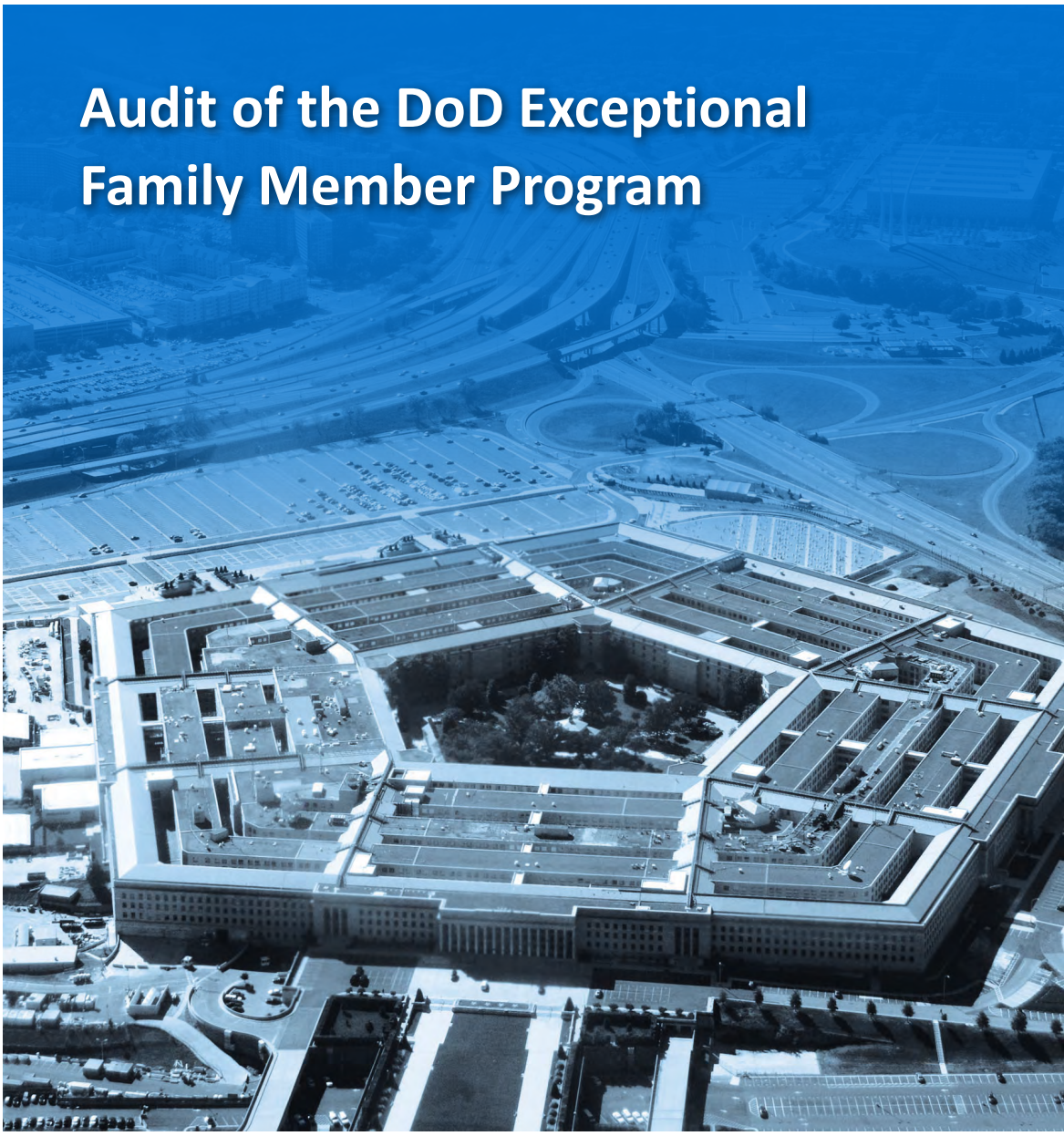
Report No. DODIG-2023-102

INSPECTOR GENERAL

U.S. Department of Defense

AUGUST 1, 2023

Audit of the DoD Exceptional Family Member Program



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Results in Brief

Audit of the DoD Exceptional Family Member Program

August 1, 2023

Objective

The objective of this audit was to determine the extent to which the DoD provided oversight of the Exceptional Family Member Program (EFMP) and the actions the DoD took to address recommendations from two previous Government Accountability Office (GAO) reports.

Background

The DoD established the EFMP to assist military families in finding specialized medical providers, educational services, and community support for family members with special needs. The DoD Office of Special Needs (OSN) is responsible for the development and implementation of policy to support military families with special needs, program oversight, and the identification of gaps in services. In 2012 and 2018 the GAO issued reports on the EFMP, recommending ways to improve the program.

Finding

As of March 2023, the OSN had not fully implemented previous GAO recommendations. Although the OSN made progress in collecting appropriate data, the OSN did not improve the EFMP Data Repository to collect the comparable, detailed data necessary to improve monitoring of the EFMP and better analyze gaps. In addition, the OSN did not collect installation-level data, such as data reflecting gaps in medical services that could lead to a decision to not recommend a Service member for an assignment. Furthermore, the OSN did not establish goals for current or planned performance metrics to monitor program effectiveness.

Finding (cont'd)

The OSN did not collect the data or metrics needed to improve oversight of the EFMP because OSN officials did not provide policy and implementing guidance to standardize Services' EFMP processes across the DoD or provide detailed data requirements. Additionally, lack of information technology systems and the involvement of multiple EFMP components and stakeholders slowed the OSN's progress in improving oversight of the EFMP.

Until the OSN standardizes the EFMP, including collecting the data and metrics needed, the OSN will not be able to assess the effectiveness of the program, fully identify gaps in medical and educational services, or implement associated improvements at specific installations. If the OSN cannot perform appropriate assessments, then military families in the EFMP could be relocated to installations without the medical services they need. This could reduce military readiness by increasing stress on Service members and families struggling to find special needs care and considering family separation to relocate families for care. The lack of services could also cause Service members to relocate again to an installation with the services their family needs. In addition, DoD Educational Activity schools could face delays in providing required educational services.

Recommendations

The OIG made a total of seven recommendations to address the findings of our audit, including recommendations that the Under Secretary of Defense for Personnel and Readiness ensure the OSN and Assistant Secretaries of Defense:

- standardize and update processes, instructions, dictionaries, and systems related to the EFMP;
- establish a process to track and elevate disputes to the appropriate office for resolution; and
- develop a DoD information technology system and perform more in-depth data reliability tests of the data for the EFMP.

Results in Brief

Audit of the DoD Exceptional Family Member Program

Management Comments and Our Response

The Under Secretary of Defense for Personnel and Readiness agreed with or partially agreed with the recommendations and described planned actions with milestones for all recommendations. However, the subsequent actions taken for one recommendation, which revised DoD EFMP policy, only partially answered the recommendation to standardize assignment coordination processes across the DoD. Therefore, one recommendation is unresolved, and six recommendations are resolved. All seven recommendations will remain open until management officials provide documentation showing that the planned actions have been completed and satisfied the intent of the recommendations. We request that the Under Secretary provide comments on the unresolved recommendation within 30 days.

Please see the Recommendations Table on the next page for the status of the recommendations.

Recommendations Table

Management	Recommendations Unresolved	Recommendations Resolved	Recommendations Closed
Under Secretary of Defense for Personnel and Readiness	1.a	1.b, 1.c, 2.a, 2.b, 2.c, and 3	None

Please provide Management Comments by September 1, 2023.

Note: The following categories are used to describe agency management's comments to individual recommendations.

- **Unresolved** – Management has not agreed to implement the recommendation or has not proposed actions that will address the recommendation.
- **Resolved** – Management agreed to implement the recommendation or has proposed actions that will address the underlying finding that generated the recommendation.
- **Closed** – DoD OIG verified that the agreed upon corrective actions were implemented.


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August 1, 2023

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR PERSONNEL AND READINESS

SUBJECT: Audit of the DoD Exceptional Family Member Program (Report No. DODIG-2023-102)

This final report provides the results of the DoD Office of Inspector General's audit. We previously provided copies of the draft report and requested written comments on the recommendations. We considered comments from the Under Secretary of Defense for Personnel and Readiness in finalizing our report. These comments are included in the report.

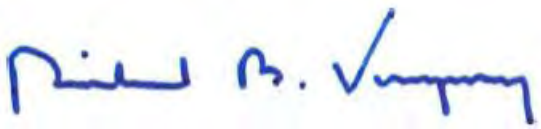
This report contains one recommendation that we consider unresolved because the actions completed only partially addressed the recommendation presented in the report. Therefore, as discussed in the Recommendations, Management Comments, and Our Response section of this report, Recommendation 1.a will remain open. We will track this recommendation until an agreement is reached on the actions taken to address the recommendation, and you provide us with adequate documentation showing that all agreed-upon actions are completed.

This report also contains six recommendations we consider resolved and open. As described in the Recommendations, Management Comments, and Our Response section of this report, we will close the recommendations when you provide us with adequate documentation showing that all agreed-upon actions are completed and satisfied the intent of the recommendations.

DoD Instruction 7650.03 requires that recommendations be resolved promptly. For the unresolved recommendation, within 30 days please provide us your response concerning specific actions in process or alternative corrective actions proposed on the recommendation. For the resolved recommendations, within 90 days please provide us documentation showing that the agreed-upon action has been completed. Send your response to either followup@dodig.mil if unclassified or rfunet@dodig.smil.mil if classified SECRET.

We appreciate the cooperation and assistance received during the audit. If you have any questions or would like to meet to discuss the audit, please contact me at [redacted]

FOR THE INSPECTOR GENERAL:



Richard B. Vasquez
Assistant Inspector General for Audit
Readiness and Global Operations

cc:
COMMANDER, U.S. INDO-PACIFIC COMMAND
AUDITOR GENERAL, DEPARTMENT OF THE ARMY
AUDITOR GENERAL, DEPARTMENT OF THE NAVY
AUDITOR GENERAL, DEPARTMENT OF THE AIR FORCE

Contents

Introduction

Objective

The announced objective of this audit was to determine whether the DoD provided assignment coordination and family support services through the Exceptional Family Member Program (EFMP) for military families with special needs assigned to overseas military installations within the U.S. Indo-Pacific Command (USINDOPACOM) area of responsibility in accordance with laws and DoD regulations.

During the planning phase of this audit, we had difficulties obtaining EFMP assignment coordination data.[1] Specifically, the DoD Office of Special Needs (OSN), the Army, and the Navy did not have data available to identify individual Service members or family members in the EFMP with assignments coordinated to the USINDOPACOM area of responsibility.[2] For example, to obtain individual data, Army personnel stated that they would have to go through manual records at each installation. Navy personnel stated that they would have to look through e-mail correspondence and open all of their screening records to identify EFMP records. The OSN, Army, and Navy did not maintain information technology systems with this detailed level of data.[3] Consequently, both the Army and Navy only provided summary data for review, with an overall total of screenings and travel recommendations, and the OSN only provided Service-level totals from the EFMP Data Repository.

As a result of these difficulties obtaining data, we were unable to complete a USINDOPACOM analysis and refocused our audit efforts on DoD-level oversight of the EFMP, and the actions the DoD has taken to address recommendations from previous engagements by the Government Accountability Office (GAO) that related to our objective. See Appendix A for a complete description of our audit scope and methodology.

In addition, we interviewed the Services' EFMP family support and assignment coordination staff members at installations in Japan and Korea to determine whether there were issues specifically affecting USINDOPACOM. See Appendix B for the results of our interviews with EFMP staff.

[1] Each Military Service implements its own processes for screening military families and verifying medical and educational services availability before assignment relocation. For the purposes of this report, we refer to assignment coordination as the full process, which may include one or two screenings, depending on the Service and if relocation is to a continental United States (CONUS) or outside the continental United States (OCONUS) assignment.

[2] The Navy performs screenings and makes final travel recommendations for both Sailors and Marines with potential overseas assignments. Therefore, we did not request EFMP assignment coordination data to the USINDOPACOM area of responsibility from the Marine Corps.

[3] The Air Force maintains an information technology system with detailed data. According to Marine Corps officials, they have information technology systems with detailed data only for the assignment coordination conducted by the Marine Corps EFMP and not on the screening the Navy performed on Marines' families. We provided additional details on information technology systems in the body of this report.

