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19 Nov 2010

MEMORANDUM

From: 
Catherine A. Haines, CAPT
Chair, Diversity Advisory Council

Reply to: CG-12B
Attn of: CDR Stundtner
(202) 475-5247

To: CCG *3/14*
Thru: (1) CG-12 *C.S. Odom 12/16/10*
(2) CG-1 *727Huntt 12/16/10*
(3) CG-01 *JPC 12/20*
(4) CG-09 *AK 2/26/11*

Not attached

Subj: FALL 2010 DIVERSITY ADVISORY COUNCIL (DAC) REPORT

1. The Diversity Advisory Council (DAC) met from 25-29 October 2010 at Coast Guard Headquarters. Members in attendance are indicated in enclosure (1). Mr. Curtis Odom (CG-12) and DAC Chair, CAPT Catherine Haines (CG-12B), welcomed the council.
2. The council received the following briefs and updates:
 - a. The Comprehensive Review Working Group (CRWG) U.S. Coast Guard Liaison Officer briefed on the progress of the working group and status of the study.
 - b. CG-1221 briefed the DAC on the weight program, the recording of maternity leave in the OER, and other updates to policy.
 - c. CG-00H briefed the DAC on the new Civil Rights complaint process and the directorate chain of command.
 - d. MCPOCG Leavitt briefed the DAC on diversity within and recruiting for the Gold and Silver badge corps.
 - e. OPM and EPM were present throughout the DAC meetings to provide input on assignment, promotion and advancement, and counseling processes.
3. The DAC provided input to the Diversity Staff (CG-12B) on recommended ways ahead for the unit Human Relations Councils (HRCs) and on how to best communicate OPTASK Diversity to all levels of the organization (enclosure 2).
4. The DAC received 23 submitted issues in October 2010 and carried over two issues from previous DAC meetings. In determining which issues to research, the DAC considered whether the submitted issues were diversity-related, organizational in scope, researchable, and reasonably manageable. Furthermore, the DAC plans to refer some issues that they deemed outside of their purview to a more appropriate authority.

5. The Council briefed the Commandant and Chief of Staff on the following issues and recommendations:

Issue 1: Speech Capabilities Possibly Affecting Job Performance

CG personnel with accents (particularly members who speak English as a second language) may experience disadvantages, especially in the communication sections of performance evaluations and other communication-type qualifications and missions.

Determination:

The DAC has received anecdotal information regarding speech or accents affecting job performance. For example, a member not being allowed to talk on the radio because of their accent, a member not being able to participate as a board recorder, a pilot who may have to or has turned in his wings for similar reasons, and that TRACEN Cape May sends between 5 – 10 recruits a year to Medical for speech/communication evaluations.

The DAC’s goal is to determine whether the issue that speech could affect job performance is real or perceived. If it is real, is it systemic or isolated? As the CG becomes more diverse, the possibility of speech affecting job performance increases. Whether this problem is real, perceived, systemic, or isolated, we feel that the solution should be supportive and should include training for all Coast Guard members. We understand that our mission is the priority and our members need to communicate clearly to the nation and world we serve. We owe it to our shipmates to work to improve the speaking and listening skills of all Coast Guard members.

Recommendations:

1. Publish a Flag Voice or ALCOAST similar to Flag Voice 257 (July, 2005) “Other Than English at the Workplace”. This Flag Voice speaks of our “changing demographics” and how “valuing a multi-lingual capability” is “more critical than ever.” A similar Flag Voice or ALCOAST should be published emphasizing and complimenting those who have the ability to speak multiple languages. It also should be written in a way that would encourage training and tolerance for all Coast Guard members.
2. Consider using organizational survey data available to determine prevalence of speech issues affecting the workforce. This will help senior leadership determine if this is an organizational problem, and if we need to draft a policy to address possible concerns.

CG-1 Comments: *Concur with DAC recommendations to release Flag Voice and release OAS survey data to study further.*

CCG Comments:

Issue 2: Restricted Reporting Options

Currently, a CG member may only use Restricted Reporting for sexual assault via a healthcare provider or Victim Advocate. If a victim confides in a friend who is also a CG member, that person is required to report the assault and begin the Unrestricted Reporting process. This may cause undue hardship to the member, affecting not only his/her career, but also his/her desire to remain in the CG.

