

October 2008

# DEFENSE HEALTH CARE

## Additional Efforts Needed to Ensure Compliance with Personality Disorder Separation Requirements





Highlights of [GAO-09-31](#), a report to congressional addressees

## Why GAO Did This Study

At DOD, a personality disorder can render a servicemember unsuitable for service. GAO was required to report on personality disorder separations and examined (1) the extent that selected military installations complied with DOD's separation requirements and (2) how DOD ensures compliance with these requirements. GAO reviewed a sample of 312 servicemembers' records from four installations, representing the Army, Air Force, and Marine Corps, that had the highest or second highest number of Operation Enduring Freedom or Operation Iraqi Freedom servicemembers separated because of a personality disorder. The review is generalizable to the installations, but not to the services. GAO also reviewed 59 Navy servicemembers' records, but this review is not generalizable to the installation or the Navy because parts of the separation process could have been completed at multiple locations.

## What GAO Recommends

GAO recommends that DOD (1) ensure that the services' personality disorder separations comply with DOD's requirements and (2) monitor the services' compliance. DOD concurred with GAO's first recommendation and partially concurred with the other. DOD stated that it will strengthen policy guidance for the services' compliance reporting, but stated that it is the responsibility of the services to ensure compliance. However, GAO's review indicates that reliance on the services is insufficient to ensure compliance.

To view the full product, including the scope and methodology, click on [GAO-09-31](#). For more information, contact Randall B. Williamson at (202) 512-7114 or [williamsonr@gao.gov](mailto:williamsonr@gao.gov).

## DEFENSE HEALTH CARE

### Additional Efforts Needed to Ensure Compliance with Personality Disorder Separation Requirements

## What GAO Found

GAO's review of enlisted servicemembers' records found that the selected military installations GAO visited varied in their documented compliance with DOD's requirements for personality disorder separations. DOD has requirements for separations because of a personality disorder, which is defined as an enduring pattern of behavior that deviates markedly from expected behavior and has an onset in adolescence or early adulthood. The three key requirements established by DOD are that enlisted servicemembers (1) must be notified of their impending separation because of a personality disorder, (2) must be diagnosed with a personality disorder by a psychiatrist or psychologist who determines that servicemembers' personality disorder interferes with their ability to function in the military, and (3) must receive formal counseling about their problem with functioning in the military. For the four installations, compliance with the notification requirement was at or above 98 percent. The compliance rates for the requirement related to the personality disorder diagnosis ranged from 40 to 78 percent. For the requirement for formal counseling, compliance ranged from 40 to 99 percent. GAO's review of the documentation in the enlisted Navy servicemembers' records found that compliance varied by requirement. Ninety-five percent of enlisted Navy servicemembers' records had documentation indicating that enlisted servicemembers had been notified of their impending separation because of a personality disorder. Eighty-two percent had documentation that indicated compliance with the requirement that enlisted servicemembers must be diagnosed with a personality disorder by a psychiatrist or psychologist who determines that the personality disorder interferes with servicemembers' ability to function in the military. Seventy-seven percent had documentation indicating compliance with the requirement for formal counseling.

DOD does not have reasonable assurance that its key personality disorder separation requirements have been followed. DOD policy directs the military services to implement and ensure consistent administration of DOD's requirements for separating enlisted servicemembers because of a personality disorder. According to military service officials, the military services delegate to commanders with separation authority at military installations sole responsibility for ensuring that the separation requirements are followed for enlisted servicemembers under their command. When asked about the low rates of compliance for some of the separation requirements that GAO found, military officials responsible for reviewing the servicemembers' records with whom GAO spoke could not explain why these separations were approved if compliance with the separation requirements was not documented in the servicemembers' records. The military services have not established a way to determine whether the commanders with separation authority are ensuring that DOD's key separation requirements are met, and DOD does not have reasonable assurance that its requirements have been followed.

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### Abbreviations

DMDC	Defense Manpower Data Center
DOD	Department of Defense
DSM	<i>Diagnostic and Statistical Manual of Mental Disorders</i>
OEF	Operation Enduring Freedom
OIF	Operation Iraqi Freedom
PTSD	post-traumatic stress disorder

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United States Government Accountability Office  
Washington, DC 20548

October 31, 2008

Congressional Addressees

The Department of Defense (DOD) requires that all servicemembers, including those who serve in Operation Enduring Freedom (OEF) and Operation Iraqi Freedom (OIF), be physically and psychologically suitable for military service.<sup>1</sup> Enlisted servicemembers who fail to meet this standard may be separated from the military.<sup>2</sup> One psychological condition that can render a servicemember unsuitable for military service is a personality disorder, which is defined as a long-standing, inflexible pattern of behavior that deviates markedly from expected behavior, has an onset in adolescence or early adulthood, and leads to distress or impairment.<sup>3</sup> Such a condition may make one unable to work within a military environment. DOD data show that from November 1, 2001, through June 30, 2007, about 26,000 enlisted servicemembers were separated from the military because of a personality disorder.<sup>4</sup> Of these 26,000, about 2,800 had deployed at least once in support of OEF/OIF.

Accurately diagnosing OEF/OIF servicemembers with a personality disorder can be challenging. Specifically, some of the symptoms of a personality disorder—irritability, feelings of detachment or estrangement from others, and aggressiveness—are similar to the symptoms of post-traumatic stress disorder (PTSD), a condition for which some OEF/OIF servicemembers may also be at risk. However, according to mental health experts and military mental health providers, one important difference between a personality disorder and PTSD is that a personality disorder is a long-standing condition, whereas PTSD is a condition that follows exposure to a traumatic event. Although servicemembers with personality disorders may have symptoms that first appear during their military duty,

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<sup>1</sup>Department of Defense Directive 6200.04, Section 4.1, *Force Health Protection* (Apr. 23, 2007).

<sup>2</sup>We included only enlisted servicemembers because officers generally are able to resign at any time rather than be involuntarily separated.

<sup>3</sup>*Diagnostic and Statistical Manual of Mental Disorders*, 4th ed., Text revision (Washington, D.C.: American Psychiatric Association, 2000).

<sup>4</sup>At the time of our review, the most recent DOD data on separations were through June 30, 2007.

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DOD does not consider this to be a condition caused by military service. A separation from the military because of a personality disorder can be stigmatizing and can have adverse consequences for servicemembers, such as limiting employment opportunities after servicemembers leave the military.

DOD has established three key requirements that the military services—Army, Air Force, Navy, and Marine Corps—must follow when separating enlisted servicemembers because of a personality disorder.<sup>5</sup> Specifically, before they are separated because of a personality disorder, enlisted servicemembers

- must receive notification of their impending separation because of a personality disorder;
- must receive, prior to the notification, a diagnosis of personality disorder by a psychiatrist or psychologist<sup>6</sup> who determines that the personality disorder interferes with servicemembers' ability to function in the military; and
- must receive formal counseling about their problem with functioning in the military.<sup>7</sup>

Typically, an enlisted servicemember's commander initiates the separation process. This commander, as well as a psychiatrist or psychologist, must follow the requirements established by DOD when separating a servicemember because of a personality disorder. Additionally, servicemembers undergoing the separation process have various protections available to them. For example, servicemembers may meet with a military attorney to discuss their rights during the separation process.

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<sup>5</sup>In the military, personality disorder separations are processed as administrative separations. We use "separation" to refer to these administrative separations.

<sup>6</sup>According to a DOD official, DOD does not hire psychologists who are not doctoral-level psychologists. We use psychologists to refer to doctoral-level psychologists.