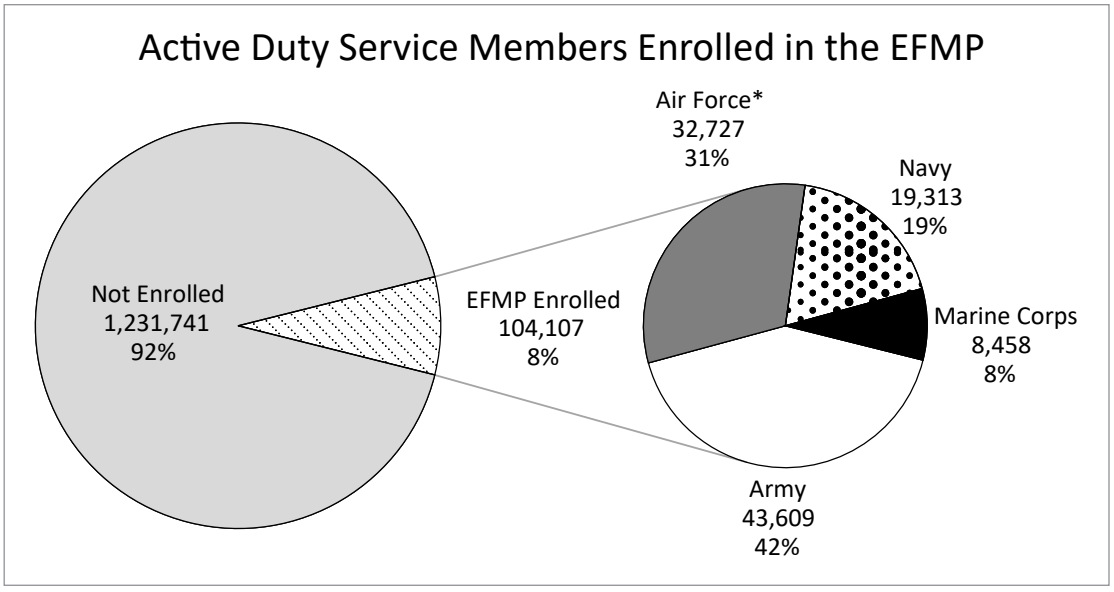
Background

The DoD provides support for military families with special needs through the EFMP, which was first established by the Army in 1979. In subsequent years, other Services (Navy, Marine Corps, and Air Force) also established their own EFMPs.[4] An exceptional family member is any authorized family member (spouse, child, stepchild, adopted child, foster child, or other dependent adult) residing with the Service member who possesses a physical, intellectual, or emotional disability, and requires special medical or educational services.

Military families face frequent moves around the globe, which could be especially challenging and stressful for Service members with a special needs family member because of the need to find specialized medical providers, educational services, and community support. The Services established the EFMP to assist military families with these challenges.

As of fourth quarter FY 2022, there were over 104,000 Service members enrolled in the EFMP, which is about 8 percent of all active duty Service members.[5] The Figure shows the percentage of Service members enrolled in the EFMP by Service.

Figure. Composition of Active Duty Service Members Enrolled in the EFMP by Service



* Includes Space Force members for whom the Air Force provides EFMP support.

Source: Enrollment data from the EFMP Data Repository as of fourth quarter FY 2022, and active duty data from the 2021 Demographics Profile of the Military Community.

[4] During this audit, we evaluated the EFMPs for the Army, Navy, Air Force, and Marine Corps; therefore, we will use the term "Services" when referring to those four Military Services. Air Force personnel stated that the Air Force provided EFMP support for Space Force Service members and families because the Space Force did not have a separate EFMP.

[5] As of February 2, 2023, the Army, Navy, and Marine Corps last reported fourth quarter FY 2022 data and the Air Force last reported first quarter FY 2022 data to the EFMP Data Repository.

Components of the Exceptional Family Member Program

According to DoD Instruction (DoDI) 1315.19, "The Exceptional Family Member Program," April 19, 2017, the EFMP consists of three components: identification and enrollment, assignment coordination, and family support. The DoDI requires the Military Departments to establish an EFMP that includes the three major components and to promote collaboration among the three components.

Identification and Enrollment

DoDI 1315.19 establishes the criteria for identifying family members with special needs as an individual with:

- potentially life-threatening conditions, chronic medical or physical conditions requiring followup care from a primary care manager more than once a year, or specialty care;
- a current and chronic mental health condition;
- asthma or other respiratory-related diagnosis with chronic recurring symptoms;
- a diagnosis of attention deficit disorder or attention deficit hyperactivity disorder;
- a chronic condition that requires either adaptive equipment, assistive technology devices, or environmental or architectural considerations; and
- special educational needs with, or eligible for, an individualized family service plan or individualized education program.[6]

DoDI 1315.19 also states that when military medical treatment facility (MTF) personnel identify a family member with a special need, MTF personnel refer the Service member to the Service-specific EFMP point of contact for enrollment. The DoDI requires enrollment in the EFMP for Service members who have families with special needs. In addition, the DoDI requires the Assistant Secretary of Defense for Health Affairs to ensure TRICARE (the DoD's health benefits program) providers are aware of the mandatory enrollment requirements.

[6] An individualized family service plan is a written document that identifies the specially designed services for an infant or toddler with a disability and the family of the infant or toddler. An individualized education program is a written document that identifies the required components of the individualized education program for a child with a disability that is 3 years of age or older.

Assignment Coordination

DoDI 1315.19 requires the Services to ensure military personnel offices coordinate with medical and educational specialists to verify whether required special medical and educational services are available at:

- locations in the continental United States (CONUS) for Service members enrolled in the EFMP, and
- locations outside the continental United States (OCONUS) for Service members who request accompanied family member travel regardless of EFMP enrollment status.

In addition to verifying the availability of medical and educational services, DoDI 1315.19 requires the Services to establish procedures that:

- identify Service members who have family members with special needs and use this information when considering family member travel;
- update the status of family members with special needs when changes to those conditions occur or as required by Service-specific policies; and
- maintain records on the effectiveness of the assignment process, including records on problematic assignments that occurred because of inadequate procedures or noncompliance with procedures.[7]

Family Support

According to DoDI 1315.19, family support services personnel are required to provide Service members and their families with information and referral to installation and community resources that could help Service members and their families improve their quality of life. Some of those resources are in the educational, social, community, housing, legal, or financial services areas. DoDI 1315.19 also specifies that family support does not involve coordination and followup of medical treatments.

Oversight of the Exceptional Family Member Program

The National Defense Authorization Act (NDAA) for FY 2010 established the Office of Community Support for Military Families with Special Needs (name changed to Office of Special Needs [OSN] in 2017), under the Office of the Under Secretary of Defense for Personnel and Readiness.[8] The OSN's responsibilities include the development and implementation of policy to support military families

[7] The "Exceptional Family Member Program (EFMP) Standardization Implementation Project, Data Repository Data Dictionary," June 22, 2021, defines "problematic assignments" as the number of assignments coordinated that result in either the early return of the dependents, or the reassignment of the Service member and their family.

[8] Public Law 111-84, "National Defense Authorization Act for Fiscal Year 2010," section 563, amended Title 10, United States Code, and added section 1781c.

with special needs and program oversight, which requires collaboration with the Assistant Secretary of Defense for Health Affairs, the Military Services, and other stakeholders. In addition, the OSN is responsible for identifying gaps in services for military families with special needs and reporting annually to the congressional defense committees on the ongoing and planned efforts to address those gaps.

In addition, a 2010 Senate Armed Services Committee report and the FY 2017 NDAA required the Comptroller General of the United States to conduct a review of the availability of services for military dependent children with special needs and an assessment of the EFMP, respectively, and to report their findings to congressional committees.[9] During the assessments, the GAO found the following issues with the EFMP.

- In 2012, the GAO reported that better oversight of special education services was needed to improve services for children with special needs. The GAO made the following recommendations to the Secretary of Defense.
  - Ensure the Services screen children for medical and educational needs before relocation overseas. The DoD concurred with the recommendation. DoD officials stated that DoDI 1315.19, required the Military Services to identify children with special educational needs, and provide the information to Department of Defense Education Activity (DoDEA) reviewers for educational placement recommendations.
  - Direct the OSN to establish benchmarks and performance goals for the identification and enrollment and assignment coordination components of the EFMP. The DoD partially concurred with the recommendation. DoD officials stated that the DoD completed an analysis of the identification and enrollment and assignment coordination components of the EFMP in 2012, with the goal of developing and finalizing benchmarks and performance goals sometime in mid-2013. DoD officials also stated that the Council on Accreditation developed accreditation standards for the family support component that would result in uniform benchmarks and performance goals for the family support component.[10]

[9] Committee on Armed Services, United States Senate, Report 111-201, "National Defense Authorization Act for Fiscal Year 2011," June 4, 2010. Public Law 114-328, "National Defense Authorization Act for Fiscal Year 2017," section 578, "Comptroller General of the United States Assessment And Report On Exceptional Family Member Programs," December 23, 2016.

[10] The Council on Accreditation is an international, independent, not-for-profit, child and family service and behavioral healthcare accrediting organization.

- Provide the OSN the authority to require the Services to comply with EFMP policies and requirements, and to identify and report any noncompliance issues to senior leadership for corrective action. The DoD partially concurred with the recommendation. DoD officials stated that current DoD policy assigned compliance responsibility to senior leadership within the Office of the Secretary of Defense. DoD officials also stated that updated EFMP guidance would require the Assistant Secretary of Defense for Readiness and Force Management to direct the Military Services to take corrective action when the OSN reports instances of noncompliance with EFMP policies and requirements.[11]

- In 2018, the GAO reported that the DoD should improve its oversight of the EFMP. The GAO made the following recommendations to the Secretary of Defense.
  - Direct the OSN to assess the extent to which each Service provides sufficient family support personnel. The DoD concurred with this recommendation. DoD officials stated that they planned to pilot a staffing tool that will help the Services determine the number of family support providers at each installation.[12]
  - Direct the OSN to develop common performance metrics for assignment coordination and family support. The DoD concurred with this recommendation. DoD officials stated that additional performance metrics needed to be developed for assignment coordination and that they were in the process of measuring families' satisfaction with EFMP family support services.
  - Implement a process to evaluate the results of the Services' EFMP monitoring activities. The DoD concurred with this recommendation. DoD officials stated that the OSN was developing a plan for evaluating the Services' monitoring activities.[13]
- In February 2020, GAO officials testified before Congress that the DoD had made limited progress toward addressing the recommendations from the 2018 report.[14]

[11] Report No. GAO-12-680, "Better Oversight Needed to Improve Services for Children with Special Needs," September 2012. The DoD concurred with or partially concurred with all GAO recommendations. According to the GAO's website, these recommendations are closed.

[12] The DoD did not provide a course of action for this recommendation in the official Management Comments published in the report. However, according to the GAO's website, the DoD provided this course of action after report publication.

[13] Report No. GAO-18-348, "DoD Should Improve Its Oversight of the Exceptional Family Member Program," May 2018. The DoD concurred with all GAO recommendations. According to a GAO official, as of March 2023, these recommendations were still open.

[14] Testimony No. GAO-20-400T, "DoD Has Made Limited Progress Toward Improving Oversight of the Exceptional Family Member Program," February 2020.

- In May 2022, the GAO completed an assessment mandated by the NDAA for FY 2021 that required the Comptroller General of the United States to examine and report on a range of military children's education issues and include the improvements made to family support programs in response to the 2018 GAO recommendations.[15] The GAO did not issue new recommendations for the EFMP in this report, and it reported that in August 2021, DoD officials stated that the DoD had taken steps to implement each recommendation from the 2018 GAO report and expects to fully implement the recommendations by September 30, 2022.[16]

See Appendix A for additional details on the results of the assessments completed by the Comptroller General of the United States.

Additional Oversight

Military families throughout the Services have voiced their concerns regarding the EFMP during multiple congressional inquiries. For example, at a February 2020 congressional hearing before the House Armed Services Committee, Military Personnel Subcommittee, a military spouse testified on the suffering of military families and the impact on military readiness and retention caused by continued EFMP shortcomings.[17] In addition, in letters to the DoD Office of Inspector General (DoD OIG) in 2018 and 2020, members of Congress highlighted concerns from military families and requested that the DoD OIG provide insights on the military families' request to review the DoD's compliance with congressionally mandated support for military families with special needs through the EFMP.

Ongoing Improvement Efforts

According to the OSN's annual reports to Congress, the OSN has made efforts to provide oversight of and improve the EFMP. These efforts include the EFMP Data Repository, Family Member Travel Screening (FMTS), and the Family Support Staffing Tool.

EFMP Data Repository

According to the April 2017 and April 2018 OSN Annual Reports to Congress and the EFMP Data Repository Data Dictionary, the OSN created the EFMP Data Repository in an effort to improve the OSN's reporting and oversight capabilities,

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15 Public Law 116-283, "William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021," section 589G.

