



August 2022

MILITARY PERSONNEL

Armed Forces Should Clarify Tattoo Policies' Waiver Guidance

Accessible Version

GAO Highlights

Highlights of [GAO-22-105676](#), a report to congressional committees

Why GAO Did This Study

The House Committee on Armed Services and the military services have acknowledged recent challenges in recruiting, which they have attributed to a number of social and economic factors. Tattoo prevalence among American youth has increased, and Congress has expressed interest in the effect the armed forces' tattoo policies have on recruitment and retention.

The National Defense Authorization Act for Fiscal Year 2022 includes a provision for GAO to review the armed forces' tattoo policies. GAO examined the extent to which (1) tattoo policies exist for potential and current members of the armed forces, (2) the armed forces assess any effects of their tattoo policies on recruitment and retention of members, and (3) the armed forces have waiver processes for unauthorized tattoos.

GAO included the Army, Marine Corps, Navy, Air Force, and Space Force within the Department of Defense (DOD), and the Coast Guard within the Department of Homeland Security (DHS). GAO analyzed their tattoo policies for potential recruits and current service members, including enlisted personnel and officers.

What GAO Recommends

GAO recommends that each of the six armed forces updates its tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers are available for recruits and service members; and provides clear guidance on eligible tattoos and requirements for requesting a waiver, among other things. DOD and the military services generally agreed, and DHS agreed, with the recommendations.

View [GAO-22-105676](#). For more information, contact Brenda S. Farrell at (202) 512-3604 or FarrellB@gao.gov.

August 2022

MILITARY PERSONNEL

Armed Forces Should Clarify Tattoo Policies' Waiver Guidance

What GAO Found

The armed forces' policies for tattoo permissions and restrictions all focus on the content, size, and location of allowable tattoos. While the armed forces have content prohibitions for tattoos, the policies have evolved and become less restrictive regarding size and location. The current policies permit tattoos almost anywhere on the body except for on the head and face.

Navy Service Member with Allowable Tattoos



Source: U.S. Navy/Mass Communication Specialist 3rd Class R. McFarlane. | GAO-22-105676

Armed forces officials GAO interviewed stated that recruiting and retention data do not include tattoo-specific data or other information that would allow an assessment of whether tattoo policies have a direct effect on recruitment and retention. Officials stated that tattoo policy updates are based on general discussions and on limited assessments of tattoo-related information, such as studies on tattoo prevalence among youth.

Most armed forces allow waivers (i.e., exceptions) for certain unauthorized tattoos, usually related to their size or location, for recruits and service members. Although each of the armed forces allows waivers for certain tattoo restrictions for recruits, the policies do not always mention or provide clear guidance on the requirements for these waivers. In addition, each armed force, except for the Navy, allows waivers for certain tattoo restrictions for service members, but their respective policies generally do not document this possibility clearly. Clear guidance on waivers for unauthorized tattoos would provide consistent information about requirements for waiver requests and conditions for approval. This could clarify whether tattoo prevalence affects future or continued military service.

Contents

GAO Highlights		ii
	Why GAO Did This Study	ii
	What GAO Recommends	ii
	What GAO Found	ii
Letter		1
	Policies Focus on Tattoo Content, Size, and Location and Have Become Less Restrictive	4
	Limited Assessments Have Been Conducted on Tattoo Policies' Effect on Recruitment and Retention	6
	Opportunities Exist to Clarify Waiver Policies for Unauthorized Tattoos	9
	Conclusions	13
	Recommendations for Executive Action	13
	Agency Comments and Our Evaluation	15
Appendix I: Comments from the Department of Defense		17
Accessible Text for Appendix I: Comments from the Department of Defense		21
Appendix II: Comments from the Department of Homeland Security		24
Accessible Text for Appendix II: Comments from the Department of Homeland Security		28
Appendix III: GAO Contact and Staff Acknowledgments		30
Tables		
	Table 1: Armed Forces' Policies on Tattoo Waivers for Recruits	10
	Table 2: Armed Forces' Policies on Tattoo Waivers for Service Members	11
Figure		
	Figure 1: Evolution of the Armed Forces' Policies on Tattoos for Recruits and Service Members	5

Abbreviations

DOD	Department of Defense
JAMRS	Joint Advertising, Market Research and Studies

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



August 17, 2022

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

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

The House Committee on Armed Services and the military services have acknowledged recent challenges in recruiting for military service.¹ The Department of Defense (DOD) and the military services have attributed these challenges to a number of social and economic factors, such as low unemployment rates, competitive labor markets, limited eligibility among the youth population, and the COVID-19 pandemic.

The House Committee on Armed Services cited concerns that tattoo restrictions may be affecting the military services' ability to recruit and retain talent. For example, a report accompanying a bill for the National Defense Authorization Act for Fiscal Year 2022 expressed concern that potential enlistees' tattoos had become a deterrent to meeting recruitment goals in previous years.² Studies commissioned by DOD have suggested

¹H.R. Rep. No. 117-118 at 134 (2021); *Department of Defense Announces Recruiting and Retention Numbers for Fiscal Year 2022 thru March 2022* (2022). U.S. Army Recruiting Command, Facts and Figures, Recruiting Challenges, https://recruiting.army.mil/pao/facts_figures/, (accessed April 4, 2022).

²H.R. Rep. No. 117-118 at 134 (2021), See also, *Military Personnel Talent Management Modernization and the Effects of Legacy Policies: Hearing before the Subcomm. on Military Personnel of the House Comm. on Armed Services, 117th Cong.* (Feb. 8, 2022).

that the prevalence of young people under 24 years old with tattoos may have risen.³

Section 586 of the National Defense Authorization Act for Fiscal Year 2022 included a provision that we review the armed forces' tattoo policies and related effects on recruitment and retention.⁴ This report examines the extent to which (1) tattoo policies exist for potential and current members of the armed forces, (2) the armed forces assess any effects of their tattoo policies on recruitment and retention of members, and (3) the armed forces have waiver processes for unauthorized tattoos.⁵

To address these objectives, we analyzed the armed forces' current tattoo policies for recruits and service members, including both enlisted personnel and officers, and compared the policies with previous policies to determine how they have changed.⁶ We reviewed armed forces' information on recruitment and retention for fiscal years 2017 through 2022, as available. We also reviewed tattoo-related studies and

³Joint Advertising, Market Research and Studies, *Joint Advertising, Market Research and Studies 2014 General Youth Survey* (2014). The survey includes 16- to 24-year old respondents. CNA Analysis and Solutions, *Tattoo trends in America's youth and Marine Corps tattoo policy* (Nov. 1, 2018). The CNA study includes 18- to 24-year olds.

⁴Pub. L. 117-81, § 586 (2021). For the purposes of this report, we refer collectively to the Army, Marine Corps, Navy, Air Force, Space Force, and Coast Guard as the "armed forces."

