



February 2016

DOD AND COAST GUARD

Actions Needed to Increase Oversight and Management Information on Hazing Incidents Involving Servicemembers

GAO Highlights

Highlights of [GAO-16-226](#), a report to congressional committees

Why GAO Did This Study

Initiations and rites of passage can instill esprit de corps and loyalty and are included in many traditions throughout DOD and the Coast Guard. However, at times these, and more ad hoc activities, have included cruel or abusive behavior that can undermine unit cohesion and operational effectiveness.

Congress included a provision in statute for GAO to report on DOD, including each of the military services, and Coast Guard policies to prevent, and efforts to track, incidents of hazing. This report addresses the extent to which DOD and the Coast Guard, which falls under the Department of Homeland Security (DHS), have (1) developed and implemented policies to address incidents of hazing, and (2) visibility over hazing incidents involving servicemembers. GAO reviewed hazing policies; assessed data on hazing incidents and requirements for and methods used to track them; assessed the results of organizational climate surveys that included questions on hazing; conducted focus groups with servicemembers during site visits to two installations selected based on available hazing and sexual assault data, among other factors; and interviewed cognizant officials.

What GAO Recommends

GAO is making 12 recommendations, among them that DOD and the Coast Guard regularly monitor policy implementation, issue guidance on the collection and tracking of hazing incident data, and evaluate the prevalence of hazing. DOD and DHS concurred with all of GAO's recommendations and have begun taking actions to address them.

View [GAO-16-226](#). For more information, contact Brenda S. Farrell at (202) 512-3604 or farrellb@gao.gov

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What GAO Found

The Department of Defense (DOD), including each of the military services, and the Coast Guard have issued policies to address hazing, but generally do not know the extent to which their policies have been implemented. The military services' and Coast Guard's policies define hazing similarly to DOD and include servicemember training requirements. The military service and Coast Guard policies also contain guidance, such as responsibilities for policy implementation and direction on avoiding hazing in service customs and traditions, beyond what is included in DOD's policy. However, DOD and the Coast Guard generally do not know the extent to which their policies have been implemented because most of the services and the Coast Guard have not conducted oversight through regular monitoring of policy implementation. The Marine Corps conducts inspections of command hazing policy on issues such as providing servicemembers with information on the hazing policy and complying with hazing incident reporting requirements. While these inspections provide Marine Corps headquarters officials with some information they can use to conduct oversight of hazing policy implementation, they do not necessarily cover all aspects of hazing policy implementation. Without routinely monitoring policy implementation, DOD, the Coast Guard, and the military services may not have the accountability needed to help ensure efforts to address hazing are implemented consistently.

DOD and the Coast Guard have limited visibility over hazing incidents involving servicemembers. Specifically, the Army, the Navy, and the Marine Corps track data on reported incidents of hazing, but the data are not complete and consistent due to varying tracking methods that do not always include all reported incidents. For example, until October 2015, the Army only tracked cases investigated by criminal investigators or military police, while the Navy required reports on substantiated hazing cases and the Marine Corps required reports on both substantiated and unsubstantiated cases. The Air Force and Coast Guard do not require the collection of hazing incident data, and instead have taken an ad hoc approach to compiling relevant information to respond to requests for such data. In the absence of guidance on hazing data collection, DOD and the Coast Guard do not have an accurate picture of reported hazing incidents across the services. In addition, DOD and the Coast Guard have not evaluated the prevalence of hazing. An evaluation of prevalence would provide information on the extent of hazing beyond the limited data on reported incidents, and could be estimated based on survey responses, as DOD does in the case of sexual assault. Service officials said that currently, reported hazing incidents are the primary indicator of the extent of hazing. However, data obtained through other sources suggest that hazing may be more widespread in DOD and the Coast Guard than the current reported numbers. For example, GAO analysis of organizational climate survey results from 2014 for the military services and the Coast Guard found that about 12 percent of respondents in the junior enlisted ranks indicated their belief that such incidents occur in their units. Although these results do not measure the prevalence of hazing incidents, they yield insights into servicemember perceptions of hazing, and suggest that an evaluation of the extent of hazing is warranted. Without evaluating the prevalence of hazing within their organizations, DOD and the Coast Guard will be limited in their ability to effectively target their efforts to address hazing.

Contents

Letter		1
	Background	5
	DOD and the Coast Guard Have Issued Policies to Address Hazing but They Do Not Know the Extent to Which the Policies Have Been Implemented and Servicemembers Need Clarification on the Policies	10
	DOD and the Coast Guard Have Limited Visibility Over Hazing Incidents	25
	Conclusions	38
	Recommendations for Executive Action	39
	Agency Comments and Our Evaluation	41
Appendix I	Scope and Methodology	45
Appendix II	Hazing Incident Data as Tracked by DOD and the Coast Guard	51
Appendix III	Focus Group and Survey Methodology for Hazing Site Visits	57
Appendix IV	Comments from the Department of Defense	62
Appendix V	Comments from the Department of Homeland Security	65
Appendix VI	GAO Contact and Staff Acknowledgments	69
Tables		
	Table 1: Differences in Military Service and Coast Guard Hazing Incident Data Collection	27
	Table 2: 2014 Organizational Climate Survey Questions on Hazing and Demeaning Behaviors	34
	Table 3: GAO Analysis of 2014 Organizational Climate Survey Data from Army, Navy, Air Force, Marine Corps, and	

Coast Guard Active-Duty Units on Hazing and Demeaning Behaviors	36
Table 4: DOD and Coast Guard Locations Visited or Contacted	50
Table 5: Participation in Focus Group Meetings by Service and Gender	58

Figures

Figure 1. Timeline of DOD and Armed Services' Hazing Policies and Relevant Congressional Actions	12
Figure 2. GAO Analysis of Reported Army Alleged Hazing Data	52
Figure 3: GAO Analysis of Reported Navy Alleged Hazing Data	53

Abbreviations

DHS	Department of Homeland Security
DOD	Department of Defense
ODMEO	Office of Diversity Management and Equal Opportunity
UCMJ	Uniform Code of Military Justice

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February 9, 2016

Congressional Committees

Initiations and rites of passage can be effective tools to instill esprit de corps and loyalty among servicemembers and are included in many traditions throughout the Department of Defense (DOD) and in the Coast Guard.¹ However, such traditional activities, as well as other, more ad hoc activities, have at times included cruel or abusive behavior, and it has not always been easy for servicemembers to draw a clear distinction between legitimate traditions and patterns of misconduct. In recent years, the military services, as well as the Coast Guard, have experienced high-profile hazing incidents. For example, seven members of the Coast Guard were convicted at courts-martial for charges related to hazing behaviors while on board the Coast Guard Cutter *Venturous* from 2007 through 2009. In 2011, while serving in Afghanistan, an Army private committed suicide after reportedly being subjected to verbal and physical hazing and a Lance Corporal in the Marine Corps committed suicide after fellow Marines beat him during an alleged hazing incident for falling asleep on watch.²

Until December 2015, DOD defined hazing as any conduct whereby a military member or members, regardless of service or rank, without proper authority causes another military member or members, regardless of service or rank, to suffer or be exposed to any activity which is cruel,

¹The military services include the Army, the Navy, the Marine Corps, the Air Force, and the Coast Guard. Although the Coast Guard falls under the control of the Department of Homeland Security (DHS), DHS does not set policy relating to hazing for the Coast Guard, according to both DHS and Coast Guard officials. The Coast Guard is not required to adhere to DOD policy, but has chosen to align its hazing policy with DOD's. In times of war or other national emergency the Coast Guard can operate under the Department of the Navy. Because of the distinct status of the Coast Guard, for the purposes of this report, we refer to the "military services" to include the Army, Navy, Marine Corps, and Air Force, and refer separately to the Coast Guard.

²Army and Marine Corps officials subsequently told us that these incidents in their services may be better defined as bullying rather than hazing. According to the Army, while hazing and bullying can include both physical and nonphysical interactions, bullying is always committed with the intent to exclude or reject another from inclusion in a group.

abusive, humiliating, oppressive, demeaning, or harmful.³ Soliciting or coercing another to perpetrate any such activity was also considered hazing, and the actions could be verbal or psychological in nature. Furthermore, actual or implied consent did not eliminate the culpability of the perpetrator. The military services and the Coast Guard have adopted similar definitions of hazing. At the conclusion of this review, DOD updated its definition of hazing to, among other things, distinguish between hazing and bullying, as we discuss later in this report. According to the updated definition, hazing involves bringing people into a group or new status, whereas bullying may involve the singling out of an individual for being different or weak.⁴

The Carl Levin and Howard P. “Buck” McKeon National Defense Authorization Act for Fiscal Year 2015 included a provision for us to report on the policies to prevent hazing, and systems initiated to track incidents of hazing, in each of the armed services.⁵ For this report, we reviewed the extent to which DOD, the military services, and the Coast Guard have (1) developed and implemented policies to address hazing incidents, and (2) visibility over hazing incidents involving servicemembers.

To address the first objective, we reviewed hazing policies and guidance from DOD, the military services, and the Coast Guard.⁶ We interviewed officials within the Office of the Under Secretary of Defense for Personnel and Readiness, the Army, the Navy, the Marine Corps, the Air Force, and the Coast Guard who are responsible for the development and implementation of hazing policies, as well as criminal investigators, inspector general officials, and legal officials.⁷ In addition, we reviewed training materials from the military services and the Coast Guard on the prevention of hazing. We visited two installations—one for the Navy and one for the Marine Corps—to obtain the perspectives of servicemembers, commanders, and other officials responsible for implementing hazing

³Secretary of Defense memorandum, *Hazing* (Aug 28, 1997).

⁴Deputy Secretary of Defense Memorandum, *Hazing and Bullying Prevention and Response in the Armed Forces* (Dec. 23, 2015).

⁵See Pub. L. No. 113-291, § 587 (2014).

⁶We compared all the services’ policies in order to identify similarities and differences in their efforts to address hazing.

⁷Section 587 of Pub. L. No. 113-291 directed that our review include the Coast Guard.

policies and responding to reported incidents, and we conducted nine focus groups with servicemembers in enlisted pay grades E3-E5 (5 Navy and 4 Marine Corps) at those installations. We also administered a related survey to the focus group participants.⁸ These focus groups provided insight into the effects of hazing policies at the local levels, but were not generalizable across the military services. We compared the extent to which DOD, the military services, and the Coast Guard have monitored the implementation of hazing policies to the *Standards for Internal Control in the Federal Government* criteria on management control activities, including the policies, procedures, techniques, and mechanisms that enforce management's directives to achieve an entity's objectives.⁹ We also compared the extent to which policies and guidance are sufficiently clear for servicemembers to determine when hazing has occurred to the *Standards for Internal Control in the Federal Government* criteria that state that management establishes standards of conduct, which guide the directives, attitudes, and behaviors of the organization in achieving the entity's objectives.¹⁰

To address the second objective, we reviewed DOD's, the military services', and the Coast Guard's hazing policies to determine the extent to which they required tracking of hazing incidents and to identify the processes, if any, that are used to collect and maintain hazing incident data. We analyzed hazing incident data from December 2012 through December 2014—to the extent they were available—for each of the military services and the Coast Guard.¹¹ Further, we interviewed officials

⁸We selected installations—Naval Base Coronado, Calif., and Marine Corps Base Camp Pendleton, Calif.—to visit based on available data on hazing incidents as well as sexual assaults of males in the armed services, and selected two installations to include one land-based and one non-land based service, which for efficiency were located in close proximity. We used data on sexual assaults of males as a partial proxy due to the limited data available on hazing incidents and the documented overlap between sexual assaults of males and hazing in the armed services. In the Navy, E3 is a Seaman; E4 is a Petty Officer Third Class; and E5 is a Petty Officer Second Class. In the Marine Corps, E3 is a Lance Corporal; E4 is a Corporal; and E5 is a Sergeant.

⁹GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

¹⁰[GAO-14-704G](#).

¹¹Pub. L. No. 113-291, § 587 specifically provided that we review hazing incident data starting two years earlier, so we reviewed data starting in December 2012, two years prior to the statute's enactment, through 2014, the last full year of data available.

from the military services and the Coast Guard who are responsible for collecting data on hazing incidents and any related adjudications. We also interviewed officials within the Office of the Under Secretary of Defense for Personnel and Readiness to determine the extent to which DOD had provided the military services with guidance on tracking hazing incident data, and we interviewed officials in the Coast Guard Office of Military Personnel, Policy and Standards Division, to determine the extent to which the Coast Guard had issued guidance on tracking hazing incident data. We compared the military services' and the Coast Guard's methods of data collection with *Standards for Internal Control in the Federal Government* criteria stating that information should be recorded and communicated to management and others who need it in a form and within a time frame that allows them to carry out their internal control and other responsibilities.¹² We found limitations in the reliability of the armed services' data on hazing incidents, which we discuss in the report. However, we found that the data were sufficiently reliable for reporting some aggregate numbers of incidents, alleged offenders, and alleged victims, and in some cases for reporting demographic information on alleged offenders and victims. We interviewed officials in the Office of the Under Secretary of Defense for Personnel and Readiness and from each of the military services to identify any DOD-wide or service-specific initiatives that exist to evaluate the extent of hazing in the military. We also interviewed Coast Guard officials to identify any steps that had been taken to evaluate the extent of hazing in the Coast Guard. We obtained and analyzed available data pertaining to perceptions of hazing and demeaning behaviors from the results of command climate surveys administered by each military service and by the Coast Guard in calendar year 2014.¹³ We found some limitations in the reliability of these data, which we discuss in the report. However, we found that the data were sufficiently reliable to report some aggregate numbers on perceptions of hazing across the armed services and in each armed service. Because of the nature of the decentralized process used to administer and to collect the results of the command climate surveys, the analysis cannot be

¹²GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999). We applied the internal control standards in effect during the time period of the data we reviewed.

¹³Calendar year 2014 was the only full year of data available since hazing questions were added to the survey in January 2014. DOD and service policies require that each unit administer the surveys at least once a year. The year for which we reviewed data included 1.4 million individual survey responses from about 13,000 units.

generalized to the entire population of active service members across the armed forces or each service. Therefore, the analyses we present using the command climate survey data are intended to demonstrate how the survey data might be used to assess perceptions related to hazing. We also reviewed a 2014 RAND Corporation study on sexual assault in the military that also discussed hazing to identify the extent to which sexual assault incidents may also result from or constitute hazing.¹⁴ We compared the extent to which DOD and the Coast Guard have evaluated the prevalence of hazing with *Standards for Internal Control in the Federal Government* criteria stating that management analyzes identified risks to estimate their significance, which provides a basis for responding to the risks,¹⁵ and with leading practices for program evaluations, which state that evaluations can play a key role in planning and program management by providing feedback on both program design and execution.¹⁶

We conducted this performance audit from April 2015 to February 2016 in accordance with generally accepted government auditing standards. These 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. Further details on our scope and methodology are presented in appendix I.

Background

¹⁴ RAND Corporation, *Sexual Assault and Sexual Harassment in the Military: Top-Line Estimates for Active-Duty Service Members from the 2014 RAND Military Workplace Study*, Annex 1 to Department of Defense, *Report to the President of the United States on Sexual Assault Prevention and Response* (Nov. 25, 2014), and RAND Corporation, *Sexual Assault and Sexual Harassment in the U.S. Military: Annex to Volume 2: Tabular Results from the 2014 RAND Military Workplace Study for Department of Defense Service Members*, Annex to Annex 1 of Department of Defense, *Department of Defense Annual Report on Sexual Assault in the Military, Fiscal Year 2014* (Apr. 29, 2015).

¹⁵[GAO-14-704G](#).

¹⁶GAO, *Evaluations: 2012 Revision*, [GAO-12-208G](#) (Washington, D.C.: January 2012). This report is a guide to successfully completing evaluation tasks, and is based on GAO studies and policy documents and program evaluation literature.