16 Report No. GAO-22-105015, "DoD Programs and Services for Military-Dependent Students with Disabilities," May 2022. As of March 2023, GAO officials stated that the recommendations from the GAO's 2018 report are still open.

17 House Armed Services Committee, Subcommittee on Military Personnel Hearing: "Exceptional Family Member Program–Are the Military Services Really Taking Care of Family Members?," February 5, 2020.

and to better understand how the EFMP functions across the Services, based on access to performance metrics.[18] The EFMP Data Repository is a centralized database that is intended to give the OSN and the Services the ability to:

- store data on assignment coordination efforts, the number of family members enrolled in the EFMP, and the type of family support services provided;[19]
- extract data stored in the database and respond to requests for information about the EFMP; and
- review the number of family support personnel available at each installation and the types of services provided.

As part of the data repository, the OSN developed a data dictionary to standardize DoD definitions for data terms collected from the Services. The OSN implemented the EFMP Data Repository in 2017, but it continues to expand the number of performance metrics collected and update the definitions of data terms. The OSN published the latest data dictionary in June 2021.

Family Member Travel Screening

OSN officials, in conjunction with the Services, developed five standardized FMTS forms to replace Military Department-specific screening forms. The OSN designed these five standardized forms to guide the screening of special medical, educational, or dental needs during the FMTS process and provide a consistent FMTS process for military families with permanent change of station orders to overseas and remote locations, regardless of EFMP enrollment.[20] The OSN completed the pilot of FMTS forms in 2017, and according to OSN officials, in April 2020, the OSN began collecting baseline data reflecting the Services' current, Service-specific screening processes.[21]

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18 "Annual Report to the Congressional Defense Committees on the Activities of the Office of Special Needs – 2016, as required by Section 1781c(g) of Title 10, U.S. Code," April 2017; "Annual Report to the Congressional Defense Committees on the Activities of the Office of Special Needs – 2017, pursuant to Section 1781c(g) of Title 10, United States Code," April 2018; and "Exceptional Family Member Program (EFMP) Standardization Implementation Project Data Repository Data Dictionary," June 22, 2021.

19 The EFMP Data Repository currently collects Service-level assignment coordination data and installation-level family support data. In June 2022, OSN officials stated that their goal was to expand the EFMP Data Repository to collect installation-level assignment coordination data. OSN officials were not specific on a timeframe to begin collecting installation-level assignment coordination data, but stated that they expected to distribute data collection templates to the Services by the end of FY 2022. In March 2023, OSN officials further stated that they anticipated full implementation of the templates across the DoD by the third quarter FY 2023.

20 Remote locations include areas such as Fort Irwin, California, and Cavalier Space Force Station, North Dakota.

21 The baseline data include information such as assignment location, needs identified, date the screenings were completed, travel recommendation, reason travel not recommended, and appeal details. The Navy performs screenings and reports the data for both Sailors and Marines.

The OSN did not fully implement the FMTS initiative to standardize forms and processes DoD-wide for travel screening because FMTS policy had not yet been published. Specifically, in 2017, the OSN and the Services' medical representatives began developing an FMTS Defense Health Agency (DHA) Procedural Instruction to facilitate DoD-wide implementation of the forms. In May 2022, OSN officials stated that they estimated publication of the FMTS DoDI in the fall of 2022, with DHA Procedural Instruction submission for publication thereafter. The DHA is a sub-organization of the Office of the Assistant Secretary of Defense for Health Affairs, which is the proponent for FMTS policy. In April 2023, a Health Affairs official estimated the FMTS policy would be published later in 2023 or early 2024.

Family Support Staffing Tool

To help determine the number of family support staff providers needed at each installation, the OSN implemented a 2-year pilot for the family support staffing tool. OSN officials stated that they completed the pilot in November 2021. During the 2-year period, pilot participants tracked their daily activities and submitted data to the OSN. According to OSN officials, based on the findings, the OSN recommended establishing a DoD maximum caseload ratio for all Services to use when determining the number of EFMP family support staff at an installation.

What We Reviewed

We reviewed the results of past GAO audits and OSN annual reports to congressional defense committees concerning the EFMP to understand identified issues and the status of any corrective actions. We reviewed applicable Federal laws, as well as DoD and Service-specific policies and procedures to understand the EFMP and identify the standards for program performance.

We interviewed or conducted data calls with officials from the OSN, DHA, DoDEA, Army, Marine Corps, Navy, and Air Force to verify procedures for EFMP assignment coordination, family support, and overseas travel screening; identify available data for review; and discuss concerns and ongoing improvements. In addition, we interviewed 25 EFMP family support and assignment coordination staff members in Japan and Korea to determine if there were issues specifically affecting USINDOPACOM. Those 25 EFMP staff members worked at 12 different installations in Japan and Korea, and one provided EFMP support at multiple installations throughout the USINDOPACOM area of responsibility. We requested data from the EFMP Data Repository, as well as data from each Service concerning EFMP enrollment, assignments coordinated, and number of staff by installation.

Finding

The DoD Has Not Taken Sufficient Action to Improve Oversight of the EFMP

The OSN has not fully implemented previous GAO recommendations to improve oversight of the EFMP through development of performance metrics or goals. Although the OSN has made progress with the implementation of the EFMP Data Repository to collect data from all the Services, the OSN did not improve the EFMP Data Repository to collect comparable, detailed data or performance metrics across the Services, which is necessary to improve EFMP monitoring and better analyze gaps. Specifically, while OSN officials collected some Service-level assignment coordination data, OSN officials did not ensure the Services compiled and reported data using a standardized DoD-wide approach, limiting data comparison among the Services. In addition, the OSN did not expand the EFMP Data Repository to collect more detailed, installation-level assignment coordination data, such as data reflecting gaps in medical services that could lead to non-recommendations for assignments. Furthermore, we found that the OSN did not establish assignment coordination numerical goals (targets) for the current or planned performance metrics to monitor program effectiveness.[22]

The OSN did not collect the data or metrics needed to improve oversight of the EFMP because OSN officials did not provide policy and implementing guidance to standardize Services' processes across the DoD or provide detailed data requirements. Specifically, the OSN only provided general policy and guidance, which allowed the Services to continue operating their own individual programs with Service-specific processes and methodology for reporting data. In addition, the OSN did not update the guidance for the Services to report installation-level assignment coordination data. Furthermore, the EFMP's complexity, including data limitations from lack of information technology systems and the involvement of multiple EFMP components (identification and enrollment, assignment coordination, family support) requiring coordination with numerous stakeholders, slowed the OSN's progress in improving oversight of the EFMP.

[22] The results of our analysis are based on the OSN's actions as of March 2023.

Until the OSN standardizes the Services' EFMP processes, the OSN will not be able to assess the effectiveness of the program throughout the DoD, fully identify gaps in medical and educational services, or implement associated improvement efforts at specific installations. If the OSN cannot assess the effectiveness of assignment coordination, military families could be relocated to installations without necessary medical services, which may reduce military readiness due to increased stress on Service members struggling to find special needs care and considering family separation to relocate families for care. Also, readiness impacts could result from vacant positions if Service members relocate with their families to obtain special needs care. In addition, DoDEA schools could face delays in providing required educational services.

The OSN Did Not Fully Develop Performance Metrics or Goals for the EFMP

The GAO recommended that the OSN establish uniform benchmarks and goals in 2012 and performance metrics in 2018. Upon the OSN's establishment in 2010, the OSN identified that there was no initial baseline data across the Services and three EFMP components (identification and enrollment, assignment coordination, and family support) from which to monitor trends and changes in performance.

From 2011 to 2013, OSN officials analyzed the existing databases and information technology systems used by the Services and identified there was no single information technology system that linked information from the three EFMP components and among all Services. From 2013 to 2016, the OSN developed and piloted a data repository and in 2017, it implemented the EFMP Data Repository to collect, report, and review standardized EFMP data across the Services, including performance metrics. In the April 2017 OSN Annual Report to Congress, OSN officials stated that the consistent and standardized collection and submission of EFMP data across all Services would enable the OSN to better analyze EFMP trends and identify gaps in services.[23]

Overall, we determined that as of March 2023, the OSN has not fully implemented corrective actions for the past GAO recommendations. According to the 2012 GAO report, the OSN anticipated it would finalize assignment coordination benchmarks and goals in mid-2013. However, in 2018 the GAO reported that the OSN had

[23] "Annual Report to the Congressional Defense Committees on the Activities of the Office of Special Needs – 2016, as required by Section 1781c(g) of Title 10, U.S. Code," April 2017.

not yet developed metrics for assignment coordination and recommended that the OSN develop the needed performance metrics. The OSN agreed to develop additional performance metrics. We reviewed the metrics the OSN collected for assignment coordination and determined that OSN officials made progress in their efforts to collect data across the Services with the implementation of the EFMP Data Repository. However, we found that OSN officials have not improved or expanded the EFMP Data Repository to collect comparable, detailed data or additional performance metrics across the Services. For example, while the OSN collected some Service-level assignment coordination information, the OSN did not ensure that the Services compiled and reported data using a standardized methodology, which limited data comparison among the Services and the ability to improve oversight of the EFMP. In addition, the OSN did not collect installation-level assignment coordination information, such as data reflecting gaps in medical services that lead to non-recommendations for assignments to installations, or cycle time to monitor timeliness of the coordination processes.

The OSN did not ensure that the Services compiled and reported data using a standardized methodology.

Further, we found that the OSN did not establish assignment coordination numerical goals (targets) for the current or planned performance metrics to monitor program effectiveness.[24] In May 2022, we followed up with the OSN on the status of the implementation of the performance metrics and associated goals. OSN officials stated that they estimated full implementation of data collection in November 2023, with partial collection of the new metrics beginning in November 2022. Further, OSN officials stated the implementation process includes setting firm targets (goals) for the metrics after collecting baseline data. In March 2023, OSN officials stated that the new metrics requirements were included in the revised DoDI 1315.19, which the OSN estimated to be published in the spring of 2023. OSN officials also stated that they anticipated full implementation of the performance metrics by November 2023.

Non-Standardized EFMP Data Repository Service-Level Assignment Coordination Data Limited Comparison Across the Services

The Services compiled and reported Service-level assignment coordination data for the EFMP Data Repository using Service-specific methods instead of a standardized DoD-wide approach. This non-standardized process limited

[24] In Report No. GAO-18-348, the GAO described the attributes of effective performance metrics, including that a metric should be clearly stated, with the definition consistent with the methodology used to calculate it; have a numerical goal or measurable target; and have baseline and trend data to monitor changes in performance.

data comparison across the Services and usefulness of metrics for oversight of the EFMP. We requested information from the Services on the methodology used to compile data for submission to the EFMP Data Repository. We found multiple inconsistencies in the way the Services reported this data to the OSN for some data terms. Table 1 identifies the data terms and definitions reviewed.

Table 1. EFMP Data Repository Assignment Coordination Data Terms and Definitions

Data Term	Data Dictionary Definition
Coordinated CONUS Assignments	The number of final permanent change of station assignments to CONUS locations coordinated for Service members enrolled in the EFMP
Coordinated OCONUS Assignments	The number of final permanent change of station assignments to OCONUS locations coordinated for Service members enrolled in the EFMP
Non-Recommended Accompanied	The number of permanent change of station CONUS or OCONUS assignments that are not recommended for Service members enrolled in the EFMP because of the unavailability of medical or educational services
Problematic Assignments*	The number of coordinated CONUS or OCONUS assignments that result in the early return of dependents or reassignment of Service members and their families because of the unavailability of medical services

* Problematic assignments is an overarching data term tracked by multiple sub-category data terms, such as "failure to disclose," "screening failure," and "other reasons."

Source: "Exceptional Family Member Program (EFMP) Standardization Implementation Project, Data Repository Data Dictionary," June 22, 2021.

These inconsistencies were a result of Service-specific assignment coordination processes. Despite the lack of standardized reporting and comparability which limited the usefulness of data for oversight, in the May 2021 OSN Annual Report to Congress, the OSN reported that 89 percent of the data terms in the EFMP Data Repository were "collectible" across the Services.[25] When we asked for clarification, OSN officials stated that "collectible" only meant that all Services reported a number for the data term at that time. However, the data terms in Table 1 identified as "collectible" by the OSN did not mean that the data was comparable across the Services or that it could be used for oversight purposes.