⁵For the purposes of this report, we refer to exceptions to the armed forces' policies as "waivers."

⁶For the purposes of this report, "recruits" include potential recruits, applicants, or individuals in a military service's pre-enlistment or commissioning process. We reviewed the following current armed forces' tattoo policies: Army Regulation 670-1, *Wear and Appearance of Army Uniforms and Insignia* (Jan. 26, 2021); Army Directive 2022-09, *Soldier Tattoos* (June 22, 2022); NAVPERS 15665J, *United States Navy Uniform Regulations* (2021); Marine Corps Bulletin 1020, *Marine Corps Tattoo Policy* (Oct. 29, 2021); Department of the Air Force Instruction 36-2903, *Dress and Personal Appearance of United States Air Force and United States Space Force Personnel* (Feb. 7, 2020) (incorporating Change 4, Apr. 12, 2022); Space Force Guidance Memorandum 2022-36-01, *Space Force Guidance Memorandum Establishing U.S. Space Force Dress and Appearance Standards* (May 23, 2022); and U.S. Coast Guard Commandant Instruction 1000.1E, *Tattoo, Body Marking, Body Piercing, and Mutilation Standards* (Apr. 21, 2022). Previous armed forces' tattoo policies include the following: Army Regulation 670-1, *Wear and Appearance of Army Uniforms and Insignia* (Mar. 31, 2014); NAVADMIN 110/06, *Navy Uniforms* (Apr. 21, 2006); Marine Corps Order 1020.34H, *Marine Corps Uniform Regulations* (May 1, 2018); Air Force Instruction 36-2903, *Dress and Personal Appearance of Air Force Personnel* (July 18, 2011); and U.S. Coast Guard Commandant Instruction 1000.1C, *Tattoo, Body Marking, Body Piercing, and Mutilation Policy* (Dec. 29, 2016).

information used by the armed forces.⁷ We compared the armed forces' tattoo policies on waivers for unauthorized tattoos with federal standards for internal control.⁸ Specifically, we compared the policies with the internal controls on communicating the necessary quality information to achieve an entity's objectives. We also conducted interviews with DOD and armed forces officials to gather information about topics covered within this review.⁹

We conducted this performance audit from February 2022 to August 2022 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.

⁷Armed forces officials we interviewed identified relevant tattoo-related studies, surveys, and assessments that they used to help inform their tattoo policy changes or discussions. We reviewed methodological information for these studies as available.

⁸GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

⁹We conducted interviews with officials from the following DOD entities: the Office of the Deputy Assistant Secretary of Defense for Military Personnel Policy (which falls under the Offices of the Assistant Secretary of Defense for Manpower and Reserve Affairs and the Under Secretary of Defense for Personnel and Readiness); the armed forces' offices responsible for tattoo policy, waivers, and recruitment and retention; the U.S. Military Entrance Processing Command; and DOD's Joint Advertising, Market Research and Studies.

Policies Focus on Tattoo Content, Size, and Location and Have Become Less Restrictive

The armed forces have all established tattoo policies that are similar in their focus on the content, size, and location of tattoos.¹⁰ With respect to the size and location of tattoos, the armed forces' policies became less restrictive during 2016 through June 2022.

Content. All of the armed forces' policies prohibit tattoos that are prejudicial to good order and discipline, or that are of a nature to bring discredit to their service. Specifically, all of the policies prohibit content related to extremism, sexism, and racism.¹¹ Additionally, the Navy, Marine Corps, and Coast Guard also prohibit content related to drugs and gangs, and the Air Force prohibits content related to gangs.

Size and location. The armed forces have made the policies less restrictive regarding the size and location of tattoos. Specifically, the current tattoo policies have evolved to permit tattoos for recruits and

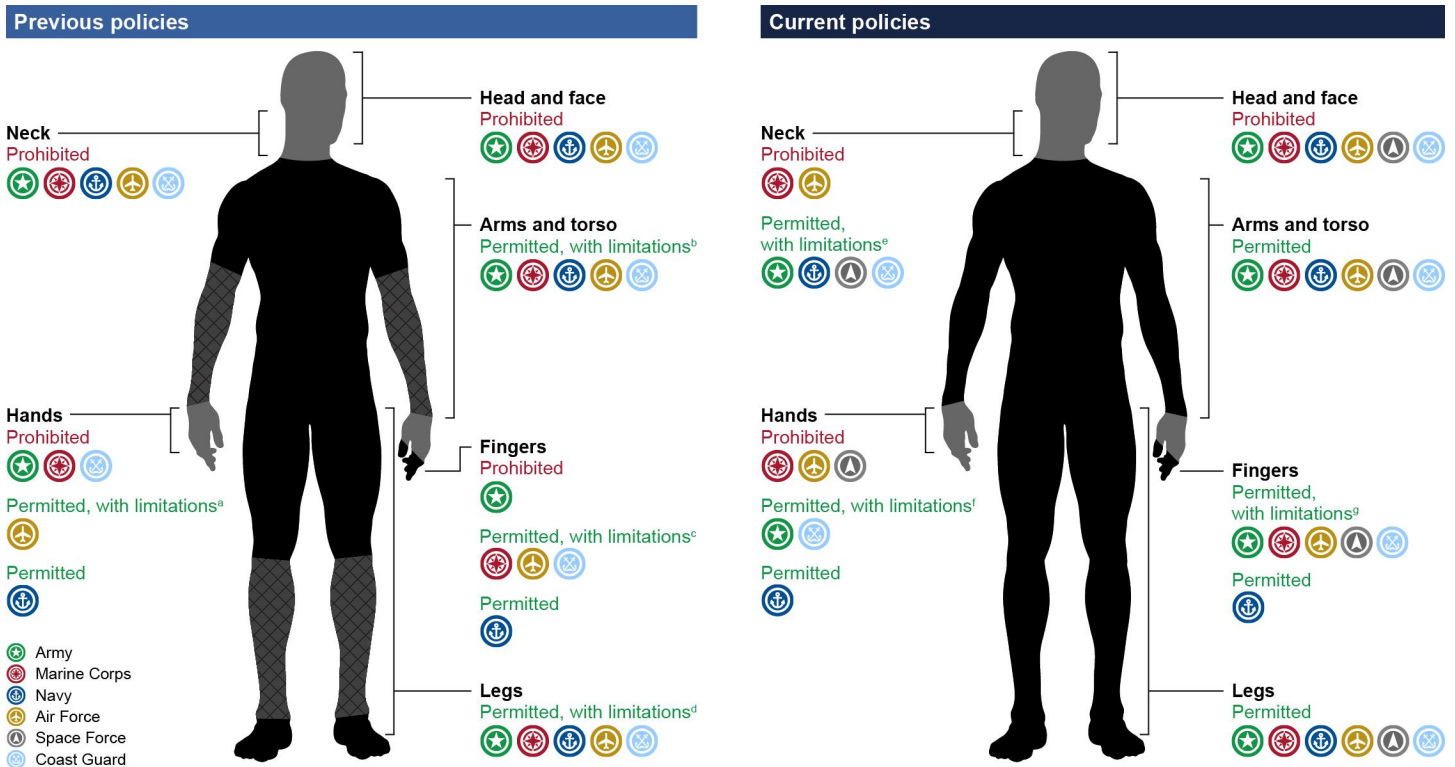
¹⁰The Army, Navy, and Air Force have established dress, appearance, or uniform standards—referred to as “appearance policies” for the purposes of this report—that address tattoo permissions and restrictions for potential recruits and service members. The Marine Corps and Coast Guard have stand-alone tattoo policies. The Army provided an update to its policy with an Army directive in June 2022. The Marine Corps provided an update to its policy with a Marine Corps bulletin in October 2021. In May 2022, the Department of the Air Force issued a Space Force dress and appearance guidance memorandum (addressing tattoos and other dress and appearance policies) that it uses in conjunction with the Air Force's dress and appearance policy.

