Washington, D.C.: Feb. 14, 1996); *Missile Defense: Opportunity to Refocus on Strengthening Acquisition Management*, [GAO-13-432](#) (Washington, D.C.: Apr. 26, 2013); *Performance Measurement and Evaluation: Definitions and Relationships*, [GAO-11-646SP](#) (Washington, D.C.: May 2011); *Defense Health Care Reform: Additional Implementation Details Would Increase Transparency of DOD’s Plans and Enhance Accountability*, [GAO-14-49](#) (Washington, D.C.: Nov. 6, 2013); and *Agency Performance Plans: Examples of Practices That Can Improve Usefulness to Decisionmakers*, [GAO/GGD/AIMD-99-69](#) (Washington, D.C.: Feb. 26, 1999).

Table 7: Attributes of Effective Performance Metrics Identified by GAO

Attribute	Definition
Balance	A suite of metrics ensures that an organization's various priorities are covered.
Clarity	Metric is clearly stated, and the name and definition are consistent with the methodology used to calculate it.
Core program activities	Metric covers the activities that an organization is expected to perform to support the intent of the program.
Government-wide priorities	Metric covers a priority such as quality, timeliness, and cost of service.
Limited overlap	Metric provides new information beyond that provided by other measures.
Linkage	Metric is aligned with division and agency-wide goals and mission, and is clearly communicated throughout the organization.
Measurable target	Metric has a numerical goal.
Objectivity	Metric is reasonably free from significant bias or manipulation.
Reliability	Metric produces the same result under similar conditions.
Baseline and trend data	Metric 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.

Source: GAO. | GAO-15-711

OSN officials said each Service is currently responsible for assessing the performance of its own EFMP, including the development of Service-specific goals and performance measures. OSN officials said that they recognize the need to continually measure the department's progress overall in implementing its policy for families with special needs, and are considering ways to do so. They also said they have encountered challenges to developing common performance measures. In addition, OSN officials said its efforts to reach consensus among the Services about performance measures for the overall EFMP are still ongoing because each Service wants to maintain its own measures, and DOD has not required them to reach a consensus. Absent common performance measures, DOD is unlikely to fully determine whether its long-standing efforts to improve support for families with special needs are being implemented as intended.

DOD Does Not Systematically Review the Services' Monitoring Activities

DOD requires each Service to monitor its own family readiness programs, including procedures for assignment coordination and family support through the EFMP, but lacks a systematic process to evaluate the results of these monitoring activities. To monitor family readiness services, as required by DOD, each Service must accredit or certify its family support services, including the EFMP, using standards developed by a national

accrediting body not less than once every 4 years.³⁸ In addition, personnel from each Service's headquarters are required to periodically visit installations as a part of their monitoring activities for assignment coordination, among other things.³⁹ The Services initially had the Council on Accreditation accredit family support services provided through their installations' EFMPs using national standards developed for military and family readiness programs, according to the officials with whom we spoke.⁴⁰ However, by 2016, each Service was certifying installations' family support services using standards that meet those of a national accrediting body, Service-specific standards, and best practices. According to officials from each Service with whom we spoke, this occurred due to changes in the funding levels allocated to this activity. Table 8 provides an overview of the certification process currently being used by each Service.

³⁸DODI 1342.22, para. 6(b).

³⁹DODI 1342.22, para 6(c). These visits can be a part of the accreditation or certification process.

⁴⁰The Council on Accreditation (COA) is an international, independent, not-for-profit, child- and family-service and behavioral healthcare accrediting organization. It was founded in 1977 by the Child Welfare League of America and Family Service America (now the Alliance for Strong Families and Communities). Originally known as an accrediting body for family and children's agencies, COA currently accredits over 45 different service areas. Among the service areas are substance abuse treatment, adult day care, services for the homeless, foster care, inter-country adoption, and military family readiness. Although the Army began using COA standards in 2000, COA did not accredit family support services at any Army installations because they did not conduct any external inspections, according to the Army officials with whom we spoke. These officials also said the Army used an internal accreditation process for its installations until 2017 when it officially transitioned to a certification process.

Table 8: Certification Processes for Family Support Services Provided through the Department of Defense’s (DOD) Exceptional Family Member Program (EFMP)

Service	Frequency	Format	Certification Process
Air Force	Annual	Self-study	Each Airman and Family Readiness Center completes an annual self-study for its family readiness programs including family support services provided through the EFMP. According to Air Force officials, the self-study is conducted using a Management Inspection Toolkit. The toolkit includes 28 items related to the operations of each Airman and Family Readiness Center, including their efforts to establish, develop, and maintain effective working relationships with family support related civilian organizations for services provided. Each self-study is also reviewed by the Air Force Inspector General for any necessary corrective actions.
Army	Annual Every 4 years	Self-study Installation site review	As a part of its Army Community Service certification checklist, Army headquarters certifies each installation’s EFMP every 4 years through a site-review process. Among other things, this checklist verifies that (1) a standard operating procedure for the EFMP is on file at the installation and addresses the required components, (2) case records at the installation document coordination between the losing and gaining installation’s EFMP managers regarding community support needs, and (3) Army Community Service sponsors support groups at the installation. Installations are also responsible for maintaining compliance through annual self-studies.
Marine Corps	Annual Every 4 years	Self-study Installation site-review	As a part of its Marine Corps Family Programs certification process, Marine Corps headquarters certifies each installation’s EFMP not less than once every 4 years through a site-review process. The 46 standards used during the certification process specifically address program administration, staff responsibilities, reporting, and record-keeping. Installations are also responsible for completing an annual self-study to maintain their certification. Marine Corps headquarters identifies and tracks all corrective actions that may result from installation site-reviews and self-studies.
Navy	Annual Every 4 years	Self-study Installation site-review	As a part of its Fleet and Family Support certification process, Navy Headquarters certifies each installation’s EFMP every 4 years. There are 27 standards specifically related to the EFMP. Among other things, these standards address (1) training content and personnel qualifications, (2) supervision, (3) family centered services planning and monitoring, (4) information and referral, and (5) informational workshops and briefings. Installations are also responsible for maintaining compliance through annual self-studies and a regional review process until they are recertified by Navy headquarters.

Source: GAO analysis of DOD documents and interviews with agency officials. | GAO-18-348

OSN officials said they do not have an ongoing process to systematically review the results of the Services’ activities, including the certification of EFMPs because they choose to rely on the Services to develop their own monitoring activities and ensure they provide the desired outcomes. In doing so, DOD allows each Service to develop its own processes for certifying installations’ family support services, including the selection of standards. In addition, OSN officials told us that efforts to standardize certification of EFMPs are ongoing because the Military Services have not

been able to reach consensus on a set of standards that can be used across DOD for installations' family support services. Further, OSN has not established a process to assess the results of the Services' processes for certifying installations' family support services. Federal standards for internal control state that management should evaluate the results of monitoring efforts—such as those the Services are conducting on their own—to help ensure they meet their strategic goals. The lack of such a process hampers OSN's ability to monitor the Services' EFMPs and determine the adequacy of such programs as required by the NDAA for Fiscal Year 2010.⁴¹

Conclusions

OSN's job of developing a policy for families with special needs that will work across DOD's four Services is challenging given the size, complexity, and mission of the U.S. military. It has had to consider, among other things, the Services' mission requirements, resource constraints, and the myriad demands on servicemembers and their families during their frequent relocations. Anything that further complicates a relocation—such as not receiving the required family support services for family members with special needs—potentially affects readiness or, at a minimum, makes an already stressful situation worse. By providing little direction on how the Services should provide family support or what the scope of family support services should be, some servicemembers get more—or less—from the EFMP each time they relocate, including when a servicemember from one Service is assigned to a joint base led by another Service.