Coordinated Assignments

We found that the Services reported coordinated assignments data inconsistently, which limits comparison among the Services. Specifically, for the "coordinated CONUS assignments" data term, while the Navy and Air Force reported the number of Service members for whom they coordinated assignments,

[25] "Annual Report to the Congressional Defense Committees on the Activities of the Office of Special Needs – 2020 Pursuant to 10 U.S.C., § 1781 c(h)," May 2021.

the Army and Marine Corps reported the number of coordinations they did for each Service member. For example, if Army and Marine Corps officials coordinated five possible assignments for one Service member before determining the final assignment, they reported five instances, while the Navy and Air Force would have reported one.[26] Therefore, the method of the Army and Marine Corps would result in data with a higher number of coordination instances than the other Services.

There were also inconsistencies in how the Services reported the "coordinated OCONUS assignments" data term. Specifically, each Service compiled the data for this number differently. Table 2 explains the reporting elements each Service used to compile the OCONUS assignments data.

Table 2. Coordinated OCONUS Assignments Reporting Elements by Service

Reporting Elements (The data included)	Army	Navy	Marine Corps	Air Force
Service Members Enrolled in the EFMP Before Travel Screening	✓	✓	✓	✓
Service Members Enrolled in the EFMP After (as a Result of) Travel Screening*	✓			✓

* Marine Corps officials stated that the data may include Service members enrolled in the EFMP as a result of the travel screening process the Navy performed, depending on how far along the Service member is in the process and whether Marine Corps officials also conduct a screening.

Source: DoD OIG analysis of Services' responses about the information the Services submit to the EFMP Data Repository.

Service-specific processes created other differences. For example, the Army and the Air Force reported the number of Service members who completed an overseas travel screening for family members while the Navy reported the number of Service members who received OCONUS orders regardless of whether they chose to proceed with a travel screening for family members.[27] Furthermore, the Marine Corps reported the number of Service members who received a limited screening, before receiving orders, regardless of whether Marine Corps officials referred the Service member to the Navy Bureau of Medicine and Surgery (BUMED) for a more detailed travel screening. According to Navy and Marine Corps officials, they did not have visibility over the Navy BUMED travel screening

[26] Due to Service-specific processes, the Army conducts multiple assignment coordinations concurrently, while the Marine Corps conducts coordinations consecutively and would only report multiple coordinations for one Service member if an assignment is non-recommended and orders are modified, prompting another coordination.

[27] The Services complete overseas travel screenings for Service members who request an accompanied assignment to identify family members' special needs and coordinate the availability of necessary medical and educational services at the assignment location. The Army uses the term "deployment screening" when referring to this process, and the Air Force uses the term "family member relocation clearance." The Navy refers to this screening as the "overseas suitability screening" which it performs for both Sailors and Marines. However, because of the upcoming implementation of the FMTS, all Services will be transitioning to the term "family member travel screening" when referring to this process.

process and did not report data from this screening.[28] Therefore, the numbers that Navy and Marine Corps officials reported for this data term did not include all the overseas travel screenings that the Navy BUMED performed, which limited the accuracy of the data when compared to the Army and Air Force.

Non-Recommended Accompanied

We found that one Service did not report "non-recommended accompanied" data, while the other three Services used different data elements to compile the overall number reported for this data term. Table 3 explains the reporting elements each Service used to compile the "non-recommended accompanied" data term.

Table 3. Non-Recommended Accompanied Reporting Element by Service

Reporting Elements (The data included)	Army	Navy[1]	Marine Corps	Air Force
Service Members Not Recommended for CONUS Assignments	✓		✓	✓
Service Members Not Recommended for OCONUS Assignments	✓		✓	✓
Only Service Members Enrolled in the EFMP[2]			✓	✓

[1] As of June 2022, Navy officials stated that they did not track and report this data term.

[2] Army officials stated that the data included travel concerns which may not be eligible for EFMP enrollment, such as pregnancy.

Source: DoD OIG analysis of Services' responses about information the Services submit to the EFMP Data Repository.

Navy personnel stated that they did not have the capability to track this information in any system and did not report the data term.[29] In addition, Marine Corps officials stated that they only reported non-recommendations that resulted from the coordination they performed and did not have visibility over the subsequent travel screening the Navy BUMED performs. Therefore, the Marine Corps number does not include Marines screened by the Navy BUMED for an OCONUS assignment that were non-recommended for an accompanied assignment.

[28] The Navy BUMED performs the overseas suitability screening (travel screening) for all Navy and Marine Corps Service members to overseas assignments, regardless of EFMP status. This office is separate from the Navy and Marine Corps EFMP offices.

[29] Navy personnel in this instance refers to the Navy Personnel Command.

Problematic Assignments

We found that the Services inconsistently reported data for problematic assignments. The EFMP Data Repository Data Dictionary included reporting requirements for problematic assignments data within sub-categories used to identify the cause of early relocations. Table 4 identifies the sub-categories and definitions we reviewed.

Table 4. Sub-Categories for Problematic Assignments and Associated Definitions

Sub-Category*	Definition
Failure to Disclose	The number of problematic assignments from the family not disclosing a condition or providing inaccurate information during the assignment coordination process
Screening Failure	The number of problematic assignments from special needs not identified during the assignment coordination process and family cleared for travel (no fault of the family)
Other Reasons	The number of problematic assignments for any additional reasons

* During the audit, the OSN updated requirements to report two separate data terms (CONUS and OCONUS) for each sub-category and established five new sub-categories, including "loss of service at installation after arrival." The updated requirements and sub-categories are not included in this table.

Source: "Exceptional Family Member Program (EFMP) Standardization Implementation Project, Data Repository Data Dictionary," June 22, 2021.

While the Army captured and reported data in all three sub-categories, the Air Force and the Navy only reported data under the "other reasons" category. Air Force officials stated that they implemented manual procedures in February 2021 to capture the "failure to disclose" and "screening failure" data. The Navy did not develop any procedures, and Navy officials stated that the number reported included all problematic assignments because it did not have system capabilities to identify whether the problematic assignment occurred due to "failure to disclose" or "screening failure." Further, the Marine Corps only reported problematic assignments data related to the limited Marine Corps screening instead of the subsequent overseas travel screening that the Navy BUMED performed for Marines.

In addition, we found inconsistencies in the following reporting elements that each Service used to report the data.

- Early return of dependents – the relocation of family members without the Service member to a location that provides the needed services
- Reassignment – the reassignment and relocation of the Service member and their family to a location that provides the needed services
- Only medical relocations – relocations due to the unavailability of medical services or other medical considerations (does not include non-medical reasons such as financial or legal issues)

Table 5 shows the problematic assignments reporting elements used by each Service to compile the data.

Table 5. Problematic Assignments (Medical) Reporting Elements by Service

Reporting Elements (The data included)	Army*	Navy	Marine Corps	Air Force
Early Return of Dependents*		✓		
Reassignment of Service Members*		✓	✓	✓
Only Medical Relocations	✓			✓

* Army officials stated that they reported problematic assignments when medical office personnel at gaining installations notified them.

Source: DoD OIG analysis of Services' responses about information the Services submit to the EFMP Data Repository.

EFMP Data Repository Installation-Level Assignment Coordination Data Were Not Collected, Limiting Extent of Oversight

While the OSN has expanded the EFMP Data Repository to collect family support installation-level data, it has not begun collecting assignment coordination data at the installation-level, thus, limiting OSN officials' oversight capabilities. Specifically, the Services report family support data terms, such as the number of authorized staff, information and referrals, and family needs assessments completed by each specific military installation. However, the Services only reported Service-wide totals for assignment coordination data terms without identifying the installations for which the Services conducted travel screening and the installations for which the outcome of the travel screening was either a non-recommendation or problematic assignment. For example, for a Service member enrolled in the EFMP and undergoing assignment coordination from Schofield Barracks, Hawaii, to Camp Zama, Japan, Army officials will report the result of the Service member screening within an Army-wide number for "coordinated OCONUS assignments" rather than a Schofield Barracks (losing installation) or Camp Zama (gaining installation) installation-level number for the data term.

Without the installation-level data, the OSN could not monitor assignment coordination trends or identify issues, including gaps in medical services at specific installations or areas of responsibility. For example, OSN officials did not collect data on the reasons for non-recommendations or problematic assignments, such as unavailable medical capabilities at specific installations, which made it difficult to identify where families may need additional services or which installations may have shortcomings that the DoD could address. In addition, OSN officials did not collect cycle time data to monitor the timeliness of assignment coordination,

which prevented the OSN from assessing whether delays occurred and where in the process the delays occurred.[30] Further, OSN officials did not collect data to determine whether there were vacant positions at installations because of EFMP decisions or how long the positions remained vacant.

General Policy and Guidance Allowed for Service-Specific Processes to Continue, and Program Complexity Slowed Improvements

The OSN did not collect the data or performance metrics needed to improve oversight of the EFMP because OSN officials did not provide policy and implementing guidance to standardize Services' processes across the DoD. In addition, OSN officials did not update implementing guidance to require the Services to report additional detailed data, such as data at the installation-level, for the EFMP Data Repository. Furthermore, the EFMP's complexity, including data limitations from lack of information technology systems and the involvement of multiple EFMP components (identification and enrollment, assignment coordination, and family support) requiring coordination with numerous DoD stakeholders, slowed the OSN's progress in improving oversight of the EFMP.

The EFMP's complexity slowed the OSN's progress in improving oversight of the EFMP.

General Policy and Guidance Did Not Standardize Service Processes

The Army first established the EFMP in 1979, and in subsequent years the other Services established their own programs with Service-specific processes and terminology. Since its establishment in 2010, the OSN has been working to improve oversight of the EFMP across the DoD, but it has only provided general policy and guidance that allows the Services to continue operating their own individual programs with Service-specific processes. For example, the Services implemented their own assignment coordination processes for screening military families and verifying medical and educational services availability before assignment relocation.

The Army and Marine Corps had a two-part assignment coordination process for Service members enrolled in the EFMP and relocating overseas. During the first part of the assignment coordination process, Army and Marine Corps

[30] Cycle time data to monitor timeliness could include the number of days for losing and gaining installations to complete coordination, medical personnel to make travel recommendations, and orders issuance.

officials conducted a screening of the family member's special needs using the information identified on the Service member's EFMP enrollment forms. During the second part of the process, Army officials and Navy officials (who performed screenings for Marines) reviewed the current medical records of the family members and interviewed the family members. This second part of the assignment coordination process was required for all Army and Marine Corps Service members relocating overseas, regardless of EFMP enrollment status.[31] The Air Force and Navy conducted one screening for all Service members who were relocating overseas regardless of EFMP enrollment status, which included the review of current medical records and interviews with family members.[32]

DoD Instruction 1315.19

According to the first OSN Annual Report to Congress, required by the FY 2010 NDAA, OSN officials identified that there was insufficient DoD policy and implementation guidance to meet the EFMP requirements in the FY 2010 NDAA.[33] These requirements included providing family support services and expanding assignment coordination from only OCONUS locations to also include CONUS locations. Therefore, the OSN, in coordination with Joint Services EFMP work group representatives, expanded the scope of DoDI 1315.19 to include the requirements from the FY 2010 NDAA, and on April 19, 2017, reissued the instruction and renamed it, "The Exceptional Family Member Program."[34]

The revised policy provided only general guidance for all EFMP components and did not standardize the Services' programs or provide detailed implementation guidance, which allowed Service-specific processes to continue and complicate the OSN's efforts to collect comparable data. Specifically, DoDI 1315.19 requires military personnel offices to coordinate assignments, but does not explain how to accomplish coordination. Consequently, the Services did not interpret the assignment coordination section of the policy the same way and tailored their Service-specific processes based on their interpretation. For example, during an EFMP work group meeting on standardization in March 2021, there

[31] The Navy BUMED performs the second part of the Marine Corps process known as the overseas suitability screening (travel screening).

[32] Because of the difficulty in obtaining assignment coordination and family member travel screening data, we did not review the efficiency of the one-part versus two-part process. In some instances, the travel screening data we requested was not in an information technology system and would have required the Service's EFMP staff to look through hundreds of scanned hard copy files to identify relevant information. In other instances, the Services stored the documentation we requested at each specific installation, or did not have an index file that could easily identify the files we needed to do this analysis.

[33] "Report to Congress, Support for Military Families with Special Needs," 2010.

[34] In 2009, the Joint Services EFMP work group was established to raise awareness of EFMP services, develop additional services, encourage EFMP enrollment, and ensure Service representation when developing policy. This particular work group is not ongoing, and OSN officials stated that due to changes in staffing and lapse of time the date of dissolution was unknown. The title of the prior guidance was "Authorizing Special Needs Family Members Travel Overseas at Government Expense."

was disagreement over when in the assignment coordination process to consider EFMP enrollment.[35] While representatives from three Services agreed to review for EFMP enrollment at the beginning of the assignment coordination process, a representative from one Service stated that its interpretation of Section 4.1(b) drove its decision not to consider EFMP enrollment at the beginning. DoDI 1315.19 Section 4.1(b) states:

> Active duty Service members may not be denied consideration for an essential (as defined by the military personnel assignment system) duty assignment overseas solely because of the special needs of a family member. They will receive the same consideration for travel at government expense to any duty location as families without such members.