The Army's directive is rescinded on publication of the revised regulation. The Marine Corps' bulletin and the Space Force's memorandum expire after 1 year or whenever the contents are incorporated into permanent policy. There is no overarching Office of the Secretary of Defense policy related to dress and appearance or tattoos.

¹¹A DOD instruction with guidelines for handling protest, extremist, and criminal gang activities among members of the armed forces includes restrictions on related tattoos. Department of Defense Instruction 1325.06, *Handling Protest, Extremist, and Criminal Gang Activities Among Members of the Armed Forces* (Nov. 27, 2009) (incorporating Change 2, Dec. 20, 2021).

service members almost anywhere on the body, except for on the head and face (see fig. 1).¹²

Figure 1: Evolution of the Armed Forces' Policies on Tattoos for Recruits and Service Members



Source: GAO analysis of armed forces' tattoo policies (text); ag visuell/stock.adobe.com (silhouette). | GAO-22-105676

Note: Each of the armed forces' tattoo policies represented in this figure went into effect in different years. For previous policies: Army Regulation 670-1 (2014); NAVADMIN 110/06 (2006); Marine Corps Order 1020.34H (2018); Air Force Instruction 36-2903 (2011); U.S. Coast Guard Commandant Instruction 1000.1C (2016). The Space Force is not included in the Air Force's previous tattoo policy because the Space Force was not established until 2019. From 2020 through present, the Air Force's tattoo policy applies to Space Force personnel, and is now applied in conjunction with the Space Force memorandum of May 2022. For current policies: Army Regulation 670-1 (2021); Army Directive 2022-09 (2022); NAVPERS 15665J (2021); Marine Corps Bulletin 1020 (2021); Department of the Air Force Instruction 36-2903 (2022); Space Force Guidance Memorandum 2022-36-01 (2022); U.S. Coast Guard Commandant Instruction 1000.1E (2022).

¹²The Navy's, Air Force's, and Space Force's tattoo policies permit cosmetic tattoos to correct medical conditions. Additionally, the Army's, Air Force's, Space Force's, and Coast Guard's tattoo policies permit cosmetic tattoos, including permanent facial makeup (e.g., eyebrows and eyeliner). The Marine Corps' tattoo policy does not mention cosmetic tattoos.

^{a, b, c, d}The Air Force permitted hand, arm, torso, finger, and leg tattoos in a previous policy as long as tattoos exceeding 25 percent of the exposed body part were not visible while a service member was wearing any uniform combination.

^{b, d}The Army, Navy and Marine Corps permitted lower arm and lower leg tattoos but with limitations. Specifically, the Army permitted service members to have no more than four visible tattoos (smaller than the service member's hand) below the elbow and below the knee. In the Navy, tattoos in these areas visible when wearing a short-sleeve uniform shirt could not be larger than the service member's hand. The Marine Corps permitted tattoos in these areas but limited them to one of the following: (1) a single tattoo that could be covered by the service member's hand, (2) a single collection of tattoos that could be covered by the service member's hand, or (3) a single band tattoo.

^eThe Marine Corps permitted one ring tattoo on one hand. The Coast Guard permitted one ring tattoo on one finger of each hand.

^eThe Army permits one tattoo on the back of the neck not to exceed 2 inches and permits one tattoo behind the ear not to exceed 1 inch. The Navy and Space Force permit one tattoo on the neck or behind the ear not to exceed 1 inch. The Coast Guard permits one tattoo behind the ear that is no larger than 1 inch.

^fThe Army permits tattoos on each hand (including the palm) no larger than 1 inch. The Coast Guard permits a single tattoo on each hand, no larger than 1 inch.

^gThe Army, Marine Corps, and Space Force permit one ring tattoo on one finger of each hand. The Air Force permits one ring tattoo on one hand. The Coast Guard permits one tattoo on one finger of each hand.

An example of a significant change relates to a large collection of tattoos on the legs or arms (i.e., a sleeve tattoo). Specifically:

- In May 2018, the Marine Corps tattoo policy did not allow elbow tattoos, knee tattoos, or sleeve tattoos. However, in October 2021, the Marine Corps updated its tattoo policy to permit tattoos anywhere except on the head, neck, face, and parts of the hands.
- In January 2017, Air Force eliminated its restriction on tattoos which covered more than 25 percent of a visible body part. Prior to this, hand, arm, torso, and leg tattoos were permitted by a previous Air Force tattoo policy as long as they did not exceed 25 percent of the visible body part when a service member was wearing any or all uniform combinations.
- In March 2014, the Army tattoo policy did not allow sleeve tattoos below the elbow or the knee. However, the Army updated its tattoo policy in May 2017 to allow service members to have sleeve tattoos. This more permissive rule on sleeve tattoos remains valid.