<sup>7</sup>Although DOD separation policy does not specify who needs to conduct the formal counseling session, according to a DOD separation policy official, the counseling should be done by the servicemember's supervisor.

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Congress included provisions in the National Defense Authorization Act for Fiscal Year 2008 that require us to review and report on OEF/OIF servicemembers' separations from military service because of a personality disorder,<sup>8</sup> and 11 senators also expressed interest in this work. For our review, we examined (1) the extent to which selected military installations complied with DOD requirements for separating enlisted servicemembers because of a personality disorder, (2) how DOD ensures compliance by the military services with personality disorder separation requirements, and (3) the extent to which enlisted servicemembers selected the protections available to them.

To determine the extent to which selected military installations<sup>9</sup> complied with DOD's personality disorder separation requirements, we reviewed DOD and the military services' separation regulations and instructions to identify the key requirements for separating enlisted servicemembers because of a personality disorder. We included only enlisted servicemembers because officers generally are able to resign at any time rather than be involuntarily separated. We obtained DOD data for enlisted OEF/OIF servicemembers separated because of a personality disorder from November 1, 2001, through June 30, 2007, which we determined to be sufficiently reliable for our purposes by corroborating these data with information in the servicemembers' personnel records. We analyzed these data to determine which installations across the military services had the highest number of enlisted OEF/OIF servicemembers separated because of a personality disorder. We selected four installations to visit—Fort Carson (Army), Fort Hood (Army), Davis-Monthan Air Force Base (Air Force), and Camp Pendleton (Marine Corps)—because these installations accounted for the highest or second highest number of enlisted OEF/OIF servicemembers separated because of a personality disorder from November 1, 2001, through June 30, 2007, among their military service's

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<sup>8</sup>Pub. L. No. 110-181, § 597(b), 122 Stat. 3, 140.

<sup>9</sup>For the purposes of this report, we use "installation" to refer to Army, Marine Corps, and Air Force locations that we visited.

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installations.<sup>10,11</sup> For three of the installations we visited, we obtained and reviewed personnel records for a random sample of enlisted servicemembers whose certificates of release<sup>12</sup> indicated that they were separated from these installations because of a personality disorder. For the fourth installation, we obtained and reviewed personnel records for all of the enlisted servicemembers whose certificates of release indicated that they were separated from that installation because of a personality disorder. We reviewed all of these enlisted servicemembers' records because the total number of servicemembers separated from this installation was too small to draw a random, generalizable sample. Our findings based on our compliance review can be generalized to each of the four installations but cannot be generalized to the military services.

In addition to the four military installations from the Army, Air Force, and Marine Corps, we visited Naval Base San Diego. We obtained and reviewed personnel records for enlisted Navy servicemembers whose certificates of release indicated that they were separated because of a personality disorder. During the course of our review, Navy officials at this base told us that enlisted Navy servicemembers selected for our review were transferred to the transient personnel unit at Naval Base San Diego from a Navy ship at various points in the separation process.<sup>13</sup> According to a Navy official, most enlisted Navy servicemembers were diagnosed, formally counseled, and notified of their impending separation while on board a Navy ship and were transferred to the transient personnel unit at Naval Base San Diego to receive their certificates of release. Other enlisted Navy servicemembers were diagnosed, formally counseled, and notified of their impending separation while at Naval Base San Diego. We could not generalize our findings to Naval Base San Diego because some of the

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<sup>10</sup>We selected two Army installations because at the time of our review the Army had the majority of servicemembers deployed in support of OEF/OIF when compared with the Air Force and Marine Corps.

<sup>11</sup>Among Marine Corps installations, Camp Pendleton had the second highest number of enlisted OEF/OIF servicemembers separated because of a personality disorder during this time period. The Marine Corps installation with the highest number of enlisted OEF/OIF servicemembers separated because of a personality disorder was in the midst of a deployment cycle and requested that we not visit this installation.

<sup>12</sup>When servicemembers are separated from military service, they each receive a certificate of release from the military, known as a DD-214, which includes information on the reason for separation.

<sup>13</sup>The transient personnel unit serves as a transition center for Navy servicemembers who are being separated from military service.



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elements of the separation process could have been completed while these servicemembers were on board a Navy ship. We also could not generalize to the Navy. Therefore, we have reported the results of our review of enlisted Navy servicemembers' records separately from our presentation of findings based on our review of the other four military installations.

For our compliance review, we examined 312 personnel records for enlisted servicemembers from the Army, Air Force, and Marine Corps installations and 59 records for enlisted servicemembers from the Navy—371 records in total. We obtained these records from each military service's central repository, where the personnel records of servicemembers who have been separated from the military are stored. In each of these records, we reviewed what is known as a separation packet, which is required to contain documents related to a servicemember's separation.<sup>14</sup> According to military service officials responsible for the separation policy, the separation packet is required to include documentation demonstrating that DOD's three key requirements for a personality disorder separation have been met.

To complete our compliance review, we reviewed servicemembers' separation packets first to see if the packets contained documentation that servicemembers had been notified of their impending separation because of a personality disorder. If the servicemembers' separation packets lacked such documentation, we did not assess compliance for the other two key separation requirements. If the packets did include such documentation, we reviewed the packets to determine whether they contained documentation required by the military services demonstrating that the other two key requirements had been met. Table 1 describes the criteria we used to determine compliance.

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<sup>14</sup>DOD policy does not specify which documents should be included in the separation packet. However, each military service specifies which documents or documentation is required to be included in the separation packet.

**Table 1: Criteria to Determine Compliance from Review of Separation Packets in Enlisted Servicemembers' Personnel Records**

Requirement	Compliance	Noncompliance
Servicemembers must be notified of the separation because of a personality disorder	Separation packet contained a notification letter of the separation because of a personality disorder	Separation packet did not contain a notification letter of the separation because of a personality disorder
Servicemembers must receive a personality disorder diagnosis by a psychiatrist or psychologist who determines that the personality disorder interferes with servicemembers' ability to function in the military	Separation packet contained what is known as a medical form that documents the following three parts of this requirement: (a) A diagnosis of personality disorder (b) Made by psychiatrist or psychologist (c) Who determines that the personality disorder interferes with servicemembers' ability to function in the military	Separation packet did not contain a medical form or Separation packet included a medical form, but documentation supporting one or more of the following parts of this requirement was missing or was incorrect: (a) A diagnosis of personality disorder (b) Made by psychiatrist or psychologist (c) Who determines that the personality disorder interferes with servicemembers' ability to function in the military
Servicemembers must be formally counseled about their problem with functioning in the military	Separation packet contained a counseling form	Separation packet did not include a counseling form

Source: GAO analysis of DOD's and military services' separation regulations and instructions.

To determine how DOD ensures compliance with its personality disorder separation requirements by the military services, we reviewed DOD regulations and interviewed officials from DOD and the military services. To determine the extent to which enlisted servicemembers selected the protections available to them, such as consulting legal counsel prior to being separated, we reviewed the same 371 enlisted servicemembers' separation packets as we reviewed to determine compliance with DOD's personality disorder separation requirements—312 separation packets for enlisted servicemembers from the Army, Air Force, and Marine Corps installations and 59 separation packets for enlisted servicemembers from the Navy.<sup>15</sup> For the 371 enlisted servicemembers whose separation packets we reviewed, we also obtained information from the military services to

<sup>15</sup>Enlisted servicemembers are given a list of the protections available to them and select protections from this list. This list is included in servicemembers' separation packets. Our review of the separation packets in enlisted servicemembers' personnel records was for the purpose of determining whether the servicemembers selected the protections available to them. We did not determine if a protection was exercised.