Congressional Interest in Hazing and DOD and Coast Guard Reports to Congress

In light of the prominent hazing incidents previously noted, Congress, in the National Defense Authorization Act for Fiscal Year 2013, directed that each Secretary of a military department (and the Secretary of Homeland Security in the case of the Coast Guard) submit a report on hazing in each Armed Force under the jurisdiction of the Secretary.¹⁷ Specifically, Congress specified that each Armed Force report include, among other things, an evaluation of the hazing definition contained in an August 1997 Secretary of Defense policy memorandum on hazing, a discussion of their respective policies for preventing and responding to incidents of hazing, and a description of the methods implemented to track and report, including report anonymously, incidents of hazing in the Armed Forces.¹⁸

In response, each service provided reports to Congress in May and July 2013 addressing the requirements of the Act.¹⁹ For example, the Navy, the Marine Corps, and the Coast Guard concurred with DOD's 1997 definition of hazing. To address all behaviors that involve mistreatment in a single policy, the Army recommended revising the hazing definition to include bullying. The Air Force recommended the hazing definition be revised to better align with the hazing definitions used by the states because DOD's broader definition risked creating a perception that hazing is a larger problem in the military than it actually is according to

¹⁷In its report, the Coast Guard stated that it had evaluated and supported DOD's hazing definition.

¹⁸See Pub. L. No. 112-239, § 534 (2013). In addition, §534 also required that each of the Armed Force's reports include an assessment by the Secretary submitting the report of the following: (a) the scope of the problem of hazing in the Armed Force, (b) the training on recognizing and preventing hazing provided members of the Armed Force, (c) the actions taken to prevent and respond to hazing incidents in the Armed Force, (d) the extent to which the Uniform Code of Military Justice specifically addresses the prosecution of persons subject to the Code who are alleged to have committed hazing, and (e) the feasibility of establishing a database to track, respond to, and resolve incidents of hazing. The statute further directed that each of the Armed Force's reports include a description of the additional actions, if any, the Secretary proposes to take to further address the incidence of hazing, and any recommended changes to the Uniform Code of Military Justice or the Manual for Courts-Martial to improve the prosecution of persons alleged to have committed hazing in the Armed Forces.

¹⁹Army, *Section 534, National Defense Authorization Act 2013 (NDAA 13), Reports on Hazing in the Armed Forces* (May 30, 2013); Navy, *Report to Congress on Hazing in the Military* (May 16, 2013); Marine Corps, *Report to Congress on Hazing in the Military* (May 29, 2013); Air Force Report to Congressional Committees, *Hazing in the Armed Forces* (July 1, 2013); Coast Guard, *Hazing in the Coast Guard: 2013 Report to Congress* (July 1, 2013).

the civilian understanding of hazing. The Coast Guard also noted in its report to Congress that it developed its policy to reflect the provisions contained in DOD's hazing policy.

With respect to the feasibility of establishing a database to track, respond to, and resolve incidents of hazing, the Army report stated that existing databases and legal tracking systems are sufficient for tracking hazing incidents. The Navy reported that although it has a tracking database in use, a comprehensive database for all services may be beneficial in combatting hazing. The Marine Corps report stated that the Marine Corps currently uses a service-wide database for tracking and managing all allegations of hazing. The Air Force report stated that it will examine the costs and benefits of establishing a database to track, respond to, and resolve hazing incidents once a common definition and data elements are developed. The Coast Guard stated that existing systems provide adequate management of hazing incidents.

Lastly, in response to the requirement to provide any recommended changes to the Uniform Code of Military Justice (UCMJ) or the Manual for Courts-Martial, the Army, Navy, Marine Corps, and Air Force reports stated that they supported inserting a provision in the Manual for Courts-Martial discussion section of Article 92 of the UCMJ that would enable incidents of hazing to be charged as violations of Article 92 (violation of or failure to obey a lawful general order or regulation). All of the armed services agreed that a separate enumerated offense of the UCMJ for hazing would be duplicative.

In addition, in May 2012, the House Appropriations Committee Report accompanying the DOD Appropriations Bill, 2013, expressing concern about reports of hazing in the armed services, directed the Secretary of Defense to provide a report to the Committee on the incidence of hazing, harassment, and mistreatment of servicemembers, as well as a review of the policies to prevent and respond to alleged hazing incidents.²⁰ In response to this requirement, and in addition to the service reports, in September 2013, the Undersecretary of Defense for Personnel and Readiness provided a report to Congress that summarized the armed service reports to Congress.²¹ In addition, the report noted that DOD

²⁰H.R. Rep. No. 112-493, at 19-20 (May 25, 2012).

²¹DOD, *Hazing in the Armed Forces: Summary Report* (Sept. 4, 2013).

commissioned the RAND Corporation to conduct a study that would include an assessment of the 1997 definition of hazing and subsequent recommendation on a DOD definition of hazing, as well as an evaluation of the feasibility of establishing a DOD-wide database to track hazing incidents, common data elements, and requirements to include in the revision of the 1997 policy memorandum for uniformity across the services.²²

Hazing and Military Law

There is no specific article under the UCMJ that defines and prohibits hazing. However, since at least 1950, hazing has been punishable under various punitive articles included in the UCMJ such as Article 93, Cruelty and Maltreatment.²³ To constitute an offense under Article 93, the accused must be cruel toward, or oppress, or maltreat a victim that is subject to his or her orders. Depending on the individual facts and circumstances of the case, hazing could also be charged under other punitive articles, such as Article 128, Assault.²⁴

Commanders have multiple options to respond to allegations of hazing in their units. After receiving a hazing complaint, commanders or other authorities must promptly and thoroughly investigate the allegation, according to the DOD policy. If the allegation is unsubstantiated, the case is typically dropped. If the investigation substantiates the allegations, the commander must take effective and appropriate action, which may include adverse administrative action, non-judicial punishment, court-martial, or no action, among others. An allegation that is initially deemed substantiated does not necessarily result in punishment for the offender because a servicemember could be found not guilty at non-judicial punishment or court-martial, among other reasons.

²²This study was subsequently issued in 2015. See Kirsten M. Keller et. al., *Hazing in the U.S. Armed Forces* (Santa Monica, RAND Corporation: 2015). The study made a number of recommendations to DOD, including recommendations related to clarifying the definition of hazing, improving hazing prevention programs throughout the armed forces, and conducting a more comprehensive assessment of the extent of hazing.

²³See Pub. L. No. 81-506, 64 Stat. 136 (1950), codified at 10 U.S.C. § 893.

²⁴See 10 U.S.C. § 928. The UCMJ also applies to the Coast Guard.

Prior GAO Work on Sexual Assault and Hazing

While we have not reported on hazing in the military since 1992,²⁵ we have issued multiple reports and made numerous recommendations related to DOD's and the Coast Guard's efforts to prevent and respond to the sometimes correlated issue of sexual assault. In particular, our March 2015 report on male servicemember victims of sexual assault reported that hazing incidents may cross the line into sexual assault.²⁶ We noted that service officials and male servicemembers at several military installations gave us examples of recent incidents involving both hazing and sexual assault. We found that a series of hazing incidents may escalate into a sexual assault and that service officials stated that training on hazing-type activities and their relationship to sexual assault would be particularly beneficial to males in that it might lead to increased reporting and fewer inappropriate incidents. Among other things, we recommended that DOD revise its sexual assault prevention and response training to more comprehensively and directly address how certain behavior and activities, such as hazing, can constitute sexual assault. DOD concurred with this recommendation, but did not state what actions it planned to take in response. The National Defense Authorization Act for Fiscal Year 2016 subsequently included a provision requiring the Secretary of Defense, in collaboration with the Secretaries of the Military Departments, to develop a plan for prevention and response to sexual assaults in which the victim is a male servicemember. This plan is required to include sexual assault prevention and response training to address the incidence of male servicemembers who are sexually assaulted and how certain behaviors and activities, such as hazing, can constitute a sexual assault.²⁷

²⁵GAO, *DOD Service Academies: More Changes Needed to Eliminate Hazing*, [GAO/NSAID-93-36](#) (Washington, D.C.: Nov. 16, 1992).

²⁶GAO, *Military Personnel: Actions Needed to Address Sexual Assaults of Male Servicemembers*, [GAO-15-284](#) (Washington, D.C.: Mar. 19, 2015).

²⁷See Pub. L. No. 114-92, § 538 (2015).

DOD and the Coast Guard Have Issued Policies to Address Hazing but They Do Not Know the Extent to Which the Policies Have Been Implemented and Servicemembers Need Clarification on the Policies

Each of the military services has issued policies to address hazing incidents among servicemembers consistent with DOD's 1997 hazing policy. However, DOD does not know the extent to which these policies have been implemented because the military services, with the exception of the Marine Corps, have not conducted oversight by regularly monitoring policy implementation. The Coast Guard has issued a policy to address hazing incidents, but it likewise has not conducted oversight by regularly monitoring policy implementation. In addition, the military services' hazing policies are broad and servicemembers may not have enough information to determine whether instances of training or discipline may be considered hazing.

DOD and the Coast Guard Have Issued Policies to Address Hazing Incidents

In August 1997, the Secretary of Defense issued a memorandum on DOD's policy that defined and provided examples of what did and did not constitute prohibited hazing conduct.²⁸ DOD's policy also specified that commanders and senior noncommissioned officers would promptly and thoroughly investigate all reports of hazing and that they would take appropriate and effective action on substantiated allegations. Further, it required the Secretaries of the Military Departments to ensure that DOD's hazing policy was incorporated into entry-level enlisted and officer military training, as well as professional military education. Coast Guard officials told us that the Department of Homeland Security (DHS) has not issued any hazing-related policy applicable to the Coast Guard, and DHS officials confirmed that no such policy had been issued, though as we discuss further in this report, the Coast Guard issued policies that reflect DOD's 1997 hazing policy.

From 1997 through 2014, each of the military services issued or updated applicable policies to reflect DOD's position on hazing and its

²⁸DOD Memorandum, *Hazing* (Aug. 28, 1997).

requirements for addressing such incidents.²⁹ The military services updated their policies for various reasons, such as implementing tracking requirements or defining and prohibiting bullying along with hazing. The Coast Guard also issued a policy during this timeframe that, as noted in its 2013 report to Congress on hazing, mirrors the policy developed by DOD.³⁰ Each of the services made their policies punitive so that a violation of the military service regulation could also be charged under the UCMJ as a violation of Article 92, Failure to obey an order or regulation.

More recently, in December 2015 DOD issued an updated hazing and bullying memorandum and policy, which among other things included an updated definition of hazing, defined bullying, and directed the secretaries of the military departments to develop instructions to comply with the memorandum. Figure 1 provides additional details on the timeline of DOD, military service, and Coast Guard hazing policies and relevant congressional actions since 1997.

²⁹Army Regulation 600-20, Army Command Policy (Nov. 6, 2014); Secretary of the Navy Instruction 1610.2A, *Department of the Navy (DON) Policy on Hazing* (July 15, 2005). Marine Corps Order 1700.28B, *Hazing* (May 20, 2013); Department of the Air Force Memorandum, *Air Force Policy on Hazing* (Oct. 30, 1997); Air Force Instruction 1-1, *Air Force Standards* (Aug. 7, 2012); and United States Coast Guard COMDTINST 1600.2, *Discipline and Conduct*, (September 2011).

³⁰Coast Guard, *Hazing in the Coast Guard* (July 1, 2013).

Figure 1. Timeline of DOD and Armed Services' Hazing Policies and Relevant Congressional Actions



Source: GAO analysis of Department of Defense (DOD) and Coast Guard policies and congressional actions. | GAO-16-226

^aThe Coast Guard issued a policy in 1991 that required hazing awareness training.

Each of the military services' policies (1) include the same or a similar definition of hazing as the one developed by DOD, (2) require that commanders investigate reported hazing incidents, and (3) direct that all servicemembers receive training on the hazing policy. Though not required, the Army, the Navy, and the Marine Corps hazing policies contain guidance and requirements that supplement several key provisions in DOD's policy. For example, in addition to the examples of hazing included in DOD's policy, the Army's 2014 regulation update explicitly prohibits hazing via social media or other electronic communications, and makes a distinction between hazing and bullying, which it also prohibits.³¹

Further, the Army's, the Navy's, and the Marine Corps' hazing policies and guidance include requirements for commanders and senior noncommissioned officers beyond the general investigative and

³¹Army Regulation 600-20, Army Command Policy (Nov. 6, 2014). The Army defines bullying as conduct intended to exclude or reject another servicemember through cruel, abusive, humiliating, oppressive, demeaning, or harmful behavior, which results in diminishing the other servicemember's dignity, position, or status.

disciplinary responsibilities specified by DOD. Specifically, the Army's regulation requires its commanders to seek the counsel of their legal advisor when taking actions pursuant to the hazing policy. Navy policy on reporting hazing incidents directs all commands to submit reports of substantiated hazing incidents for tracking by the Navy's Office of Hazing Prevention.³² The Marine Corps' order requires commanding officers to report both substantiated and unsubstantiated hazing incidents to Marine Corps headquarters.³³ In October 1997, the Air Force reissued the Secretary of Defense's memorandum and DOD's hazing policy with a cover letter from the Chief of Staff of the Air Force that underscored that hazing is contrary to good order and discipline, that it would not be tolerated, and that commanders and supervisors must stay engaged to ensure that hazing does not occur within the Air Force.

Regarding training, the Army's, the Navy's, and the Marine Corps' policies supplement DOD's requirement that the topic of hazing be incorporated into entry-level enlisted and officer training and Professional Military Education. Specifically, the Army's hazing regulation requires that commanders at a minimum conduct hazing awareness training on at least an annual basis as part of the Army's Equal Opportunity training requirements. The Department of the Navy's instruction³⁴ requires that hazing awareness training be incorporated into leadership training and commander's courses, and the Marine Corps' order includes similar requirements, adding that hazing awareness training also be included in troop information programs and in unit orientation.³⁵ By including the DOD hazing policy, the Air Force memorandum includes the training requirements specified by DOD, and an Air Education and Training

³²Chief of Naval Operations, *Navy Policy for Reporting Hazing and Assignment of Responsibility for Tracking Hazing Incidents* (February 2013). The Office of Hazing Prevention has since been renamed the Office of Behavioral Standards, but includes hazing among its main responsibilities, according to Navy officials.

³³Marine Corps Order 1700.28B, *Hazing* (May 20, 2013).

³⁴Secretary of the Navy Instruction 1610.2A, *Department of the Navy (DON) Policy on Hazing* (Jul. 15, 2005).

³⁵Marine Corps Order 1700.28B, *Hazing* (May 20, 2013).

Command policy requires annual hazing awareness training within Air Force training units.³⁶

In September 2011, the Coast Guard updated its Discipline and Conduct Instruction to include its policy prohibiting hazing. As previously noted, the Coast Guard's instruction mirrors guidance set forth in a 1997 Secretary of Defense Policy Memorandum, including DOD's definition of hazing and examples of what does and does not constitute prohibited hazing conduct. Like DOD's policy, the Coast Guard's instruction also specifies that commanders who receive complaints or information about hazing must investigate and take prompt, effective action and are to incorporate hazing awareness training into the annual unit training. While similar in some respects, the Coast Guard's hazing instruction contains guidance and requirements that go beyond the policy issued by DOD. For example, in addition to a requirement to investigate alleged incidents, the Coast Guard's policy identifies penalties that may result from hazing that, depending on the circumstances, range from counseling to administrative discharge procedures. Further, the Coast Guard's instruction also requires that a discussion about hazing be incorporated into existing recruit, officer, and leadership training curricula.

The Army, the Navy, and the Marine Corps hazing policies state that servicemembers should report hazing complaints within the chain of command, such as to their commander. The Army's regulation also states that servicemembers may report hazing complaints to law enforcement or the inspector general. The Coast Guard's hazing instruction states that every military member—to include victims of or witnesses to actual or attempted hazing—must report such incidents to the appropriate level within the chain of command.

Headquarters officials from each military service and the Coast Guard told us that servicemembers may report hazing complaints through existing channels, such as the commander, law enforcement, inspector general, or the equal opportunity office, among others. In some cases these channels may be independent of or above the level of their commands, such as an inspector general at a higher level than their own command's inspector general. In other cases, such as an equal

³⁶Air Education and Training Command, Instruction 36-2909, *Recruiting, Education, and Training Standards of Conduct* (Dec 2, 2013).

opportunity advisor in their own command, the reporting channel would not be independent of the command. These officials said that in most cases, there are means to report hazing complaints anonymously to many of these channels, such as anonymous inspector general hotlines.