Limited Assessments Have Been Conducted on Tattoo Policies' Effect on Recruitment and Retention

Officials from each of the armed forces stated that they generally do not use data on their respective tattoo policies to assess their performance in

meeting recruiting and retention goals. These officials stated that the forces' recruiting and retention data do not include tattoo-specific data or other information that would allow an assessment as to whether their tattoo policies have a direct effect on recruitment and retention.¹³

However, according to officials from each of the armed forces, they have based some tattoo policy updates on general discussions and on limited assessments of tattoo-related information. For example:

- **Joint Advertising, Market Research and Studies (JAMRS).** Army officials stated that findings from JAMRS—DOD's program for joint military advertising and market research—led them to change the Army's tattoo policy in 2017 to become less restrictive. According to JAMRS officials, in 2013, a research request by one of the military services initiated the inclusion of two tattoo-related questions in the JAMRS' 2014 general youth survey to gather information on whether youth have tattoos and, if so, where the tattoos are located. The 2014 JAMRS research found that when looking within the eligible youth (ages 16–24) population, changing from a more restrictive to a less restrictive tattoo policy would increase the recruiting pool by approximately 6 percent of the eligible youth market. Further, JAMRS repeated the tattoo questions in its 2020 general youth survey and found that 49 percent of youth had a tattoo on the forearm and 25 percent of youth had a tattoo below the knee. According to JAMRS officials, the results of both the 2014 and 2020 general youth surveys were summarized and distributed to all of the military services.
- **Air Force Recruiting Service surveys.** Air Force officials said they used two Air Force Recruiting Service surveys to support the removal of certain tattoo restrictions in Air Force policy. In fall 2016, the Air Force Recruiting Service found, based on survey information collected from recruiters, that a number of potential recruits had tattoos that required review or disqualified them due to failure to meet Air Force standards. Air Force officials stated that they used this information to support a policy update in 2017 permitting service members to have sleeve tattoos on their arms and large collections of tattoos on parts of their bodies where tattoo collections were previously prohibited. The officials stated that the Air Force also updated its tattoo policy in April 2022 after an Air Force Recruiting Service survey in 2021 found that

¹³Because recruitment and retention data do not include tattoo-specific indicators, we could not directly assess the effects of the armed forces' tattoo policies on recruitment and retention. However, we did evaluate the extent to which the armed forces assess the effects of tattoo policies on recruitment and retention.

additional individuals may have qualified for Air Force service if the Air Force policy had been changed to allow hand tattoos.

- **Coast Guard RAND study.** In 2021, RAND conducted a study to improve the representation of women and racial and ethnic groups among Coast Guard service members.¹⁴ Coast Guard officials stated that, in response to this study, a task force looked at potential recruiting barriers and worked with the Coast Guard Recruiting Command to update the tattoo policy and to make other changes to enhance recruiting efforts.
- **Tattoo waiver data.** Navy officials stated that they have used waiver data to inform policy changes related to tattoo permissions for recruits, but have not used waiver data to examine tattoo policy specific to retention or reenlistment. For example, Navy officials stated that leadership observed that recruits were declined because of unauthorized tattoos deemed ineligible for waivers. Additionally, Coast Guard officials stated that they collect and maintain data on recruits who request tattoo waivers to gain entry into the service, for use by policy makers.¹⁵

DOD and Coast Guard recruitment and retention active component data show that the armed forces generally met recruitment and retention goals for fiscal years 2017 through 2021, with a few exceptions.¹⁶ Through nine months of fiscal year 2022 (October 2021–June 2022), the Army and Navy did not meet their recruiting goals, and the military services met

¹⁴Homeland Security Operational Analysis Center operated by the RAND Corporation, *Improving the Representation of Women and Racial/Ethnic Minorities Among U.S. Coast Guard Active-Duty Members* (2021).

¹⁵Army, Marine Corps, and Air Force officials stated that they do not use waiver data to make decisions related to updating tattoo policies for the recruitment and retention of service members.

¹⁶According to DOD's recruiting and retention press releases, for fiscal year 2018 the Army did not meet its recruiting goal. In fiscal year 2019, the Marine Corps was slightly below its retention goal. In fiscal year 2021, the Navy and Marine Corps were slightly below their respective retention goals. <https://www.defense.gov/News/Releases/Release/Article/1691314/departments-of-defense-announces-fiscal-year-2018-recruiting-and-retention-numbers/> (accessed June 3, 2022); <https://prhome.defense.gov/Portals/52/September%202019.pdf> (accessed June 3, 2022); DOD, *Department of Defense Announces Recruiting and Retention Numbers for Fiscal Year 2021* (2021). According to Coast Guard officials, the Coast Guard did not meet all of its recruitment and retention goals for fiscal years 2019 through 2021. The Space Force was created in 2019 and started collecting recruitment and retention data in 2022. Armed forces' recruitment and retention data are being collected for fiscal year 2022.

their retention goals.¹⁷ In 2022, DOD reported that its broader recruiting market continues to deteriorate. DOD specifically stated that its recruiting challenges include youth's lack of interest in military service. U.S. Army Recruiting Command stated that among the recruiting challenges is the most challenging labor market since the inception of the all-volunteer force.¹⁸ In addition, DOD officials attributed current recruiting challenges to the following:

- broad social and economic factors, such as a lack of qualified military applicants and historically low propensity-to-serve rates among today's youth;
- a decreasing number of individuals that favor military service, together with an economy offering an increasing amount of hiring bonuses for civilian jobs;
- lower accessibility to schools and less in-person recruiting due to COVID-19; and
- the effects of a U.S. labor shortage.

Opportunities Exist to Clarify Waiver Policies for Unauthorized Tattoos

Most armed forces allow waivers (i.e., exceptions to tattoo policies) for certain unauthorized tattoos, usually related to their size or location, for recruits and current service members. However, some of the armed forces' relevant policies do not directly address whether waivers for unauthorized tattoos are available for recruits, and only one armed force's policy directly addresses whether waivers for unauthorized tattoos are available for service members. In addition, most of the armed forces' tattoo policies do not include clear information on the tattoos or individuals eligible for waivers, requirements for waiver requests and

¹⁷DOD, *Department of Defense Announces Recruiting and Retention Numbers for Fiscal Year 2022 thru June 2022* (2022). DOD reported that the military services have generally exhibited strong retention, with all military services exceeding retention goals. According to DOD, the military services have used incentives to maintain retention for the active component. Coast Guard officials stated that recruitment and retention data for fiscal year 2022 are not yet available because the fiscal year is ongoing.

¹⁸U.S. Army Recruiting Command, *Facts and Figures, Recruiting Challenges*, https://recruiting.army.mil/pao/facts_figures/, (accessed April 4, 2022).

conditions for approval, or specifics on who has authority to approve tattoo waivers.

Waivers for recruits. Each of the armed forces allows waivers for certain tattoo restrictions for recruits, but the policies do not always mention or provide clear guidance on these waivers (see table 1).

Table 1: Armed Forces’ Policies on Tattoo Waivers for Recruits

Armed force	Tattoo waiver (including waiver approval authority) clearly stated in tattoo section of appearance policy?	Tattoos eligible for waivers clearly specified in tattoo section of appearance policy?	Requirements for requests and conditions for waiver approval clearly specified in tattoo section of appearance policy?
Army	Yes	Suggests they are available outside authorized areas	No
Marine Corps ^a	Yes	Yes, outside authorized areas	No
Navy	Yes	No	No
Air Force	Yes, only for exceptionally qualified recruits in critical, understaffed career fields	Yes, an additional hand tattoo	No
Space Force ^b	Yes, only for exceptionally qualified recruits in critical, understaffed career fields	Yes, an additional hand tattoo	No
Coast Guard	No	No	No

Source: GAO analysis of the armed forces’ documents. | GAO-22-105676

Note: Armed forces’ policies on dress, appearance, or uniform standards or their stand-alone tattoo policies—referred to as “appearance policies” for the purposes of this table—address tattoo permissions and restrictions for each armed force.