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determine whether any of these servicemembers appealed the reason for their separation. Appendix I provides more detailed information on our methodology. We conducted this performance audit from May 2007 through August 2008 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Results in Brief

The four military installations we visited varied in their compliance with DOD's three key requirements for personality disorder separations. For the four installations, compliance with the requirement to notify enlisted servicemembers of their impending separation because of a personality disorder was at or above 98 percent. The compliance rates for the requirement that enlisted servicemembers must be diagnosed with a personality disorder by a psychiatrist or psychologist who determines that the personality disorder interferes with servicemembers' ability to function in the military ranged from 40 to 78 percent. For the requirement that enlisted servicemembers be formally counseled about their problem with functioning in the military, compliance ranged from 40 to 99 percent. Our review of the documentation in the enlisted Navy servicemembers' separation packets found that compliance varied by requirement. Ninety-five percent of enlisted Navy servicemembers' separation packets had documentation indicating that they had been notified of their impending separation because of a personality disorder. Eighty-two percent had documentation that indicated compliance with the requirement that enlisted servicemembers must be diagnosed with a personality disorder by a psychiatrist or psychologist who determines that the personality disorder interferes with servicemembers' ability to function in the military. Seventy-seven percent had documentation indicating compliance with the requirement for formal counseling.

DOD does not have reasonable assurance that its key personality disorder separation requirements have been followed. DOD policy directs the military services to implement and ensure consistent administration of DOD's requirements for separating enlisted servicemembers because of a personality disorder. In turn, according to officials in each of the military services, the military services delegate to commanders with separation authority at military installations sole responsibility for ensuring that the key separation requirements are followed for enlisted servicemembers under their command. When asked about the low rates of compliance for

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some of the separation requirements that we found, the military officials responsible for reviewing the separation packets with whom we spoke could not explain why these separations were approved if compliance with the separation requirements was not documented in the servicemembers' separation packets. The military services have given commanders with separation authority sole responsibility for ensuring compliance with DOD's requirements, but the military services have not established a way to determine whether these commanders are ensuring that DOD's key separation requirements are met. Furthermore, DOD does not have reasonable assurance that its requirements for separating enlisted servicemembers because of a personality disorder have been followed.

The extent to which enlisted servicemembers from the four installations selected the protections available to them varied. For example, the majority of enlisted servicemembers—about 93 percent—requested copies of the separation documents, while few enlisted servicemembers—12 percent—indicated that they wanted to submit statements on their own behalf to the commander with separation authority. Among enlisted Navy servicemembers, 66 percent requested copies of their separation documents, while 5 percent stated that they wanted to submit statements on their own behalf to the commander with separation authority. After separation had occurred, three enlisted servicemembers from the four installations we visited and among enlisted Navy servicemembers whose separation packets we reviewed chose to challenge the reason for their separation.

To help ensure that DOD's requirements for personality disorder separations are met and to help increase assurance that these separations are appropriate, we recommend that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to (1) direct the Secretaries of the Army, the Air Force, and the Navy and the Commandant of the Marine Corps to develop a system to ensure that personality disorder separations are conducted in accordance with DOD's requirements and (2) ensure that DOD monitors the military services' compliance with DOD's personality disorder separation requirements. In written comments on a draft of this report, DOD concurred with our recommendation that the military services develop a system to ensure that personality disorder separations be conducted in accordance with DOD's requirements. DOD partially concurred with our recommendation that DOD monitor the military services' compliance with DOD's personality disorder separation requirements. DOD stated that it will strengthen policy guidance related to the military services' standardized compliance

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reporting, but that it is the responsibility of the military services to ensure compliance with DOD policy. However, as we stated in our draft report, DOD's reliance on the military services to ensure compliance with its separation requirements does not provide reasonable assurance that these requirements will be followed. The low rates of compliance we found for some of DOD's key personality disorder separation requirements suggest the need for another system to ensure compliance with these requirements, as well as the need for DOD to monitor the military services' compliance. DOD also provided technical comments, which we incorporated as appropriate.

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## Background

Enlisted servicemembers can be separated from the military when they are found to be unsuitable for continued military service. According to DOD regulations, enlisted servicemembers can be separated for reasons such as misconduct, failure to overcome substance abuse, and certain mental health conditions, including a personality disorder. A personality disorder by itself does not make enlisted servicemembers unsuitable for military service. DOD requires that the disorder be severe enough that it interferes with an enlisted servicemember's ability to function in the military.<sup>16</sup>

DOD and the military services require that to diagnose a personality disorder a psychiatrist or psychologist use criteria established in the *Diagnostic and Statistical Manual of Mental Disorders* (DSM), which was developed by the American Psychiatric Association.<sup>17</sup> Similarly, in the private sector, clinicians use criteria in the DSM to diagnose a personality disorder, but in some instances, clinicians other than psychiatrists or psychologists, such as licensed clinical social workers, may make this diagnosis.

Diagnosing a personality disorder in a servicemember who has served in combat can be complicated by the fact that some symptoms of a personality disorder may be similar to symptoms of combat-related mental health conditions. For example, both personality disorder and PTSD have

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<sup>16</sup>Department of Defense Directive 1332.14, *Enlisted Administrative Separations* (Nov. 21, 2003).

<sup>17</sup>Psychiatrists and psychologists may use multiple diagnostic approaches, including a variety of psychological tests that aid in establishing a diagnosis. However, as with other mental health conditions, no single test can definitively determine if an individual has a personality disorder, according to mental health experts.

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similar symptoms of feelings of detachment or estrangement from others, and irritability. According to the American Psychiatric Association and the American Psychological Association, the only way to distinguish a personality disorder from a combat-related mental health condition, such as PTSD, is by getting an in-depth medical and personal history from the servicemember that is corroborated, if possible, by family and friends.

According to DOD officials, the three key requirements that the military services must follow when separating an enlisted servicemember are designed to help ensure that enlisted servicemembers are separated for the appropriate reason.<sup>18,19</sup> Documentation of compliance with these requirements is to be included in the separation packet found in the enlisted servicemember's personnel record, as required by the military services. The separation packet is required to contain other documents related to the enlisted servicemember's separation. According to officials from the military services, the servicemember's immediate commander gives the separation packet to an installation official who is to review the packet to verify that the requirements for the personality disorder separation have been met. If this review verifies that the requirements have been met, the separation packet is then sent to a commander at the installation who has authority for approving a personality disorder separation for that enlisted servicemember. This commander is a higher-level officer than the enlisted servicemember's immediate commander. A military installation may have more than one commander who has the authority to approve separations because of a personality disorder. However, each commander with separation authority approves separations only for enlisted servicemembers under his or her command.

Once enlisted servicemembers have been separated from military service, they receive certificates of release from the military, which include information on the reason for separation and an official characterization

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<sup>18</sup>The military services have established policies governing separating enlisted servicemembers with personality disorders. These policies reaffirm the three key requirements established by DOD.

<sup>19</sup>After our review was completed, DOD updated its enlisted administrative separation policy and included additional requirements for enlisted servicemembers who are separated because of a personality disorder and have served in designated combat zones, such as OEF/OIF. Among its requirements, the updated policy requires that a servicemember's diagnosis of a personality disorder be corroborated by a peer or higher-level mental health professional and be endorsed by the military service's surgeon general.