Determination:

Coast Guard personnel are considered "mandated reporters" of crimes, and sexual assault is a crime. If a member

confides in another member who is not a trained Victim Advocate or a healthcare provider, the report must be unrestricted and reported to the chain of command.

This is a training issue. We need to ensure that all personnel understand that restricted reporting means that the assault can ONLY be reported to an Employee Assistance Program Coordinator (EAPC)/Sexual Assault Response Coordinator, a trained Victim Advocate, or a healthcare provider (including mental health). Chaplains also have privilege, but will not follow the same protocol that the others listed above must.

If there are not clear guidelines on Restricted reporting and confidentiality, there is no way to ensure that consistent responses are afforded the victim. All of the armed services have attempted to blur the lines to "benefit" the victim in the initial implementation phases, but over time we have learned that it does not. Consistent and stable policy affords victims the most protection, and restricted reporting is just that - extremely restricted.

This policy is even more important in the Coast Guard because we are a small service. Word gets around quickly, and if everyone knows about an assault it must be unrestricted. Commands and personnel can't be aware of a sexual assault and do nothing about it. The more informed our Coast Guard personnel are regarding the SAPR Program, the better prepared we are to respond when it does occur.

More often than not, when a victim meets with their EAPC/SARC, VA, or HCP, they choose the Unrestricted Reporting option when they understand how restrictive Restricted Reporting is. The intent of Restricted Reporting is to encourage victims to come forward for help, but Unrestricted is and has always been the preferred option. We just need to continue to improve the process so that Unrestricted is not viewed as "bad."

An Unrestricted Report is not a punishment or a bad thing. People often do not want to go through the investigative process, but they usually don't realize that they DON'T have to go through it. A victim does not have to cooperate with law enforcement if they choose not to, and that is made clear in the revised policy. Victims can choose Unrestricted if they desire to tell friends at their command, and may gain certain protections from the command without enduring a potentially lengthy investigative process.

Recommendation:

1. The DAC recommends this policy remains as is, and ensure all units are conducting mandatory training as required.

CG-1 Comments: Concur with the DAC recommendation. We will review and update the CG learning portal training as needed and track completion rate.

CCG Comments:

Issue 3: CG Auxiliary Diversity Issues

1. Lack of diversity within CG AUX, and lack of respect for minorities and underrepresented groups
2. CG AUX boating and water safety courses not available to minority communities
3. Lack of knowledge within Active Duty CG of AUX capabilities

Determination:

The CG Auxiliary faces many of the same diversity issues as the Active Duty CG. However, they have the additional challenge of being a volunteer force. The CG AUX is addressing the matter and taking steps to improve the concerns through the release of the new "USCG Auxiliary Strategic Plan for Managing Diversity." The new

strategic plan addresses all the concerns raised to the DAC, and if effectively implemented, would be a strong vehicle for positive change with regard to Diversity within the AUX. Therefore, the DAC's recommendations are focused upon follow-through of the plan to ensure maximum effectiveness.

Recommendations:

1. Operationalize the new "USCG Auxiliary Strategic Plan for Managing Diversity" to include status updates periodically and include a Point of Contact for each action item to ensure accountability.
2. Appoint a Diversity Representative for each District and Flotilla to ensure follow-through of the AUX Diversity Strategic Plan from the top down to the field.
3. Create a separate Diversity Affairs Department in the Auxiliary to oversee implementation of the AUX Diversity Strategic Plan and to handle Diversity activities, including the 3 Star NACO Program. This staff would work with the Office of Diversity (CG-12B) to find opportunities to work jointly on diversity initiatives.
4. Include local AUX on unit check-in sheets to ensure newly arriving Active Duty personnel are familiar with local AUX members and their missions.

CG-1 Comments: Concur with DAC recommendations. CG-12B staff continues to partner with CG Auxiliary to improve diversity.

CCG Comments:

Issue 4: SMART Recruiting

There is a perception that the SMART Recruiting program and the Minority Serving Institution (MSI) partnership programs introduce reverse discrimination into CG recruiting and outreach by lowering standards for minorities. There is also a perception that people who attend MSIs would not choose employment in the Coast Guard.

Determination:

The DAC spoke with Coast Guard Recruiting Command and MSI program managers. We concluded that these perceptions, while incorrect, may be prevalent within the CG. The joint LAC/DAC survey from April of this year also indicated that this perception is pervasive.