In addition, because hazing can be associated with rites of passage and traditions, the Army, the Navy, and the Marine Corps—either in their policies or through supplemental guidance—permit command-authorized rituals, customs, and rites of passage that are not cruel or abusive, and require commanders to ensure that these events do not include hazing. The Army’s policy states that the chain of command will ensure that traditional events are carried out in accordance with Army values, and that the dignity and respect of all participants is maintained. A quick reference legal handbook issued by the Department of the Navy provides guidance to Navy and Marine Corps commanders for conducting ceremonies and traditional events as part of its section on hazing prevention.³⁷ Although the Air Force instruction on standards does not specifically address traditions and customs, according to officials in the Air Force Personnel Directorate office, commanders are responsible for ensuring the appropriateness of such observances.³⁸

During a site visit to Naval Base Coronado, we met with the commander of the USS Carl Vinson, who issued local guidance that was more specifically tailored to a particular event or ceremony under his command. Prior to a recent ‘crossing the line’ ceremony—marking the first time a sailor crosses the equator or the international dateline—the commander of the USS Carl Vinson issued formal guidelines for conducting the ceremony that designated oversight and safety responsibilities, listed permissible and non-permissible activities, and noted that participation was voluntary. Specifically, among other things the guidance stated that servicemembers may perform a talent show, provided that it does not include sexually suggestive props, costumes, skits, or gags. The guidance also stated that servicemembers that do not wish to participate in the events may opt out and that non-participants are not permitted to observe the ceremony or any related activities.

³⁷Department of the Navy, *USN/USMC Commander’s Quick Reference Legal Handbook* (January 2015).

³⁸Air Force Instruction 1-1, *Air Force Standards* (Aug. 7, 2012).

The Coast Guard's hazing instruction permits command-authorized rituals, customs, and rites of passage that are not cruel or abusive, and requires commanders to ensure that these events do not include hazing. Specifically, the Coast Guard's hazing instruction states that traditional ceremonies, including Chief's Initiations and equator, international dateline, and Arctic and Antarctic Circle crossings, are authorized, provided that commands comply with governing directives when conducting such ceremonies. The instruction further states that commanding officers shall ensure these events do not include harassment of any kind that contains character degradation, sexual overtones, bodily harm or otherwise uncivilized behavior.

In its 2013 report to Congress, DOD said that it would develop an update to the 1997 policy memorandum on hazing, to be followed by an instruction outlining its hazing policy. The Office of the Under Secretary of Defense for Personnel and Readiness in 2013 formed a hazing working group, led by the Office of Diversity Management and Equal Opportunity (ODMEO), to update DOD's hazing policy. The updated policy was issued as a memorandum in December 2015.³⁹ The updated policy distinguishes between hazing and bullying and includes a hazing and bullying training requirement, among other things. With the issuance of the memorandum, the officials said they will begin working, through the hazing working group, on a DOD instruction on hazing that will replace the updated memorandum.

DOD and the Coast Guard Do Not Know the Extent to Which Their Hazing Policies Have Been Implemented

DOD and the Coast Guard do not know the extent to which hazing policies have been implemented because—with the exception of policy compliance inspections conducted by the Marine Corps—DOD, the military services and the Coast Guard do not conduct oversight by regularly monitoring the implementation of their hazing policies.

Standards for Internal Control in the Federal Government states that management designs control activities that include the policies, procedures, techniques, and mechanisms that enforce management's directives to achieve an entity's objectives.⁴⁰ Although most service

³⁹Deputy Secretary of Defense Memorandum, *Hazing and Bullying Prevention and Response in the Armed Forces* (Dec. 23, 2015).

⁴⁰[GAO-14-704G](#).

policies designated implementation responsibilities, DOD, the military services, and the Coast Guard generally do not know the extent or consistency with which their policies have been implemented because—with the exception of the inspections conducted by the Marine Corps—they have not instituted headquarters-level mechanisms to regularly monitor policy implementation, such as by collecting local command data on hazing policy implementation or conducting site inspections to determine the extent to which the policies have been implemented, among other things.

DOD's 2013 report to Congress on hazing stated that prevention of hazing is under the purview of the Under Secretary of Defense for Personnel and Readiness. However, DOD has not conducted oversight by regularly monitoring the implementation of its hazing policy by the military services, and it has not required that the military services regularly monitor the implementation of their hazing policies. Likewise, the Coast Guard has not required regular headquarters-level monitoring of the implementation of its hazing policy.

We reviewed each of the military services' hazing policies and found that the Army, the Navy, and the Marine Corps policies specify some implementation responsibilities. Specifically, the Army's hazing regulation states that commanders and supervisors at all levels are responsible for its enforcement. However, according to an official in the Army office that developed the Army's hazing policy, there is no service-wide effort to oversee the implementation of the hazing regulation. The Navy's instruction designates commanders and supervisors as responsible for ensuring that all ceremonies and initiations in their organizations comply with the policy. The Navy's instruction also identifies the Chief of Naval Operations as being responsible for ensuring that the hazing policy is implemented. However, officials in the Navy's office that develops hazing policy said there is no service-wide effort to specifically oversee

implementation of the hazing policy.⁴¹ The Marine Corps' order designates the Deputy Commandant for Manpower and Reserve Affairs, the Commanding General, and the Marine Corps Combat Development Command, as well as commanding officers, and officers-in-charge as being responsible for policy implementation. In addition, the Marine Corps reported conducting regular inspections of command implementation of the Marine Corps hazing policy as a means of overseeing service-wide implementation of its hazing policy. The Air Force's hazing policy does not contain specific designations of responsibility. However, the Air Force policy memorandum states that commanders and supervisors must stay engaged to make sure that hazing doesn't occur in the Air Force and the Air Force instruction on standards states that each airman in the chain of command is obligated to prevent hazing. As with the Army and Navy, the Air Force hazing policy memorandum does not include requirements to regularly monitor policy implementation across the service.

The Coast Guard's hazing instruction generally identifies training centers, commanders, and Coast Guard personnel as being responsible for its implementation. Specifically, the instruction specifies that training centers are responsible for incorporating hazing awareness training into curricula administered to different levels of personnel. In addition to their investigative responsibilities, the instruction also states that commanding officers and supervisors are responsible for ensuring that they administer their units in an environment of professionalism and mutual respect that does not tolerate hazing of individuals or groups. Lastly, the instruction charges all Coast Guard personnel with the responsibility to help ensure that hazing does not occur in any form at any level and that the appropriate authorities are informed of any suspected policy violation. However, the Coast Guard reported that it has not regularly monitored hazing policy implementation.

⁴¹A Naval Inspector General official told us that the Naval Inspector General evaluates the command climate of all commands immediately subordinate to the Chief of Naval Operations (e.g., U.S. Fleet Forces Command or Naval Sea Systems Command). The official said there is no specific guidance for the Naval Inspector General to inspect hazing policy implementation, but if there are indications of hazing during the command climate evaluation, the inspector general will look into those. As noted in this report, organizational climate surveys administered by military commands include questions relating to hazing. Furthermore, the official said that inspectors general at the commands immediately subordinate to the Chief of Naval Operations may conduct similar inspections at their own subordinate commands, but this is at the discretion of the commander of each of the commands immediately subordinate to the Chief of Naval Operations.

An official in the Army's Equal Opportunity office stated that although its office has responsibility for hazing policy, the office has not been tasked with, and thus has not developed, a mechanism to monitor implementation of its policy. However, the official acknowledged that it could be helpful to have more information on the extent to which elements of such policies are being incorporated by its commands and at its installations. The official added that ways to do this could include collecting and reviewing data from commands on policy implementation, or conducting inspections, though the official noted that inspections would require additional resources. Officials in the Navy's Office of Behavioral Standards stated that the responsibility for compliance with the hazing policy is delegated to the command level, with oversight by the immediate superior in command, but our review found that the Navy did not have a mechanism to facilitate headquarters-level monitoring of hazing policy implementation.

In contrast, the Marine Corps Inspector General, in coordination with the Marine Corps Office of Manpower and Reserve Affairs, conducts service-wide inspections to determine, among other things, whether the provisions of the Marine Corps' hazing policy are being implemented consistently and to ensure that commands are in compliance with the requirements of the hazing policy. Marine Corps Inspector General officials told us that the Marine Corps Inspector General has inspected command programs to address hazing since June 1997, with the initial issuance of the Marine Corps' hazing order.⁴² Specifically, the Inspector General checks command programs against a series of hazing-related items, such as whether the command includes hazing policies and procedures in its orientation and annual troop information program and whether the command has complied with hazing incident reporting requirements. These inspections do not necessarily cover all aspects of hazing policy implementation. For example, Marine Corps Inspector General officials told us they do not consistently review the content of training materials, although they do review training rosters to verify that servicemembers have received hazing training. However, the inspections provide additional information to Marine Corps headquarters officials on the implementation of hazing policy by commands. Marine Corps Manpower and Reserve Affairs officials also told us that they will begin consistently reviewing training content after they standardize the training.

⁴²Marine Corps Order 1700.28, *Hazing* (June 18, 1997).

Marine Corps Inspector General officials stated that at the local level, command inspectors general complete compliance inspections every two years, and the Marine Corps headquarters inspector general assesses local command inspectors general every three years to ensure they are effectively inspecting subordinate units. The Marine Corps headquarters inspector general also inspects those commands that do not have their own inspectors general every two years. According to the Office of the Marine Corps Inspector General, commanders are required to provide the Inspector General—within 30 days of its report—a plan for addressing any findings of non-compliance with the hazing policy. Further, a Marine Corps Manpower and Reserve Affairs official said that when commands are found to be out of compliance with the policy, officials conducting the inspections will assist them in taking steps to improve their hazing prevention program. Marine Corps officials told us that in the past 24 months, 3 of 33 commands inspected by the Marine Corps Inspector General were found to have non-mission-capable hazing prevention programs. They added that not having a mission-capable program does not necessarily indicate the existence of a hazing problem in the command. A Marine Corps Inspector General official said that local inspectors general may re-inspect commands within 60 days, and no longer than the next inspection cycle, to ensure they have made changes to comply with the hazing policy.

An official from the Air Force Personnel Directorate stated that oversight is inherent in the requirement to comply with policy and that any violations would be captured through the regular investigative, inspector general, and equal opportunity processes, and potentially the military justice process. The official also added that it is ultimately a commander's responsibility to ensure policy compliance. However, the Air Force has not established a mechanism that monitors implementation to help ensure commanders are consistently applying the policy. Similarly, officials from the Coast Guard's Office of Military Personnel, Policy and Standards Division stated that they have not instituted a mechanism to monitor implementation of the Coast Guard's hazing policy.

During site visits to Naval Base Coronado and Marine Corps Base Camp Pendleton, we conducted nine focus groups with enlisted servicemembers and found that they were generally aware of some of the requirements specified in DOD's and their respective service's policies on hazing. For example, enlisted personnel in all nine focus groups demonstrated an understanding that hazing is prohibited and generally stated that they had received hazing awareness training. In addition, during our site visit to Naval Base Coronado, servicemembers in one

focus group said that prior to a recent ceremony aboard the USS Carl Vinson, the ship's commander provided all personnel aboard with command-specific guidance and training to raise their awareness of hazing. At Marine Corps Base Camp Pendleton, we identified multiple postings of hazing policy statements throughout various commands.

We are encouraged by the actions taken at these two installations and we understand that there is a general expectation for commanders and other leaders in the military services and in the Coast Guard to help ensure compliance with policy. In addition, we note that the Marine Corps has implemented a means of monitoring hazing policy implementation throughout the service. However, without regular monitoring by DOD of the implementation of its hazing policy by the services, and without regular monitoring by all of the services of the implementation of their hazing policies, DOD and the military services will be unable to effectively identify issues and, when necessary, adjust their respective approaches to addressing hazing. Likewise, without regular monitoring by the Coast Guard of the implementation of its hazing policy, the Coast Guard will be unable to effectively identify issues and make adjustments to its approach to addressing hazing when necessary.

Military Servicemembers May Not Have Sufficient Information to Distinguish Hazing From Permitted Behavior

As previously noted, DOD and military service policies generally define hazing and provide examples of prohibited conduct.⁴³ However, based on our review of these policies, meetings with officials, and focus groups with servicemembers, we found that the military services may not have provided servicemembers with sufficient information to determine whether specific conduct or activities constitute hazing. According to the *Standards for Internal Control in the Federal Government*, management establishes standards of conduct, which guide the directives, attitudes, and behaviors of the organization in achieving the entity's objectives.⁴⁴ Each of the military services has defined hazing and provided training on the definition to servicemembers, but may not have provided sufficient clarification to servicemembers to help them make distinctions between

⁴³In this discussion of the information provided to servicemembers to clarify the hazing policies, we do not include the Coast Guard because the Coast Guard is not necessarily subject to DOD policies and we did not visit a Coast Guard installation.

⁴⁴[GAO-14-704G](#).

hazing and generally accepted activities in the military, such as training and extra military instruction.

To help servicemembers recognize an incident of hazing, DOD and military service policies provide a definition of hazing and include examples of rituals for servicemembers to illustrate various types of prohibited conduct. As noted previously, from 1997 to December 2015 DOD defined hazing as any conduct whereby a servicemember, without proper authority, causes another servicemember to suffer, or be exposed to any activity which is, among other things, humiliating or demeaning. According to this definition, hazing includes soliciting another to perpetrate any such activity, and can be verbal or psychological in nature. In addition, consent does not eliminate the culpability of the perpetrator. DOD's 1997 hazing policy also listed examples such as playing abusive tricks; threatening violence or bodily harm; striking; branding; shaving; painting; or forcing or requiring the consumption of food, alcohol, drugs, or any other substance. The policy also noted that this was not an inclusive list of examples. Likewise, DOD's revised December 2015 hazing definition includes both physical and psychological acts, prohibits soliciting others to perpetrate acts of hazing, states that consent does not eliminate culpability, and gives a non-inclusive list of examples of hazing.

Headquarters-level officials from each military service stated that under the hazing definition a great variety of behaviors could be perceived as hazing. For example, Army officials said the definition encompasses a wide range of possible behaviors. Likewise, Marine Corps officials said that based on the definition included in its order, any activity can be construed as hazing. At our site visits, servicemembers in each focus group, as well as groups of non-commissioned officers, noted that perception plays a significant role in deciding whether something is hazing or not—that servicemembers may believe they have been hazed because they feel demeaned, for example.

To distinguish hazing from other types of activities, DOD (in its 1997 hazing memorandum) and military service policies also provide examples of things that are not considered to be hazing, including command-authorized mission or operational activities, the requisite training to prepare for such missions or operations, administrative corrective measures, extra military instruction, command-authorized physical training, and other similar activities that are authorized by the chain of command. However, as DOD noted in its 2013 report to Congress on hazing, corrective military instruction has the potential to be perceived as hazing. DOD noted that military training can be arduous, and stated that

hazing prevention education should distinguish between extra military instruction and unlawful behavior. DOD also stated that the services should deliberately incorporate discussion of extra military instruction, including proper administration and oversight, in contrast with hazing as part of prevention education. Conversely, a superior may haze a subordinate, and servicemembers therefore need to be able to recognize when conduct by a superior crosses the line into hazing.

To raise awareness of hazing, each service has developed training that provides a general overview of prohibited conduct and the potential consequences. However, the training materials we reviewed did not provide servicemembers with information to enable them to identify less obvious incidents of potential hazing, such as the inappropriate or demeaning use of otherwise generally accepted corrective measures such as extra military instruction. Conversely, the training materials that we reviewed also did not include necessary information to help servicemembers recognize an appropriate use of corrective measures. Specifically, the training materials generally focused on clear examples of hazing behaviors, and did not illustrate where accepted activities such as training and discipline can cross the line into hazing. For example, the Army administers hazing awareness training for use at all levels that provides servicemembers with the definition of hazing and information about the circumstances under which hazing may occur, as well as a list of activities that are not considered hazing. However, our review found that the Army's training materials do not provide information to servicemembers about how to make consistent determinations about whether an activity should be considered hazing, such as in cases that may resemble permitted activities.