OSN officials stated that they addressed this issue with the EFMP work group by developing a process map with the steps for CONUS assignment coordination, which would be included in a revision to DoDI 1315.19.[36] We reviewed the new process map that indicated the first step in the process is that the Service member is identified for a potential assignment and then EFMP enrollment status is checked. Therefore, the Under Secretary of Defense for Personnel and Readiness (USD[P&R]) should ensure the OSN completes standardization of assignment coordination processes across the DoD and revisions to DoDI 1315.19, providing the Services with a consistent, DoD-wide approach and eliminating Service-unique processes.

EFMP Data Repository Data Dictionary

In addition to DoDI 1315.19, the OSN developed the EFMP Data Repository Data Dictionary to provide standard DoD definitions for the data terms and guide the Services in compiling data and metrics to report. We initially reviewed the EFMP Data Repository Data Dictionary, updated in November 2020, and determined that the OSN did not provide clear guidance to the Services for reporting data. While the EFMP Data Repository Data Dictionary provided general definitions for data terms, it did not provide a standardized methodology or cross-walk to Service-specific terminology

[35] In 2020, the OSN established the EFMP work group to develop transparent, standard EFMP procedures to improve the support and services provided to military families with special needs. The EFMP work group is comprised of representatives from all Military Departments, the DoDEA, the Office of the Assistant Secretary of Defense for Health Affairs, the Office of the Deputy Assistant Secretary of Defense for Military Personnel Policy, and the Defense Health Agency.

[36] In August 2022, OSN officials stated that an OCONUS assignment coordination process map had been developed but was pre-decisional, and the OSN anticipated it would be included in a DHA Procedural Instruction after publication of the FMTS DoDI policy.

to aid the Services in data reporting. OSN officials stated that Service-specific processes made it difficult to define the data terms in the EFMP Data Repository Data Dictionary.

We also reviewed the updated EFMP Data Repository Data Dictionary, dated June 2021 and published during the audit. It provided clearer definitions for some previously collected data terms and established new data terms for collection.

OSN officials stated that they began collecting this new data at the end of FY 2021, but not all Services were able to report all the data because of Service-specific processes or information technology systems limitations. In June 2022, Air Force officials stated that they were reporting information for all the problematic assignments data. Army officials stated that the Army was unable to report problematic assignments data for CONUS assignments because it had not developed a tracking method. Navy officials stated that the Navy was only able to report problematic assignments as one total number because it did not have system capabilities to differentiate among the data terms. Marine Corps officials stated that they were reporting all problematic assignments data related to the screening that the Marine Corps EFMP conducted, which did not include data related to the subsequent screening that the Navy performed.

Further, we found that the EFMP Data Repository Data Dictionary, dated June 2021, still did not include definitions with a standardized methodology for each data term to guide the Services in reporting comparable information. In July 2022, when we asked the OSN how it was planning to standardize the Services' data reported in the EFMP Data Repository, OSN officials stated that they were coordinating with the Services to develop standardized calculation requirements for reporting data, but the OSN did not provide a timeline for completion. Therefore, the USD(P&R) should ensure the OSN updates the EFMP Data Repository Data Dictionary with definitions that include a standardized methodology for each data term to guide the Services in reporting comparable assignment coordination information.

Guidance Not Updated with Additional Requirements

The OSN did not update the EFMP Data Repository Data Dictionary with additional, detailed data requirements to allow the Services to report installation-level assignment coordination data and metrics. Since the implementation of the EFMP Data Repository in 2017, OSN officials stated in reports to Congress that the OSN would continue to enhance the EFMP Data Repository and collect additional data and performance metrics. In 2020, the OSN expanded the collection of family support data to collect installation-level data, and we found the EFMP Data

Repository Data Dictionary included these requirements. However, 6 years after implementing the EFMP Data Repository, the OSN collected assignment coordination data only at the Service level and did not expand collection efforts to the installation level.

However, 6 years after implementing the EFMP Data Repository, the OSN collected assignment coordination data only at the Service level and did not expand collection efforts to the installation level.

In June 2022, OSN officials stated that they were coordinating with the Services to establish a list of installations and that once they compile that list, the OSN plans to enhance the EFMP Data Repository for installation-level assignment coordination data. OSN officials did not specify a timeline for completing this task and stated that they expected to distribute data collection templates to the Services by the end of FY 2022. OSN officials would then coordinate with each Service to determine their capabilities and a timeline for the Services' reporting of the more detailed level of data indicated on the templates. In March 2023, OSN officials further stated that they anticipated full implementation of the templates across the DoD by the third quarter of FY 2023. Therefore, the USD(P&R) should ensure the OSN updates the EFMP Data Repository Data Dictionary with additional data terms and definitions to guide the Services in reporting installation-level assignment coordination data to identify areas for improvement at specific installations.

In addition, OSN officials stated that after publication and full implementation of the new family member travel screening (FMTS) policy, the Services would be required to report data and metrics on overseas travel screenings, such as reasons for non-recommendation and cycle times, by installation. However, after reviewing the new FMTS data collection spreadsheets for inputs to the EFMP Data Repository, we determined that while the FMTS data collection spreadsheets were detailed and had a comprehensive list of information for the Services to provide, that information did not include identification of Service members enrolled in the EFMP. This data gap limited the ability to analyze travel screening process improvement actions in relation to the EFMP. In July 2022, when asked whether the OSN had plans to identify Service members' EFMP status as part of the FMTS process, OSN officials stated that at that time the FMTS data collection spreadsheets would not include an EFMP enrollment status data point. They further stated that they would consider adding EFMP enrollment information after the FMTS process was implemented. However, as of April 2023, the new FMTS policy had not been issued and a Health Affairs official estimated it would be published later in 2023 or

early 2024.[37] Therefore, the USD(P&R) should ensure that the Assistant Secretary of Defense for Health Affairs issues the FMTS policy to standardize overseas travel screening processes and address EFMP concerns. In addition, the USD(P&R) should ensure the OSN coordinates with the Assistant Secretary of Defense for Health Affairs to add an EFMP identifier to the FMTS data collection spreadsheets to better analyze travel screenings for EFMP enrolled Service members.

Data Limitations and Multiple DoD Stakeholders Created Complexities

In addition to having Service-specific processes, the Services also relied on their own information technology systems or manual records to process data on assignment coordination and overseas travel screenings. These data limitations affected the Services' ability to track and compile data for the EFMP Data Repository.

During our review, the Air Force used Q-Base, an information technology system, to collect assignment coordination and travel screening data. The Air Force implemented a new automated process for travel screening within the MyVector system.[38] However, the Army and Navy did not have information technology systems to collect and record assignment coordination and travel screening data and relied on data collection spreadsheets that personnel at medical health clinics filled out manually, which allowed for human error and data reliability issues.[39] For example, Navy personnel identified that their manual process to collect overseas travel screening data involves collecting spreadsheets from MTFs and compiling the data for quarterly submissions to the OSN. This data collection process includes manual entries for data points, such as diagnosis, screening dates, travel recommendations, and appeals.

Army Office of the Surgeon General officials identified similar manual procedures to compile data for the OSN. Army officials stated that in August 2022, the Army launched a new information technology system, Enterprise EFMP, with a goal for the system to track all data for the EFMP Data Repository by June or July 2023. The Navy stated that it did not have an information technology system for overseas suitability screenings, and its assignments information technology systems (used for writing orders) were in a "minimum sustainment profile" and only funded for

[37] As explained in the Background section of this report, the Office of the Assistant Secretary of Defense for Health Affairs is the proponent of the new FMTS policy, which will standardize overseas travel screening processes DoD-wide for all family members regardless of EFMP enrollment.

[38] MyVector is an Air Force information technology system for career development and mentoring, which as of August 2021 included automated processes for FMTS and EFMP enrollment.

[39] The Navy BUMED performs overseas suitability screenings (travel screenings) and reports FMTS data for both Sailors and Marines.

maintenance, rather than for the development of new capabilities. Navy BUMED officials stated that the Navy was in the planning stages for an information technology system for overseas suitability screenings.

As explained earlier, the Navy BUMED performs these travel screenings and makes final travel recommendations for both Sailors and Marines. This Navy BUMED screening is the second part of the assignment coordination process for Marines enrolled in the EFMP who are relocating overseas. For the first part of the assignment coordination process, Marine Corps officials use two information technology systems, WebMASS for orders review and recommendation and the EFMP Case Management System. However, these systems did not track data on the subsequent Navy BUMED overseas suitability screening performed on Marines.

In the April 2015 OSN Annual Report to Congress, OSN officials stated that the OSN had initiated design of an EFMP information technology system for use across all Services for EFMP processes, including process automation where possible.[40] In the April 2017 OSN Annual Report to Congress, the OSN stated that it had developed an initial design for a "technology roadmap" to plan for synchronizing EFMP information technology systems among the Services. This roadmap would allow current information technology systems to communicate with each other, and for the development of standardized new information technology systems for the future.[41] However, as of August 2022, 5 years after reporting this information to Congress, when we asked the OSN about the status of this initiative, OSN officials stated that it was not completed according to their records, and they had no information on the effort. Further, OSN officials stated that they were only in the initial stages of exploring the development of a single information technology solution for EFMP case management, data collection, and reporting with no estimated date for implementation.

In November 2022, the Acting Assistant Secretary of Defense for Manpower and Reserve Affairs formally announced the development and implementation of a standard information technology solution for the EFMP in a memorandum to DoD stakeholders. The memorandum explained the OSN would establish a work group with subject matter experts across the DoD, including the Military Departments, to guide the development and implementation. Since this has already been a multi-year effort and the OSN had no information on the previous "technology roadmap" efforts, the USD(P&R) should direct the OSN to coordinate

[40] "Annual Report to the Congressional Defense Committees on Support for Military Families with Special Needs, pursuant to Section 1781c(h) of Title 10, U.S. Code," April 2015.

[41] "Annual Report to the Congressional Defense Committees on the Activities of the Office of Special Needs – 2016, as required by Section 1781c(g) of Title 10, U.S. Code," April 2017.

with the EFMP information technology work group to develop and implement a single DoD information technology system to maintain readily available, reliable data for oversight of the EFMP.

Despite the implementation of the EFMP Data Repository, the lack of Service information technology systems or a DoD standard system to automate the Services' data collection creates challenges for the OSN to obtain uniform and reliable data to analyze EFMP trends and identify gaps in services. In addition, the reliance on manual processes, such as manual data entry to spreadsheets, increases the risk of human error and data reliability problems. When we asked the OSN to explain the data reliability and validation tests it performs on the data collected for the EFMP Data Repository, OSN officials stated that they compare current quarter data to the previous quarter and to the same quarter of the previous year. However, OSN officials did not have procedures to test manually entered data, such as tracing to source documents. Therefore, given the increased risk of human error produced by entering data manually and Service-specific data reporting issues we identified, the USD(P&R) should direct the OSN to perform more in-depth data reliability tests of the data entered into the EFMP Data Repository.

The lack of Service information technology systems or a DoD standard system to automate the Services' data collection creates challenges for the OSN to obtain uniform and reliable data to analyze EFMP trends and identify gaps in services.

Furthermore, the EFMP involves multiple components (identification and enrollment, assignment coordination, and family support), requiring OSN coordination with numerous stakeholders. OSN officials stated that they relied on inputs from various DoD stakeholders to develop standardized solutions and EFMP improvements. We found the complexity of the EFMP and its coordination requirements contributed to slowing the timeline for EFMP improvements. For example, OSN officials stated that medical benefits policy was not under their authority and required a partnership with the Office of the Assistant Secretary of Defense for Health Affairs/TRICARE Management Activity to address concerns, such as family member eligibility for certain medical services, speech therapy, physical therapy, and respite care services.[42] In addition, OSN officials stated reliance on collaboration with the DHA to establish performance metrics, and that finalized metrics were dependent on the DHA issuing FMTS policy.

We found the complexity of the EFMP and its coordination requirements contributed to slowing the timeline for EFMP improvements.

[42] Office of the Assistant Secretary of Defense for Health Affairs/TRICARE Management Activity is responsible for overall health and benefit policy through the direct care (MTF) and purchased care (TRICARE) systems.