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of their time in the service.<sup>20</sup> For enlisted servicemembers separated because of a personality disorder, their certificates of release would state that the reason for their separation was a personality disorder. Employers may request to see separated servicemembers' certificates of release to verify their military service, and employers may make employment decisions based on the information they see on servicemembers' certificates of release.

Enlisted servicemembers have protections available to them when going through the separation process. All enlisted servicemembers can submit statements on their own behalf to the commander with separation authority, consult with legal counsel prior to separation, and obtain copies of the separation packet that is sent to the commander with separation authority. In addition, enlisted servicemembers with 6 or more years of military service are eligible to request a hearing before an administrative board.<sup>21</sup> An administrative board hearing allows enlisted servicemembers to have legal representation, call witnesses, and speak on their own behalf in defending against the recommended separation. The board includes at least three members who, following a hearing, make a recommendation to the commander with separation authority as to whether the enlisted servicemember should be separated.

Enlisted servicemembers also have protections available to them after they have been separated. They may challenge the reasons given for their separations after they have been separated from the military. Within 15 years after separation from the military, enlisted servicemembers may appeal their separation to a discharge review board. Further, enlisted servicemembers may appeal the discharge review board's decision by applying to a board for the correction of military records.<sup>22</sup>

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<sup>20</sup>Specifically, enlisted servicemembers who are separated because of a personality disorder receive either an "honorable" or "general under honorable" characterization of service that is given at the time of separation. This is in contrast to another separation due to misconduct, for which an enlisted servicemember may receive an "other than honorable" characterization of service.

<sup>21</sup>The Navy allows enlisted servicemembers with less than 6 years of service to request that their separations be reviewed and approved by a commander with a higher-level authority than the commander who regularly approves personality disorder separations.

<sup>22</sup>Servicemembers who choose to challenge the reason for their separations beyond 15 years after separation apply directly to the board for the correction of military records.

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## Selected Military Installations' Compliance with Three Key Personality Disorder Separation Requirements Varied

The four military installations we visited varied in their compliance with DOD's three key requirements for personality disorder separations. For the four installations, compliance with the first requirement—to notify enlisted servicemembers of their impending separation because of a personality disorder—was at or above 98 percent. For the second requirement, that enlisted servicemembers must be diagnosed with a personality disorder by a psychiatrist or psychologist who determines that the personality disorder interferes with servicemembers' ability to function in the military, the compliance rates ranged from 40 to 78 percent. Compliance ranged from 40 to 99 percent for the third requirement, that enlisted servicemembers receive formal counseling about their problem with functioning in the military. Our review of the documentation in the enlisted Navy servicemembers' separation packets found that compliance varied by requirement.

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## Compliance with the Notification Requirement Ranged from 98 to 100 Percent

Across the four installations, the percentage of enlisted servicemembers' separation packets that documented compliance with the notification requirement ranged from 98 to 100 percent. Of the 312 enlisted servicemembers' separation packets included in our review, only 4 did not contain documentation that the servicemembers received notification that they were being separated because of a personality disorder. We did not assess whether the separation packets for these 4 servicemembers had documentation that indicated compliance for the remaining two key separation requirements.

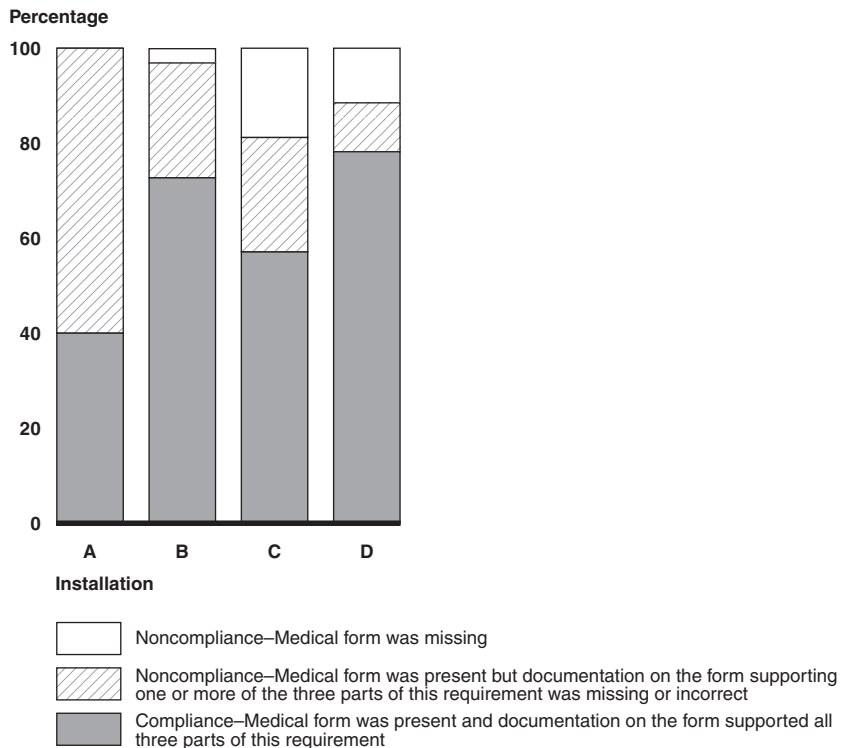
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## Compliance with the Requirement Related to the Personality Disorder Diagnosis Ranged from 40 to 78 Percent

Across the four installations, the percentage of enlisted servicemembers' separation packets that had documentation indicating compliance with all three parts of the second requirement—that enlisted servicemembers separated because of a personality disorder (1) be diagnosed with a personality disorder (2) by a psychiatrist or psychologist who (3) determines that the personality disorder interferes with servicemembers' ability to function in the military—ranged from 40 to 78 percent. Noncompliance with this requirement occurred in two ways: enlisted servicemembers' separation packets did not contain the medical form used to document the three parts of this requirement or servicemembers' separation packets contained the medical form but documentation on the form for one or more of the three parts of this requirement was missing or incorrect. Figure 1 summarizes the four installations' compliance rates for this requirement.



**Figure 1: Rate of Documented Compliance at Selected Military Installations with Requirement That Enlisted Servicemembers Be Diagnosed with a Personality Disorder by a Psychiatrist or Psychologist Who Determines That the Personality Disorder Interferes with Servicemembers' Ability to Function in the Military, for Separations Completed from November 1, 2001, through June 30, 2007**



Source: GAO analysis of enlisted servicemembers' personnel records obtained from the military services.

Notes: We determined compliance with this requirement by reviewing 308 personnel records of enlisted servicemembers whose separation packets had documentation that they had been notified of their impending separation because of a personality disorder.

Air Force officials acknowledged that prior to October 2006 some enlisted servicemembers with a mental health diagnosis other than a personality disorder, such as adjustment disorder, were erroneously separated under the reason of a personality disorder. However in October 2006, Air Force officials stated that they took steps to correct this error. Some of the servicemembers separated from the Air Force installation we visited may have been affected by this error.

We found that 34 enlisted servicemembers' separation packets did not contain a medical form, which is used to document compliance with the three parts of this requirement. We also found that of the enlisted servicemembers' separation packets that contained a medical form, the medical form in 66 of these packets did not contain information needed to fulfill all three parts of the requirement. For example, 27 of these 66 enlisted servicemembers' medical forms had documentation indicating

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that the servicemember had been diagnosed with a personality disorder, but there was also information in the medical form indicating that the diagnosis was not made by a psychiatrist or psychologist. In some of these cases, we found that the diagnosis of a personality disorder was made by a licensed clinical social worker or other type of provider, such as a battalion surgeon.