Likewise, the Navy's training is designed to empower sailors to recognize, intervene, and stop various behaviors such as hazing that are not aligned with the Navy's ethos and core values. However, our review found that the training focuses on intervening when an incident of hazing has occurred and does not include information to help servicemembers discern, for example, when a permissible activity is being used in an impermissible manner. The Marine Corps' hazing awareness training is locally developed and examples of training materials we reviewed provide an overview of the definition of hazing, examples of acts that could be considered hazing similar to those delineated in the Marine Corps order governing hazing, and a list of potential disciplinary actions that could arise from a violation of the hazing order, among other things. However, our review found that the training materials do not provide servicemembers with information on activities that are not considered

hazing, such as extra military instruction, or the necessary information to differentiate between permissible and non-permissible activities. In its 2013 report to Congress on Hazing in the Armed Forces, DOD similarly identified that it can be difficult to distinguish between corrective measures and hazing and noted that the services should incorporate a discussion of extra military instruction, to include proper administration and oversight, in contrast with hazing as part of prevention education.

During our site visits to Naval Base Coronado and Marine Corps Base Camp Pendleton, three groups of non-commissioned officers reinforced the suggestion that hazing definitions are not sufficiently clear to facilitate a determination of which activities and conduct constitute hazing. The non-commissioned officers we met with generally agreed that the broad definition of hazing prevents them from effectively doing their jobs, including disciplining servicemembers, taking corrective action, or administering extra military instruction for fear of an allegation of hazing. For example, non-commissioned officers during one site visit said that a servicemember need only say “hazing” to prompt an investigation. During another site visit, a non-commissioned officer described one hazing complaint in which the complainant alleged hazing because the complainant’s supervisor had required that the complainant work late to catch up on administrative responsibilities. Although this complaint was later found to be unsubstantiated, the allegation of hazing required that resources be devoted to investigate the complaint. In addition, some noncommissioned officers we met with stated that they were concerned that the use of extra military instruction may result in an allegation of hazing.

In our focus groups, enlisted servicemembers—over the course of both site visits—provided a range of possible definitions for hazing that further demonstrated the different interpretations of what constitutes prohibited conduct. For example, some defined hazing only in physical terms, whereas others recognized that hazing can be purely verbal or psychological as well. Some servicemembers believed that an incident would not be hazing if the servicemembers consented to involvement in the activity, although DOD and service policies state that actual or implied consent to acts of hazing does not eliminate the culpability of the perpetrator. In addition, consistent with the concerns expressed by some of the non-commissioned officers that we interviewed, servicemembers in two focus groups stated that they may perceive extra military instruction as hazing. By contrast, unit commanders and legal officials at one site visit stated that they believe that the existing definition of hazing provides supervisors with sufficient latitude to address misconduct.

Standards for Internal Control in the Federal Government states that management establishes expectations of competence for key roles, and other roles at management's discretion. Competence is the qualification to carry out assigned responsibilities, and requires relevant knowledge, skills, and abilities. It also states that management should internally communicate the necessary quality information to achieve the entity's objectives.⁴⁵ Without a more comprehensive understanding among servicemembers of the conduct and activities that warrant an allegation of hazing, servicemembers may not be able to effectively distinguish, and thus effectively identify and address, prohibited conduct.

DOD and the Coast Guard Have Limited Visibility Over Hazing Incidents

DOD and the Coast Guard Do Not Have Complete and Consistent Data on Reported Hazing Incidents

The Army, the Navy, and the Marine Corps track data on reported incidents of hazing. However, the data collected and the methods used to track them vary, and the data are therefore not complete and consistent. The Air Force does not have a method of specifically tracking hazing incidents, and the data it has generated on hazing incidents is also therefore not necessarily complete, or consistent with the other military services' data. Likewise, the Coast Guard does not have a method of specifically tracking hazing incidents, and the data it has generated on hazing incidents is therefore not necessarily complete.

Although it is difficult to determine the total number of actual hazing incidents, the military services' data may not effectively characterize reported incidents of hazing because, for the time period of data we reviewed, DOD had not articulated a consistent methodology for tracking hazing incidents, such as specifying and defining common data collection requirements. As a result, there is an inconsistent and incomplete accounting of hazing incidents both within and across these services. *Standards for Internal Control in the Federal Government* state that

⁴⁵[GAO-14-704G](#).

information should be recorded and communicated to management and others who need it in a form and within a time frame that allows them to carry out their internal control and other responsibilities.⁴⁶ In the absence of DOD-level guidance on how to track and report hazing incidents, the Army, the Navy, and the Marine Corps developed differing policies on hazing data collection and collected data on hazing incidents differently. For example, until October 2015 the Army only collected data on cases investigated by criminal investigators and military police, whereas the Navy collected data on all substantiated hazing incidents reported to commanders, and the Marine Corps collected data on both substantiated and unsubstantiated incidents. The Air Force and the Coast Guard hazing policies do not include a similar requirement to collect and track data on hazing incidents. In the absence of DOD guidance, the Air Force has taken an ad hoc approach to compiling relevant information to respond to requests for data on hazing incidents, and in the absence of Coast Guard guidance on tracking hazing incidents, the Coast Guard has also taken an ad hoc approach to compiling hazing data. For example, the Air Force queried its legal database for cases using variants of the word “hazing” to provide information on hazing incidents to Congress in 2013. Table 1 illustrates some of the differences in the services’ collection of data on hazing incidents and the total number of incidents for each service as reflected in the data for the time period we reviewed. However, due to the differences noted, data on reported incidents of hazing are not comparable across the services.

⁴⁶GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999). We applied the internal control standards in effect during the time period of the data we reviewed.

Table 1: Differences in Military Service and Coast Guard Hazing Incident Data Collection

Service	Reported number of cases (Dec. 2012-Dec. 2014^a)	Data tracking requirement	Issues with available data
Army	18	Substantiated and unsubstantiated incidents	Due to the limitations of the system used to track hazing incidents, data for this period only reflect cases investigated by Army Criminal Investigation Command or military police. Data do not include cases investigated by others such as the chain of command or inspector general.
Navy	73	Substantiated incidents (tracking unsubstantiated incidents is optional and, to some extent, may be included in totals)	Does not consistently collect data on unsubstantiated cases.
Marine Corps ^a	303 ^a	Substantiated and unsubstantiated incidents	Duplicate cases due to inconsistent method of counting cases—those with multiple alleged offenders or victims sometimes counted as one case, but at other times a case is based on each offender-victim pair. We determined the data were overstated by at least 100 reported hazing cases, at least 50 alleged offenders, and at least 90 alleged victims.
Air Force	4	No requirement	Data obtained using a keyword search of legal database for variants of the word “hazing,” but there is no requirement for “hazing” to be included in the case narrative.
Coast Guard	7	No requirement	Data obtained using a keyword search on “hazing” in its databases of criminal investigations and court-martials, but there is no requirement for “hazing” to be included in the case narrative.

Sources: GAO analysis of Army, Navy, Marine Corps, Air Force, and Coast Guard data. | GAO-16-226.

^aThe Marine Corps began using its current method of tracking hazing incidents in May 2013. Marine Corps data is from May 2013-December 2014. The Army distinguishes between hazing and bullying, and both hazing and bullying cases are included in the data.

Until September 2015, the Army’s primary tracking method for alleged hazing incidents was a spreadsheet maintained by an official within the Army’s Criminal Investigation Command, which included data on alleged hazing incidents that were recorded in a database of cases investigated by either military police or Criminal Investigation Command investigators, according to officials in the Army’s Equal Opportunity office. However, use of this database as the primary means of tracking hazing incidents limited the Army’s visibility over reported hazing incidents because it did not capture allegations handled by other Army offices, such as cases that

are investigated by the chain of command or by the office of the inspector general. Data on hazing incidents through September 2015 are therefore not complete or consistent with the data from the other military services. Beginning in October 2015, the Army began to track hazing and bullying incidents in its Equal Opportunity Office's Equal Opportunity Reporting System, but Army Equal Opportunity officials told us that they continue to have difficulties obtaining all needed information on hazing cases due to limitations in their ability to obtain information on hazing cases from commanders.

The Navy requires that commands report all substantiated hazing incidents by sending a report to the headquarters-level Office of Behavioral Standards, where the information is entered into a spreadsheet that contains service-wide data received on reported hazing incidents. Officials in the Navy's Office of Behavioral Standards told us that they encourage commanders to also report unsubstantiated incidents, but this is at the commanders' discretion. The data on unsubstantiated incidents are therefore not necessarily comparable with those of services that require the collection and tracking of data on unsubstantiated incidents. Furthermore, as a result of the different types of data that are collected, reported numbers of hazing incidents may not be consistently represented across the services.

Since May 2013, the Marine Corps has required that commanders coordinate with their local Equal Opportunity Advisor to record substantiated and unsubstantiated allegations of hazing in the Marine Corps' Discrimination and Sexual Harassment database. While the Marine Corps' tracking method is designed to capture all hazing allegations of which a unit commander is aware, we found that the methods used by the service to count cases, offenders, and victims have not been consistent. For example, our analyses of these data identified inconsistencies over time in the method of recording hazing cases. Specifically, we found that in some instances, a reported hazing incident involving multiple offenders or victims was counted as a separate case for each offender-victim pair. In other instances, the incident was counted as a single case even when it involved multiple offenders or victims. So, for example, an incident involving 2 alleged offenders and 4 alleged victims was counted as 8 incidents, and another with 3 alleged offenders and 3 alleged victims was counted as 9 incidents. On the other hand, we found an example of a case with 4 alleged offenders and 1 alleged victim being counted as a single case, and another with 2 alleged offenders and 2 alleged victims counted as a single case. The recording of incidents in the

Marine Corps is therefore not internally consistent or consistent with the other military services.

As previously noted, the Air Force does not require that data be collected or tracked on reported incidents of hazing, which has complicated its ability to efficiently provide data on hazing incidents when they are requested. To produce the congressionally-mandated report on hazing incidents reported in fiscal year 2013, the Air Force performed a keyword search of its legal database for variants of the word “hazing.” However, given that the database is used and maintained by legal personnel, query results only captured cases that came to the attention of a judge advocate. Further, while the keyword search of its database identified some incidents, the Air Force does not require that the term “hazing” or any of its variants be included in the case narrative, even if the case involved hazing. An official of the Air Force Legal Operations Agency told us that judge advocates focus on the articles of the UCMJ, and depending on the circumstances, they may or may not consider the context of hazing to be relevant information to record in the file. Given that “hazing” is not specifically delineated as an offense in the UCMJ, documented incidents of hazing in the Air Force fall under various UCMJ articles, such as Article 92 on Failure to Obey an Order or Regulation and Article 128 on Assault, and may not identify the incident as hazing. Consequently, Air Force officials stated that queries of the legal database would not necessarily capture all reported hazing cases across the Air Force. The Air Force’s data on hazing incidents are also therefore not necessarily complete or consistent with the other military services’ data.

The Coast Guard also has not established a requirement to collect and track data on reported incidents of hazing, which has complicated its ability to efficiently provide data on hazing incidents when they are requested. As with the Air Force, the Coast Guard’s current process of compiling data on hazing cases has complicated its ability to efficiently provide data on hazing incidents when they are requested, according to Coast Guard officials. For example, to produce the congressionally-mandated report on hazing incidents reported in fiscal year 2013, the Coast Guard queried its database of criminal investigations as well as its database of courts-martials for variants of the term “hazing.” According to Coast Guard officials, the Coast Guard’s queries only captured cases that explicitly used a variant of the term “hazing” in the case narrative and that were investigated by the Coast Guard Investigative Service or had resulted in a court-martial. As such, the Coast Guard’s data did not capture, for example, any cases that may have been investigated by the

chain of command and deemed unsubstantiated or resolved through administrative action or non-judicial punishment.

The military services' and the Coast Guard's available information on hazing cases include some information on the dispositions of hazing cases, which have been adjudicated in a variety of ways. Our review of the data showed that this information was not always available or updated, and the sources of the information were not always reliable. We therefore found that data on hazing case dispositions were not sufficiently reliable to report in aggregate. There were a wide range of dispositions, from cases being found unsubstantiated to courts-martial. For example, in one case, multiple servicemembers pled guilty at court-martial to hazing and assault consummated by battery after being accused of attempted penetrative sexual assault. In another hazing case involving taping to a chair, the offender was punished through non-judicial punishment with restriction, extra duty, and forfeiture of pay and the victim was given a similar but lesser punishment for consenting to the hazing. In a third case, a complainant alleged hazing after being told to work late, but an investigation determined that the allegation was unsubstantiated.

ODMEO officials acknowledged that it is difficult to gauge the scope and impact of hazing given the limited information that is currently available and the inconsistent nature of the services' data collection efforts. DOD's updated hazing policy includes requirements that are intended to promote greater consistency in the services' collection of data on reported hazing incidents. Specifically, the revised policy includes a requirement for the services to collect data on the number of substantiated and unsubstantiated incidents of hazing and bullying, as well as the demographics of the complainant and alleged offender in each case, a description of the incident, and if applicable, disposition of the case. ODMEO officials said they plan to provide a data collection template that will provide a standard list of data elements and additional details on the data to be collected and reported to ODMEO.

DOD's updated hazing policy will help to improve the consistency of hazing incident data collected by the services. However, it does not appear that the policy will serve to make the services' disparate data collection efforts fully consistent because the policy does not clearly define the scope of information or define the data to be collected. For example, the policy requires the military services to track hazing incidents, but does not identify how to count an incident relative to the number of alleged offenders and alleged victims, and the services have counted incidents differently for tracking purposes. ODMEO officials said

they are continuing to revise the data collection template, which could provide further specificity to the data collection.

As a result of inconsistent and incomplete data, DOD and the Coast Guard cannot provide an accurate picture of reported hazing incidents either for the purposes of internal management or for external reporting. Further, without a common basis to guide the collection of data, including a standard list of data elements, decision makers in DOD, the Coast Guard, and Congress will not be able to use these data to determine the number of reported hazing incidents in DOD or the Coast Guard, or to draw conclusions from the data.

DOD and the Coast Guard Do Not Know the Extent of Hazing In Their Organizations

To date, DOD and the Coast Guard do not know the extent of hazing in their organizations because they have not conducted an evaluation of the prevalence of hazing. In contrast to the limited data on reports of hazing incidents, information on the prevalence of hazing would help DOD and the Coast Guard to understand the extent of hazing beyond those incidents that are reported.⁴⁷

The prevalence of hazing could be estimated based on survey responses, as DOD does in the case of sexual assault. We believe such an evaluation could form the baseline against which to measure the effectiveness of their efforts to address hazing and would enhance visibility over the prevalence of such misconduct. *Standards for Internal Control in the Federal Government* states that it is important to establish a baseline that can be used as criteria against which to assess progress and to help identify any issues or deficiencies that may exist.⁴⁸ ODMEIO officials said that their efforts to address hazing are in the early stages and that following the issuance of the updated hazing policy, DOD may begin to establish a baseline against which to evaluate appropriate responses to hazing. However, to date DOD and the military services have not evaluated the prevalence of hazing across their organizations in

⁴⁷Prevalence refers to the proportion of a population which has or has had a specific characteristic in a given time period. Prevalence can be calculated if information is available about the entire population, or estimated based on samples of the population of interest.

⁴⁸[GAO-14-704G](#).

order to determine the appropriate responses. The Coast Guard also has not evaluated the prevalence of hazing within its service.

Officials in each of the military services and the Coast Guard told us that reports of hazing incidents are currently the primary indicator used to gauge the incidence of hazing. However, as previously noted, the data that are currently collected on hazing incidents are neither complete or consistent, and data obtained through other sources, such as surveys, suggest that hazing may be more widespread in the military services and the Coast Guard than the current numbers of reports indicate. In particular, the RAND Corporation conducted a survey on sexual assault and sexual harassment in the military for DOD in 2014, the results of which indicate that the actual number of hazing incidents may exceed the number of reported incidents tracked by the services.⁴⁹ Based on our analysis of RAND's survey results, we estimate that in 2014, about 11,000 male servicemembers in the Army, the Navy, the Marine Corps, and the Air Force were sexually assaulted. Of these, RAND estimated that between 24 percent and 46 percent would describe their sexual assaults as hazing ("things done to humiliate or 'toughen up' people prior to accepting them in a group"). Officials from DOD and the Coast Guard told us that hazing and sexual assault can occur as part of the same incident, but it will be documented and addressed based on the more egregious offense—in this case, sexual assault. We recognize that the classification of an offense is key in that it directly corresponds to the punitive actions that can be taken, but note that this further reinforces that there may be a broader incidence of hazing than the data currently collected by the military services and the Coast Guard indicate.