^aThe Marine Corps bulletin addressing tattoos will be in effect until October 2022 or until incorporated into permanent policy, whichever occurs sooner.

^bIn May 2022, the Department of the Air Force issued a Space Force guidance memorandum (in effect for 1 year or until incorporated into permanent policy, whichever occurs sooner) related to appearance, including tattoos. However, the memorandum is not all-inclusive, and the Space Force uses current Air Force policy for those areas, such as waivers, not addressed in the memorandum. This memorandum is part of the Space Force’s “appearance policy.”

The Army, Navy, and Air Force discuss waivers for recruits in the tattoo-specific sections of their appearance policies. An October 2021 Marine Corps bulletin, updating the Marine Corps’ tattoo policy, states that recruits can request a waiver, although the bulletin also states that such waivers are unlikely to be approved.¹⁹ The Navy and the Marine Corps have recruit-specific guidance that provides additional information on waivers for tattoos. Navy officials also stated that, in March 2022, the

¹⁹The Marine Corps bulletin will be in effect until October 2022 or until incorporated into permanent policy, whichever occurs sooner. Marine Corps officials stated that they expect the bulletin to be extended until the contents are incorporated into permanent policy.

Navy expanded its waiver availability for recruits to include more locations on the neck and ear; however, they stated that this expansion is not yet included in Navy policy or other guidance documents. The Coast Guard’s policy discusses that authority for tattoo consideration for recruits resides with the relevant command structure, but it does not specifically state a waiver is available for tattoos. However, Coast Guard officials confirmed that recruits are eligible for waivers for tattoos.

Waivers for service members. Each of the armed forces, except for the Navy, allows waivers to certain tattoo restrictions for service members, although their respective appearance policies generally do not document this possibility clearly. However, the Marine Corps states explicitly in its policy that waivers for unauthorized tattoos are available (see table 2).

Table 2: Armed Forces’ Policies on Tattoo Waivers for Service Members

Armed force	Tattoo waiver (including waiver approval authority) clearly stated in tattoo section of appearance policy?	Tattoos eligible for waivers clearly specified in tattoo section of appearance policy?	Requirements for requests and conditions for waiver approval clearly specified in tattoo section of appearance policy?
Army	No ^a	No	No
Marine Corps ^b	Yes	Yes, outside authorized areas	No
Navy	No	Not applicable	Not applicable
Air Force	No	No	No
Space Force ^c	No	No	No
Coast Guard	No	No	No

Source: GAO analysis of the armed forces’ documents. | GAO-22-105676

Note: Armed forces’ policies on dress, appearance, or uniform standards or their stand-alone tattoo policies—referred to as “appearance policies” for the purposes of this table—address tattoo permissions and restrictions for each armed force.

^aArmy policy has one narrow waiver available to service members. That is, a member whose tattoo was deemed appropriate upon entry, but is later determined to violate the policy, may request a waiver through command channels.

^bThe Marine Corps bulletin will be in effect until October 2022 or until incorporated into permanent policy, whichever occurs sooner.

^cIn May 2022, the Department of the Air Force issued a Space Force guidance memorandum (in effect for 1 year or until incorporated into policy, whichever occurs sooner) related to appearance, including tattoos. However, the memorandum is not all-inclusive, and the Space Force uses current Air Force policy for those areas, such as waivers, not addressed in the memorandum. This memorandum is part of the Space Force’s “appearance policy.”

The Marine Corps policy states that service members can request a waiver for tattoos outside an authorized location, but notes that the request is unlikely to be approved. Army, Air Force, and Coast Guard officials stated that service members can request waivers to the tattoo

policy.²⁰ The Navy does not currently offer waivers for service members' unauthorized tattoos, but Navy officials indicated possible changes to the tattoo policy for service members are under consideration.

Although waiver availability for service members is generally not clearly stated in policies, most armed forces' policies allow for, or officials stated that they allow for, waivers. Specifically, they stated that service members either should follow standard procedures for policy-related requests or should contact their respective chains of command to request waivers to tattoo policy. For example, the Army's appearance policy states that service members should route any waiver requests through the appropriate command. Similarly, the Air Force's and Coast Guard's appearance policies provide an email address for requesting an exception to anything within the policy, which would include a waiver for tattoos. Marine Corps officials confirmed that the command structure has the authority to approve waivers. Officials from four armed forces stated that current waiver approval processes include decision-makers' consideration of the "whole person," which would include evaluation of factors beyond the tattoo.

Waivers for content. Waivers are not generally available for tattoos with unauthorized content. Marine Corps policy states that waivers for unauthorized tattoos are available only for those tattoos outside an allowed location. The Air Force policy specifically states that waivers for recruits are not available for tattoo content, and the Navy policy states that it does not grant waivers for prohibited content. The Army policy provides the option for recruits to request waivers for unauthorized tattoo locations. Navy and Air Force officials confirmed that tattoo content is not eligible for a waiver.

According to *Standards for Internal Control in the Federal Government*, effective information and communication are vital for an entity to achieve its objectives.²¹ These standards state that management should internally and externally communicate the necessary quality information to achieve the entity's objectives. This includes considering who needs the

²⁰Air Force officials' statement applies to service members from both the Air Force and Space Force.

²¹GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

information, how best to communicate it, and how to make the information readily available to them.

Clear policies on waiver availability for unauthorized tattoos—such as what types of waivers are available, to whom, and under what conditions—would provide decision-makers, such as commanders; recruiters, who interface with potential recruits; and potential waiver applicants with consistent information about requirements for waiver requests and conditions for approval. In addition, clarified policies could enhance awareness among commanders, recruiters, eligible recruits, and current service members that tattoo prevalence may not eliminate the possibility of military service or continued service if certain conditions can be met.

Conclusions

Social acceptance and prevalence of tattoos have increased over the last 2 decades, particularly among young Americans. The armed forces have demonstrated some responsiveness to this social change by revising their respective tattoo policies to lift restrictions. These policies have evolved to allow tattoos of various sizes and on most locations of the body, and the armed forces allow waivers for certain unauthorized tattoos. However, not all of the armed forces have clearly documented in policy whether these waivers are available for both recruits and service members, and none have provided clear guidance on tattoos eligible for waivers, waiver approval authorities, and other necessary conditions for waiver consideration or approval. By providing clear policies on tattoo waivers, the armed forces could clarify whether tattoos are a barrier to future or continued military service.