By largely deferring to the Services to design, implement, and monitor their EFMPs' performance, DOD cannot, as required by the NDAA for Fiscal Year 2010, fully determine the adequacy of the Services' EFMPs in serving families with special needs, including any gaps in services these families receive, because it has not built a systematic process to do so. Instead, it relies on the Services to self-monitor and address, within each Service, the results of monitoring activities. However, because servicemembers relocate frequently and often depend on the EFMP of a Service other than their own, a view of EFMP performance across all of the Services is essential to ensuring, for example, that relocating servicemembers get consistent EFMP service delivery no matter where they are stationed. Evaluating and developing program improvements

⁴¹See 10 U.S.C. § 1781c(c)(5).

based on the results of the Services' monitoring would help DOD ensure the Services' EFMPs achieve the desired outcomes and improve its ability to assess the overall effectiveness of the program.

Recommendations for Executive Action

We are making the following three recommendations to DOD:

We recommend the Secretary of Defense direct the Office of Special Needs (OSN) to assess the extent to which each Service is (1) providing sufficient resources for an appropriate number of family support providers, and (2) developing services plans for each family with special needs, and to include these results as part of OSN's analysis of any gaps in services for military families with special needs in each annual report issued by the Department to the congressional defense committees. (Recommendation 1)

We recommend that the Secretary of Defense direct the Office of Special Needs (OSN) to develop common performance metrics for assignment coordination and family support, in accordance with leading practices for performance measurement. (Recommendation 2)

We recommend that the Secretary of Defense implement a systematic process for evaluating the results of monitoring activities conducted by each Service's EFMP. (Recommendation 3)

Agency Comments and Our Evaluation

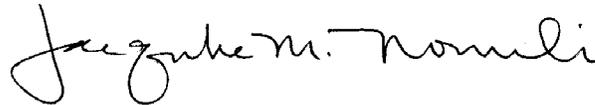
We provided a draft of this report to the Department of Defense (DOD) for comment. DOD provided written comments, which are reproduced in appendix IV. DOD also provided technical comments, which we incorporated as appropriate.

DOD agreed with all three of our recommendations.

In its written comments, DOD stated that additional performance metrics need to be developed for assignment coordination and that it is in the process of measuring families' satisfaction with family support provided through the EFMP. DOD also stated that it is developing plans for evaluating the results of each Service's monitoring activities for the EFMP.

We are sending copies of this report to the appropriate congressional committees, the Secretaries of Defense and Education, and other interested parties. The report also is 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 (617) 788-0580 or nowickij@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 V.

A handwritten signature in black ink that reads "Jacqueline M. Nowicki". The signature is written in a cursive style with a large initial 'J' and 'M'.

Jacqueline M. Nowicki, Director
Education, Workforce, and Income Security Issues

Appendix I: Objectives, Scope, and Methodology

The National Defense Authorization Act (NDAA) for Fiscal Year 2017 includes a provision for GAO to assess the effectiveness of the Department of Defense's (DOD) Exceptional Family Member Programs (EFMP).¹ This report focuses on the assignment coordination and family support components of the EFMP for dependents with special needs and examines: (1) the extent to which each Service has provided family support as required by DOD, and (2) the extent to which the Services monitor and DOD evaluates assignment coordination and family support. To address these objectives, we used a variety of data collection methods. Key methods are described in greater detail below.

For both objectives, we reviewed relevant federal laws, regulations, and DOD guidance and documentation that pertain to the EFMP, including the following:

- The NDAA for Fiscal Year 2010, which established the Office of Special Needs and defined program requirements for assisting families with special needs, including assignment coordination and family support.²
- DOD's guidance for administering the EFMP. We assessed how DOD implements the requirements in the NDAA for Fiscal Year 2010; how each Service implements assignment coordination and family support; and how the Services and DOD monitor assignment coordination and family support using performance measures. Specially, we reviewed DOD Instruction 1315.19 - Exceptional Family Member Program;³ Service-specific guidance and related documents from the Air Force,

¹National Defense Authorization Act for Fiscal Year 2017, Pub. L. No.114-328, § 578, 130 Stat. 2000, 2144 (2016).

²*National Defense Authorization Act for Fiscal Year 2010*, Pub. L. No.111-84, § 563, 123 Stat. 2190, 2304 (2009). In this report, we use the term "special needs" to encompass both family members with disabilities that receive special education services as well as family members that require special medical services. Throughout this appendix, we refer to them as "families with special needs."

³DOD Instruction (DODI) 1315.19, *The Exceptional Family Member Program (EFMP)* (April 19, 2017). We did not assess procedures for assignment coordination and family support used by the Coast Guard because it is a component of the Department of Homeland Security. According to DOD officials, the Coast Guard has its own Special Needs Program which provides assistance to families with special needs. DOD officials with whom we spoke said they have met with the Coast Guard several times to exchange ideas. In addition, the Coast Guard is currently using the standardized enrollment forms developed by DOD for the EFMP, according to DOD officials.

Army, Marine Corps, and Navy; and DOD Instruction 1342.22 - Military Family Readiness.⁴

- Standards for internal control in the federal government related to the documentation of responsibilities through policies, performance measures, and evaluating the results of monitoring activities. We compared each Service's procedures for monitoring assignment coordination and family support to these standards.⁵

To determine the extent of the Services' EFMP family support, we obtained and analyzed fiscal year 2016 EFMP data (the most recent available) for each Service.⁶ We reviewed DOD policy to identify data variables that each Service maintains related to its EFMP.⁷ We used these data to summarize key characteristics of each Service's EFMP.⁸ The selected variables provided Service-wide and installation-specific EFMP information on,

- the number of continental United States (CONUS) and outside the continental United States (OCONUS) installations;
- the number of servicemembers (sponsors) enrolled in the EFMP;
- the number of family members with special needs enrolled in the EFMP;
- the number of EFMP family support personnel; and
- the number of services plans created for families with special needs enrolled in the EFMP.

⁴DODI 1342.22, *Military Family Readiness* (April 11, 2017).

⁵GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 2014).

⁶The Navy provided EFMP sponsor data as of March 2016 and family member data as of November 2016 because its current data system does not provide historical data prior to the second quarter of 2017, according to Navy officials.