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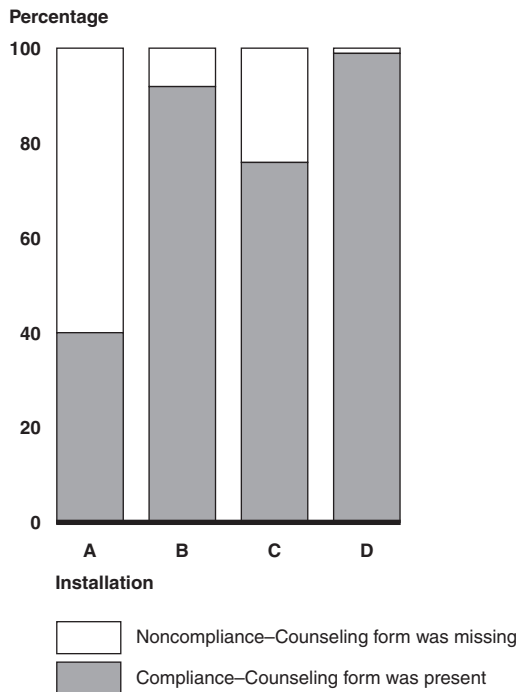
### Compliance with the Requirement for Formal Counseling Ranged from 40 to 99 Percent

We found that compliance with the requirement that enlisted servicemembers receive formal counseling about their problem with functioning in the military ranged from 40 to 99 percent.<sup>23</sup> Across the four installations, we found that 42 enlisted servicemembers' separation packets did not contain a counseling form documenting that servicemembers received formal counseling as required. As a result, these 42 servicemembers' separation packets were noncompliant with this requirement. Figure 2 summarizes the four installations' compliance rates for this requirement.

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<sup>23</sup>If the psychiatrist or psychologist determines that enlisted servicemembers are a threat to themselves or others, the Marine Corps waives the requirement that servicemembers must receive formal counseling. We considered enlisted servicemembers' separation packets that included documentation of this waiver to indicate compliance with DOD's counseling requirement.

**Figure 2: Rate of Documented Compliance at Selected Military Installations with Requirement That Enlisted Servicemembers Receive Formal Counseling about Their Problem with Functioning in the Military, for Separations Completed from November 1, 2001, through June 30, 2007**



Source: GAO analysis of enlisted servicemembers' personnel records obtained from the military services.

Note: We determined compliance with this requirement by reviewing 308 personnel records of enlisted servicemembers whose separation packets had documentation that they had been notified of their impending separation because of a personality disorder.

**Documented Compliance with the Three Key Personality Disorder Separation Requirements Varied for Enlisted Navy Servicemembers' Separation Packets That We Reviewed**

Our review of the documentation in 59 enlisted Navy servicemembers' separation packets found that compliance varied by requirement. Of the separation packets that we reviewed, 95 percent had documentation indicating that enlisted servicemembers had been notified of their impending separation because of a personality disorder. (Three enlisted servicemembers' separation packets did not contain documentation of this requirement, and as a result, we did not assess compliance with the remaining two requirements for these three servicemembers' separation packets.) The requirement that enlisted servicemembers be diagnosed with a personality disorder by a psychiatrist or psychologist who determines that the personality disorder interferes with servicemembers' ability to function in the military had a compliance rate of 82 percent for

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the 56 remaining enlisted Navy servicemembers' separation packets that we reviewed. Of the 56, we found that 1 enlisted Navy servicemember's separation packet did not contain a medical form, which is used to document compliance with the three parts of this requirement. We also found that 9 of the 56 enlisted Navy servicemembers' separation packets contained a medical form, but did not have documentation indicating compliance with all three parts of this requirement. Most of these—6—did not have documentation indicating that the diagnosis of a personality disorder was made by a psychiatrist or psychologist. For the requirement for formal counseling, 77 percent of the 56 enlisted Navy servicemembers' separation packets contained documentation that enlisted servicemembers received formal counseling about their problem with functioning in the military.<sup>24</sup>

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## DOD Does Not Have Reasonable Assurance That Its Separation Requirements Have Been Followed

DOD does not have reasonable assurance that its key personality disorder separation requirements have been followed. DOD policy directs the military services to implement and ensure consistent administration of DOD's requirements for separating enlisted servicemembers because of a personality disorder. In turn, according to officials in each of the military services, the military services delegate to commanders with separation authority at the military installations sole responsibility for ensuring that the requirements are followed for enlisted servicemembers under their command.

According to military officials at the installations we visited, to ensure compliance with DOD's key separation requirements, the commander with separation authority has an official at the installation examine the enlisted servicemember's separation packet prior to the separation to determine that all requirements have been met. Military officials responsible for reviewing the separation packets at the installations we visited explained that when the official who is reviewing the separation packet discovers that a requirement for separation has not been documented, the reviewing official is supposed to take steps to resolve the situation. For example, if the official reviewing the separation packets does not find documentation that enlisted servicemembers have been formally counseled about their

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<sup>24</sup>If the psychiatrist or psychologist determines that servicemembers are a threat to themselves or others, the Navy waives the requirement that servicemembers must receive formal counseling. We considered enlisted servicemembers' separation packets that included documentation of this waiver to indicate compliance with DOD's counseling requirement.

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problem with functioning in the military, the reviewing official would verify that the formal counseling had occurred and then obtain documentation of that counseling session. Similarly, a Navy legal official told us that enlisted servicemembers' separation packets should be reviewed to make sure that DOD's key separation requirements have been met before the separations are approved. When we asked about the low rates of compliance for some of the separation requirements that we found at the Army, Air Force, and Marine Corps installations we visited and for the enlisted Navy servicemembers' records that we reviewed, the military officials responsible for reviewing the separation packets with whom we spoke could not explain why these separations were approved if compliance with the separation requirements was not documented in the separation packet.

Having given sole responsibility to the commanders with separation authority to ensure compliance, the military services have not established a way to determine whether these commanders are ensuring that DOD's key requirements are met. Furthermore, DOD does not have reasonable assurance that its requirements for separating enlisted servicemembers because of a personality disorder have been followed.

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## Enlisted Servicemembers' Selection of Protections Available During and After Separation Varied

At the four installations we visited, enlisted servicemembers who were separated because of a personality disorder varied in the extent to which they selected the protections available to them during the separation process, depending on the specific protection. Based on our review of separation packets in the enlisted servicemembers' personnel records, we found that a small proportion of enlisted servicemembers—12 percent—stated that they wanted to submit statements on their own behalf to the commander with separation authority. Of these servicemembers who submitted a statement, 18 percent submitted a statement that either questioned whether the diagnosis of a personality disorder was an accurate diagnosis or requested not to be separated. All of these servicemembers were separated. We also found that 38 percent of enlisted servicemembers at the installations we visited stated that they wanted to consult with legal counsel prior to their separation. According to legal officials at the installations we visited, enlisted servicemembers may seek legal counsel to discuss the implications of a personality disorder separation, seek advice on how to stay in the military, or obtain information on their eligibility for Department of Veterans Affairs' benefits, such as health and educational benefits, after separation. For enlisted Navy servicemembers whose separation packets we reviewed,

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5 percent selected to submit statements and 5 percent selected to consult with counsel prior to separation.