Recommendations for Executive Action

We are making a total of six recommendations, one to each of the armed forces.

The Secretary of the Army, in coordination with the Chief of Staff of the Army, should update the Army's tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provides clear guidance on tattoos eligible for waivers, the waiver approval authority,

requirements for requesting a waiver, and on any other conditions required for waiver consideration or approval. (Recommendation 1)

The Secretary of the Navy should ensure that the Commandant of the Marine Corps updates the Marine Corps' tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provides clear guidance on tattoos eligible for waivers, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver consideration or approval. (Recommendation 2)

The Secretary of the Navy should ensure that the Chief of Naval Operations updates the Navy's tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for recruits and, if applicable, for service members; and provides clear guidance on tattoos eligible for waivers, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver consideration or approval. (Recommendation 3)

The Secretary of the Air Force, in coordination with the Chief of Staff of the Air Force, should update the Air Force's tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provides clear guidance on tattoos eligible for waivers, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver consideration or approval. (Recommendation 4)

The Secretary of the Air Force, in coordination with the Chief of Space Operations, U.S. Space Force, should update the Space Force's tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provides clear guidance on tattoos eligible for waivers, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver consideration or approval. (Recommendation 5)

The Secretary of Homeland Security should ensure that the Commandant of the Coast Guard updates the Coast Guard's tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and

provides clear guidance on tattoos eligible for waivers, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver consideration or approval. (Recommendation 6)

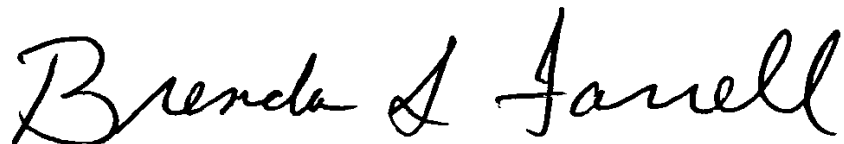
Agency Comments and Our Evaluation

We provided a draft of this report to the Departments of Defense and Homeland Security for comment. In written comments, reproduced in appendix I, DOD and the military services generally agreed with the draft report's five recommendations (Recommendations 1 – 5) addressed to them. Specifically, the Army and the Marine Corps concurred, and the Navy, Air Force, and Space Force partially concurred with the recommendations, as discussed below. In its response, DOD stated that the military services have agreed to address the issues identified in our report and will do so by developing and issuing revised guidance. In written comments, reproduced in appendix II, the Department of Homeland Security agreed with the recommendation addressed to it (Recommendation 6). In addition, the Marine Corps and the Navy provided technical comments, which we incorporated as appropriate.

The Navy partially concurred with the draft report's Recommendation 3, stating that it has current policy prohibiting unauthorized content in tattoos. In our report, we acknowledge that the Navy, and other military services, have policies that restrict the content of tattoos, and we have structured our recommendation accordingly. The Air Force and Space Force also partially concurred with the draft report's Recommendations 4 and 5 respectively, stating that the phrase "conditions required for waiver approval" suggests that waivers can be approved prior to consideration by a decision-maker. In our report, we discuss the lack of clarity in guidance on tattoo waiver availability and the waiver process. The intention of these recommendations is to ensure that the military services document whether waivers to tattoo policy are available and to enhance clarity about tattoo waiver eligibility, relevant authority, and waiver processes for recruits and service members. To respond to the Navy, Air Force, and Space Force comments about these recommendations, we slightly modified the wording of the recommendations to clarify our intent. We believe these changes address the concerns expressed.

We are sending copies of this report to the appropriate congressional committees; the Secretaries of Defense and Homeland Security; the Secretaries of the Army, the Navy, the Air Force; the Chief of Space Operations, U.S. Space Force; and the Commandants of the Marine Corps and Coast Guard. In addition, the report will be available at no charge on the GAO website at <https://www.gao.gov>.

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

A handwritten signature in black ink that reads "Brenda S. Farrell". The signature is written in a cursive style with a large initial "B".

Brenda S. Farrell, Director
Defense Capabilities and Management

Appendix I: Comments from the Department of Defense

Appendix I: Comments from the Department of Defense



MANPOWER AND
RESERVE AFFAIRS

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
1500 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-1500

Ms. Brenda S. Farrell
Director, Defense Capabilities Management
U.S. Government Accountability Office
441 G Street, NW
Washington DC 20548

Dear Ms. Farrell,

This is the Department of Defense (DoD) response to the GAO Draft Report 22-105676, Military Personnel: "Armed Forces Should Clarify Tattoo Policies' Waiver Guidance," July 1, 2022 (GAO Code 105676)

The Department appreciates GAO's review and generally agrees with the content of the report. GAO found there are instances where the Military Services' tattoo policies are not clear and should be improved. Each Military Service has agreed to address these issues and will develop and issue revised guidance.

Thank you for your thorough review and recommendations. Attached is DoD's response to the subject report. My point of contact, Mr. Dennis Drogo, can be reached at dennis.j.drogo.civ@mail.mil and by phone (703)697-9268.

Sincerely,

Thomas A. Constable AUG 03 2022
Performing the Duties of the Assistant Secretary
of Defense for Manpower and Reserve
Affairs

JPM: [illegible]
703-697-9268
2022-08-03

**GAO DRAFT REPORT DATED JULY 1, 2022,
GAO -22-105676 (GAO CODE 105676)**

**MILITARY PERSONNEL: ARMED FORCES SHOULD CLARIFY TATTOO
POLICIES' WAIVER GUIDANCE**

**DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATION**

RECOMMENDATION 1: The GAO recommends that the Secretary of the Army, in coordination with the Chief of Staff of the Army, update the Army's tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provide clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

DoD RESPONSE: The Army concurs with the recommendation listed in the report and will update the tattoo policy, as appropriate, to ensure it clearly documents whether waivers are available for both recruits and Service members. The revised policy will provide guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and any other conditions required for waiver approval no later than two years from the time GAO publishes the final report.

RECOMMENDATION 2: The GAO recommends that the Secretary of the Navy ensure that the Commandant of the Marine Corps updates the Marine Corps' tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provides clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

DoD RESPONSE: The Marine Corps concurs with the recommendation and will update its tattoo policy, as appropriate, to ensure it documents whether waivers to the tattoo policy are available for both recruits and Service members. The revised policy will provide guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval. The Marine Corps will complete this update incident to the next review of the policy.