In addition to the results of RAND's survey, we also obtained and analyzed the results of organizational climate surveys for each of the military services and the Coast Guard for calendar year 2014 and determined that some servicemembers perceive that hazing occurs in their units despite the policies in place prohibiting hazing. Commanders

⁴⁹RAND Corporation, *Sexual Assault and Sexual Harassment in the Military: Top-Line Estimates for Active-Duty Service Members from the 2014 RAND Military Workplace Study*, Annex 1 to Department of Defense, *Report to the President of the United States on Sexual Assault Prevention and Response* (Nov. 25, 2014), and RAND Corporation, *Sexual Assault and Sexual Harassment in the U.S. Military: Annex to Volume 2: Tabular Results from the 2014 RAND Military Workplace Study for Department of Defense Service Members*, Annex to Annex 1 of Department of Defense, *Department of Defense Annual Report on Sexual Assault in the Military, Fiscal Year 2014* (Apr. 29, 2015).

throughout the military services and the Coast Guard are required—at designated intervals—to administer organizational climate surveys to members of their respective units.⁵⁰ These surveys are designed to evaluate various aspects of their unit’s climate, including, among other things, sexual assault and sexual harassment, and were recently revised to include questions that solicit servicemember perspectives on the incidence of hazing. Specifically, in 2014, the Defense Equal Opportunity Management Institute—the organization responsible for administering the surveys—began including questions related to hazing and demeaning behaviors in the organizational climate surveys it administers for commands throughout the military services and the Coast Guard. Each question asked whether respondents strongly disagreed, disagreed, agreed, or strongly agreed with a statement intended to measure either hazing or demeaning behaviors. Table 2 shows the statements in the organizational climate surveys about hazing and demeaning behaviors.

⁵⁰The military services and the Coast Guard are required by law and policy to conduct a climate assessment. See section 572 of the National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239 (2013) and Under Secretary of Defense for Personnel and Readiness Memorandum, *Command Climate Assessments* (July 25, 2013). The military services and the Coast Guard have issued implementing guidance on administering the surveys. See Department of the Army, Army Regulation 600-20, *Army Command Policy* (Nov. 6, 2014); Chief, Naval Operations, Navy Administrative Messages 336/13 and 064/14, *Guidance on Command Climate Assessments* (Dec. 30, 2013 and Mar. 20, 2014) and Department of the Navy, Bureau of Naval Personnel, Instruction 1610.10D, *Navy Performance Evaluation System* (May 1, 2015); Headquarters, Marine Corps, Marine Administrative Message 464/13, *Command Climate Assessments* (Sept. 17, 2013); Headquarters, Department of the Air Force, *Implementing Instructions and Processing Procedures for the transition from the Unit Climate Assessment (UCA) to the Defense Equal Opportunity Management Institute (DEOMI) Equal Opportunity Climate Survey (DEOCS)* (Dec. 17, 2013); and Coast Guard, *Administration of the Defense Equal Opportunity Management Institute (DEOMI) Organizational Climate Survey (DEOCS)* (Aug. 2, 2012).

Table 2: 2014 Organizational Climate Survey Questions on Hazing and Demeaning Behaviors

Hazing	Newcomers in this organization are pressured to engage in potentially harmful activities that are not related to the mission.
	Newcomers are harassed and humiliated prior to being accepted into the organization.
	To be accepted in this organization, members must participate in potentially dangerous activities that are not related to the mission.
Demeaning Behaviors	Certain members are purposely excluded from social work group activities.
	Certain members are frequently reminded of small errors or mistakes they have made, in an effort to belittle them.
	Certain members are excessively teased to the point where they are unable to defend themselves.

Source: Defense Equal Opportunity Management Institute. | GAO-16-226.

These surveys do not measure the prevalence of hazing. Instead, they measure the extent to which servicemembers perceive that hazing (and demeaning behaviors) occurs in their units. In addition, the organizational climate surveys were designed to be a tool for commanders to evaluate their individual units as opposed to aggregate-level analyses; thus, the data have limitations when used for aggregate-level analysis. The results of these surveys are also not generalizable, in part because the Army requires that command climate surveys be conducted more frequently than is required by the other services. As such, Army responses are overrepresented relative to the other military services when results are

aggregated.⁵¹ Finally, survey data may reflect other errors, such as differences in how questions are interpreted. Since demographic information is gathered through self-selection, breaking down the results into specific subgroups may introduce additional error.

Despite these limitations, analysis of these data yields insight into perceptions of hazing within and across the services. Table 3 shows the results of our analysis of data from these organizational climate surveys administered by the Defense Equal Opportunity Management Institute for servicemembers in active-duty units in the Army, Navy, Marine Corps, Air Force, and Coast Guard for 2014 on hazing and demeaning behaviors.

⁵¹The Army requires company-level commanders or equivalents in active-duty units to conduct a unit command climate survey within 30 days of assuming command, again at 6 months, and annually thereafter. The Navy requires commanders to complete a command climate assessment within 90 days of assuming command and every 9-12 months thereafter. The Marine Corps requires commanding officers to initiate the command climate survey within 90 days of assuming command and at least annually thereafter. The Air Force requires command climate assessments within the first 120 days of assuming command and annually thereafter. See Department of the Army, Army Regulation 600-20, *Army Command Policy* (Nov. 6, 2014); Chief, Naval Operations, Navy Administrative Messages 336/13 and 064/14, *Guidance on Command Climate Assessments* (Dec. 30, 2013 and Mar. 20, 2014) and Department of the Navy, Bureau of Naval Personnel, Instruction 1610.10D, *Navy Performance Evaluation System* (May 1, 2015); Headquarters, Marine Corps, Marine Administrative Message 464/13, *Command Climate Assessments* (Sept. 17, 2013); Headquarters, Department of the Air Force, *Implementing Instructions and Processing Procedures for the transition from the Unit Climate Assessment (UCA) to the Defense Equal Opportunity Management Institute (DEOMI) Equal Opportunity Climate Survey (DEOCS)* (Dec. 17, 2013); and Coast Guard, *Administration of the Defense Equal Opportunity Management Institute (DEOMI) Organizational Climate Survey (DEOCS)* (Aug. 2, 2012).

Table 3: GAO Analysis of 2014 Organizational Climate Survey Data from Army, Navy, Air Force, Marine Corps, and Coast Guard Active-Duty Units on Hazing and Demeaning Behaviors

Demographic		Agreed with all hazing statements		Agreed with all demeaning behavior statements	
		Responses	Percentage	Responses	Percentage
Grade	E1-E3	21,575	12%	32,388	18%
	E-4-E6	40,800	8%	68,495	14%
	E7-E9	2,885	3%	4,645	5%
	W1-W5	434	3%	643	4%
	O1-O3	1,992	3%	3,193	4%
Gender	O4-O6	376	1%	638	2%
	Male	61,328	8%	95,810	12%
	Female	6,746	5%	14,204	10%
Race	American Indian or Alaskan Native	1,412	10%	2,112	15%
	Asian	3,187	10%	4,638	15%
	Black	10,795	9%	16,252	13%
	Native Hawaiian or Other Pacific Islander	1,405	10%	1,993	14%
	White	34,291	6%	56,948	11%
	Multiple races	2,646	7%	4,708	13%
	Declined to respond	14,338	8%	23,363	14%
Ethnicity	Hispanic	10,941	9%	17,036	13%
	Non-Hispanic	44,664	7%	73,613	11%
	Declined to respond	12,469	10%	19,365	15%
Service	Army	49,459	9%	77,275	14%
	Navy	6,945	5%	13,538	9%
	Marine Corps	8,750	11%	11,835	15%
	Air Force	2,534	2%	6,522	5%
	Coast Guard	386	2%	844	5%

Source: GAO analysis of Defense Equal Opportunity Management Institute data. | GAO-16-226.

NOTE: All percentages given are the percentage of response in each category that agreed (or strongly agreed) with all three statements. For example, 12 percent of servicemembers in active-duty units in pay grades E1-E3 agreed with all three hazing statements. For the purposes of the analyses reflected in the table, "agreed" refers to both "agreed" and "strongly agreed." These analyses are not generalizable to all servicemembers across DOD or the Coast Guard. The scope of data is limited to

active-duty units. Enlisted grades start at E1 and continue through E9; officer grades start at O1 and continue through O6 (O7-O10 are general officer grades). W1-W5 are grades for warrant officers, who are specialists or experts in certain military technologies or capabilities. The Air Force does not have warrant officers.

As shown in table 3, about 12 percent of responses by enlisted servicemembers in active-duty units⁵² at the E1-E3 pay grades agreed⁵³ with all three statements about hazing (noted in table 3, above) and about 18 percent of responses at these pay grades agreed with all three statements about demeaning behaviors.⁵⁴ These percentages dropped to about 8 percent and 14 percent, respectively, at the E4-E6 levels, and continued to drop, reaching about 1 percent for hazing and 2 percent for demeaning behaviors for officers at the O4-O6 level.⁵⁵ These responses indicate that perceptions of the extent of hazing and demeaning behaviors in the military services and in the Coast Guard may be different between those at the lower and middle enlisted ranks and those with responsibility for developing or enforcing policy.

The data also show that perceptions of hazing may differ by service. For hazing, about 9 percent of Army responses agreed with all three statements; about 5 percent of Navy responses agreed with all three statements; about 11 percent of Marine Corps responses agreed with all three statements; and about 2 percent of responses in the Air Force and Coast Guard agreed with all three statements. Likewise, for demeaning behaviors, about 14 percent of Army responses agreed with all three statements; about 9 percent of Navy responses agreed with all three statements; about 15 percent of Marine Corps responses agreed with all three statements; and responses from the Air Force and Coast Guard came in at about 5 percent in agreement with all three statements for each service.

⁵²All data given here from organizational climate survey responses are for active-duty units in the Army, Navy, Marine Corps, Air Force, and Coast Guard.

⁵³For the purposes of this analysis, we combined “agree” and “strongly agree” responses, and these are described as simply “agree.”

⁵⁴E1-E3 are the lowest three enlisted grades. In the Army, for example, an E1 is a private E1; an E2 is a private E2; and an E3 is a private first class.

⁵⁵In the Army, for example, an E4 is a corporal or specialist; an E5 is a sergeant; and an E6 is a staff sergeant; an O4 is a major, an O5 is a lieutenant colonel, and an O6 is a colonel.

The results of such analyses indicate that sufficient numbers of servicemembers perceive hazing to be occurring to warrant evaluation of the prevalence of hazing. In addition, such survey data can provide valuable insights that can be used by military leaders to help form a baseline of information. For example, the services could use the results to evaluate service-wide as well as command-specific perceptions of hazing, compare how perceptions change over time, make comparisons with incident rates, and perform other analyses to identify trends and areas needing improvement.

Standards for Internal Control in the Federal Government states that management analyzes identified risks to estimate their significance, which provides a basis for responding to the risks. Management estimates the significance of a risk by considering the magnitude of impact, likelihood of occurrence, and the nature of the risk.⁵⁶ In addition, according to leading practices for program evaluations, evaluations can play a key role in planning and program management by providing feedback on both program design and execution.⁵⁷ However, DOD and the military services have not evaluated the extent of hazing in their organizations or the magnitude of its impact or likelihood of occurrence, in order to effectively target their responses to hazing. Likewise, the Coast Guard has not evaluated the extent of hazing in the Coast Guard. Without doing so, the services may be limited in their ability to further develop and target their efforts in such a way as to have the maximum positive effect for the most efficient use of resources.

Conclusions

Incidents of hazing in DOD and the Coast Guard can have effects that extend beyond their victims and perpetrators, undermining unit cohesion and potentially reducing operational effectiveness as a consequence. At the service-wide level, high-profile hazing incidents can shape public perceptions, potentially making recruitment and retention more challenging. Both DOD and the Coast Guard have issued policies that prohibit hazing. However, DOD issued its earlier hazing policy in 1997,

⁵⁶[GAO-14-704G](#).

⁵⁷GAO, *Designing Evaluations: 2012 Revision*, [GAO-12-208G](#) (Washington, D.C.: Jan 2012). This report is one of a series of papers whose purpose is to provide guides to various aspects of audit and evaluation methodology and is based on GAO studies and policy documents and program evaluation literature.

and despite several hazing incidents coming to public attention in recent years, DOD and the Coast Guard do not regularly monitor implementation of their hazing policies and do not know the extent of hazing in their organizations. Without effective monitoring by DOD, the Coast Guard, and each of the services, the offices with responsibility for addressing hazing will not know whether hazing prevention policies and training are being consistently implemented. In addition, servicemembers may not sufficiently understand how to recognize and respond to hazing incidents. As our discussions with groups of servicemembers and officials suggest, there may be confusion that persists. Without providing additional clarification to servicemembers, perhaps through revising and tailoring training or providing more communication, servicemembers may be limited in their ability to carry out their responsibilities, such as recognizing hazing and enforcing discipline. At the same time, if they do not fully understand the hazing policies, hazing victims may not be able to recognize hazing when it occurs, including hazing by those in positions of authority.

DOD's and the Coast Guard's efforts to reduce hazing would also benefit from a better understanding of the extent of hazing incidents. Available data do not provide a complete picture of the extent of reported hazing incidents. Without consistent and complete tracking of hazing incidents within and across the services, decision makers will not be able to identify areas of concern and target resources appropriately. Achieving such visibility over hazing incidents depends on better data, which will not be available without guidance specifying that the services should track all reported hazing incidents, with standardized and defined data elements that will facilitate the accurate tracking of reported hazing incidents. Concurrent with better data, DOD and the Coast Guard need to evaluate the prevalence of hazing in their organizations, since the data on reported incidents alone will not provide a picture of the full extent of hazing in the armed forces. Without such an evaluation, decision makers will not be positioned to appropriately tailor their response or to judge progress in their efforts.

Recommendations for Executive Action

We recommend that the Secretary of Defense take the following seven actions:

To enhance and to promote more consistent oversight of efforts within the department to address the incidence of hazing, direct the Under Secretary of Defense for Personnel and Readiness to:

-
- regularly monitor the implementation of DOD's hazing policy by the military services; and
 - require that the Secretaries of the military departments regularly monitor implementation of the hazing policies within each military service.

To improve the ability of servicemembers to implement DOD and service hazing policies, direct the Under Secretary of Defense for Personnel and Readiness to establish a requirement for the Secretaries of the military departments to provide additional clarification to servicemembers to better inform them as to how to determine what is or is not hazing. This could take the form of revised training or additional communications to provide further guidance on hazing policies.

To promote greater consistency in and visibility over the military services' collection of data on reported hazing incidents and the methods used to track them, direct the Under Secretary of Defense for Personnel and Readiness, in coordination with the Secretaries of the military departments, to issue DOD-level guidance on the prevention of hazing that specifies data collection and tracking requirements, including

- the scope of data to be collected and maintained by the military services on reported incidents of hazing;
- a standard list of data elements that each service should collect on reported hazing incidents; and
- definitions of the data elements to be collected to help ensure that incidents are tracked consistently within and across the services.

To promote greater visibility over the extent of hazing in DOD to better inform DOD and military service actions to address hazing, direct the Under Secretary of Defense for Personnel and Readiness, in collaboration with the Secretaries of the Military Departments, to evaluate prevalence of hazing in the military services.

We recommend that the Commandant of the Coast Guard take the following five actions:

To enhance and to promote more consistent oversight of the Coast Guard's efforts to address the incidence of hazing, regularly monitor hazing policy implementation.

To promote greater consistency in and visibility over the Coast Guard's collection of data on reported hazing incidents and the methods used to track them, by issuing guidance on the prevention of hazing that specifies data collection and tracking requirements, including

- the scope of the data to be collected and maintained on reported incidents of hazing;
- a standard list of data elements to be collected on reported hazing incidents; and
- definitions of the data elements to be collected to help ensure that incidents are tracked consistently within the Coast Guard.

To promote greater visibility over the extent of hazing in the Coast Guard to better inform actions to address hazing, evaluate the prevalence of hazing in the Coast Guard.