However, we found that the DHA was not familiar with this responsibility. DHA officials stated that FMTS was a Service program, not owned by the DHA, and that the FMTS policy had not yet been published with the DHA's assigned roles. In the June 2022 OSN Annual Report to Congress, the OSN identified the lack of strategic coordination and planning among the various DoD offices responsible for supporting military families with special needs as a gap in the EFMP.[43]

In addition, we found that the OSN struggled to coordinate with the Services to obtain resolution of identified data standardization discrepancies. For example, the OSN identified that the Army FY 2020 number reported for the "coordinated CONUS assignments" data term was inflated and could not be compared to the numbers provided by the other Services for the same data term. Further, in the EFMP Data Repository Data Dictionary, updated in November 2020, the OSN included a "note for Army" that this data term referred to the final assignment determination, not the total effort to coordinate. However, in June 2022 when we asked Army officials about the data term, they disagreed with OSN on whether the Army data were inflated. Army officials stated that they were not planning to change their reporting process for this data term. In July 2022, OSN officials stated that they were still working with Army stakeholders to resolve the issue and obtain comparable, standardized data to meet the OSN's intent, which is to determine the percentage of finalized assignments coordinated that result in problematic assignments.

DoDI 1315.19 requires the Assistant Secretary of Defense for Manpower and Reserve Affairs to resolve disputes among the DoD Components regarding the implementation of EFMP procedures, including the collaboration between OSN and other DoD Components to standardize EFMP.[44]

Since its inception 13 years ago, the OSN has been unable to standardize and improve oversight of the EFMP. We found that coordination and reliance on distinct DoD stakeholders for multiple EFMP components slowed the OSN's progress. Therefore, to ensure that the OSN implements relevant and timely changes to the EFMP, the USD(P&R) should direct the OSN to establish a process to track disputes with DoD stakeholders and elevate outstanding disputes to the Assistant Secretary of Defense for Manpower and Reserve Affairs in a timely manner for dispute resolution in accordance with DoDI 1315.19.

Since its inception 13 years ago, the OSN has been unable to standardize and improve oversight of the EFMP.

[43] "Annual Report to the Congressional Defense Committees on the Activities of the Office of Special Needs for Fiscal Year 2021," June 2022. The OSN annual report to Congress identifies the Office of the Deputy Assistant Secretary of Defense for Housing, Defense Health Agency, Office of the Assistant Secretary of Defense for Health Affairs, and the Military Departments as the other DoD offices with which OSN coordinates.

[44] DoDI 1315.19, "The Exceptional Family Member Program (EFMP)," April 19, 2017, Section 2.2.b.

Without EFMP Standardization and Improved Oversight, the OSN Cannot Assess EFMP Effectiveness

As a result of not completing EFMP standardization efforts, including collecting comparable data and metrics across the Services, the OSN is not able to improve monitoring of the program, better analyze EFMP trends and gaps in medical and educational services, and implement associated improvement efforts at specific military installations for military families. Specifically, if the OSN cannot assess the effectiveness of assignment coordination, military families with special needs could be relocated to installations without necessary medical services. This lack of oversight, in turn, could reduce military readiness as Service members and families experience increased stress. Specifically, Service members struggling to find special needs care and considering family separation, when having to relocate family members to a location with necessary services, may significantly add stress which could affect Service members' work performance. Also, military readiness could be impacted when the Service members relocate with their families to a different installation that can provide the special needs care, leaving their positions unexpectedly vacant. In addition, DoDEA schools may not be readily able to support special needs and could face delays in providing required educational services for special needs families relocated without prior effective assignment coordination.

If the OSN cannot assess the effectiveness of assignment coordination, military families with special needs could be relocated to installations without necessary medical services.

Standardizing the EFMP across the Services could provide consistency and help ease the stress of having to find adequate care for family members with special needs during multiple assignment relocations throughout Service members' careers. Ultimately, realizing efficiencies in the EFMP through standardization could help improve the quality of life for military families with special needs by ensuring they receive the support they need as required by Federal law.

Management Actions Taken During the Audit

The FY 2021 NDAA was enacted on January 1, 2021. Section 582 contained multiple provisions for improvements to the EFMP.[45] For example, the FY 2021 NDAA requires the Secretary of Defense to standardize the EFMP across the Military Departments, to the extent practicable by June 30, 2021. In addition, the FY 2021 NDAA requires the DoD to develop standardized performance metrics for measuring, across the DoD and with respect to each Military Department, assignment coordination and support for military families with special

[45] Public Law 116-283, "National Defense Authorization Act for Fiscal Year 2021," section 582, amends Title 10, United States Code, section 1781c.

needs, the reassignment of military families with special needs, and the level of satisfaction of military families with special needs regarding provided family and medical support.[46]

The FY 2021 NDAA also required the Secretary of Defense to submit a report on implementation of the provisions by June 30, 2021. In November 2021, the Under Secretary of Defense for Personnel and Readiness sent a report to Congress regarding the actions taken to improve the EFMP as required by the FY 2021 NDAA.[47] The report detailed the following actions, related to our findings.

- The OSN established an EFMP work group for standardization efforts, comprised of representatives from the Office of the Assistant Secretary of Defense for Health Affairs, Office of the Deputy Assistant Secretary of Defense for Military Personnel Policy, DHA, DoDEA, and Military Services.
- The work group developed a standard process for assignment coordination from CONUS to CONUS locations, including a second review process for assignment recommendation.
- The work group developed metrics for measuring performance of the EFMP, including assignment coordination cycle time, number of second reviews, number of reassignments with the reason and losing installation, and level of satisfaction with EFMP services.
- The OSN will incorporate the standard processes and procedures in a revision of DoDI 1315.19 with implementation guidance, including the responsibilities of all stakeholders.

Management Comments on the Report and Our Response

The Under Secretary of Defense for Personnel and Readiness provided the following comments on the report. For the full text of all comments received, see the Management Comments section of the report.

Under Secretary of Defense for Personnel and Readiness Comments

The Under Secretary of Defense for Personnel and Readiness stated that enhancing and improving the EFMP is a priority of their office and the DoD continues to develop and implement measures to standardize the program across the DoD. In addition, the Under Secretary of Defense for Personnel and Readiness stated

[46] The NDAA for FY 2021, section 582 contains additional metrics requirements not included in this list.

[47] "DoD Report on Implementation of Section 582 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Public Law 116-283," November 2021.

that the DoD reviewed the report and determined the report did not contain controlled unclassified information (CUI), and requested the DoD OIG clarify how we determined which sections of the report to mark as CUI.

Our Response

We obtained the information in the draft report that we portion marked as CUI from the draft FMTS policy, which, according to the management comments to the draft report, will not be completed until late 2023 or early 2024. We determined that since the FMTS policy is still in draft, it is pre-decisional and contains information that is not yet to be released to the public. DoDI 5200.48, "Controlled Unclassified Information (CUI)," states that the authorized holder of a document or material is responsible for determining, at the time of creation, whether information in a document falls into a CUI category. In the management comments to the draft report, the Under Secretary of Defense for Personnel and Readiness determined that all the information in the draft report was unclassified; therefore, we updated the final report, removed all the portion markings, and consider the final report to be unclassified.[48]

Recommendations, Management Comments, and Our Response

Recommendation 1

We recommend that the Under Secretary of Defense for Personnel and Readiness ensure the Office of Special Needs:

a. Completes standardization of assignment coordination processes across the DoD and revisions to DoD Instruction 1315.19, "The Exceptional Family Member Program," providing the Services with a consistent DoD-wide approach and eliminating the need for the Services to follow their own unique processes.

Under Secretary of Defense for Personnel and Readiness Comments

The Under Secretary of Defense for Personnel and Readiness agreed with the recommendation, stating that the DoD is revising DoDI 1315.19 to implement standard assignment coordination processes and procedures for the EFMP across the DoD and anticipated publication in June 2023.

[48] DoDI 5200.48, "Controlled Unclassified Information (CUI)," March 6, 2020, Section 3.6.

Our Response

Comments from the Under Secretary of Defense for Personnel and Readiness addressed the specifics of the recommendation. However, the subsequent actions taken by the Under Secretary to publish the revised DoDI 1315.19 in June 2023, only partially addressed the specifics of the recommendation related to standardizing assignment coordination processes across the DoD. For example, the revised DoDI 1315.19 has a process map for the CONUS assignment coordination process, and a reporting requirement for process cycle time. However, the revised DoDI 1315.19 does not have a process map or cycle time requirement for the overseas assignment coordination process or a reference to any supplemental guidance that standardizes the overseas assignment coordination process. Further, the revised DoDI 1315.19 still allows for Service-specific policy and procedures and therefore does not provide the Services a consistent DoD-wide approach. Therefore, the recommendation is unresolved. We ask the Under Secretary of Defense for Personnel and Readiness to provide comments, within 30 days, on what additional actions the Under Secretary will take to fully standardize assignment coordination across the DoD.

b. Updates the Exceptional Family Member Program Data Repository Data Dictionary with additional data terms and definitions that include a standardized methodology for each data term to guide the Services in reporting comparable, installation-level assignment coordination information, to identify areas for improvement at specific installations.

Under Secretary of Defense for Personnel and Readiness Comments

The Under Secretary of Defense for Personnel and Readiness agreed with the recommendation, stating that the OSN is exploring options to update the EFMP Data Repository Data Dictionary and anticipates completion by October 2023.

Our Response

Comments from the Under Secretary of Defense for Personnel and Readiness addressed the specifics of the recommendation; therefore, the recommendation is resolved, but will remain open. We will close the recommendation once we verify that the OSN has updated the EFMP Data Repository Data Dictionary with additional data terms and definitions to guide the Services in reporting comparable, installation-level assignment coordination information.

c. Coordinates with the Assistant Secretary of Defense for Health Affairs to add an Exceptional Family Member Program identifier to the Family Member Travel Screening data collection spreadsheets to better analyze travel screenings for enrolled Service members.

Under Secretary of Defense for Personnel and Readiness Comments

The Under Secretary of Defense for Personnel and Readiness partially agreed with the recommendation, stating that the OSN would be responsible for adding an EFMP modifier to the FMTS data collection spreadsheets. The Under Secretary also stated that the OSN is exploring potential options to make the update and anticipates completion by November 2023.

Our Response

Although the Under Secretary of Defense for Personnel and Readiness partially agreed with the recommendation, the proposed action to explore potential options to make the update to the FMTS data collection spreadsheets and complete this action by November 2023 satisfied the intent of the recommendation. Therefore, the recommendation is resolved, but will remain open. We will close the recommendation once we verify that the OSN added an EFMP identifier to the FMTS data collection spreadsheets.

Recommendation 2

We recommend that the Under Secretary of Defense for Personnel and Readiness direct the Office of Special Needs to:

a. Coordinate with the Exceptional Family Member Program information technology work group to develop and implement a single DoD information technology system to maintain readily available, reliable data for oversight of the Exceptional Family Member Program.

Under Secretary of Defense for Personnel and Readiness Comments

The Under Secretary of Defense for Personnel and Readiness agreed with the recommendation, stating that the DoD is working to establish a standard information technology system and anticipates implementation by July 2025.

Our Response

Comments from the Under Secretary of Defense for Personnel and Readiness addressed the specifics of the recommendation; therefore, the recommendation is resolved, but will remain open. We will close the recommendation once we verify that the DoD developed and implemented a standard information technology system for the EFMP.

b. Perform more in-depth data reliability tests of the data entered into the Exceptional Family Member Program Data Repository.

Under Secretary of Defense for Personnel and Readiness Comments

The Under Secretary of Defense for Personnel and Readiness agreed with the recommendation, stating that the OSN is revising and improving the EFMP oversight process, including more in-depth data reliability testing and anticipates implementation by January 2024.

Our Response

Comments from the Under Secretary of Defense for Personnel and Readiness addressed the recommendation; therefore, the recommendation is resolved, but will remain open. We will close the recommendation once we verify that the OSN implemented procedures for more in-depth data reliability testing of the EFMP Data Repository.

c. Establish a process to track disputes with DoD stakeholders and elevate outstanding disputes to the Assistant Secretary of Defense for Manpower and Reserve Affairs in a timely manner for dispute resolution in accordance with DoD Instruction 1315.19.

Under Secretary of Defense for Personnel and Readiness Comments

The Under Secretary of Defense for Personnel and Readiness agreed with the recommendation, stating that they plan to develop a process for dispute resolution by September 2023.

Our Response

Comments from the Under Secretary of Defense for Personnel and Readiness addressed the specifics of the recommendation; therefore, the recommendation is resolved, but will remain open. We will close the recommendation once we verify that the developed process to track disputes with DoD stakeholders and elevate outstanding disputes to the Assistant Secretary of Defense for Manpower and Reserve Affairs in a timely manner is implemented.