As we know, these programs do not discriminate against the majority community. The purpose of these programs is to expand the applicant pool for CG accessions, and to introduce the Coast Guard to communities that have little general knowledge of Coast Guard career opportunities and missions. Entry standards are not lowered. On the contrary, the goal of the programs is to increase the size and diversity of our applicant pool.

The CG partners with MSIs because there is little knowledge of the CG within many of these schools. These schools provide excellent educational and mentoring opportunities for minorities, and are diverse and inclusive communities for all genders, races, and ethnicities.

Our efforts to recruit diversity have not and will not impede our recruiting efforts at non-MSIs. Our goal remains increasing the diversity within the candidate pools of applicants thereby increasing the opportunity of selection.

Recommendations:

1. Utilize Strategic Communications (STRATCOMs) to ensure a consistent message is sent. A STRATCOM paper on this topic has been drafted (enclosure 3). This message will address these perceptions and provide guidance to commands who are seeking answers. It will also ensure that the same message is being heard throughout the Coast Guard.

2. Include information regarding diversity outreach/recruiting efforts in diversity training for all Coast Guard members.
CG-1 Comments: <i>Concur with DAC recommendation to improve strategic comms on our recruiting efforts. We are working with FC and LDC to develop diversity training modules.</i>
CCG Comments:

<p>Issue 5: BMI and Weight Standards</p> <p>BMI is an outdated form of fitness-evaluation. It does not take into account gender, race/ethnic dispositions, age or other factors that affect body composition.</p> <p>Determination:</p> <p>CG-1221/PSC will research over 2010-2011 to collect more data.</p> <p>Other related issues to be considered include the lack of CG-wide knowledge of the availability of caliper requests and the negative stigma associated with being measured.</p> <p>This should be a continuous process to ensure that we are properly measuring health/fitness with the best and most up-to-date methods.</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 1. Recommend that PSC and CG-12A track statistics and report directly to CCG/DAC on the findings. 2. Recommend that PSC and CG-12A track and publish/release results of BMI tracking by race, ethnicity, gender, and age in order to dispel the perception about BMI being discriminatory and out-dated. 3. Recommend considering a more health-based and remedial approach, including alternative measurements rather than weight, such as a body fat only approach and/or mandatory physical fitness evaluations. 4. Recommend strongly encouraging command compliance with the Commandant's three hour P.T. authorization during the work week. <p>CG-1 Comments: <i>Concur with DAC recommendations. We will track and publish statistics, look at alternatives to achieve desired effects, and will encourage command compliance w/ PT program... may want to include in your CO letter.</i></p> <p>CCG Comments:</p>

<p>Issue 6: Pregnancy affecting performance evaluations and promotions in Specialized Communities.</p> <p>Determination:</p> <p>The DAC took the 2008 pregnancy survey and refocused it to create four separate surveys for each of the following communities: aviation, afloat, response, and prevention.</p> <p>Overall, we found that across each community, most women plan their careers around their family or vice versa. However, it is clear from the comments that the junior to mid-grade officer level is the crucial period at which</p>

women decide to place career or family interests as a priority.

The majority of responders did not feel their OERs were negatively affected by pregnancy. They found that extra work toward collaterals provided enough substance and justification for solid OERs. Any pressure to work long hours or to come back quickly after maternity leave appears to be, for the majority, self-imposed.

The majority of women officers understand that planning is paramount in maintaining a balance between career and family. Anecdotal responses showed females lean toward family taking precedence over careers, particularly for member to member relationships. Only a few responded that their husbands were/would be the primary caretaker.

According to the survey, commands are supportive with very few exceptions. However, at the peer level there may be less understanding and support.

While we thought diving into specific communities would provide more information or insight into how pregnancies affect women officers, we received many similar responses to the previous general survey. We believe this issue has been researched to the best of the DAC's ability and any further discussion may require the development of professional surveys.

Furthermore, it appears as though the majority of operational women officers have had positive experiences when dealing with pregnancies. This emphasizes that most women officers who do not return to operational billets are doing so based on their desires, and not necessarily lack of camaraderie or opportunity.

Aviation Community Specifics:

65 women aviators (out of approximately 90 total designated female aviators) participated in the survey. Of the 65 women officers, 42% felt that their personal/family goals negatively affected their career goals. 69% strategically planned their pregnancy around specific CG tours.

There were four major themes of concern found within the aviation community survey.