⁷See DODI 1315.19.

⁸Each Service uses its own data systems for collecting EFMP-related information, such as medical and/or special educational conditions of family members and recorded contacts between family support personnel and family members, on families enrolled in the program. The Air Force uses Q-Base and the Air Force Family Integrated Results Statistical Tracking; the Army uses the Personnel Network and Case Tracking System; the Marine Corps uses the Case Management System; and the Navy uses the Navy Family Accountability and Assessment System.

We determined that the selected data variables from each Service are sufficiently reliable for the purposes of providing summary results about family support for fiscal year 2016.

To learn more about how the Services implement their EFMPs, we visited seven installations in five states.⁹ We selected the seven installations based on their location in states with the largest number of military-connected students in school year 2012-2013 (the most recent available and reliable data)¹⁰ or in states with the largest percentage of students enrolled in U.S. DOD schools as of May 2017, as well as their status as a joint base.¹¹ At each installation, we interviewed installation officials, EFMP managers, selected family support personnel, and family members and caregivers enrolled in the program. In states we visited that had the largest number of military-connected students, the EFMP personnel we interviewed collectively served 66 percent of students who attend local public schools and 42 percent of the students attending U.S. DOD schools.

To obtain illustrative examples about how the EFMP serves families with special needs, we conducted seven group interviews with EFMP-enrolled family members and caregivers (one at each of the seven installations we visited). Using a prepared script, we asked participants to describe how they were identified and enrolled in the EFMP, how they were assigned to new installations, and the types of family support services they received. We also asked about how these services aligned with their family member's EFMP-eligible condition, the benefits and challenges they experienced, as well as their overall satisfaction. A total of 38 self-selected volunteers participated in the seven group discussions. While the participants in these groups included a variety of family members and

⁹These seven installations are: (1) Marine Corps Base Quantico (Virginia), (2) Fort Bragg (North Carolina), (3) Camp Lejeune (North Carolina), (4) Fort Hood (Texas), (5) Joint Base San Antonio - Lackland (Texas), (6) Joint Base Lewis-McChord (Washington), and (7) Naval Base San Diego (California).

¹⁰Department of Defense Education Activity, *Assistance to Local Educational Agencies for Defense Dependents' Education (Update)* (March 2015). Data in this report are the most recently available from DODEA.

¹¹DOD has its own school system currently serving approximately 73,000 military-connected students and children of DOD civilian employees in 168 elementary, middle, and high schools inside and outside the United States. According to DOD, fewer than 25,000 military dependents attend DOD schools in the United States. The vast majority of military dependent students attend local public schools.

caregivers, the number of participants and groups were very small relative to the total number of family members enrolled in the EFMP. Their comments are not intended to represent all EFMP-enrolled family members or caregivers. Other EFMP-enrolled family members and caregivers may have had other experiences with the program during the same period.

Finally, for both objectives, we conducted interviews with a variety of DOD, Service-level, and nonfederal officials. We spoke with DOD officials from the Office of the Assistant Secretary of Defense—Offices of Manpower and Reserve Affairs, Military Community and Family Policy, Military Family Readiness Policy, and Special Needs. We also spoke with EFMP Managers from Air Force, Army, Marine Corps, and Navy headquarters. We also met with officials from selected national military family advocacy organizations including the National Military Family Association; the Military Family Advisory Network; and the Military Officers Association of America to discuss the EFMP.

We conducted this performance audit from February 2017 to May 2018 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: Services' Fiscal Year 2016 Exceptional Family Member Program Data

Each Service has an Exceptional Family Member Program (EFMP) that provides support to military families with special needs. The tables below present the following information on selected EFMP and family support categories for each Service's program at continental United States (CONUS) and outside the continental United States (OCONUS) installations in fiscal year 2016:

- Installation;
- City, state or country;
- Number of exceptional family members;
- Number of family support providers (by Full-Time Equivalent);¹
- Number of family support provider vacancies;
- Number of services plans;
- Number of indirect contacts;² and
- Number of direct contacts.³

The information below is listed sequentially in alphabetical order by Service.

¹Full-time equivalent reflects the total number of regular hours (i.e., not including overtime or holiday hours) worked by employees divided by the number of hours for which they are compensated each fiscal year.

²Indirect contacts for the Air Force and Marine Corps refer to time family support providers spend on emailing family members or caregivers, conducting research, or collaborating with other providers. Indirect—or simple—contacts for the Army refer to contacts by family support providers who spend less than 15 minutes with a family member. Indirect contacts for the Navy refer to information and referral services provided over the telephone or in response to an email.

³Direct contacts for the Air Force and Marine Corps refer to time family support providers spend meeting with families, either in person or on the telephone. Direct—or extended—contacts for the Army refer to contacts by family support providers who spend 15 minutes or more with a family member; conduct research; teach or facilitate a class; or collaborate with other stakeholders. Direct contacts for the Navy refer to information and referral services provided to family members in person as well as individualized family support services via email, telephone, in person, or other mode of communication.

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Table 9: Fiscal Year 2016 Air Force Exceptional Family Member Program (EFMP) Data by Installation – Selected Categories, Continental United States (CONUS) and Outside the Continental United States (OCONUS)

Installation	City, state, or country	Number of exceptional family Members (EFM)	Number of family support providers (by FTE)^a	Number of family support provider vacancies	Number of services plans^b	Number of indirect contacts^c	Number of direct contacts^d
CONUS^e							
Air Force Academy	Colorado Springs, CO	330	0.5	0	0	14	6
Altus AFB	Altus, OK	148	0.5	0	0	7	1
Barksdale AFB	Bossier City, LA	827	1	0	0	26	291
Beale AFB	Marysville, CA	479	1	0	1	10	67
Buckley AFB	Aurora, CO	235	0.5	0	0	51	41
Cannon AFB	Clovis, NM	363	0.5	0	1	23	24
Columbus AFB	Columbus, MS	190	0.5	0	0	5	278
Davis-Monthan AFB	Tucson, AZ	780	1	0	1	3	14
Dover AFB	Dover, DE	460	0.5	0	0	0	0
Dyess AFB	Abilene, TX	455	1	0	0	0	39
Edwards AFB	Edwards, CA	380	0.5	0	0	2	0
Eglin AFB	Valpraiso, FL	775	1	0	0	161	198
Ellsworth AFB	Rapid City, SD	256	0.5	0	0	7	1
F E Warren AFB	Cheyenne, WY	337	0.5	0	0	0	0
Fairchild AFB	Airway Heights, WA	381	0.5	0	0	0	17
Goodfellow AFB	San Angelo, TX	243	0.5	0	0	47	7
Grand Forks AFB	Grand Forks, ND	234	0.5	0	0	5	0
Hanscom AFB	Lincoln, MA	278	0.5	0	0	9	5
Hill AFB	Ogden, UT	766	1	0	0	207	388
Holloman AFB	Alamogordo, NM	562	0.5	0	0	53	213
Hurlburt Field	Mary Esther, FL	1036	1	0	5	203	127
Joint Base Andrews	Camp Springs, MD	1839	1	0	0	112	38
Joint Base Charleston	Charleston, SC	464	1	0	15	130	54
Joint Base Langley-Eustis	Hampton, VA	1154	1	0	8	29	406