Agency Comments and Our Evaluation

We provided a draft of this report to DOD and DHS for review and comment. Written comments from DOD and DHS are reprinted in their entirety in appendixes IV and V. DOD and DHS concurred with each of our recommendations and also provided technical comments, which we incorporated in the report as appropriate.

In its written comments, DOD concurred with the seven recommendations we directed to it, and made additional comments about ways in which its newly issued December 2015 hazing policy memorandum takes actions toward our recommendations. Among other things, the new hazing policy assigns authority to the Under Secretary for Personnel and Readiness to amend or supplement DOD hazing and bullying policy, requires training on hazing and bullying for servicemembers, and requires tracking of hazing incidents, but in itself does not fully address our recommendations.

Regarding our recommendation for the Under Secretary of Defense for Personnel and Readiness to regularly monitor the implementation of DOD's hazing policy by the military services, DOD stated that its December 23, 2015 updated hazing policy memorandum provides comprehensive definitions of hazing and bullying, enterprise-wide guidance on prevention training and education, as well as reporting and tracking requirements. We agree that these are important steps to address hazing in the armed services. However, the policy does not

specifically require the Under Secretary of Defense for Personnel and Readiness to regularly monitor the implementation of DOD's hazing policy, and we continue to believe that the Under Secretary of Defense for Personnel and Readiness should monitor the implementation of DOD's hazing policy to ensure its requirements are implemented throughout the military services.

With respect to our recommendation to establish a requirement for the secretaries of the military departments to provide additional clarification to servicemembers to better inform them as to how to determine what is or is not hazing, DOD stated that its December 2015 updated hazing policy memorandum directs the military departments to develop training that includes descriptions of the military departments' hazing and bullying policies and differentiates between what is or is not hazing and bullying. We are encouraged by DOD's efforts to integrate the recommendation into its policy requirements and believe the services will benefit by incorporating these requirements into their hazing prevention activities.

Regarding our recommendations to issue DOD-level guidance that specifies data collection and tracking requirements for hazing incidents, including the scope of data to be collected and maintained by the military services on reported incidents of hazing and a standard list of data elements that each service should collect on reported hazing incidents, DOD stated that its December 2015 updated hazing policy memorandum provides guidance and requirements for tracking and reporting incidents of hazing and bullying. We believe that the incident data tracking requirements in this policy are an important step for DOD to improve its data collection on hazing incidents. As noted in our report, the updated policy memorandum will not fully address disparities in service-specific data collection efforts until DOD and the services clearly define the scope of information or define the data to be collected. For example, the hazing policy requires the services to track hazing incidents, but does not identify how to count an incident relative to the number of alleged offenders and alleged victims, and the services have counted incidents differently for tracking purposes. As we note in the report, DOD plans to provide a data collection template to the services, and this could provide a vehicle for fully addressing these recommendations.

In its written comments, DHS concurred with the five recommendations we directed to the Coast Guard, and made additional comments about steps the Coast Guard will take to address our recommendations.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Defense, the Secretary of Homeland Security, the Under Secretary of Defense for Personnel and Readiness, the Secretaries of the Army, the Navy, and the Air Force, and the Commandants of the Marine Corps and the Coast Guard. In addition, this report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions regarding 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 major contributions to this report are listed in appendix VI.

Brenda S. Farrell

Brenda S. Farrell
Director, Defense Capabilities and Management

List of Committees

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

The Honorable John Thune
Chairman
The Honorable Bill Nelson
Ranking Member
Committee on Commerce, Science, and Transportation
United States Senate

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

The Honorable Bill Shuster
Chairman
The Honorable Peter DeFazio
Ranking Member
Committee on Transportation and Infrastructure
House of Representatives

Appendix I: Scope and Methodology

To determine the extent to which the Department of Defense (DOD) and the Coast Guard have developed and implemented policies to address hazing incidents, we reviewed DOD's 1997 hazing memorandum, its December 2015 updated hazing and bullying policy memorandum, and the hazing policies of each military service and the Coast Guard.¹ We compared the policies, definitions of hazing, and oversight and training requirements to determine similarities and differences. To better understand the hazing policies and guidance from each service, including the Coast Guard, we interviewed knowledgeable officials from the Office of Diversity Management and Equal Opportunity in the Office of the Under Secretary of Defense for Personnel and Readiness, the Army Equal Opportunity Office, the Navy Office of Behavioral Standards, the Marine Corps Office of Manpower and Reserve Affairs, the Air Force Personnel Directorate, and the Coast Guard Office of Military Personnel, Policy and Standards Division, as well as officials in other offices listed in table 4, below. In addition, we reviewed the services' hazing awareness training requirements included in their respective policies and analyzed the services' training materials to determine how servicemembers are trained on hazing awareness, prevention, and response. We also interviewed or requested information from officials responsible for developing training from the Army Training and Doctrine Command, Naval Education and Training Command, Marine Corps Training and Education Command, Air Force Personnel Directorate, and the Coast Guard Fleet Forces Command and Leadership Development Center.

To better understand the reporting and response mechanisms employed by DOD and the Coast Guard, as well as the approaches in each service for responding to allegations of hazing as well as applications of the Uniform Code of Military Justice (UCMJ), court-martial, non-judicial punishment, and administrative action, we reviewed relevant policies and interviewed cognizant officials from the Army Office of the Provost

¹We reviewed the following DOD and military service hazing policies: Secretary of Defense Memorandum, *Hazing* (Aug. 28, 1997); Deputy Secretary of Defense Memorandum, *Hazing and Bullying Prevention and Response in the Armed Forces* (Dec. 23, 2015); Army Regulation 600-20, *Army Command Policy: Personnel-General* (Nov. 6, 2014); Secretary of the Navy Instruction 1610.2A, *Department of the Navy Policy on Hazing* (July 15, 2005); Navy Administrative Instruction, *Navy Policy for Reporting Substantiated Hazing and Assignment of Responsibility for Tracking Hazing Incidents* (Feb. 20, 2013); Marine Corps Order 1700.28B, *Hazing* (May 20, 2013); Department of the Air Force Memorandum, *Air Force Policy on Hazing* (Oct. 30, 1997); Air Force Instruction 1-1, *Air Force Standards* (Aug. 7, 2012). For the Coast Guard, we reviewed Coast Guard Commandant Instruction M1600.2, *Discipline and Conduct* (Sept. 29, 2011).

Marshal General and Criminal Investigation Command, Naval Criminal Investigative Service, Marine Corps Judge Advocate Division and Inspector General, Air Force Office of Special Investigations, Security Forces Directorate, Legal Operations Agency, and Inspector General, and the Coast Guard Office of the Judge Advocate General and the Coast Guard Investigative Service. To better understand how policy and training is implemented at installations, and to obtain servicemember perspectives on hazing and hazing awareness training, we conducted site visits to Naval Base Coronado, California, and Marine Corps Base Camp Pendleton, California. We selected these sites based upon reported hazing data, media reports of hazing, data on male victims of sexual assault, and geographic proximity to each other.² During these site visits we conducted nine focus groups with enlisted servicemembers in grades E-3 through E-5 that included a self-administered pen and paper survey of all participants. We selected these grades because available data on reported hazing incidents indicated that these grades were most likely to be victims or perpetrators of a hazing incident. In addition, we met with groups of noncommissioned officers (grades E-6 through E-9), commanding officers, inspectors general, equal opportunity advisors, staff judges advocates, and chaplains to obtain perspectives of servicemembers and other officials that may be involved in addressing hazing.³ For further information about the focus group and survey methodology, see appendix III. We compared the extent to which DOD and each armed service has oversight mechanisms in place to monitor the implementation of hazing policies to the *Standards for Internal Control in the Federal Government* criteria on control activities, which include the policies, procedures, techniques, and mechanisms that enforce management's directives to achieve an entity's objectives.⁴ We also

²We used the data on sexual assaults of male victims due to limited available data on hazing incidents, and because according to a 2014 RAND study, 24 percent to 46 percent of surveyed male active-duty servicemember sexual assault victims would describe their sexual assaults as hazing incidents.

³Because we did not select site visit locations using a statistically representative sampling method, the comments provided during our focus groups with enlisted personnel and interviews with installation officials are non-generalizable and therefore cannot be projected across DOD, a service, or any single installation we visited. While the information obtained was non-generalizable, it provided perspectives from enlisted personnel and installation officials about hazing, hazing policy, and hazing awareness training.

⁴GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C., Sept. 2014).

compared the extent to which guidance to servicemembers provides enough clarity to determine when hazing has occurred to the *Standards for Internal Control in the Federal Government* criteria that state that management establishes standards of conduct that guide the directives, attitudes, and behaviors of the organization in achieving the entity's objectives, as well as *Standards for Internal Control in the Federal Government* criteria that state that management establishes expectations of competence for key roles, and other roles at management's discretion and that management should internally communicate the necessary quality information to achieve the entity's objectives.⁵

To determine the extent to which DOD and the Coast Guard have visibility over hazing incidents involving servicemembers, we reviewed the DOD and Coast Guard hazing policies noted above to identify any tracking requirements. To determine the number of reported hazing incidents and the nature of these incidents, we reviewed available data on reported hazing allegations from each service covering a two-year time period. The Army, Navy, Air Force, and Coast Guard data covered the period from December 2012 through December 2014. The Marine Corps database for tracking hazing incidents began tracking in May 2013, so we analyzed Marine Corps data from May 2013 through December 2014. We reviewed the methods each service used to track hazing incident data by interviewing officials from the Army Equal Opportunity Office and the Army Criminal Investigation Command; the Navy Office of Behavioral Standards; the Marine Corps Office of Manpower and Reserve Affairs; the Air Force Personnel Directorate and Air Force Legal Operations Agency; and the Coast Guard Office of Military Personnel, Policy and Standards Division and the Coast Guard Investigative Service.

We found that the Army and Navy data were sufficiently reliable to report the number of hazing cases, offenders, and victims, as well as demographic and rank data on offenders and victims. However, due to limitations in the methods of collection, the data reported do not necessarily represent the full universe of reported hazing incidents in the Army and Navy. We found that the Marine Corps data was not sufficiently reliable to report accurate information on the total number of cases, offenders, and victims, or demographic and rank data. The Marine Corps did not record the number of hazing cases in an internally consistent

⁵[GAO-14-704G](#).

manner, resulting in duplicate records for cases, offenders, and victims, and no consistent means for correcting for the duplication. We found that the Air Force data were sufficiently reliable to report the number of cases and offenders, but not to report demographic information for the offenders or to report any information on the victims because it did not consistently track and report demographic and rank information. We also found that the Coast Guard data were sufficiently reliable to report the number of cases, offenders, and victims, but not to report demographic and rank information because it did not consistently track and report demographic and rank information. In addition, due to limitations of the collection methods, the data reported do not necessarily represent the full universe of reported hazing incidents in the Air Force and Coast Guard. We found that hazing data in all services were not sufficiently reliable to report information on the disposition of hazing cases because they did not consistently track and report this information, and because the source data for these dispositions was not reliable. We also compared the services' methods of data collection with *Standards for Internal Control in the Federal Government* criteria stating that information should be recorded and communicated to management and others who need it in a form and within a time frame that allows them to carry out their internal control and other responsibilities.⁶

We also reviewed the 2014 RAND Corporation military workplace study commissioned by the Office of the Secretary of Defense and analyzed data reported on that study on sexual assault and hazing. We also interviewed officials of the Defense Equal Opportunity Management Institute about command climate surveys and analyzed data obtained from responses to command climate survey questions relating to hazing and demeaning behaviors. We obtained survey data based on three hazing questions and three demeaning behavior questions that were asked of all survey respondents during calendar year 2014; in addition, we obtained survey data for demographic and administrative variables that we used to analyze the data across all of the command climate surveys we obtained. The data we analyzed included responses by active-duty servicemembers in all five armed services—Army, Navy,

⁶GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999). We applied the internal control standards in effect during the time period of the data we reviewed.

Marine Corps, Air Force, and Coast Guard—during calendar year 2014.⁷ We summarized the results for active-duty servicemembers by rank, gender, race/ethnicity, and by service across all of the command climate survey responses that were collected for the time period. Because of the nature of the process used to administer and to collect the results of the command climate surveys, the analysis cannot be generalized to the entire population of active servicemembers across the armed forces or for each service. For example, it is not possible to discern whether every unit administered the command climate survey, nor whether any particular unit administered the survey multiple times within the time period from which we obtained data. Therefore, the analyses we present using the command climate survey data are not intended to reflect precise information about the prevalence of perceptions related to hazing, but rather to demonstrate how the survey data might be used if the methods allowed the ability to generalize to all servicemembers. We compared the extent to which DOD and the Coast Guard have evaluated the prevalence of hazing with *Standards for Internal Control in the Federal Government* criteria on evaluating risks,⁸ and with leading practices for program evaluations.⁹

⁷Calendar year 2014 was the only full year of data available since hazing questions were added to the survey in January 2014. DOD and service policies require that each unit administer the surveys at least once a year. The year for which we reviewed data included 1.4 million individual survey responses from about 13,000 units.

⁸[GAO-14-704G](#).

⁹GAO, *Designing Evaluations: 2012 Revision*, [GAO-12-208G](#) (Washington, D.C.: January 2012).

Table 4: DOD and Coast Guard Locations Visited or Contacted

DOD	<ul style="list-style-type: none"> Office of Diversity Management and Equal Opportunity, Arlington, VA Defense Equal Opportunity Management Institute, Patrick Air Force Base, FL
Army	<ul style="list-style-type: none"> Equal Opportunity Office, Arlington, VA Criminal Investigation Command, Quantico, VA Office of the Provost Marshal General, Arlington, VA Training and Doctrine Command, Fort Eustis, VA
Navy	<ul style="list-style-type: none"> Office of Behavioral Standards, Arlington, VA Naval Criminal Investigative Service, Quantico, VA Naval Education and Training Command, Pensacola, FL Office of the Judge Advocate General, Washington, DC Naval Base Coronado, CA
Marine Corps	<ul style="list-style-type: none"> Office of Manpower and Reserve Affairs, Quantico, VA Office of the Judge Advocate Division, Washington, DC Office of the Inspector General, Washington, DC Training and Education Command, Quantico, VA Marine Corps Base Camp Pendleton, CA
Air Force	<ul style="list-style-type: none"> Personnel Directorate, Arlington, VA Air Force Legal Operations Agency, Andrews Air Force Base, MD Security Forces Directorate, Washington, DC Office of Special Investigations, Quantico, VA Office of the Inspector General, Washington, DC Air Education and Training Command, Lackland Air Force Base, TX
Coast Guard	<ul style="list-style-type: none"> Office of Military Personnel, Policy and Standards Division, Washington, DC Coast Guard Investigative Service, Washington, DC Office of the Judge Advocate General, Military Justice Branch, Washington, DC Fleet Forces Command, Norfolk, VA Leadership Development Center, New London, CT Office of Civil Rights, Washington, DC

Source: GAO-16-226.

In addition to these organizations, we also contacted the RAND Corporation.

We conducted this performance audit from April 2015 to February 2016 in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Hazing Incident Data as Tracked by DOD and the Coast Guard

Not all of the military services or the Coast Guard track data on reported hazing. Further, the data that are collected and the methods used to track them vary by service because neither the Department of Defense (DOD) or the Coast Guard has articulated a consistent methodology. As a result of inconsistent and incomplete data, any data tracked and reported by the armed services currently cannot be used to provide a complete and accurate picture of hazing in the armed services, and the data from one service cannot be compared to that of another service.