Based on our review of enlisted servicemembers' separation packets for the installations we visited, we found that the majority of servicemembers requested copies of their separation packets, which are sent to the commander with separation authority. Specifically, 289 of 312 enlisted servicemembers in our review at the four installations—93 percent—requested copies of their separation packets, while 66 percent of enlisted Navy servicemembers in our review requested copies of their separation packets. We also found that no enlisted servicemembers—either at the installations we visited or among the enlisted Navy servicemembers whose separation packets we reviewed—requested a hearing before an administrative board prior to their separation.<sup>25</sup>

Enlisted servicemembers may challenge the reason given for their separation to a discharge review board after the separation has been completed. For the four installations we visited and for enlisted Navy servicemembers, we found that three enlisted servicemembers applied to their military service's discharge review board to challenge the reason for their separation. Of these three, one servicemember received a change to the reason for separation because the discharge review board found that the separation because of a personality disorder was unjust. For this servicemember, the reason for separation was changed from personality disorder to the reason of secretarial authority of that military service.<sup>26</sup> The other two servicemembers who applied for a change to their reason for separation did not receive a change because the discharge review board found that the documentation present in the personnel record supported the personality disorder separation. The two servicemembers who were unsuccessful in their appeal to the discharge review board did not choose to appeal the discharge review board's decision to the board for the correction of military records.

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<sup>25</sup>For the four installations we visited and the enlisted Navy servicemembers' separation packets that we reviewed, 36 enlisted servicemembers had 6 or more years of military service and, as such, were eligible to request a hearing before an administrative board.

<sup>26</sup>According to DOD Directive 1332.14, *Enlisted Administrative Separations*, the secretary of a military service can separate an enlisted servicemember if he/she determines that it is in the best interest of the service.

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## Conclusions

DOD has established requirements that are intended to help ensure that enlisted servicemembers separated because of a personality disorder are separated appropriately. Failure to comply with these requirements increases the risk of enlisted servicemembers being inappropriately separated because of a personality disorder. For enlisted servicemembers, the stakes are high because a personality disorder separation can carry a long-term stigma in the civilian world. Because DOD relies on the military services to ensure compliance with its key personality disorder separation requirements, and because the military services rely solely on commanders with separation authority to ensure compliance with these requirements, there is a lack of reasonable assurance that the requirements have been met. During our review of enlisted servicemembers' separation packets at the four military installations and for enlisted Navy servicemembers' separation packets we reviewed, the low rates of compliance we found for some of the key personality disorder separation requirements indicate that the military services need a system, beyond relying on the commanders who are making separation decisions, to ensure compliance with DOD's personality disorder separation requirements. Additionally, DOD needs to monitor the military services' compliance with these requirements. Until this happens, DOD does not have reasonable assurance that personality disorder separations of enlisted servicemembers have been appropriate.

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## Recommendations for Executive Action

To help ensure that DOD's requirements for personality disorder separations are met and to help increase assurance that these separations are appropriate, we recommend that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to

1. direct the Secretaries of the Army, the Air Force, and the Navy and the Commandant of the Marine Corps to develop a system to ensure that personality disorder separations are conducted in accordance with DOD's requirements and
2. ensure that DOD monitors the military services' compliance with DOD's personality disorder separation requirements.

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## Agency Comments and Our Evaluation

In written comments on a draft of this report, DOD concurred with our recommendation that the military services develop a system to ensure that personality disorder separations are conducted in accordance with DOD's requirements. DOD partially concurred with our recommendation that DOD monitor the military services' compliance with DOD's personality disorder separation requirements. DOD stated that it will strengthen policy guidance related to the military services' standardized compliance reporting, but that it is the responsibility of the military services to ensure compliance with DOD policy. However, as we stated in our draft report, DOD's reliance on the military services to ensure compliance with its separation requirements has not provided reasonable assurance that these requirements will be followed. We believe that the low rates of compliance we found for some of DOD's key personality disorder separation requirements suggest the need for another system to ensure compliance with these requirements, as well as the need for DOD to monitor the military services' compliance.

DOD suggested that we change the title of our draft report to indicate that our subject area was personnel management and not defense health care. We have not changed the title. For an enlisted servicemember to be separated because of a personality disorder, the servicemember must first be diagnosed as having a personality disorder. Therefore, we consider our review of DOD's separation process for servicemembers with personality disorders a review of a health care issue.

In its comments, DOD also identified two inaccuracies in our description of DOD's separation requirements. DOD pointed out that its policy does not state that a servicemember's written notification of the impending separation has to come from a servicemember's commander, as we indicated in our draft report. According to DOD, the policy does not specify who must provide this written notification. We revised our draft report to clarify our discussion of this requirement. However, this change did not affect the results of our compliance review because we determined compliance based on whether servicemembers' separation packets contained a notification letter and not on who notified the servicemember. DOD also pointed out that its policy does not state that servicemembers must receive formal counseling from their supervisors about their problem with functioning in the military, as we stated in our draft report. According to DOD, the policy does not state who should provide the formal counseling to the servicemember; however, we were told by a DOD separation policy official that the counseling should be done by the servicemember's supervisor. We revised our draft report to clarify our discussion of this requirement. This also did not change the results of our



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compliance review because we assessed compliance based on whether servicemembers' separation packets contained a counseling form and not on who counseled the servicemember.

DOD also provided technical comments, which we incorporated as appropriate. DOD's written comments are reprinted in appendix II.

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We are sending copies of this report to the Secretary of Defense; the Secretaries of the Army, the Air Force, and the Navy; the Commandant of the Marine Corps; and appropriate congressional committees and addressees. We will also provide copies to others upon request. In addition, this report is available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7114 or [williamsonr@gao.gov](mailto:williamsonr@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 III.



Randall B. Williamson  
Director, Health Care

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*List of Congressional Addressees*

The Honorable Carl Levin  
Chairman  
The Honorable John McCain  
Ranking Member  
Committee on Armed Services  
United States Senate

The Honorable Ike Skelton  
Chairman  
The Honorable Duncan L. Hunter  
Ranking Member  
Committee on Armed Services  
House of Representatives

The Honorable Daniel K. Akaka  
United States Senate

The Honorable Wayne Allard  
United States Senate

The Honorable Christopher S. Bond  
United States Senate

The Honorable Barbara Boxer  
United States Senate

The Honorable Tom Harkin  
United States Senate

The Honorable Joseph I. Lieberman  
United States Senate

The Honorable Claire C. McCaskill  
United States Senate

The Honorable Patty Murray  
United States Senate

The Honorable Barack Obama  
United States Senate

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The Honorable Ken Salazar  
United States Senate

The Honorable Bernard Sanders  
United States Senate

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# Appendix I: Scope and Methodology

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To meet our objectives, we examined Department of Defense (DOD) separation regulations that the military services are required to follow to help ensure that enlisted servicemembers are separated for the appropriate reasons. For our review, we examined (1) the extent to which selected military installations complied with DOD requirements for separating enlisted servicemembers because of a personality disorder, (2) how DOD ensures compliance with personality disorder separation requirements by the military services, and (3) the extent to which enlisted servicemembers who are separated because of a personality disorder selected protections available to them.

For this review, we included enlisted servicemembers from the Army, Air Force, Navy, and Marine Corps. We included only enlisted servicemembers because officers are able to resign at any time rather than be involuntarily separated. We included enlisted servicemembers who deployed at least once in support of Operation Enduring Freedom (OEF) or Operation Iraqi Freedom (OIF). The Coast Guard was excluded because it is under the direction of the Department of Homeland Security and represents a very small portion of servicemembers deployed in support of OEF and OIF. For this review, enlisted servicemembers are those in the active duty component and Reserve component—reservists and National Guard members—who were discharged or released from active duty from November 1, 2001—the first full month of combat operations for OEF—through June 30, 2007—the latest date for which data were available from DOD at the time of our review.