Recommendation 3

We recommend that the Under Secretary of Defense for Personnel and Readiness ensure that the Assistant Secretary of Defense for Health Affairs issues the Family Member Travel Screening Policy to standardize overseas travel screening processes and address Exceptional Family Member Program concerns.

Under Secretary of Defense for Personnel and Readiness Comments

The Under Secretary of Defense for Personnel and Readiness partially agreed with the recommendation, stating that the FMTS process is not specific to EFMP and applies to all dependents of Service members who will travel overseas at the Government's expense to accompany their Service member. The Under Secretary stated that the FMTS policy to standardize the process was being developed and anticipates completion by late 2023 or early 2024.

Our Response

Although the Under Secretary of Defense for Personnel and Readiness partially agreed with the specifics of the recommendation, the proposed action of publishing the FMTS policy to standardize overseas travel screening processes in either late 2023 or early 2024 satisfied the intent of the recommendation. Therefore, the recommendation is resolved, but will remain open. We will close the recommendation once we verify that the published FMTS policy standardizes the overseas travel screening processes and addresses EFMP concerns.

Appendix A

Scope and Methodology

We conducted this performance audit from October 2020 through May 2023 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.

Our announced objective was to determine whether the DoD provided assignment coordination and family support services through the EFMP for military families with special needs assigned to overseas military installations within the USINDOPACOM area of responsibility in accordance with laws and DoD regulations. However, during the planning phase of the audit, we had difficulties obtaining EFMP assignment coordination data.

Specifically, the OSN, Army, and Navy did not have data to identify individual Service members or family members in the EFMP that had assignments coordinated and travel screenings to the USINDOPACOM area of responsibility. The OSN, Army, and Navy did not maintain information technology systems with this detailed level of data. For example, the Army provided the overall number of EFMP coordinated assignments and family member travel screenings for all the installations in USINDOPACOM, but could not readily provide detailed data by individual Service member and installation. The number was compiled from an Excel spreadsheet on SharePoint that was manually populated monthly by personnel at each MTF, and it only captured the overall number of Service members and their families whose assignments were either approved or denied. In addition, Army personnel stated that they would have to go through all their manual records to be able to provide individual data.

The Navy provided the total number of family members for which it performed the overseas suitability screening for installations in USINDOPACOM, but could not readily identify those in the EFMP or provide detailed data by individual.[49] The Navy manually compiled this information from the MTF at gaining installations and did not include the screenings for which decisions were made at losing installations; therefore, the data could have been incomplete. Then the Navy had to filter the screenings for family members in the EFMP because the overseas

[49] The Navy performs the overseas suitability screening for both the Navy and the Marine Corps.

suitability screening process is done for all Service members and family members regardless of EFMP enrollment. Navy BUMED personnel stated that to obtain detailed information, they would have to gather this data by looking through e-mail correspondence and opening all screening records to identify Service members in the EFMP because the Navy does not separate records based on EFMP status.

The OSN only provided Service-level summary data from the EFMP Data Repository. As a result of these difficulties obtaining data, we were unable to complete a USINDOPACOM analysis and refocused our efforts on DoD-level oversight of the EFMP, and the actions the DoD has taken to address recommendations from previous engagements by the GAO that related to our objective.

In addition, we interviewed the Services' EFMP family support and assignment coordination staff members at installations in Japan and Korea to determine if there were EFMP issues specifically affecting USINDOPACOM. See Appendix B for a detailed discussion.

Work Performed

We reviewed results of the 2012, 2018, and 2022 GAO audits concerning the EFMP to understand previously identified issues and the status of corrective actions.

We obtained and reviewed the following DoD and Service policies to understand the EFMP.

- DoD Instruction 1315.19, "The Exceptional Family Member Program (EFMP)," April 19, 2017
- Navy
  - Secretary of the Navy Instruction 1754.5C, "Exceptional Family Member Program," April 12, 2019
  - Chief of Naval Operations Instruction 1754.2F, "Exceptional Family Member Program," November 15, 2017
  - Bureau of Medicine and Surgery Instruction 1300.2B, "Suitability Screening, Medical Assignment Screening, and EFMP Identification and Enrollment," July 27, 2016
  - Chief of Naval Operations Instruction 1300.14D, "Suitability Screening for Overseas and Remote Duty Assignment," April 9, 2007
- Marine Corps Order 1754.4C, "Exceptional Family Member Program (EFMP)," October 8, 2020
- Army Regulation 608-75, "Personal Affairs: Exceptional Family Member Program," January 27, 2017, Effective February 27, 2017

- Air Force
  - Air Force Instruction 36-2110, "Total Force Assignments," October 5, 2018
    - "Air Force Guidance Memorandum to Air Force Instruction 36-2110, Total Force Assignments," July 28, 2020
  - Air Force Instruction 36-3009, "Airman and Family Readiness Centers," August 30, 2018
    - "Air Force Guidance Memorandum to AFI 36-3009, Airman and Family Readiness Centers," May 29, 2020
  - Air Force Instruction 40-701, "Medical Support to Family Member Relocation and Exceptional Family Member Program (EFMP)," November 19, 2014 (Certified Current April 22, 2020)
  - Air Force Policy Directive 40-7, "Medical Support to Family Member Relocation and Exceptional Family Member Program-Medical (EFMP-M)," May 9, 2018

We obtained the following documents to review the status of ongoing improvement efforts to the EFMP.

- "DoD Report on Implementation of Section 582 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Public Law 116-283," November 2021
- OSN annual reports to the congressional defense committees, June 2022, May 2021, April 2020, April 2018, April 2017, April 2016, April 2015, April 2014, April 2013, April 2011, and 2010
- "EFMP Working Group Standardization Sessions" meeting summary, March 29 – April 1, 2021
- EFMP Data Repository data dictionaries, April 2019 (with an updated comment as of November 2020), March 2021, and June 2021
- EFMP Data Repository data collection spreadsheets (assignment coordination, family support, and FMTS)
- Standardized draft FMTS forms: DD Form 3040, "Screening Verification"; DD Form 3040-1, "Medical and Educational Information"; DD Form 3040-2, "Dental Health Information"; DD Form 3040-3, "Patient Care Review"; and DD Form 3040-4, "Administrative Review Checklist"
- Draft DoDI 6000 series, "Family Member Travel Screening"

To understand the magnitude of the EFMP in USINDOPACOM, we obtained the total number of Service members enrolled in the EFMP and assigned to installations within USINDOPACOM and the total number of EFMP family support

and assignment coordination staff within USINDOPACOM. Further, to understand the DoD-wide magnitude, we obtained the total number of Service members enrolled in the EFMP within the DoD.

We obtained and reviewed the following laws to determine the ongoing requirements for the EFMP.

- Public Law 116-283, "William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021," January 1, 2021
- Public Law 114-328, "National Defense Authorization Act for Fiscal Year 2017," December 23, 2016
- Report 111-201, "National Defense Authorization Act for Fiscal Year 2011," Committee on Armed Services, United States Senate, June 4, 2010
- Public Law 111-84, "National Defense Authorization Act for Fiscal Year 2010," October 28, 2009
- Section 1781c, title 10, United States Code

We interviewed or conducted data calls from October 2020 to April 2023 with officials from the following organizations to verify procedures for the EFMP assignment coordination, family support, and overseas travel screening; identify available data for review; and discuss concerns and ongoing improvements.

- Office of Special Needs
- Services (Army, Navy, Marine Corps, and Air Force)
- Defense Health Agency
- DoD Education Activity
- Government Accountability Office

Selection of Audit Sample for Interviews of EFMP Staff in Japan and Korea

We selected a nonstatistical sample of 25 EFMP staff for interviews to determine the experiences of EFMP staff and determine any EFMP issues specifically affecting the USINDOPACOM area of responsibility. We developed standardized interview questions for staff concerning training, data systems, staffing levels, and communications areas. To conduct the interviews, we obtained the universe of EFMP assignment coordination and family support staff within Japan and Korea. We selected these countries because of the highest populations of Service members enrolled in the EFMP at USINDOPACOM installations that are not in the United States. For the universe, we identified 27 assignment coordination staff and 18 family support staff located in Japan and Korea. We used a nonstatistical sample due to time and the small universe.

We selected the nonstatistical sample of staff for interviews based on unique Service, installation, and staff positions; and we removed contractor staff. For assignment coordination staff, we based our selection on the highest populations of Service members enrolled in the EFMP at the installation. We selected 12 assignment coordination staff with 2 replacements for unavailable individuals (4 Army, 2 Navy, and 6 Air Force) and 13 family support staff (2 Army, 3 Navy, 4 Marine Corps, and 4 Air Force).

Tables 6 and 7 identify our sample of staff selected and interviewed by Service, installation, and staff position. The 25 EFMP staff selected worked at 12 different installations and some provided support throughout installations in the USINDOPACOM area of responsibility. Because we selected this nonstatistical sample of 25 EFMP staff out of 45 potential interviewees and conducted individual interviews to determine their experiences, the results of our sample could not be applied to the other 20 EFMP staff.

Table 6. Assignment Coordination Staff Selected and Interviewed

Military Service	Installation	Staff Position Title
Army	Camp Zama, Japan	EFMP Medical Director
Army	Camp Zama, Japan	EFMP Coordinator
Army	Camp Humphreys, Korea	EFMP Medical Director
Army	Camp Humphreys, Korea	EFMP Coordinator
Navy	Navy Medicine Readiness and Training Command Okinawa, Japan	Suitability Screening Coordinator
Navy	Navy Medicine Readiness and Training Unit Atsugi, Japan	Suitability Screening Coordinator
Air Force	Yokota Air Base, Japan	Special Needs Coordinator
Air Force	Misawa Air Base, Japan	Family Member Relocation Clearance Coordinator
Air Force	Kadena Air Base, Japan	Family Member Relocation Clearance Coordinator
Air Force	Kadena Air Base, Japan	Special Needs Coordinator
Air Force	Osan Air Base, Korea	Family Member Relocation Clearance Coordinator
Air Force	Osan Air Base, Korea	Special Needs Coordinator

Source: The DoD OIG.

Table 7. Family Support Staff Selected and Interviewed

Military Service	Installation	Staff Position Title
Army	Camp Zama, Japan	Army Community Service EFMP Coordinator
Army	Camp Humphreys, Korea	Army Community Service EFMP Coordinator
Navy	Yokosuka, Japan	Regional Work and Family Life Advisor
Navy	Atsugi, Japan	EFMP Case Liaison
Navy	Chinhae, Korea	EFMP Case Liaison
Marine Corps	Iwakuni, Japan	EFMP Manager
Marine Corps	Camp Butler, Okinawa, Japan	EFMP Manager
Marine Corps	Camp Butler, Okinawa, Japan	Family Case Worker
Marine Corps	Camp Butler, Okinawa, Japan	Training Education Outreach Specialist
Air Force	Yokota Air Base, Japan	EFMP Family Support Coordinator
Air Force	Misawa Air Base, Japan	EFMP Family Support Coordinator
Air Force	Kadena Air Base, Japan	EFMP Coordinator
Air Force	Osan Air Base, Korea	EFMP Family Support Coordinator

Source: The DoD OIG.

Internal Control Assessment and Compliance

We assessed internal controls and compliance with laws and regulations necessary to satisfy the audit objective. In particular, we assessed:

- **Control environment (exercising oversight responsibility).** We evaluated the OSN's oversight responsibilities for the EFMP.
- **Monitoring (performing monitoring activities).** We evaluated the OSN's actions to implement the GAO's recommendation to develop performance metrics and goals for the EFMP necessary for better monitoring of the program.
- **Control environment (demonstrating commitment to competence).** We identified whether the Services provided training to EFMP family support and assignment coordination staff in Japan and Korea.
- **Information and communication (using quality information).** We identified whether the Services provided EFMP family support and assignment coordination staff in Japan and Korea with access to the data they needed to perform their duties.

We identified internal control weaknesses related to the OSN's oversight of the EFMP. Specifically, the OSN did not fully develop performance metrics needed for assignment coordination, and did not collect comparable, detailed (installation-level) data terms from the Services needed to provide oversight and improve the monitoring capabilities of the EFMP. We also identified internal control weaknesses related to training of assignment coordination staff and access to data. However, because our review was limited to these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

Use of Computer-Processed Data

We used computer-processed data for informational purposes only and did not rely on it for our audit findings, conclusions, or recommendations. Specifically, for the report background we used computer-processed data to identify the number of Service members enrolled in the EFMP and the composition by Service. This enrollment data was provided by OSN officials from the EFMP Data Repository. We did not perform testing to assess data reliability of the EFMP Data Repository enrollment data because we used the data for informational purposes only.