RECOMMENDATION 3: The GAO recommends that the Secretary of the Navy ensure that the Chief of Naval Operations updates the Navy's tattoo policy, as appropriate, to ensure it clearly documents whether waivers to the tattoo policy are available for recruits and, if applicable, for service members. The revised policy will provide clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

Appendix I: Comments from the Department of Defense

DoD RESPONSE: Navy partially concurs. Navy believes the recommendation should be edited to read, “The GAO recommends that the Secretary of the Navy should ensure that the Chief of Naval Operations updates the Navy’s tattoo policy, as appropriate, to better ensure that it documents the process to request a waiver to the policy and provide the waiver approval authority.” If edited as shown Navy would fully concur. The edits reflect the fact that as originally written, recommendation 3 does not account for the fact that Navy already has policy in place with prohibited content clearly noted in regulations which are applicable to all Sailors. Providing guidance for what is specifically allowed is not possible given the vast array of tattoo options available. Navy believes that the current provision on prohibited content is the correct policy.

RECOMMENDATION 4: The GAO recommends that the Secretary of the Air Force, in coordination with the Chief of Staff of the Air Force, update the Air Force’s tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provide clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

DoD RESPONSE: Air Force partially concurs. It agrees that clear documentation is warranted informing Service members that tattoo waivers are available, as well as guidance on eligible tattoos, waiver approval authorities, and the requirements and process for pursuing a waiver. It does not concur with the language in the recommendation to provide “conditions required for waiver approval.” Instead Air Force recommends “waiver approval” be updated to “conditions required to pursue a waiver” as to avoid any misperception that approval is guaranteed before routing the request to the decision authority. Finally, it disagrees that the waiver policy guidance and waiver authority specific to recruits is not clearly defined, as the process is detailed in the April 2022 version of DAFI 36-2903 para 3.4.4 through 3.4.4.2.

RECOMMENDATION 5: The GAO recommends that the Secretary of the Air Force, in coordination with the Chief of Space Operations, U.S. Space Force, update the Space Force’s tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to tattoo policy are available for both recruits and service members; and provide clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

DoD RESPONSE: Space Force partially concurs. It agrees that clear documentation is warranted informing Service members that tattoo waivers are available, as well as guidance on eligible tattoos, waiver approval authorities, and the requirements and process for pursuing a waiver. It does not concur with the language in the recommendation to provide “conditions required for waiver approval.” Instead Space Force recommends “waiver approval” be updated to “conditions required to pursue a waiver” as to avoid any misperception that approval is guaranteed before routing the request to the decision authority. Finally, it disagrees that the waiver policy guidance and waiver authority specific to recruits is not clearly defined, as the process is detailed in the April 2022 version of DAFI 36-2903 para 3.4.4 through 3.4.4.2.

Accessible Text for Appendix I: Comments from the Department of Defense

Ms. Brenda S. Farrell
Director, Defense Capabilities Management
U.S. Government Accountability Office
441 G Street, NW
Washington DC 20548

Dear Ms. Farrell,

This is the Department of Defense (DoD) response to the GAO Draft Report 22-105676, Military Personnel: "Armed Forces Should Clarify Tattoo Policies' Waiver Guidance," July 1, 2022 (GAO Code 105676)

The Department appreciates GAO's review and generally agrees with the content of the report. GAO found there are instances where the Military Services' tattoo policies are not clear and should be improved. Each Military Service has agreed to address these issues and will develop and issue revised guidance.

Thank you for your thorough review and recommendations. Attached is DoD's response to the subject report. My point of contact, Mr. Dennis Drogo, can be reached at dennis.j.drogo.civ@mail.mil and by phone (703)697-9268.

Sincerely,

Thomas A. Constable AUG 03 2022
Performing the Duties of the Assistant Secretary
of Defense for Manpower and Reserve Affairs

GAO DRAFT REPORT DATED JULY 1, 2022, GAO -22-105676 (GAO CODE
105676)

MILITARY PERSONNEL: ARMED FORCES SHOULD CLARIFY TATTOO
POLICIES' WAIVER GUIDANCE

DEPARTMENT OF DEFENSE COMMENTS TO THE GAO RECOMMENDATION

RECOMMENDATION 1: The GAO recommends that the Secretary of the Army, in coordination with the Chief of Staff of the Army, update the Army's tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provide clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

DoD RESPONSE: The Army concurs with the recommendation listed in the report and will update the tattoo policy, as appropriate, to ensure it clearly documents whether waivers are available for both recruits and Service members. The revised policy will provide guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and any other conditions required for waiver approval no later than two years from the time GAO publishes the final report.

RECOMMENDATION 2: The GAO recommends that the Secretary of the Navy ensure that the Commandant of the Marine Corps updates the Marine Corps' tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provides clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

DoD RESPONSE: The Marine Corps concurs with the recommendation and will update its tattoo policy, as appropriate, to ensure it documents whether waivers to the tattoo policy are available for both recruits and Service members. The revised policy will provide guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval. The Marine Corps will complete this update incident to the next review of the policy.

RECOMMENDATION 3: The GAO recommends that the Secretary of the Navy ensure that the Chief of Naval Operations updates the Navy's tattoo policy, as appropriate, to ensure it clearly documents whether waivers to the tattoo policy are available for recruits and, if applicable, for service members. The revised policy will provide clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

DoD RESPONSE: Navy partially concurs. Navy believes the recommendation should be edited to read, "The GAO recommends that the Secretary of the Navy should ensure that the Chief of Naval Operations updates the Navy's tattoo policy, as appropriate, to better ensure that it documents the process to request a waiver to the policy and provide the waiver approval authority." If edited as shown Navy would fully concur. The edits reflect the fact that as originally written, recommendation 3 does

not account for the fact that Navy already has policy in place with prohibited content clearly noted in regulations which are applicable to all Sailors. Providing guidance for what is specifically allowed is not possible given the vast array of tattoo options available. Navy believes that the current provision on prohibited content is the correct policy.

RECOMMENDATION 4: The GAO recommends that the Secretary of the Air Force, in coordination with the Chief of Staff of the Air Force, update the Air Force's tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provide clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

DoD RESPONSE: Air Force partially concurs. It agrees that clear documentation is warranted informing Service members that tattoo waivers are available, as well as guidance on eligible tattoos, waiver approval authorities, and the requirements and process for pursuing a waiver. It does not concur with the language in the recommendation to provide "conditions required for waiver approval." Instead Air Force recommends "waiver approval" be updated to "conditions required to pursue a waiver" as to avoid any misperception that approval is guaranteed before routing the request to the decision authority. Finally, it disagrees that the waiver policy guidance and waiver authority specific to recruits is not clearly defined, as the process is detailed in the April 2022 version of DAFI 36-2903 para 3.4.4 through 3.4.4.2.