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Installation	City, state, or country	Number of exceptional family Members (EFM)	Number of family support providers (by FTE)^a	Number of family support provider vacancies	Number of services plans^b	Number of indirect contacts^c	Number of direct contacts^d
CONUS^e							
Joint Base McGuire-Dix-Lakehurst	Trenton, NJ	704	1	0	3	189	120
Joint Base San Antonio-Lackland	San Antonio, TX	1904	1	0	0	214	92
Joint Base San Antonio-Randolph	San Antonio, TX	595	1	0	1	76	5
Keesler AFB	Biloxi, MS	433	0.5	0	0	0	24
Kirtland AFB	Albuquerque, NM	475	0.5	0	0	4	20
Laughlin AFB	Del Rio, TX	74	0.5	0	0	0	12
Little Rock AFB	Jacksonville, AR	439	1	0	4	106	48
Los Angeles AFB	Los Angeles, CA	200	0.5	0	0	53	0
Luke AFB	Glendale, AZ	682	1	0	9	27	199
MacDill AFB	Tampa, FL	678	1	0	1	19	817
Malmstrom AFB	Great Falls, MT	248	0.5	0	0	83	7
Maxwell AFB	Montgomery, AL	606	0.5	0	0	0	2
McConnell AFB	Wichita, KS	648	1	0	0	40	66
Minot AFB	Minot, ND	477	0.5	0	0	32	6
Moody AFB	-	594	1	0	100	140	713
Mountain Home AFB	Mountain Home, ID	445	1	0	0	88	32
Nellis AFB	Las Vegas, NV	1199	1	0	2	253	566
Offutt AFB	Omaha, NE	818	1	0	0	154	172
Patrick AFB	Brevard County, FL	349	0.5	0	1	72	2
Pentagon	Washington, D.C.	-	1	0	0	0	121
Peterson AFB (Schriever AFB)	Colorado Springs, CO	882	1.5	0	0	157	17
Pope AFB	Fayetteville, NC	320	0.5	0	0	48	7
Robins AFB	Warner Robins, GA	598	1	0	4	21	32
Scott AFB	Belleville, IL	937	1	0	0	9	31
Seymour Johnson AFB	Goldsboro, NC	534	0.5	0	0	14	16

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Installation	City, state, or country	Number of exceptional family Members (EFM)	Number of family support providers (by FTE)^a	Number of family support provider vacancies	Number of services plans^b	Number of indirect contacts^c	Number of direct contacts^d
CONUS^e							
Shaw AFB	Sumter, SC	775	1	0	0	0	28
Sheppard AFB	Wichita Falls, TX	448	0.5	0	1	54	217
Tinker AFB	Oklahoma City, OK	606	1	0	1	64	11
Travis AFB	Fairfield, CA	750	1	0	0	11	112
Tyndall AFB	Panama City, FL	460	0.5	0	0	15	5
Vance AFB	Enid, OK	117	0.5	0	0	19	3
Vandenberg AFB	Lompoc, CA	354	0.5	0	0	7	21
Whiteman AFB	Knob Noster, MO	421	0.5	0	2	52	303
Wright-Patterson AFB	Dayton, OH	1016	1	0	0	95	2
OCONUS							
Aviano AB	Italy	606	0.5	0	2	21	18
Eielson AFB	Fairbanks, Alaska	291	0.5	0	0	0	32
Geilenkirchen AB	Germany	117	0.5	0	0	0	2
İncirlik AB, Izmir AS ^f	Turkey	190	0	Unaccompanied tours only	0	0	1
Joint Base Elmendorf-Richardson	Anchorage, Alaska	956	2	0	1	82	12
Kadena AB	Japan	882	1	0	0	101	27
Kunsan AB	Korea	348	0	Families are not typically assigned to this installation	0	0	0
Misawa AB	Japan	327	0.5	0	0	53	3
Osan AB	Korea	572	0.5	0	0	17	0
RAF Alconbury	United Kingdom	88	0	0	0	24	0
RAF Croughton	United Kingdom	56	0	0	0	0	0
RAF Lakenheath, RAF Mildenhall	United Kingdom	1381	2	0	1	22	195
Ramstein AB	Germany	2311	1	0	3	0	62

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Installation	City, state, or country	Number of exceptional family Members (EFM)	Number of family support providers (by FTE) ^a	Number of family support provider vacancies	Number of services plans ^b	Number of indirect contacts ^c	Number of direct contacts ^d
OCONUS							
Spangdahlem AB	Germany	501	1	0	0	113	385
Yokota AB	Japan	435	0.5	0	0	21	0

Source: GAO analysis of Air Force fiscal year 2016 EFMP data. | GAO-18-348

^aThe number of family support providers is provided in FTEs to be able to show that not every family support provider assists family members enrolled in the EFMP full time at every installation.

^bA services plan (SP) covers all enrolled family members and documents current needs and steps to achieve desired outcomes. Because some families have more than one enrolled family member, the total number of SPs created will be less than the total number of enrolled family members.

^cAccording to the Air Force, indirect contacts refer to time family support providers spend on emailing family members or caregivers, conducting research, or collaborating with other providers.

^dAccording to the Air Force, direct contacts refer to time family support providers spend meeting with families, either in person or on the telephone.

^eOur review focused on EFMPs located at installations in the CONUS. As defined by the Department of Defense, Alaska and Hawaii are not included in CONUS installations.

^fIn March 2016, all family members at this installation were required to relocate because of concerns about safety in the region. Prior to March 2016, there were about 190 EFMs at this installation, according to Air Force officials.

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Table 10: Fiscal Year 2016 Army Exceptional Family Member Program (EFMP) Data by Installation – Selected Categories, Continental United States (CONUS) and Outside the Continental United States (OCONUS)