Prior Coverage

The GAO has issued three reports discussing the Exceptional Family Member Program. Unrestricted GAO reports can be accessed at http://www.gao.gov.

GAO

Report No. GAO-22-105015, "DoD Programs and Services for Military Dependent Students with Disabilities," May 2022

> The report addressed the status of the recommendations from GAO-18-348. The GAO determined that in August 2021, the DoD reported that the recommendations from GAO-18-348 will be closed by September 30, 2022.

Report No. GAO-18-348, "DoD Should Improve Its Oversight of the Exceptional Family Member Program," May 2018

> The GAO determined that the Services developed relatively few services plans and that there was wide variation in the number of family support providers employed, which raised questions about potential gaps in services for families

with special needs. In addition, the GAO determined that each Service used various mechanisms to monitor assignment coordination and obtain family support, but the DoD had not established common performance measures to assess these activities. Furthermore, the GAO determined that the OSN did not have a process to systematically evaluate the results of the Services' monitoring activities.

Report No. GAO-12-680, "Better Oversight Needed to Improve Services for Children with Special Needs," September 2012

The GAO determined that ineffective screenings may result in families being placed in locations where schools were not readily equipped to serve certain needs, and reported on parents' concerns about their children not receiving all the services they needed through special education staff, especially at overseas locations. In addition, the majority of parents in GAO's focus groups indicated they lacked information about obtaining special education and related medical service. The GAO also reported that the DoD lacked agency-wide benchmarks and performance goals for the identification and enrollment and assignment coordination components of the EFMP.

Appendix B

Interviews of EFMP Staff in Japan and Korea

This appendix provides information from the interview responses of Services' EFMP family support and assignment coordination staff members at installations in Japan and Korea. We interviewed 13 family support staff members and 12 assignment coordination staff members to determine whether there were any EFMP issues specifically affecting the USINDOPACOM area of responsibility. We developed standardized interview questions for staff that covered training, data systems, staffing levels, and communications areas. The responses represent the experiences and perspectives of the EFMP staff interviewed. Those 25 EFMP staff members worked at 12 different installations in Japan and Korea, and one provided EFMP support at multiple installations throughout the USINDOPACOM area of responsibility.

EFMP Family Support and Assignment Coordination Staff Were Provided Varying Levels of Support and Tools

EFMP family support and assignment coordination staff described varying levels of support and tools used to assist families with special needs in the USINDOPACOM area of responsibility.

Formal and On-The-Job Training

Family support staff discussed formal training classes commensurate with their job duties and assignment coordination staff identified either on-the-job training or continuity binders.[50]

Specifically, 9 of 13 family support staff we interviewed reported knowledge of mandatory formal training. OSN officials stated that in coordination with Service representatives they developed and released the EFMP Family Support Core Competency Training Curriculum to aid family support staff. This curriculum includes training in the areas of the overall EFMP family support program, case notes, and family needs assessment. The OSN also stated that this curriculum will be further developed based on the needs reported by the Services.

In addition, 11 of 12 EFMP assignment coordination staff members we interviewed stated that they had either received on-the-job training provided by their predecessors or other personnel within their work unit, or relied on continuity binders or their years of experience. To address this training variance, as part

[50] We did not evaluate whether the training provided to EFMP staff was sufficient.

of the new family member travel screening (FMTS) initiative, the OSN is developing training modules for assignment coordination staff members. OSN officials stated that this training would be web-based and provided in the Joint Knowledge Online platform.

Access to Data to Perform Duties

Family support and assignment coordination staff discussed various information technology systems used to perform their duties. Specifically, family support staff members identified Service-specific data systems that they regularly used, such as the Army Client Tracking System, the Air Force Family Integrated and Statistical Tracking system, the Navy Family Accountability and Assessment System, and the Marine Corps Case Management System. Assignment coordination staff members identified the Armed Forces Health Longitudinal Application, which is the military electronic health record system, and the Composite Health Care System, which they regularly used to schedule and process appointments.

Overall, family support staff reported no difficulties accessing data to perform duties, and some assignment coordination staff requested additional access to data to help perform EFMP duties. Specifically, 10 of 13 family support staff we interviewed reported no need for additional data to perform their duties. The remaining three staff members stated that they would like administrative data that were not directly related to EFMP case management, such as real-time verification on their data inputs and real-time staff training information.

In addition, while 7 of 12 assignment coordination staff we interviewed reported no need for additional data, the other 5 staff members stated that access to additional data, such as off-base medical records and diagnosis information, would help them perform their duties. One assignment coordination staff member clarified that not having access to off-base medical records required additional coordination with the losing installation to obtain the information.

To address the issue of not having access to off-base medical records, OSN officials stated that the standardized FMTS process would use DoD approved forms to obtain this information and provide medical professionals with the necessary medical information to make travel recommendations. In addition, officials from the DHA, which is responsible for publishing implementing guidance for the FMTS policy, stated that they were developing the roles and responsibilities for the DHA to assist MTF personnel that have difficulty obtaining off-base records.[51]

[51] The DHA is a sub-organization to the Office of the Assistant Secretary of Defense for Health Affairs, which is the proponent for FMTS policy.

Turnover Rates Among Staff

Overall, family support and assignment coordination staff reported manageable workloads. Family support staff discussed low staff turnover and some assignment coordination staff expressed concerns with a higher staff turnover.

Specifically, five of seven family support staff stated that turnover rates were not an issue.[52] This was because their positions were mostly filled by appropriated civilians subject to a 3- to 5- year rotation cap or non-appropriated fund civilians not subject to a time cap. However, four of nine assignment coordination staff discussed concerns with higher turnover rates resulting from positions filled with Service members subject to a 1- to 2- year tour length or contractors subject to an annual renewal.[53] To address this concern, DHA officials stated that the DHA was working with the Services to staff positions. Further, the FMTS policy, pending publication, requires the DHA to allocate sufficient resources for family member travel screenings at MTFs.

Communicating with Headquarters and Installation Personnel

Family support staff discussed open communication at all levels, from the Services' headquarters down to EFMP families. Assignment coordination staff discussed open communication with supervisors and headquarters; however, the staff also identified some difficulties communicating with and obtaining documentation from personnel at losing installations.[54]

Specifically, all 13 family support staff we interviewed stated that they received adequate guidance on EFMP processes, had open communication with headquarters, and informed families about assistance resources and events. Further, 11 of 12 assignment coordination staff we interviewed stated that they received adequate guidance and direction from either their supervisors or higher command. However, 10 of 12 assignment coordination staff also expressed issues when communicating with losing installations. The staff identified issues including difficulty contacting the losing installations and receiving forms with missing, vague, or incorrect information. To address the assignment coordination staff concerns, OSN officials stated that the standardized FMTS process would use DoD-approved forms to facilitate required communication and exchange of information between the losing and gaining installations.

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[52] Although we interviewed 13 family support staff, only 7 provided an answer to the question on turnover rate concerns. Of the six family support staff that did not answer, one stated that they were unsure of the position history.

[53] Although we interviewed 12 assignment coordination staff, only 9 provided an answer regarding turnover rate.

[54] The losing installation is where the Service member is currently stationed and initiates the family member travel screening.

Ongoing Efforts to Eliminate Variances

The OSN and DHA are taking steps to address and eliminate issues described by EFMP assignment coordination staff. Specifically, the Services are awaiting the issuance of the new FMTS policy and full implementation of the FMTS process, which will include DoD-wide standardized travel screening training, forms, and processes. The standardized FMTS forms and data collection spreadsheets will obtain data on communication and documentation transfer between the losing and gaining installations. Furthermore, Recommendation 3 in this report addresses the issuance of the FMTS policy. Upon issuance of the FMTS policy and implementation of the FMTS process, we encourage the OSN, in coordination with the DHA, to verify that the new FMTS processes address all concerns identified by the assignment coordination staff.

Management Comments

Under Secretary of Defense for Personnel and Readiness

PERSONNEL AND READINESS

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

JUN - 7 2023

MEMORANDUM FOR INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE

SUBJECT: Response to the Department of Defense Office of Inspector General Draft Report, "Audit of the DoD Exceptional Family Member Program" (Project No. D2021-D000RM-0018.000)

Enhancing and improving the Exceptional Family Member Program (EFMP) for families with special educational and medical needs is a priority of my office. To enhance and improve the EFMP, the Department continues to develop and implement measures to standardize the program across the Department. The draft report, "Audit of the DoD Exceptional Family Member Program," provided recommendations for addressing programmatic gaps identified during the audit of the EFMP. The Department reviewed the report and determined the document is unclassified and does not contain controlled unclassified information (CUI). I ask that the Department of Defense Office of Inspector General provide clarification on the determination of sections within the report currently marked as CUI. Please find responses to each recommendation below.

Recommendation 1a: We recommend that the Under Secretary of Defense for Personnel and Readiness (USD(P&R)) ensure the Office of Special Needs (OSN) completes standardization of assignment coordination processes across the DoD and revisions to Department of Defense Instruction (DoDI) 1315.19, "The Exceptional Family Member Program," providing the Services with a consistent DoD-wide approach and eliminating the need for the Services to follow their own unique processes.

I concur with this recommendation. The Department is revising DoDI 1315.19 to implement standard assignment coordination processes and procedures for the EFMP across the Department. The DoDI has an anticipated timeline of June 2023 for publication.

Recommendation 1(b): We recommend that the USD(P&R) ensure the OSN updates the EFMP Data Repository Data Dictionary with additional data terms and definitions that include a standardized methodology for each data term to guide the Services in reporting comparable, installation-level assignment coordination information to identify areas for improvement at specific installations.

I concur with this recommendation. OSN is exploring options to make any such updates with an anticipated completion of any potential changes by October 2023.

Recommendation 1(c): We recommend that the USD(P&R) ensure the OSN coordinates with the Assistant Secretary of Defense for Health Affairs (ASD(HA)) to add an EFMP identifier to the Family Member Travel Screening (FMTS) data collection spreadsheets to better analyze travel screenings for enrolled Service members.

Under Secretary of Defense for Personnel and Readiness (cont'd)

I partially concur with this recommendation. OSN has responsibilities in this area and would be the office to add an EFMP modifier to the FMTS data collection spreadsheets to track overseas travel for families enrolled in the EFMP. Currently, OSN is exploring potential options to make such an update, with any potential completion anticipated by November 2023.

Recommendation 2(a): We recommend that the USD(P&R) ensure the OSN coordinate with the EFMP information technology (IT) work group to develop and implement a single DoD IT system to maintain readily available, reliable data for oversight of the EFMP.

I concur with this recommendation. The Department is currently working toward the necessary actions for establishment of a standard system. The anticipated timeline for full modernization and implementation of the standard IT system is July 2025.

Recommendation 2(b): We recommend that the USD(P&R) ensure the OSN perform more in-depth data reliability tests of the data entered in the EFMP Data Repository.

I concur with this recommendation. OSN is in the process of revising and improving the EFMP monitoring and oversight process, including more in-depth data reliability testing. The anticipated timeline for implementation of the enhanced monitoring and oversight process is January 2024.

Recommendation 2(c): We recommend that the USD(P&R) ensure the OSN establish a process to track disputes with DoD stakeholders and elevate outstanding disputes to the Assistant Secretary of Defense for Manpower and Reserve Affairs in a timely manner for dispute resolution in accordance with the DoDI 1315.19.

I concur with this recommendation and plan to develop a process for this purpose. The anticipated timeline for development is by September 2023.

Recommendation 3: We recommend that the USD(P&R) ensure the ASD(HA) issues the FMTS policy to standardize overseas travel screening processes and address EFMP concerns.

I partially concur with this recommendation. The FMTS process pertains to the screening of all dependents of Service members who will travel overseas at the Government's expense to accompany their Service member and is not necessarily specific to EFMP. The policy to standardize the process is being developed with an anticipated timeline for completion of late 2023 or early 2024.

Thank you for the opportunity to respond to the audit's recommendations. Please let us know if you have any further questions.

Gilbert R. Cisneros, Jr.

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Acronyms and Abbreviations

BUMED	Navy Bureau of Medicine and Surgery
CONUS	Continental United States
DHA	Defense Health Agency
DoDEA	Department of Defense Education Activity
DoDI	DoD Instruction
EFMP	Exceptional Family Member Program
FMTS	Family Member Travel Screening
GAO	Government Accountability Office
MTF	Medical Treatment Facility
NDAA	National Defense Authorization Act
OCONUS	Outside of the Continental United States
OSN	Office of Special Needs
USD(P&R)	Under Secretary of Defense for Personnel and Readiness
USINDOPACOM	U.S. Indo-Pacific Command

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