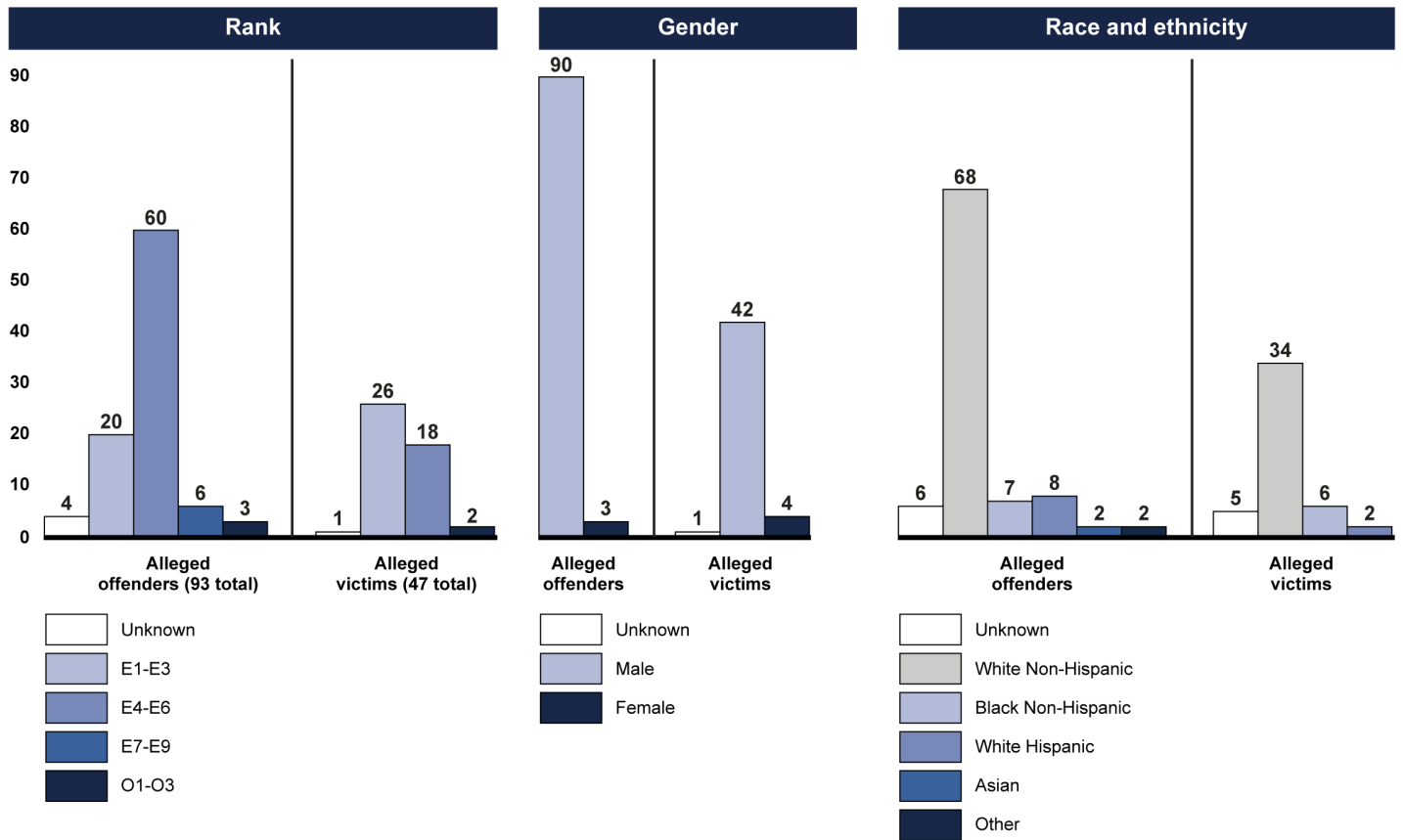
To the extent possible based on the availability of data, we obtained and reviewed data on reported hazing cases from each military service covering the period December 2012 to December 2014. For the Air Force and Coast Guard, neither of which specifically tracked hazing cases, we obtained information derived from legal and criminal investigative databases, which were the methods these services used to report hazing information to congressional committees in 2013. The following information is derived from our analyses of these data.

Army hazing data

The Army specifies the use of its Equal Opportunity Reporting System database to track hazing cases. However, the Army only began using its equal opportunity database to track hazing cases in October 2015. Previously hazing cases were tracked by Army Criminal Investigation Command. Criminal Investigation Command tracked cases using its database of cases investigated by Criminal Investigation Command and by military police, so these data necessarily exclude cases that were not investigated by Criminal Investigation Command or military police. Figure 2 shows our analysis of the Army's hazing cases from December 2012 through December 2014.

Figure 2. GAO Analysis of Reported Army Alleged Hazing Data

17 cases



Source: GAO analysis of Army data. | GAO-16-226

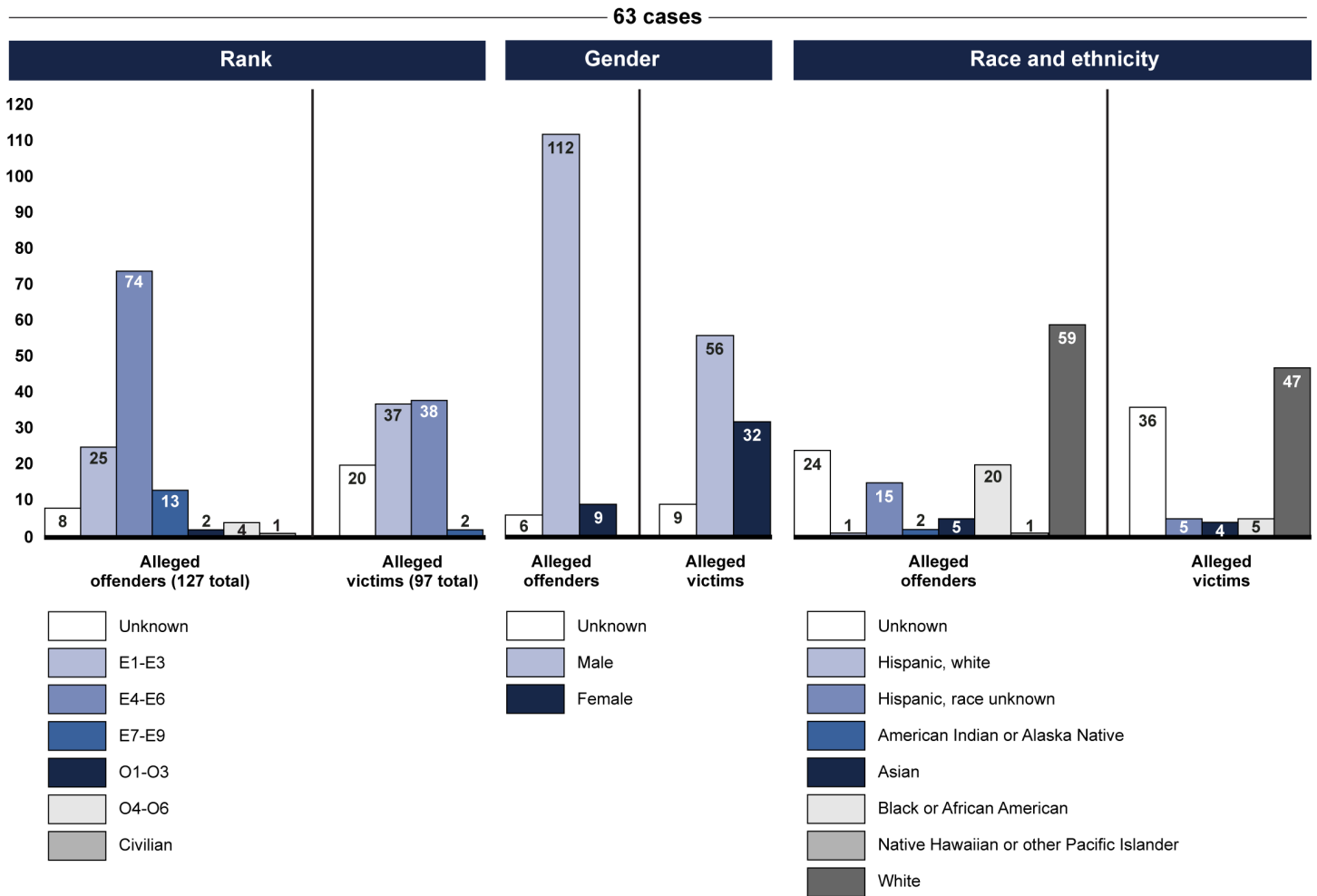
NOTE: Data are from December 2012 through December 2014. These data only include allegations investigated by military police or criminal investigators. We excluded from the above data one case with one alleged offender and an unknown number of alleged victims due to the absence of a precise number of victims. Enlisted grades begin at E1 (lowest grade), and officer grades begin at O1.

As shown in Figure 2, during this time period the Army identified a total of 17 alleged cases involving 93 alleged offenders and 47 alleged victims. The majority of alleged offenders and alleged victims were either in grades E4-E6 or E1-E3, and more alleged offenders were E4-E6 than E1-E3, while more alleged victims were E1-E3 than E4-E6. A majority of alleged offenders and alleged victims were male. Most alleged victims and alleged offenders were white, non-Hispanic, but the race and ethnicity information for some alleged offenders and alleged victims was unknown.

Navy hazing data

The Navy requires commanders to report substantiated hazing cases to the Office of Behavioral Standards, which then tracks the cases in a spreadsheet. Although Navy policy only requires substantiated cases to be reported, officials in the Navy’s Office of Behavioral Standards told us they encourage commanders to report both unsubstantiated and substantiated cases, and the data include both, to the extent reported. Figure 3 shows our analysis of this data from December 2012 through December 2014.

Figure 3: GAO Analysis of Reported Navy Alleged Hazing Data



Source: GAO analysis of Navy data. | GAO-16-226

NOTE: Data are from December 2012 through December 2014. These data include some unsubstantiated cases; however, Navy policy only requires substantiated cases to be reported, so the data may not include all unsubstantiated cases. Ten cases are excluded from the above data due to

the inclusion of an unknown number of alleged offenders or alleged victims. These cases included 5 known alleged offenders and 7 known alleged victims. From FY13 to FY14, the Navy switched its method of recording race and ethnicity. In FY13, the Navy included "Hispanic" as one category among other racial/ethnic categories; beginning in FY14, it began tracking race and ethnicity separately. Beginning in FY14 the Navy data record some cases where it was unknown whether the alleged victim or offender was Hispanic—82 alleged offenders and 65 alleged victims of unknown ethnicity in total. Therefore, all racial/ethnic categories not specifically marked as Hispanic could include Hispanics in the data above. Enlisted grades begin at E1 (lowest grade), and officer grades begin at O1.

As shown in Figure 3, during this time period the Navy identified 63 alleged hazing cases, involving 127 alleged offenders and 97 alleged victims. The majority of alleged offenders were in grades E4-E6, while the majority of alleged victims were either E1-E3 or E4-E6. Alleged offenders were overwhelmingly male, while alleged victims included a significant minority of women. In terms of race and ethnicity, the greatest single group of both alleged offenders and alleged victims was white, non-Hispanic.

Marine Corps hazing data

The Marine Corps uses its Discrimination and Sexual Harassment database to track alleged hazing incidents, both substantiated and unsubstantiated. We obtained and analyzed data from May 2013, when the Marine Corps began using this tracking method, through December 2014. We found internal inconsistencies in the Marine Corps' tracking data, and for that reason found that the data were not reliable enough to report detailed information about these alleged hazing cases. Specifically, from May 2013 through December 2014, the Marine Corps recorded 303 alleged hazing cases for which there were 390 alleged victims and 437 alleged offenders. However, our analyses of these data identified inconsistencies in the methods used to aggregate categories of information collected on reported incidents of hazing. For example, we found that in some instances, a reported hazing case involving two alleged offenders and one alleged victim was counted as a single case, whereas other instances that involved the same number of individuals were classified as two cases—one for each alleged offender. Similarly, we identified single reports of hazing that involved multiple alleged victims and were classified as one case that, at other times, were documented as separate cases relative to the number of alleged victims involved. We determined that the Marine Corps' data, for the time period requested, were overstated by at least 100 reported hazing cases, at least 50 alleged offenders, and at least 90 alleged victims.

Air Force hazing data

The Air Force has not established a system specifically to track hazing cases. In its July 2013 report to congressional committees, *Hazing in the Armed Forces*, the Air Force stated that hazing incidents in the service are best tracked using its legal database by querying the text of the cases for variants of the word “hazing.”¹ Accordingly, we obtained information on hazing cases from December 2012 through December 2014 from a search performed in this database for variants of the word “hazing,” the results of which were provided to us by the Air Force Legal Operations Agency. This data showed 4 cases with 17 alleged offenders that were reported from December 2012 through December 2014. However, these data do not present a complete picture of hazing cases in the Air Force, as they do not necessarily capture any cases that did not come to the attention of a staff judge advocate. The case files did not generally capture race or ethnicity data for alleged offenders and alleged victims; did not systematically capture gender of alleged offenders and alleged victims; generally did not capture the rank of alleged victims; and did not systematically capture the number of alleged victims. Therefore, we are not reporting rank or demographic data.

Coast Guard hazing data

The Coast Guard has not established a system specifically to track hazing cases. In its 2013 report to congressional committees, *Hazing in the Coast Guard*, the Coast Guard reported hazing incidents derived from legal and criminal investigative sources.² Accordingly, to obtain data on Coast Guard hazing incidents, we used the Coast Guard’s Quarterly Good Order and Discipline Reports, which contain a summary of disciplinary and administrative actions taken against Coast Guard military members or civilian employees, as well as Coast Guard Investigative Service case files. For the Good Order and Discipline reports covering disciplinary and administrative actions taken between October 2012 and March 2015, only one case explicitly mentioned hazing. However, these reports only include brief descriptions for certain types of cases, such as courts-martial, and do not include any details of the alleged offense and punishment for cases resulting in non-judicial punishment. In response to our request to identify Coast Guard Investigative Service cases using variants of the word “hazing” from December 2012 through December 2014, the Coast Guard identified six cases involving 14 known alleged

¹United States Air Force, *Hazing in the Armed Forces*, July 2013.

²Coast Guard, *Hazing in the Coast Guard*, July 1, 2013.

victims and 20 known alleged offenders (the number of both offenders and victims in one case were unknown). These case files did not consistently track and report the race, ethnicity, rank, and gender of the offenders and victims; therefore we are not reporting rank or demographic data. Due to the limitations of these methods of capturing reported hazing cases, these data do not necessarily present a complete picture of the number of reported hazing incidents in the Coast Guard. In addition, Coast Guard officials told us that conducting this search for case file information was time- and resource-consuming, and even with this allocation of time and resources the results of the judicial and investigative information sources may not yield complete information on reported hazing cases in the Coast Guard.

Appendix III: Focus Group and Survey Methodology for Hazing Site Visits

To obtain servicemembers' perspectives related to each of our objectives, we conducted nine focus group meetings with active-duty servicemembers in the grades E3-E5. Four of these meetings were held at Marine Corps Base Camp Pendleton, California, and five meetings were held at U.S. Naval Base Coronado, California. We selected these sites based upon reported hazing data, media reports of hazing, data on male victims of sexual assault,¹ and geographic proximity to each other. To select specific servicemembers to participate in our focus groups, we requested lists of servicemembers who were stationed at each location and likely available to participate at the time of our visit. The documentation included information about their rank, gender, and occupation.

The hazing data available suggested that hazing incidents were most likely to occur among servicemembers in the E3-E5 grades. Therefore, we randomly selected servicemembers that were in grades E3-E5 from selected units and job series (for example, at Camp Pendleton we selected servicemembers in infantry, logistics and air wing units). We selected these units and job series based on headquarters-level officials' recommendations of which would be likely to yield a wide range of servicemember experiences related to hazing. We conducted focus group meetings of approximately 10-17 servicemembers, separately by gender, at each location:

U.S. Naval Base Coronado

4 sessions with males (3 assigned to USS Carl Vinson, 1 with a helicopter maritime strike wing)
1 session with females (assigned to USS Carl Vinson)

¹We used the data on sexual assaults of male victims due to limited available data on hazing incidents, and because according to a recent RAND study, 24 percent to 46 percent of surveyed male active-duty servicemember sexual assault victims would describe their sexual assaults as hazing incidents. See RAND Corporation, *Sexual Assault and Sexual Harassment in the Military: Top-Line Estimates for Active-Duty Service Members from the 2014 RAND Military Workplace Study*, Annex 1 to Department of Defense, *Report to the President of the United States on Sexual Assault Prevention and Response* (Nov. 25, 2014), and RAND Corporation, *Sexual Assault and Sexual Harassment in the U.S. Military: Annex to Volume 2: Tabular Results from the 2014 RAND Military Workplace Study for Department of Defense Service Members*, Annex to Annex 1 of Department of Defense, *Department of Defense Annual Report on Sexual Assault in the Military, Fiscal Year 2014* (Apr. 29, 2015).