Installation	City, state, or country	Number of exceptional family members (EFM)	Number of family support providers (by FTE) ^a	Number of family support provider vacancies	Number of services plans ^b	Number of indirect contacts ^c	Number of direct contacts ^d
CONUS^e							
Aberdeen Proving Ground	Aberdeen Proving Ground, MD	150	1	0	48	5,902	224
Anniston Army Depot	Anniston, AL	3	Services provided by Family Advocacy Program	-	11	202	21
Carlisle Barracks	Carlisle, PA	87	0.33	0	0	5,597	49
Detroit Arsenal	Warren, MI	30	0.5	0	3	345	4
Dugway Proving Ground	Dugway, UT	-	0.1	0	-	-	-
Fort Belvoir	Fort Belvoir, VA	799	3	1	838	6,890	907
Fort Benning	Fort Benning, GA	1397	1	2	342	33,422	756
Fort Bliss	Fort Bliss, TX	2680	5	0	194	15,080	2,939
Fort Bragg	Fort Bragg, NC	4228	8	0	560	29,765	1,583
Fort Campbell	Fort Campbell, KY	2298	6.7	1.3	-	-	-
Fort Carson	Fort Carson, CO	3113	4	0	67	46,841	2,138
Fort Detrick	Fort Detrick, MD	116	1	0	-	-	-
Fort Drum	Fort Drum, NY	1212	3	0	45	4,272	331
Fort Gordon	Fort Gordon, GA	1164	2	0	142	52,427	1,157
Fort Hood	Fort Hood, TX	3869	10	1	169	117,919	3,595
Fort Huachuca	Fort Huachuca, AZ	442	1	0	-	-	-
Fort Irwin	Fort Irwin, CA	312	1	0	5	1,799	272
Fort Jackson	Fort Jackson, SC	692	2	2	105	1,713	386
Fort Knox	Fort Knox, KY	640	3	0	10	3,514	98
Fort Leavenworth	Fort Leavenworth, KS	587	2	1	29	2,026	211
Fort Lee	Fort Lee, VA	717	1	0	211	7,705	583
Fort Leonard Wood	Fort Leonard Wood, MO	762	3	0	77	946	6,097
Fort McCoy	Fort McCoy, WI	73	1.04	0	0	2,328	219

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Installation	City, state, or country	Number of exceptional family members (EFM)	Number of family support providers (by FTE)^a	Number of family support provider vacancies	Number of services plans^b	Number of indirect contacts^c	Number of direct contacts^d
CONUS^e							
Fort Meade	Fort Meade, MD	642	3	1	218	25,355	799
Fort Polk	Fort Polk, LA	579	1	4	97	9,836	1,060
Fort Riley	Fort Riley, KS	1225	3	0	110	20,090	1,124
Fort Rucker	Fort Rucker, AL	526	2	0	627	22,315	901
Fort Sill	Fort Sill, OK	735	2	0	330	10,847	480
Fort Stewart	Fort Stewart, GA	1770	5	0	79	11,161	1,221
Joint Base Myer-Henderson Hall	Fort Myer, VA	153	2	1	15	9,060	758
Joint Base Lewis-McChord	Joint Base Lewis-McChord, WA	3496	6	2	-	-	-
Natick Soldiers System Command	Natick, MA	16	0.14	0	1	407	2
Picatinny Arsenal	-	13	Services provided by Army Community Services	-	0	71	2
Redstone Arsenal	Redstone Arsenal, AL	110	1	1	0	4,091	47
Rock Island Arsenal	Rock Island, IL	74	1	0	0	3,654	259
Tobyhanna Army Depot	Tobyhanna, PA	2	-	-	0	17	0
U.S. Army Garrison Presidio of Monterey	Presidio of Monterey, CA	73	0.5	0.5	157	20,303	469
West Point	West Point, NY	201	1	0	105	26,456	576
White Sands	White Sands Missile Range, NM	21	0.2	0	1	333	18
In fiscal year 2016, the Army had an additional 8,102 EFMs enrolled in the EFMP who lived in the contiguous 48 states.							
OCONUS^f							
Fort Buchanan	Fort Buchanan, Puerto Rico	3	1	0	3	594	47
Joint Base Elmendorf-Richardson	Joint Base Elmendorf Richardson, AK	622	1	N/A	18	1,933	18

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Installation	City, state, or country	Number of exceptional family members (EFM)	Number of family support providers (by FTE)^a	Number of family support provider vacancies	Number of services plans^b	Number of indirect contacts^c	Number of direct contacts^d
OCONUS^f							
U.S. Army Garrison Ansbach	Germany	127	2	0	24	2,203	257
U.S. Army Garrison Bavaria	Germany	-	2	1	64	20,260	714
U.S. Army Garrison Grafenwoehr	Germany	695	1	-	0	-	-
U.S. Army Garrison Garmisch	Germany	20	-	-	0	3	0
U.S. Army Garrison Hohenfels	Germany	235	-	-	31	1,145	465
U.S. Army Garrison Benelux	Germany	-	0	1	0	91	4
U.S. Army Garrison Daegu	South Korea	-	-	-	0	28	0
U.S. Army Garrison Fort Greely	Fort Greely, AK	3	-	-	0	95	0
U.S. Army Garrison Hawaii	Hawaii	2582	5.25	0	930	44,675	1,692
U.S. Army Garrison Humphreys	Korea	613	1	0	0	7,200	190
U.S. Army Garrison Japan	Japan	-	0	2	-	-	-
Camp Zama	Japan	115	-	-	-	-	-
Torri Station	Okinawa	-	-	-	-	-	-
U.S. Army Garrison Red Cloud	South Korea	-	1	0	1	350	4
U.S. Army Garrison Rheinland-Pfalz	Germany	-	2	2	-	-	-
U.S. Army Garrison Baumholder	Germany	379	-	-	20	2,127	526
U.S. Army Garrison Kaiserslautern	Germany	811	-	-	67	6,676	645

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Installation	City, state, or country	Number of exceptional family members (EFM)	Number of family support providers (by FTE)^a	Number of family support provider vacancies	Number of services plans^b	Number of indirect contacts^c	Number of direct contacts^d
OCONUS^f							
U. S Army Garrison Stuttgart	Germany	366	3	0	4	9,423	248
U.S. Army Garrison Vicenza	Italy	562	2	0	24	2,066	292
U.S. Army Garrison Wainwright	Fort Wainwright, AK	829	2	0	9	17,151	350
U.S. Army Garrison Wiesbaden	Germany	530	2	0	12	3,215	152
U.S. Army Garrison Yongsan	South Korea	-	-	-	6	4,200	88

Source: GAO analysis of Army fiscal year 2016 EFMP data. | GAO-18-348

^aThe number of family support providers is provided in FTEs to be able to show that not every family support provider assists family members enrolled in the EFMP full time at every installation.

^bA services plan (SP) covers all enrolled family members and documents current needs and steps to achieve desired outcomes. Because some families have more than one enrolled family member, the total number of SPs created will be less than the total number of enrolled family members.

^cAccording to the Army, indirect—or simple—contacts refer to time when family support providers spend less than 15 minutes with a family member.

^dAccording to the Army, direct—or extended—contacts refer to time when family support providers spend 15 minutes or more with a family member; conduct research; teach or facilitate a class, or collaborate with other stakeholders.

^eOur review focused on EFMPs located at installations in the CONUS. As defined by the Department of Defense, Alaska and Hawaii are not included in CONUS installations.

^fSeveral installations in the Europe and Pacific regions have a large installation with smaller installations located in its vicinity. For example, U.S. Army Garrison Bavaria includes U.S. Army Garrisons Grafenwoehr, Garmish, and Hohenfels.