We obtained data from DOD's Defense Manpower Data Center (DMDC) on the number of enlisted servicemembers who had been separated from the military because of a personality disorder from November 1, 2001, through June 30, 2007. These data came from DMDC's Active Duty Military Personnel Transaction File and DMDC's Reserve Components Common Personnel Data Transaction File, which are databases that contain servicemember-level data, such as Social Security number, education level, date of birth, pay grade, separation program designator code, and reenlistment eligibility. The Active Duty Military Personnel Transaction File contains a transaction record for every individual entrance, separation, or reenlistment in the Army, Air Force, Navy, and Marine Corps within a specific time frame. The Reserve Components Common Personnel Data Transaction File contains this information for every individual entrance, separation, or reenlistment in the Army National Guard, Army Reserve, Air National Guard, Air Force Reserve, Navy Reserve, and Marine Corps Reserve within a specific time frame. We also asked that DMDC indicate, from its Contingency Tracking System

Deployment File, if any enlisted servicemembers who were separated because of a personality disorder were also deployed, for at least one tour of duty, in support of OEF or OIF. The Contingency Tracking System Deployment File is a database that includes data elements for all servicemembers deployed in support of OEF/OIF. A contingency tracking system deployment is defined as a servicemember being physically located within the OEF or OIF combat zones/areas of operation, or specifically identified by the military service as directly supporting the OEF/OIF mission outside of the designated combat zone. We determined that the DMDC data were sufficiently reliable because we corroborated these data with information in the enlisted servicemembers' personnel records.

Based on our analysis of the data provided by DMDC, we selected four military installations across the Army, Air Force, and Marine Corps to visit based on whether the installation had the highest or second highest number of enlisted OEF/OIF servicemembers separated because of a personality disorder for that service. We selected one installation each from the Air Force and the Marine Corps. We selected two Army installations because at the time of our review, the Army had the majority of servicemembers deployed in support of OEF/OIF when compared with the Air Force and the Marine Corps. Among Marine Corps installations, we selected Camp Pendleton, in California, which had the second highest number of enlisted servicemembers separated because of a personality disorder during this time period. This installation was selected because the Marine Corps installation with the highest number of enlisted servicemembers separated because of a personality disorder was in the midst of a deployment cycle and requested that we not visit. The other military installations we selected were Fort Carson (Army), Colorado; Fort Hood (Army), Texas; and Davis-Monthan Air Force Base (Air Force), Arizona.

In addition to the four military installations we visited, we visited Naval Base San Diego. We selected Naval Base San Diego based on DMDC's data, which identified this naval base as having the second highest number of enlisted OEF/OIF Navy servicemembers separated because of a personality disorder from November 1, 2001, through June 30, 2007.<sup>1</sup> During the course of our review, Navy officials at this base told us that enlisted Navy servicemembers selected for our review were transferred to

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<sup>1</sup>Naval Base San Diego was also selected to coordinate with our visit to another installation.

the transient personnel unit at Naval Base San Diego from a Navy ship at various points in the separation process.<sup>2</sup> According to a Navy official, most enlisted Navy servicemembers were diagnosed, formally counseled, and notified of their impending separation while on board a Navy ship and were transferred to the transient personnel unit at Naval Base San Diego to receive their certificates of release. Other enlisted Navy servicemembers were diagnosed, formally counseled, and notified of their impending separation while at Naval Base San Diego. We could not generalize our findings to Naval Base San Diego because some of the elements of the separation process could have been completed while these servicemembers were on board a Navy ship. Therefore, we have reported the results of our review of enlisted Navy servicemembers' records separately from our presentation of findings based on our review of the other four military installations.

To determine the extent to which the four military installations and enlisted Navy servicemembers' records that we reviewed complied with DOD personality disorder separation requirements, we reviewed DOD's and the military services' enlisted administrative separation regulations and instructions to identify the key requirements for separating enlisted servicemembers because of a personality disorder. We also interviewed officials at each of the military services' headquarters who are responsible for overseeing separation policy. We interviewed additional officials at each of the four selected installations and at Naval Base San Diego, including mental health providers, staff judge advocates, legal counsel with defense services, unit commanders, administrators of the Medical Evaluation Board, and officials in the transition/separation offices, to understand the administrative separation process.

Additionally, to determine whether the selected installations and enlisted Navy servicemembers' records that we reviewed complied with DOD's requirements for separating servicemembers because of a personality disorder, we obtained and reviewed the personnel records of selected servicemembers to verify that their certificates of release indicated that they were separated because of a personality disorder. We obtained these records from each military service's central repository, where the personnel records of servicemembers who have been separated from the military are stored. According to military service officials responsible for

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<sup>2</sup>The transient personnel unit serves as a transition center for Navy servicemembers who are being separated from military service.

separation policy, the separation packet, which is found in the enlisted servicemember's personnel record, is required to contain documents related to the separation, including documents indicating that DOD's three key requirements have been met.<sup>3</sup>

For three of the installations we selected, we reviewed the personnel records of a random, generalizable sample of enlisted servicemembers who deployed at least once in support of OEF/OIF and who were separated from that installation because of a personality disorder from November 1, 2001, through June 30, 2007. For the other installation we selected, we reviewed the personnel records of all enlisted servicemembers who deployed at least once in support of OEF/OIF and who were separated from that installation because of a personality disorder from November 1, 2001, through June 30, 2007, because the number of servicemembers separated from that installation was too small to draw a random, generalizable sample. In total, we included 343 enlisted servicemembers' personnel records across the four installations. Of these 343 records, 312 enlisted servicemembers' personnel records were included in our documentation review because their personnel records contained separation packets, which we needed to review to determine compliance. Of the 31 servicemembers' personnel records that were excluded from our review, 3 had separation packets that were illegible. The remaining 28 servicemembers' personnel records did not have separation packets available for our review.

We also obtained 94 enlisted Navy servicemembers' personnel records from the Navy's central repository, where the personnel records of servicemembers who have been separated are stored after they leave the Navy. We reviewed the personnel records of all enlisted Navy servicemembers who deployed at least once in support of OEF/OIF and who were separated from Naval Base San Diego because of a personality disorder from November 1, 2001, through June 30, 2007, because the number of enlisted servicemembers separated from Naval Base San Diego was too small to draw a random, generalizable sample. We reviewed these personnel records to determine if they contained separation packets, which are required by the Navy. Of the 94 enlisted Navy servicemembers, 59 servicemembers' personnel records were included in our review

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<sup>3</sup>DOD policy does not state the documents that should be included in the separation packet, which is found in the servicemember's personnel record. However, each military service specifies what documents or documentation is required to be included in the separation packet.

because their records contained separation packets, which were needed for us to determine compliance. We excluded 35 enlisted Navy servicemembers' personnel records from our evaluation of compliance. One enlisted servicemember's separation packet was illegible and 34 enlisted servicemembers' separation packets were not available for review.

In our review, we determined compliance for each of the three key personality disorder separation requirements by reviewing the documentation in the enlisted servicemembers' separation packets to see if it indicated compliance with that requirement. If the enlisted servicemember's separation packet did not include documentation that the servicemember had been notified of the impending separation because of a personality disorder—one of the key requirements for a personality disorder separation—we did not assess compliance with the other two key requirements. Table 2 describes the criteria we used to determine compliance.