- TEMP SEP vs. Flight obligation
- Documentation of pregnancy in OER
- Command awareness of CG pregnancy policies
- Choice between career or family

Afloat Community Specifics:

Of the total 49 women officers that participated in the survey, the majority were in the O-3 to O-5 level (41). While 7 of the participants did not consider themselves as members of the afloat community, overwhelmingly responses presented a positive outlook at their opportunity to return afloat if they so chose.

There were only three anecdotes that spoke of possible Coast Guard systemic issues negatively effecting individual desires to return to the fleet.

- Detailers not working with the female of a member to member marriage to facilitate a balance between parents' operational tours
- Feelings of increased scrutiny of females on board ships, lack of camaraderie
- Criticism from OPM of unplanned pregnancy during second tour afloat, despite prior strong performance and record.

While these specific cases are unfortunate, the results from the rest of the survey suggest that the cases are somewhat isolated.

The survey showed that 82% of the participants were willing to plan pregnancies around afloat opportunities. Furthermore, the participants admitted that –for the most part- returning afloat would be their decision, based on how they would like to prioritize competing demands.

Prevention Community Specifics:

Of the 61 women officers that participated in the Prevention survey, 92% had been in Prevention for less than 10 years and 71% had no children. 42% felt that their personal/family goals negatively affected their career goals. The majority of individuals that were pregnant received 1 – 5 extra collateral duties. Of those, when asked if those collateral duties helped their OERS, 71% stated neutral, disagreed, or strongly disagreed.

Response Community Specifics:

Of the 22 women officers that participated in the Response survey, 59% had been in Response for less than 4 years. There were only 2 survey participants that had been in the Response field for more than 10 years.

Only 1 of the survey participants had been pregnant and reassigned while in a Response billet. 7 were pregnant and not reassigned, while the remaining 14 were “not applicable.”

22% of the participants felt that their personal/family goals negatively affected their career goals. 45% answered neutral and the remaining 31% disagreed.

While the sample size of this survey was small, and many of the participants had not been affected by pregnancy yet, the general consensus showed a concern for the potential negative affects on their careers and similar comments were received as the other fields. The majority of these comments focused on the OER and concern for the quality of the OER based on possible reassignments and inability to do the job in the specialized field.

Recommendations:

1. Create a training module for Command Cadre schools for awareness. The Coast Guard needs to initiate a culture change among the leadership and accept that the number of females in the Coast Guard is increasing and these women want to have families along with a successful career. The Pregnancy Brochure created by CG-12B as a result of the last DAC research on this issue is a great start and will be further enhanced by training at leadership principles trainings (CPOA, PCO/PXO, etc).
2. Increase knowledge/understanding of waiver request option for Temporary Separation (TEMP SEP) program. OPM/EPM should highlight this option at Roadshows and conferences such as Women in Aviation International (WAI). Place language in TEMP SEP portion of PERSMAN that says obligated service waivers will be considered on a case by case basis.
3. Recommend researching extending the postpartum deferral for deployment to 12 months - similar to what the Navy does. This would coincide with the more appropriate transfer season. Women could request to deploy sooner than 12 months, pending medical professional approval.

Other Pregnancy Issues and Recommendations:

In addition, several other pregnancy concerns which relate to specific policies have been addressed over the past year.

The first concern has to do with physical fitness requirements, and when a woman is ready and able to perform a fitness test after giving birth. Upon hearing of a situation in which a woman was pressured to take and pass a small boat physical fitness standard certification test 3 months after giving birth, it was discovered that the policy in regards to this was unclear and inconsistently applied. After consulting with medical personnel and comparing to the Navy PRT time frame, we recommend that the policy give women up to 6-months after birth to take and pass a required physical fitness test or be required to conduct physiologic training.

1. Recommend a change to the PERSMAN for clarification purposes. Change the verbiage of Chapter 9.A.3.b. to read:
“Resumption of deployments, physical fitness standard tests and physiologic training, or assignment to cutter or OCONUS duties will not normally be made for a period of six months following delivery unless the servicewoman is medically fit and requests a waiver for an earlier resumption of duties.

Physical fitness standard certification requirements and physiologic training may be resumed prior to six months only after a consultation with a medical provider. This period is meant to allow the servicewoman time to regain her physical strength and stamina before performing the full duties of her rate/rank."

In response to concerns from women about why convalescent leave needed to be recorded on their OERs, a small survey was conducted to find out how women are recording this type of leave. It was found that out of 14 women who responded, 12 recorded it incorrectly ('other' rather than 'leave'), and one member stated that her supervisor took it off completely.