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Table 11: Fiscal Year 2016 Marine Corps Exceptional Family Member Program (EFMP) Data by Installation – Selected Categories, Continental United States (CONUS) and Outside the Continental United States (OCONUS)

Installation	City, state, or country	Number of exceptional family members (EFM)	Number of family support providers (by FTE)^a	Number of family support provider vacancies	Number of services plans^b	Number of indirect contacts^c	Number of direct contacts^d
CONUS^e							
Marine Corps Logistics Base	Albany, GA	48	1	0	12	72	62
Marine Corps Logistics Base	Barstow, CA	12	1	0	0	26	91
Marine Corps Air Station – Beaufort/Parris Island	Beaufort, SC	588	6	0	143	1599	812
Marine Corps Base Camp Allen	Norfolk, VA	278	3.75	0	71	2397	372
Marine Corps Base – Camp Lejeune/New River	Camp Lejeune; Jacksonville, NC	1892	17	0	131	4442	3863
Marine Corps Base	Camp Pendleton, CA	2445	14	0	43	5216	4059
Marine Corps Air Station	Cherry Point, NC	402	6	0	49	582	753
Henderson Hall	Arlington, VA	444	5	0	7	1969	841
Marine Corps Air Station	Miramar, CA	563	7	0	27	1596	929
MCRD San Diego	San Diego, CA	449	6	0	31	942	916
Marine Corps Air Ground Combat Center	Twentynine Palms, CA	347	6	0	15	1176	997
Marine Corps Base	Quantico, VA	1492	11	0	23	2266	2507
Marine Corps Air Station	Yuma, AZ	181	4	0	0	133	349
OCONUS							
Marine Corps Base	Kaneohe Bay, HI	337	4	1	16	824	754

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Installation	City, state, or country	Number of exceptional family members (EFM)	Number of family support providers (by FTE)^a	Number of family support provider vacancies	Number of services plans^b	Number of indirect contacts^c	Number of direct contacts^d
OCONUS							
Marine Corps Air Station	Iwakuni, Japan	153	1	0	3	444	328
Marine Corps Base, Camp S. D. Butler	Okinawa, Japan	992	6	0	113	2205	1068

Source: GAO analysis of Marine Corps fiscal year 2016 EFMP data. | GAO-18-348

^aThe number of family support providers is provided in FTEs to be able to show that not every family support provider assists family members enrolled in the EFMP full time at every installation.

^bA services plan (SP) covers all enrolled family members and documents current needs and steps to achieve desired outcomes. Because some families have more than one enrolled family member, the total number of SPs created will be less than the total number of enrolled family members.

^cAccording to the Marine Corps, indirect contacts refer to time family support providers spend on emailing family members or caregivers, conducting research, or collaborating with other providers.

^dAccording to the Marine Corps, direct contacts refer to time family support providers spend meeting with families, either in person or on the telephone.

^eOur review focused on EFMPs located at installations in the CONUS. As defined by the Department of Defense, Alaska and Hawaii are not included in CONUS installations.

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Table 12: Fiscal Year 2016 Navy Exceptional Family Member Program (EFMP) Data by Installation – Selected Categories, Continental United States (CONUS) and Outside the Continental United States (OCONUS)

Installation	City, state, or country	Number of exceptional family members (EFM)	Number of family support providers (by FTE) ^a	Number of family support provider vacancies	Number of services plans ^b	Number of indirect contacts ^c	Number of direct contacts ^d
CONUS^e							
In November 2016, the Navy had 17,533 EFMs enrolled in the EFMP. ^f							
Annapolis NSA	Annapolis, MD	-	0	0	N/A ^g	1	54
Beaufort NSF	Beaufort, SC	-	0	0	N/A ^g	-	-
Bethesda NSA	Bethesda, MD	-	1	0	0	442	651
China Lake NAWS	China Lake, CA	-	0	0	N/A ^g	5	7
Corpus Christi NAS	Corpus Christi, TX	-	1	0	0	89	-
Crane NSA	Crane, IN	-	0	0	N/A ^g	-	-
Earle WPNSTA	Colts Neck, NJ	-	0	0	N/A ^g	3	1
El Centro NAF	El Centro, CA	-	0	0	N/A ^g	-	-
Everett NAVSTA	Everett, WA	-	1	1	0	223	533
Fallon NAS	Fallon, NV	-	0	0	N/A ^g	1	3
Fort Worth NAS/JRB	Fort Worth, TX	-	0	0	N/A ^g	-	47
Great Lakes NAVSTA	Great Lakes, IL	-	1	0	0	639	1277
Gulfport CBC	Gulfport, MS	-	1	0	0	38	9
Indian Island NAVMAG	Hadlock, WA	-	0	0	N/A ^g	-	369
Jacksonville NAS (includes NRSE RSLO)	Jacksonville, FL	-	2	0	0	403	398
Joint Base Anacostia-Bolling	Washington, DC	-	1	0	N/A ^g	39	18
Joint Expeditionary Base Little Creek-Ft Story	Virginia Beach, VA	-	2	0	3	818	840
Key West NAS	Key West, FL	-	0	0	N/A ^g	-	-
Kings Bay SUBASE	Kings Bay, GA	-	1	0	1	289	537
Kingsville NAS	Kingsville, TX	-	0	0	N/A ^g	-	1
Kitsap N0AVBASE (includes NRNW RSLO)	Bremerton, WA	-	2	1	2	158	152
Lemoore NAS	Lemoore, CA	-	1	0	0	64	135

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Installation	City, state, or country	Number of exceptional family members (EFM)	Number of family support providers (by FTE)^a	Number of family support provider vacancies	Number of services plans^b	Number of indirect contacts^c	Number of direct contacts^d
CONUS^e							
Mayport NAVSTA	Mayport, FL	-	1	0	0	20	38
Mechanicsburg NSA	Mechanicsburg, PA	-	0	0	N/A ^g	-	-
Meridian NAS	Meridian, MS	-	0	0	N/A ^g	1	1
Metro San Diego (includes NAVBASE San Diego, NAVBASE Coronado, and NAVBASE Point Loma)	San Diego, CA	-	8	1	-	114	10086
Midsouth NSA	Millington, TN	-	1	0	0	16	22
Monterey NSA	Monterey, CA	-	1	1	0	11	53
New London SUBASE	Groton, CT	-	1	0	0	102	542
New Orleans NAS/JRB	New Orleans, LA	-	0	0	N/A ^g	92	160
Newport NAVSTA	Newport, RI	-	0.5	0.5	0	0	142
Norfolk NAVSTA (includes NRMA RSLO)	Norfolk, VA	-	3	0	0	1006	1088
Norfolk NSA	Norfolk, VA	-	0	0	1	24	57
Norfolk NSY (Portsmouth)	Norfolk, VA	-	1.25	0	N/A ^g	-	1
Oceana NAS	Virginia Beach, VA	-	3	1	0	648	2107
Orlando NSA	Orlando, FL	-	0	0	N/A ^g	-	-
Panama City NSA	Panama City, FL	-	0	0	N/A ^g	-	-
Patuxent River NAS	Patuxent River, MD	-	1	1	1	168	568
Pensacola NAS	Pensacola, FL	-	2	1	1	61	4258
Portsmouth NSY BOS	Kittery, ME	-	0	0	N/A ^g	5	3
Saratoga Springs NSA	Saratoga Springs, NY	-	0.25	0	0	11	421
Seal Beach WPNSTA	Seal Beach, CA	-	0	0	N/A ^g	-	-
South Potomac NSA	Dahlgren, VA	-	0	0	N/A ^g	4	3