**Table 2: Criteria to Determine Compliance from Review of Separation Packets in Enlisted Servicemembers' Personnel Records**

Requirement	Compliance	Noncompliance
Servicemembers must be notified of the separation because of a personality disorder	Separation packet contained a notification letter of the separation because of a personality disorder	Separation packet did not contain a notification letter of the separation because of a personality disorder
Servicemembers must receive a personality disorder diagnosis by a psychiatrist or psychologist who determines that the personality disorder interferes with servicemembers' ability to function in the military	Separation packet contained what is known as a medical form that documents the following three parts of this requirement: (a) A diagnosis of personality disorder (b) Made by psychiatrist or psychologist (c) Who determines that the personality disorder interferes with servicemembers' ability to function in the military	Separation packet did not contain a medical form or Separation packet included a medical form, but documentation supporting one or more of the following parts of this requirement was missing or was incorrect: (a) A diagnosis of personality disorder (b) Made by psychiatrist or psychologist (c) Who determines that the personality disorder interferes with servicemembers' ability to function in the military
Servicemembers must be formally counseled about their problem with functioning in the military	Separation packet contained a counseling form	Separation packet did not include a counseling form

Source: GAO analysis of DOD's and military services' separation regulations and instructions.



Our review of compliance can be generalized to each of the four installations we visited, but not to the military services. For enlisted Navy servicemembers whose separation packets we reviewed, we cannot generalize to Naval Base San Diego or to the Navy.

To determine how DOD ensures compliance by the military services with requirements for separating enlisted servicemembers because of a personality disorder, we reviewed DOD regulations and interviewed DOD and the military services' officials responsible for separation policy. Additionally, we interviewed military officials responsible for legal services at the installations we visited and at Naval Base San Diego about how they ensure compliance with DOD's key requirements for personality disorder separations.

To determine the extent to which enlisted servicemembers at the four installations we visited and enlisted Navy servicemembers selected the protections available to them during the separation process, we reviewed the same 371 enlisted servicemembers' separation packets as we reviewed to determine compliance with DOD's personality disorder separation requirements—312 separation packets for enlisted servicemembers from the Army, Air Force, and Marine Corps installations and 59 separation packets for enlisted servicemembers from the Navy. Enlisted servicemembers are given a list of the protections available to them and select protections from this list, which are included in servicemembers' separation packets. From our review of the separation packets, we determined whether enlisted servicemembers selected the protections available, but did not determine whether servicemembers received the protections that they selected. To determine the extent to which enlisted servicemembers selected protections available after being separated, we obtained information from each military service's discharge review board and board for the correction of military records. Using this information, we determined whether the same 371 enlisted servicemembers, whose separation packets we reviewed to determine compliance with DOD's personality disorder separation requirements, challenged the reason for their separation.

We conducted this performance audit from May 2007 through August 2008 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

# Appendix II: Comments from the Department of Defense



PERSONNEL AND  
READINESS

UNDER SECRETARY OF DEFENSE  
4000 DEFENSE PENTAGON  
WASHINGTON, DC 20301-4000

OCT 8 2008

Mr. Randall B. Williamson  
Director, Health Care, U.S. Government Accountability Office  
441 G. Street, N.W.  
Washington, DC 20548

Dear Mr. Williamson,

This is the Department of Defense response to the GAO Draft Report, GAO-08-1008, "DEFENSE HEALTH CARE: Additional Efforts Needed to Ensure Compliance with Personality Disorder Separation Requirements," dated August 26, 2008 (GAO Code 290722).

Thank you for the opportunity to review and comment on this draft. We appreciate the critical review your team has undertaken with this important issue. It is imperative we follow prescribed procedures when separating Service members as well as honor their rights to appeal.

Please refer to our enclosed critical and technical comments on this report and GAO recommendations.

Again, we thank you for the opportunity to provide these comments. My points of contact for additional information are Col Bob Ireland (Functional) at (703) 681-3611 and Mr. Gunther Zimmerman (Audit Liaison) at (703) 681-4360.

Sincerely,

David S. C. Chu

Enclosure:  
As stated



GAO DRAFT REPORT - DATED AUGUST 26, 2008  
GAO CODE 290722/GAO-08-1008

**"DEFENSE HEALTH CARE: Additional Efforts Needed to Ensure Compliance with  
Personality Disorder Separation Requirements"**

**DEPARTMENT OF DEFENSE COMMENTS**

**Report Title:** The current title is, "DEFENSE HEALTH CARE: Additional Efforts Needed to Ensure Compliance with Personality Disorder Separation Requirements"

**Recommended Change:** "PERSONNEL MANAGEMENT: Report to Congress on the Execution of Policies and Procedures to Administratively Separate Members of the Armed Forces on the Basis of Personality Disorder"

**Rationale for change:** Defense Health Care programs do not manage personnel separation policies and practices--the primary focus of this study. "Personnel management" is inclusive of and accounts for both medical and administrative discharge requirements. This report does not address clinical practice ("health care") efficacy or judgment, but rather whether a doctoral psychologist's or psychiatrist's statement recommending separation for a personality disorder was included in separation packages. In addition, the subtitle describes a finding, rather than the subject of the report.

**Page 3, Lines 12-13 (Table 1, Table 2, etc.):** The bullet reads, "must receive notification by their commander of the impending separation because of a personality disorder."

**Recommended change:** "must receive written notification of their impending separation because of personality disorder."

**Rationale for change:** DoDD 1332.14, *Enlisted Administrative Separations*, Enclosure 6, paragraph 2.a. requires that the "respondent shall be notified in writing of:" It makes no mention that the notification must come from the commander. The old version of DoDD 1332.14 also made no mention of the written notification having to come from the commander.

**Page 3, Lines 18-19 (p. 8 last sentence, Table 1, Table 2, etc.):** The bullet reads, "must receive counseling by their supervisors about their problem with functioning in the military."

**Recommended change:** "must receive formal counseling concerning their deficiencies which interfere with assignment to, or performance of, duty."

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**Appendix II: Comments from the Department  
of Defense**

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Rationale for change: DoDD 1332.14, *Enlisted Administrative Separations*, Paragraphs 3.a.(8)(a) and (b) do not stipulate who must provide the counseling, only that the formal counseling must be provided. This change should be incorporated throughout the report (e.g., Table 1, last line of Pg 8, Table 2, etc.)

GAO DRAFT REPORT - DATED AUGUST 26, 2008  
GAO CODE 290722/GAO-08-1008

“DEFENSE HEALTH CARE: Additional Efforts Needed to Ensure Compliance with  
Personality Disorder Separation Requirements”

DEPARTMENT OF DEFENSE COMMENTS  
TO THE RECOMMENDATIONS

**RECOMMENDATION 1:** The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to direct the Secretaries of the Army, the Air Force, and the Navy and the Commandant of the Marine Corps to develop a system to ensure that personality disorder separations are conducted in accordance with DoD’s requirements.

**DOD RESPONSE:** Concur.

**RECOMMENDATION 2:** The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to ensure that DoD monitors the military Services’ compliance with DoD’s personality disorder separation requirements.

**DOD RESPONSE:** Partial Concurrence.  
It is the responsibility of the Military Departments to ensure compliance with DoD policies. However, the USD(P&R) will strengthen policy guidance regarding Service standardized compliance reporting.

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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

Randall B. Williamson, (202) 512-7114 or [williamsonr@gao.gov](mailto:williamsonr@gao.gov)

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## Acknowledgments

In addition to the contact named above, Mary Ann Curran, Assistant Director; Sarah Burton; Christie Enders; Krister Friday; Becky Hendrickson; Martha R.W. Kelly; Lisa Motley; Jason Vassilicos; and Suzanne Worth made key contributions to this report.

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