RECOMMENDATION 5: The GAO recommends that the Secretary of the Air Force, in coordination with the Chief of Space Operations, U.S. Space Force, update the Space Force's tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to tattoo policy are available for both recruits and service members; and provide clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

DoD RESPONSE: Space Force partially concurs. It agrees that clear documentation is warranted informing Service members that tattoo waivers are available, as well as guidance on eligible tattoos, waiver approval authorities, and the requirements and process for pursuing a waiver. It does not concur with the language in the recommendation to provide "conditions required for waiver approval." Instead Space Force recommends "waiver approval" be updated to "conditions required to pursue a waiver" as to avoid any misperception that approval is guaranteed before routing the request to the decision authority. Finally, it disagrees that the waiver policy guidance and waiver authority specific to recruits is not clearly defined, as the process is detailed in the April 2022 version of DAFI 36-2903 para 3.4.4 through 3.4.4.2.

Appendix II: Comments from the Department of Homeland Security

**Appendix II: Comments from the Department
of Homeland Security**

U.S. Department of Homeland Security
Washington, DC 20528



July 28, 2022

Brenda S. Farrell
Director, Defense Capabilities and Management
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Management Response to Draft Report GAO-22-105676, "MILITARY
PERSONNEL: Armed Forces Should Clarify Tattoo Policies' Waiver Guidance"

Dear Ms. Farrell:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note GAO's recognition that the study the U.S. Coast Guard had the RAND Corporation conduct in 2021 aimed at improving recruitment of women and racial and ethnic minorities¹ led to the creation of a Coast Guard Recruiting Command task force. GAO also noted that this task force took actions to address the removal of potential recruiting barriers. For example, the Coast Guard issued ALCOAST COMDT NOTICE (ACN) 113/21, "Update to the Tattoo, Body Marking, Body Piercing, and Mutilation Policy," dated October 25, 2021, an interim update authorizing additional tattoo locations on the hands, neck, and face. DHS and the Coast Guard remain committed to promoting workforce inclusivity by ensuring recruitment efforts are fair and accessible to all candidates.

The draft report contained six recommendations, including one for the Coast Guard with which the Department concurs. Enclosed find our detailed response to the recommendation. DHS previously submitted technical comments under a separate cover for GAO's consideration.

¹ Homeland Security Operational Analysis Center operated by the Rand Corporation, "Improving the Representation of Women and Racial/Ethnic Minorities Among U.S. Coast Guard Active-Duty Members," dated 2021. https://www.rand.org/pubs/research_reports/RRA362-2.html

**Appendix II: Comments from the Department
of Homeland Security**

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

JIM H CRUMPACKER Digitally signed by JIM H
CRUMPACKER
Date: 2022.07.28 08:48:39 -0400

JIM H. CRUMPACKER, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Enclosure

**Enclosure: Management Response to Recommendation
Contained in GAO-22-105676**

GAO recommended that the Secretary of Homeland Security ensure that the
Commandant of the Coast Guard:

Recommendation 6: Updates the Coast Guard’s tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provide clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

Response: Concur. The Coast Guard’s Office of Military Personnel Policy (CG-133) will update COMDTINST 1001.1, “Tattoo, Body Marking, Body Piercing, and Mutilation Policy,” to ensure that it clearly documents guidance on eligible tattoos, the waiver approval authority, and the requirements for requesting a waiver, including the guidance in ACN 113/21, as appropriate. Specifically, CG-133 will release an interim policy update by November 30, 2022, and complete the update of COMDTINST 1000.1 by the end of the summer of 2023. Estimated Completion Date: July 31, 2023.

Accessible Text for Appendix II: Comments from the Department of Homeland Security

July 28, 2022

Brenda S. Farrell
Director, Defense Capabilities and Management
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Management Response to Draft Report GAO-22-105676, “MILITARY
PERSONNEL: Armed Forces Should Clarify Tattoo Policies’ Waiver Guidance”

Dear Ms. Farrell:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the U.S. Government Accountability Office’s (GAO) work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note GAO’s recognition that the study the U.S. Coast Guard had the RAND Corporation conduct in 2021 aimed at improving recruitment of women and racial and ethnic minorities¹ led to the creation of a Coast Guard Recruiting Command task force. GAO also noted that this task force took actions to address the removal of potential recruiting barriers. For example, the Coast Guard issued ALCOAST COMDT NOTICE (ACN) 113/21, “Update to the Tattoo, Body Marking, Body Piercing, and Mutilation Policy,” dated October 25, 2021, an interim update authorizing additional tattoo locations on the hands, neck, and face. DHS and the Coast Guard remain committed to promoting workforce inclusivity by ensuring recruitment efforts are fair and accessible to all candidates.

The draft report contained six recommendations, including one for the Coast Guard with which the Department concurs. Enclosed find our detailed response to the

¹ Homeland Security Operational Analysis Center operated by the Rand Corporation, “Improving the Representation of Women and Racial/Ethnic Minorities Among U.S. Coast Guard Active-Duty Members,” dated 2021. https://www.rand.org/pubs/research_reports/RRA362-2.html

recommendation. DHS previously submitted technical comments under a separate cover for GAO's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

JIM H. CRUMPACKER, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Enclosure

Enclosure: Management Response to Recommendation Contained in GAO-22-105676

GAO recommended that the Secretary of Homeland Security ensure that the Commandant of the Coast Guard:

Recommendation 6: Updates the Coast Guard's tattoo policy, as appropriate, to better ensure that it clearly documents whether waivers to the tattoo policy are available for both recruits and service members; and provide clear guidance on eligible tattoos, the waiver approval authority, requirements for requesting a waiver, and on any other conditions required for waiver approval.

Response: Concur. The Coast Guard's Office of Military Personnel Policy (CG-133) will update COMDTINST 1001.1, "Tattoo, Body Marking, Body Piercing, and Mutilation Policy," to ensure that it clearly documents guidance on eligible tattoos, the waiver approval authority, and the requirements for requesting a waiver, including the guidance in ACN 113/21, as appropriate. Specifically, CG-133 will release an interim policy update by November 30, 2022, and complete the update of COMDTINST 1000.1 by the end of the summer of 2023. Estimated Completion Date: July 31, 2023.

GAO Contact

Appendix III: GAO Contact and Staff Acknowledgments

Brenda S. Farrell at (202) 512-3604 or FarrellB@gao.gov

Staff Acknowledgments

In addition to the contact named above, GAO staff who made key contributions to this report include Vincent Balloon (Assistant Director), Rebekah J. Boone (Analyst-in-Charge), Vincent Buquicchio, David Jones, Mae Jones, Suzanne Kaasa, and Stephanie Moriarty.

GAO's Mission

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

Obtaining Copies of GAO Reports and Testimony

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

Order by Phone

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

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

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

Connect with GAO

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

To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

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

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

Congressional Relations

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

Public Affairs

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

Strategic Planning and External Liaison

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



Please Print on Recycled Paper.