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

Installation	City, state, or country	Number of exceptional family members (EFM)	Number of family support providers (by FTE) ^a	Number of family support provider vacancies	Number of services plans ^b	Number of indirect contacts ^c	Number of direct contacts ^d
CONUS^e							
Ventura County Point Mugu NAVBASE	Point Mugu, CA	-	1	0	20	59	545
Washington NSA	Washington, DC	-	1	0	1	-	-
Whidbey Island NAS	Oak Harbor, WA	-	1	0	1	418	180
Whiting Field NAS	Milton, FL	-	0	0	N/A ^g	-	-
Yorktown WPNSTA	Yorktown, VA	-	2	0	0	471	412
OCONUS							
In November 2016, the Navy had 1,133 EFMs enrolled in the EFMP.							
Andersen NSA	Yigo, Guam	-	0	0	N/A ^g	21	1
Atsugi NAF	Atsugi, Japan	-	0	0	N/A ^g	1	-
Bahrain NSA	Kingdom of Bahrain	-	0	0	N/A ^g	1	9
Barking Sands PMRF	Kekaha, HI	-	0	0	N/A ^g	-	-
Chinhae CFA	Chinhae, Korea	-	0	0	N/A ^g	-	-
Diego Garcia NSF	Diego Garcia, British Indian Ocean Territory	-	0	0	N/A ^g	-	-
Guam NAVBASE	Santa Rita, Guam	-	0	0	N/A ^g	50	4
Guantanamo Bay NAVSTA	Guantanamo Bay, Cuba	-	0	0	N/A ^g	59	9
Joint Base Pearl Harbor Hickam	Pearl Harbor, HI	-	2	0	1	301	363
Misawa NAF	Misawa, Japan	-	0	0	N/A ^g	-	-
Naples NSA	Naples, Italy	-	1	0	0	217	64
Okinawa CFA	Okinawa, Japan	-	0	0	N/A ^g	-	-
Rota NAVSTA	Rota, Spain	-	0	0	N/A	5	1
Sasebo CFA	Sasebo, Japan	-	1	0	0	74	115
Sigonella NAS	Sigonella, Italy	-	0	0	N/A ^g	16	5
Singapore Area Coordinator	Singapore	-	0	0	N/A ^g	-	-
Souda Bay NSA	Souda Bay, Greece	-	0	0	N/A ^g	-	-
Yokosuka CFA	Yokosuka, Japan	-	1	1	-	133	368

Source: GAO analysis of Navy fiscal year 2016 EFMP data. | GAO-18-348

**Appendix II: Services' Fiscal Year 2016
Exceptional Family Member Program Data**

^aThe number of family support providers is provided in FTEs to be able to show that not every family support provider assists family members enrolled in the EFMP full time at every installation.

^bA services plan (SP) covers all enrolled family members and documents current needs and steps to achieve desired outcomes. Because some families have more than one enrolled family member, the total number of SPs created will be less than the total number of enrolled family members.

^cAccording to the Navy, indirect contacts refer to information and referral services provided over the telephone or in response to an email.

^dAccording to the Navy, direct contacts refer to information and referral services provided to family members in person as well as individualized family support services provided by family support providers via email, telephone, in person, or other mode of communication.

^eOur review focused on EFMPs located at installations in the CONUS. As defined by the Department of Defense, Alaska and Hawaii are not included in CONUS installations.

^fThe Navy can only provide the total number of exceptional family members enrolled in the EFMP. Navy officials explained that because of reporting requirements for the Navy's Family Accountability and Assessment System (NFAAS), it could not report EFMP data by installation in fiscal year 2016. According to Navy officials, the Navy made changes to NFAAS and started reporting enrollment data by installation in the second quarter of fiscal year 2017.

^gN/A indicates this installation does not have a full-time Case Liaison (CL). These installations have a Collateral Duty Case Liaison who provides information and referral services for the EFMP as well as referral to the assigned CL if additional services are needed or requested.

Appendix III: Issues Identified by Discussion Group Participants

We held small group discussions with Exceptional Family Member Program (EFMP) participants at the seven military installations we visited. Family members and caregivers who attended each session reported they had children or spouses with EFMP-eligible conditions. The discussion group participants were self-selected; and their comments are not intended to represent all EFMP -enrolled family members or caregivers in fiscal year 2016. In addition, other EFMP -enrolled family members and caregivers may have had different experiences with the program during the same period. There were a total of 38 participants representing all the Services. The following issues were discussed by one or more participants during the small group discussions at the installations we visited.¹ The issues that emerged relate to the current and future overall effectiveness of the EFMP.

Overall Satisfaction with EFMP (Discussed by 30 of 38 participants): Measure of participants' approval of the family support services offered and experience with the EFMP.

- Many participants expressed overall satisfaction with the EFMP.
- Several participants expressed dissatisfaction with the EFMP.
- A participant expressed dissatisfaction with the lack of consistency in the provision of family support services (i.e., special education advocacy) across installations.

School Liaison Officers (Discussed by 20 of 38 participants): Serve as the primary point of contact for school-related matters as well as assist military families with school issues.²

- Several participants noted that they received no response to their request for assistance from their School Liaison Officer or they only received general information.
- Several participants said School Liaison Officers were not helpful.

¹To characterize the opinions of group discussion participants throughout this appendix, we defined modifiers (e.g., "some") to quantify users' views as follows: few participants represents at least 2 participants; some participants represents 3 to 5 participants; several participants represents 6 to 9 participants; and many participants represents 10 to 20 participants.

²Department of Defense Education Activity, *School Liaison Officers* (<http://www.dodea.edu/Partnership/schoolLiaisonOfficers.cfm>).

- Some participants found School Liaison Officers were helpful.
- Some participants were unaware of School Liaison Officers being available at their installation and the service(s) they provide.
- A few participants said School Liaison Officers did not follow up on requests for information.
- A participant noted there seems to be a disconnect between family support services provided through the EFMP and services provided by School Liaison Officers.

Family Support Personnel (Discussed by 12 of 38 participants): Provide information and referral to military families with special needs.³

- Some participants at one installation noted that the EFMP was understaffed.
- Some participants at one installation noted high turnover of family support personnel.
- Some participants noted family support personnel did not provide support for their family with special needs.

Stigma (Discussed by 12 of 38 participants): A perception that participating in the EFMP may limit a soldier's assignment opportunities and/or compromise career advancement.⁴

- Several participants believe there is still stigma associated with participating in the EFMP.
- Some participants said participating in the EFMP has not affected career advancement.