Marine Corps Base Camp Pendleton

3 sessions with males (infantry, logistics and air wing)
1 session with females (logistics and air wing)

Table 5. Participation in Focus Group Meetings by Service and Gender

	Navy	Marine Corps	Total
Men	40	39	79
Women	15	17	32
Total	55	56	111

Source: GAO. | GAO-16-226.

To conduct the focus groups, a moderator followed a protocol that included two hazing scenarios followed by a set of questions. The scenarios were developed based on examples that may be familiar to servicemembers and were used to frame the focus group discussion. A survey was administered to participants as a part of each focus group after the discussion was completed and before the participants were dismissed. The survey referred to the hazing examples and included questions of a sensitive nature that might not be appropriate for a discussion with others. The focus group protocol and questionnaire were pre-tested by using a peer review by GAO methodologists with social science backgrounds and knowledge of small group methods and survey administration. In addition, the focus group protocol was pre-tested at Camp Pendleton. The same set of questions and the same survey instrument was used in all nine focus group sessions. The scenarios for each service and the discussion questions are reprinted below.

Focus Group Hazing Scenarios and Questions

Example One

(Navy)

Petty Officer Taylor is on his first deployment to the South Pacific. His fellow shipmates have told him about an upcoming ceremony to celebrate those crossing the equator for the first time. The day of the equator crossing, all shipmates (“shellbacks and wogs”) dress up in costume. The wogs, or those who are newly crossing the equator, rotate through different stations, including tug-of-war and an obstacle course. One of the shellbacks, or those who have already crossed the line, is dressed up as King Neptune and asks the wogs to kiss his hands and feet. In addition, all of the “wogs” are required to take a shot of tequila. After completing all the stations and crossing the equator, Petty Officer Taylor is officially a shellback.

(Marine Corps)

Lance Corporal Jones recently received a promotion to Corporal. To congratulate him for the promotion, members of his unit take him to the barracks and begin hitting him at the spot of his new rank.

Example Two

(Navy)

After dinner, Petty Officer Sanchez talks with fellow sailors about playing some pranks on other members of the ship. They see Seaman Williams walking down the hall and bring him into a storage closet. There, they tape his arms and legs to a chair and leave him alone in the closet to see if he can escape.

(Marine Corps)

After dinner, Sergeant Sanchez talks with fellow marines about playing some pranks on other members of the platoon. They see Corporal Williams walking down the hall and bring him into a storage closet. There, they tape his arms and legs to a chair and leave him alone in the closet to see if he can escape.

These scenarios, providing examples of hazing, along with the following set of questions, were the basis for the discussion with participants and the context for responding to the survey questions that were administered following the discussion.

- Would you consider this example hazing?
- Do activities like these two examples sound like they could ever happen in the Marine Corps/Navy?
- What about these activities is good?
- What about these activities might be harmful?
- Do you think activities like these are important for a Marine/Sailor to become a part of the group or the unit?
- Now that we've talked about hazing, what kind of training about hazing have you received in the Marine Corps/Navy?
- Are there any other topics about hazing that we haven't covered?

To obtain additional perspectives on hazing, particularly regarding sensitive information about personal experience with hazing, servicemembers participating in each focus group completed a survey following the discussion. The survey consisted of a self-administered pen

and paper questionnaire that was provided to each focus group participant in a blank manila envelope without any identifying information. The moderator provided the following verbal instructions:

I'd like you to take a few minutes to complete this survey before we finish. Please do not put your name or any identifying information on it. Take it out of the envelope, take your time and complete the questions, and please place it back in the envelope. When you are done, you can leave it with me/put it on the chair and then leave.

Because we did not select participants using a statistically representative sampling method, the information provided from the surveys is nongeneralizable and therefore cannot be projected across the Department of Defense, a service, or any single installation we visited. The questions and instructions are shown below with the results for the closed-ended questions.

**Survey of Navy and Marine Corps Focus Group Participants
August/September 2015**

Instructions: Please complete the entire survey below. Do not include your name or other identifying information. Once finished, please place the completed survey back in the envelope and return the envelope.

1. Have you experienced hazing in the Navy/Marine Corps?

	Navy		Total Navy	Marine Corps		Total Marine Corps
	Men	Women		Men	Women	
Yes	10	4	14	14	8	22
No	27	9	36	25	9	34
I'm not sure	3	2	5	0	0	0
Total	40	15	55	39	17	56

Source: GAO. | GAO-16-226.

2. (If "Yes" or "I'm not sure" for 1) What happened?

(Please briefly describe the event(s))

3. In the group discussion we talked about two examples that some would consider hazing.

If these examples happened in your unit, would it be OK with the unit leadership? (check one for each row)

**Appendix III: Focus Group and Survey
Methodology for Hazing Site Visits**

Crossing the Line (Navy)/Pinning (Marine Corps)

	Navy			Marine Corps			Total
	OK	Not OK	I don't know	OK	Not OK	I don't know	
Men	25	10	5	8	24	6	78
Women	12	1	2	2	14	1	32
Total	37	11	7	10	38	7	110

Source: GAO. | GAO-16-226.

Storage Closet

	Navy			Marine			Total
	OK	Not OK	I don't know	OK	Not OK	I don't know	
Men	1	33	5	2	32	5	78
Women	0	13	2	0	16	1	32
Total	1	46	7	2	48	6	110

Source: GAO. | GAO-16-226.

4. Some activities that are traditions in the Marine Corps/Navy are now considered hazing. Is it important to continue any of these activities?

	Navy			Marine			Total
	Yes	No	I'm not sure	Yes	No	I'm not sure	
Men	22	7	11	22	9	7	78
Women	9	3	3	5	10	2	32
Total	31	10	14	27	19	9	110

Please explain why or why not?

5. Have you received hazing prevention training in the Navy/Marine Corps?

	Navy			Marine			Total
	Yes	No	Don't Know	Yes	No	Don't Know	
Men	37	0	3	37	0	1	78
Women	15	0	0	17	0	0	32
Total	52	0	3	54	0	1	110

Source: GAO. | GAO-16-226.

6. Is there anything else you want us to know about hazing in the Navy/Marine Corps?

Appendix IV: Comments from the Department of Defense



PERSONNEL AND
READINESS

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

JAN 23 2016


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

Ms. Farrell:

This is the Department of Defense (DoD) response to the GAO Draft Report, GAO-16-226, "DOD AND COAST GUARD: Actions Needed to Increase Oversight and Management Information on Hazing Incidents Involving Servicemembers," dated December 17, 2015 (GAO Code 352013). Responses to the seven recommendations are enclosed.

Ms. Charmane Johnson is my point of contact for this response. She can be reached by telephone at 703.571.9332 or by email at charmane.s.johnson.civ@mail.mil.

Sincerely,



Clarence A. Johnson
Director
Office of Diversity Management
And Equal Opportunity

Enclosure
As stated

GAO DRAFT REPORT DATED DECEMBER 17, 2015
GAO-16-226 (GAO CODE 352013)

“DOD AND COAST GUARD: ACTIONS NEEDED TO INCREASE OVERSIGHT AND
MANAGEMENT INFORMATION ON HAZING INCIDENTS INVOLVING
SERVICEMEMBERS”

DEPARTMENT OF DEFENSE COMMENTS
TO THE GAO RECOMMENDATION

RECOMMENDATION 1: To enhance and to promote more consistent oversight of efforts within the department to address the incidence of hazing, GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to regularly monitor the implementation of DOD’s hazing policy by the military services.

DoD RESPONSE: Concur. On December 23, 2015, the Deputy Secretary of Defense signed the “Hazing and Bullying Prevention and Response in the Armed Forces” policy memorandum. The policy provides comprehensive definitions of hazing and bullying, enterprise-wide guidance on prevention training and education, as well as reporting and tracking requirements.

RECOMMENDATION 2: To enhance and to promote more consistent oversight of efforts within the department to address the incidence of hazing, GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to require that the Secretaries of the military departments regularly monitor implementation of the hazing policies within each military service.

DoD RESPONSE: Concur.

RECOMMENDATION 3: To improve the ability of servicemembers to implement DOD and service hazing policies, GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to establish a requirement for the Secretaries of the military departments to provide additional clarification to servicemembers to better inform them as to how to determine what is or is not hazing. This could take the form of revised training or additional communications to provide further guidance on hazing policies.

DoD RESPONSE: Concur. The “Hazing and Bullying Prevention and Response in the Armed Forces” policy memorandum, dated December 23, 2015, directs the Military Departments to develop training that includes descriptions of the Military Departments’ hazing and bullying policies and differentiates between what is or is not hazing and bullying.

RECOMMENDATION 4: To promote greater consistency in and visibility over the military services’ collection of data on reported hazing incidents and the methods used to track them, GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness, in coordination with the Secretaries of the military departments, to issue DOD-level guidance on the prevention of hazing that specifies data collection and tracking

requirements, including the scope of data to be collected and maintained by the military services on reported incidents of hazing.

DoD RESPONSE: Concur. The “Hazing and Bullying Prevention and Response in the Armed Forces” policy memorandum, dated December 23, 2015, provides guidance and requirements for tracking and reporting incidents of hazing and bullying.

RECOMMENDATION 5: To promote greater consistency in and visibility over the military services’ collection of data on reported hazing incidents and the methods used to track them, GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness, in coordination with the Secretaries of the military departments, to issue DOD-level guidance on the prevention of hazing that specifies data collection and tracking requirements, including a standard list of data elements that each service should collect on reported hazing incidents.

DoD RESPONSE: Concur. The “Hazing and Bullying Prevention and Response in the Armed Forces” policy memorandum, dated December 23, 2015, provides guidance and requirements for tracking and reporting incidents of hazing and bullying.

RECOMMENDATION 6: To promote greater consistency in and visibility over the military services’ collection of data on reported hazing incidents and the methods used to track them, GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness, in coordination with the Secretaries of the military departments, to issue DOD-level guidance on the prevention of hazing that specifies data collection and tracking requirements, including definitions of the data elements to be collected to help ensure that incidents are tracked consistently within and across the services.

DoD RESPONSE: Concur.

RECOMMENDATION 7: To promote greater visibility over the extent of hazing in DOD to better inform DOD and military service actions to address hazing, GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness, in collaboration with the Secretaries of the Military Departments, to evaluate prevalence of hazing in the military services.

DoD RESPONSE: Concur.

Appendix V: Comments from the Department of Homeland Security



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

**Homeland
Security**

January 22, 2016

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

Re: Draft Report GAO-16-226 "DOD AND COAST GUARD: Actions Needed to Increase Oversight and Management Information on Hazing Incidents Involving Servicemembers"

Dear Ms. Farrell:

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

The Department is pleased to note GAO's positive recognition of the Coast Guard's work in developing policy that addresses hazing. In short, the Coast Guard does not tolerate hazing. Hazing is contrary to the organization's core values of honor, respect, and devotion to duty. The Coast Guard places the highest priority on preventing hazing, and maintaining a healthy, positive, and professional work environment. There is no place in the Coast Guard for dehumanizing treatment and every incident of hazing is investigated and appropriate disciplinary action(s) initiated against the perpetrators.

The draft report contained 5 recommendations with which the Department concurs. Specifically, GAO recommended that the Commandant of the Coast Guard:

Recommendation 1: Regularly monitor hazing policy implementation.

Response: Concur. The Coast Guard's Office of Military Personnel will develop a standard training curriculum for "Hazing Awareness Training" and research the feasibility of developing an online training course.

A standard training curriculum would allow unit commanders to incorporate "Hazing Awareness Training" into their annual unit training plans. Current policy requires

various schools and training centers to conduct “Hazing Awareness Training.” However, the absence of a standardized training curriculum can create inconsistencies in training between units. This inhibits the Service’s ability to effectively gauge a member’s understanding of hazing policy.

Unit training officers will manually enter student completion of “Hazing Awareness Training” into existing IT-based training tracking systems. This will allow the Coast Guard to review completion rates and verify policy implementation.

A potential future solution is the development of an online training course. This will take significant time to implement. The first step prior to creating any new training course is the Request for Analysis (RFA) process. The RFA will determine if there is a demonstrated need and ascertain the feasibility for creating the training course. Formal course design and full implementation is likely to exceed one year beyond the completion of a RFA.

Should the RFA determine an online course should be implemented, “Hazing Awareness Training” would become a part of required annual training for the active duty workforce. Training completion rates would be automatically tracked. During the next year, the Coast Guard will begin preliminary research into a RFA regarding the possible creation and distribution of “Hazing Awareness Training.” Estimated Completion Date (ECD): December 31, 2016.

Recommendation 2: Issue guidance on the prevention of hazing that specifies data collection and tracking requirements, including the scope of the data to be collected and maintained on reported incidents of hazing.

Response: Concur. Both the Office of the Judge Advocate General and the Coast Guard Investigative Service (CGIS) possess databases they use to track their activities nationwide. Modifications of those existing programs/databases, to include standard data elements related to hazing should allow for prompt identification of pending as well as adjudicated cases where hazing was the underlying factor. The Office of the Judge Advocate General and CGIS will initiate research and conduct analysis over the next year regarding feasibility to amending existing databases to ensure proper data capture. ECD: December 31, 2016.

Recommendation 3: Issue guidance on the prevention of hazing that specifies data collection and tracking requirements, including a standard list of data elements to be collected on reported hazing incidents.

Response: Concur. Both the Office of the Judge Advocate General and CGIS possess databases they use to track their activities nationwide. Modifications of those existing programs/databases, as well as guidance to ensure consistent identification of matters as

possible hazing incidents, should allow for prompt identification of pending as well as adjudicated cases where hazing was the underlying factor. The Office of the Judge Advocate General and CGIS will initiate research and conduct analysis over the next year regarding feasibility to amending existing databases to ensure proper data capture.

Changes will be made to current policy, particularly within the Discipline and Conduct Manual, COMDTINST M1600.2 (series), identifying specific data elements required to standardize reporting from field units to legal and/or CGIS. Units will be directed to provide these specific elements to their Servicing Legal Office (SLOs) and/or CGIS when an investigation is launched that may involve hazing. ECD: December 31, 2016.

Recommendation 4: Issue guidance on the prevention of hazing that specifies data collection and tracking requirements, including definitions of data elements to be collected to help ensure that incidents are tracked consistently within the Coast Guard.

Response: Concur. Although the Uniform Code of Military Justice (UCMJ) does not contain a specific article for hazing, units would be required to report the adjudication (if resolved at the unit level through Non-Judicial Punishment (NJP)) of the case to their SLO. In turn, SLOs will be able to consolidate both reported/alleged hazing incidents and determine whether or not the case resulted in violations of the UCMJ. If cases were adjudicated at courts-martial, the results could be paired to the initial report of investigation allowing the Coast Guard to compile both reports of hazing as well as the resulting outcomes of those reports. The Office of the Judge Advocate General and CGIS (if involved) would centrally compile the data from the SLOs. ECD: December 31, 2016.

Recommendation 5: Evaluate the prevalence of hazing in the Coast Guard.

Response: Concur. Implementing Recommendation 5 will rely on the plan of action(s) outlined in Recommendations 1 through 4. Additionally, the Coast Guard Organizational Assessment Survey (OAS) will be modified to add additional questions that speak to hazing. For example members could be asked questions about the receipt/completion of hazing awareness training, their ability to recognize hazing (if it were to occur), observances of hazing, and awareness on how to report hazing.

The corrective action plan for Recommendation 1 assures that education and policy oversight aspects are developed to address hazing. The corrective action plan for Recommendation 2, 3, and 4 provides the ability to track hazing cases. By adding direct feedback questions in the OAS, the Service provides the opportunity for members to “bridge the gap” between training and the data being tracked by the Office of the Judge Advocate and CGIS regarding hazing. ECD: December 31, 2016.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,



Jim H. Crumpacker, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Appendix VI: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact named above, key contributors to this report were Kimberly Mayo, Assistant Director; Tracy Barnes; Cynthia Grant; Simon Hirschfeld; Emily Hutz; Ronald La Due Lake; Alexander Ray; Christine San; Monica Savoy; Amie Lesser; Spencer Tackill; and Erik Wilkins-McKee.

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