Assignment Coordination (Discussed by 10 of 38 participants): The assignment of military personnel in a manner consistent with the needs of

³DOD Instruction (DODI) 1315.19, *The Exceptional Family Member Program (EFMP)* (Apr. 19, 2017), para. 6.1(a).

⁴Combat Development and Integration, United States Marine Corps, *Analysis of the Impact of Exceptional Family Member Program Enrollment on Individual Marine Career Progression and Promotion*, (<http://www.usmc-mccs.org/articles/efmp-helps-marine-with-readiness>), p.9.

armed forces that considers locations where care and support for family members with special needs are available.⁵

- Some participants found the assignment coordination process challenging.
- Some participants described limitations with the assignment coordination process.
- A few participants noted there is a lack of information among families with special needs regarding how to express the need for stabilization and /or continuity of care.⁶
- A few participants cited the challenges of assignment coordination as contributing to their decision to retire.
- One participant commented that the opinion of a medical professional was not reflected in the assignment coordination process.

Special Education Services (Discussed by 10 of 38 participants): The provision of staff capable of assisting families with special needs with special education and disability law advice and/or assistance and attendance at individualized education program (IEP) meetings where appropriate.⁷

- Several participants who had a family support provider assist them with preparing for or attending a school-based meeting, including IEP meetings, spoke positively of their experience(s).
- Some participants at one installation agreed that assistance from family support providers during meetings with school officials regarding special education services is helpful.
- A few participants who were unable to get assistance with special education services from the EFMP sought the services of private attorneys at their own expense.

⁵DODI 1315.19, paras. 1.2(b), 4.1(b).

⁶Stabilization refers to assigning a servicemember for an extended period of time to a location that has the required medical and/or educational services available for a family member enrolled in the EFMP.

⁷Department of the Navy, *Marine Corps Order 1754.4B: Exceptional Family Member Program*, (September 20, 2010) P.41, Sec. 4-1.

Family Support Services (Discussed by 9 of 38 participants): The non-clinical case management delivery of information and referral for families with special needs, including the development and maintenance of a services plan.⁸

- Some participants found that family support providers were helpful.
- Some participants could not identify needed resources or were unaware of the resources or services available to them.
- One participant noted that the family support provider had minimal contact.
- One participant said navigating the system can be challenging.

Surveys (Discussed by 8 of 38 participants): The process of collecting data from a respondent using a structured instrument and survey method to ensure the accurate collection of data.⁹

- Several participants noted that they had not or rarely had the opportunity to evaluate the family support services provided through the EFMP.
- One participant noted that comment cards used by each service are not effective for evaluating the EFMP.

Warm hand-off (Discussed by 6 of 38 participants): Assistance to identify needed supports or services and facilitating the initial contact or meeting with the next program.¹⁰

- Many participants at one installation agreed that the warm hand-off process worked well for them.
- Several participants said they found the warm hand-off process helpful when moving from one installation to the next.

⁸DODI 1315.19, para. G.2.

⁹GAO, *Choosing a Survey Administration Method* (Washington, D.C.: November, 2017), P.12.

¹⁰Department of Defense, *EFMP: Family Support Reference Guide* (<http://download.militaryonesource.mil/12038/MOS/ResourceGuides/EFMP-Family-Support-Reference-Guide.pdf>), sec. 4:5.

Outreach (Discussed by 5 of 38 participants): Developing partnerships with military and civilian agencies and offices (local, state, and national), improving program awareness, providing information updates to families, and hosting and participating in EFMP family events.¹¹

- Some participants found it difficult to obtain information regarding the types of family support services that are available.
- A few participants noted that communications regarding the EFMP were not targeted to address their needs.
- A few participants noted communications regarding the EFMP are untimely, (e.g., newsletters not issued periodically).

Joint Base Family Support Services (Discussed by 1 of 38 participants): Family support services provided by the lead Service of the Joint Base that is different from that of the servicemember enrolled in the EFMP.

- One participant said that using family support services on joint bases may pose a challenge as each Service has different rules and procedures and as a result provides different types of family support services.

¹¹Department of Defense, *EFMP: Family Support Reference Guide* (<http://download.militaryonesource.mil/12038/MOS/ResourceGuides/EFMP-Family-Support-Reference-Guide.pdf>), sec. 2:1.

Appendix IV: Comments from the Department of Defense



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WASHINGTON, DC 20301-1500

Mr. Joseph Kirschbaum
Director, Defense Capabilities Management
U.S. Government Accountability Office
441 G Street, NW
Washington DC 20548

Dear Mr. Kirschbaum:

This is the Department of Defense (DoD) response to the GAO Draft Report GAO-18-348, "MILITARY PERSONNEL: DoD Should Improve Its Oversight of the Exceptional Family Member Program" dated March 13, 2018 (GAO Code 101697).

Attached is DoD's proposed response to the subject report. My point of contact is Dr. Ed Tyner who can be reached at w.e.tyner.civ@mail.mil and phone 571.372.5320.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann G. Johnston".

Ann G. Johnston
Deputy Assistant Secretary of Defense
(Military Community and Family Policy)

GAO DRAFT REPORT DATED MARCH 13, 2018
GAO-18-348 (GAO CODE 101697)

“MILITARY DEPENDENT STUDENTS: DOD SHOULD IMPROVE ITS OVERSIGHT
OF THE EXCEPTIONAL FAMILY MEMBER PROGRAM

DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATIONS

RECOMMENDATION 1: We [GAO] recommend the Secretary of Defense direct the Office of Special Needs (OSN) to assess the extent to which each Service is (1) providing sufficient resources for an appropriate number of family support providers, and (2) developing individualized services plans for each special needs family, and to include these results as part of OSN’s analysis of any gaps in services for military families with special needs in each annual report issued by the Department to the congressional defense committees.

DoD RESPONSE: Concur.

RECOMMENDATION 2: We [GAO] recommend that the Secretary of Defense direct the Office of Special Needs (OSN) to develop common performance metrics for assignment coordination and family support, in accordance with leading practices for performance measurement.

DoD RESPONSE: Concur. OSN and the Services have developed and piloted an instrument to measure families’ satisfaction with EFMP family support services, the results of which will be used to facilitate program improvements during the next year.

OSN agrees that further performance metrics need to be developed for assignment coordination beyond the EFMP Data Repository.

RECOMMENDATION 3: We [GAO] recommend that the Secretary of Defense implement a systematic process for evaluating the result of monitoring activities conducted by each Services EFM program.

DoD RESPONSE: Concur. OSN is developing plans for evaluating the monitoring activities of the Services.

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Jacqueline M. Nowicki at (617) 788-0580 or nowickij@gao.gov

Staff Acknowledgments

In addition to the contact named above, Bill MacBlane (Assistant Director), Brian Egger (Analyst-in-Charge), Patricia Donahue, Holly Dye, Robin Marion, James Rebbe, Shelia Thorpe, and Walter Vance made significant contributions to this report. Also contributing to this report were Lucas Alvarez, Bonnie Anderson, Connor Kincaid, Brian Lepore, Daniel Meyer, and Mimi Nguyen.

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