2. Recommend that the policy be clarified in the PERSMAN to indicate where convalescent leave should be recorded (in same category as convalescent leave: other).

Finally, women in aviation face significant challenges if they choose to start a family. One of the first concerns has to do with deciding if they should continue to fly while pregnant. The Aviation Medical Manual and PERSMAN both currently state that there is a concern of the effect on fetal hearing from the noise frequencies associated with rotary wing aircraft. Due to this concern, the manuals state that it is recommended that pregnant servicewomen refrain from participating in rotary wing flight. This policy has been inconsistently applied at Air Stations, as has been reported by female aviators.

3. Recommend clarifying the Aviation Medical Manual and PERSMAN policy. CG-711 and CG-11 should work in coordination with one another to research the validity of the dated study and policy. If no valid concerns are found, then this policy should be revised.

Current Policy: "Excessive noise. Due to concerns of the effect on fetal hearing of noise frequencies associated with rotary wing aircraft, it is recommended that pregnant servicewomen refrain from participating in rotary wing flight." COMDTINST M6410.3 (series) and Aviation Medical Manual, Chapter 11.

Considering the percentage of women who are currently in the workforce, and the continued concern for increasing diversity within the Coast Guard, we believe these recommendations deserve priority concern.

4. Recommend issuing an ALCOAST on these specific changes in regards to pregnancy to facilitate communication, and notify the field of changes.

CG-1 Comments: *Concur with DAC recommendations to promote awareness including ALCOAST and to ensure policy is understood.*

CCG Comments:

Issue 7: Single Parent Accessions

Determination:

Researched exclusively in policy for enlisted accessions. Policy allows for accession of single parents who have joint custody (not primary custody). Unmarried members with sole custody are not authorized to enlist.

Recommendations:

1. Recommend maintaining current policy with the following caveats:

<ul style="list-style-type: none"> A. Ensure both males and females are screened for single parenthood at accession; B. Clarify definitions of custody (states have varying definitions); C. Require joint-custody members to complete a family care plan prior to attending basic training.
<p>CG-1 Comments: <i>Concur with DAC recommendation and will update policy.</i></p>
<p>CCG Comments:</p>

6. The following issues were submitted by CG members, and will be researched and addressed by the DAC throughout the next six months.

<p>Issue 1: Special Duty Assignments</p> <p>According to PERSMAN Article 4.E.2.a.12, requirements for eligibility for special duty assignments state that "Men must be clean-shaven; however, a neatly trimmed mustache is allowed. Those with approved waivers for folliculitis are not eligible for Special Duty assignments."</p> <p>These criteria should be removed from the PERSMAN and no longer be a disqualifying factor for Special Duty assignments. Typically, men diagnosed with folliculitis are minorities. Therefore, this requirement may disadvantage minority men by not allowing them to compete for career enhancing assignments (e.g. Instructor Duty, Recruiting Duty, Company Commanders, Special Agents, Command Master Chief, etc.). There may be assignments that would require strict adherence to CG grooming standards such as Ceremonial Honor Guard; however, there should not be a blanket disqualification for all Special Duty assignments based on a waiverable medical condition.</p> <p>The CG has recently relaxed its grooming standards in the wearing of tattoos, body markings, and body piercings (See ALCOAST 505/09). This was done because the old policy was unnecessarily restrictive, ambiguous, and difficult to enforce. It also brought the CG in line with what the other services were doing. In the same manner, the current special duty policy in folliculitis should be reviewed and determined if it is unnecessarily restrictive and disadvantages any of our CG members.</p> <p>Determination:</p> <p>DAC discussion revealed that this may not only be an issue that turns minorities away from special duty assignments, but may also be a factor in the lack of minorities in senior leadership. Many of these special duty assignments are considered particularly advantageous to career and leadership development.</p> <p>The DAC will research over the next 6 months, and report to the Commandant in spring 2011.</p> <p>CG-1 Comments: <i>We will work with the DAC to further research.</i></p> <p>CCG Comments:</p>
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<p>Issue 2: Speech Capabilities Possibly Affecting Job Performance</p>

CG personnel with accents (especially members who learned English as a second language) may experience disadvantages, especially in the communication sections of performance evaluations and other communication-type qualifications and missions.

Determination:

At this time the DAC has received anecdotal information regarding speech or accents effecting job performance. For example, a member not being allowed to talk on the radio because of their accent, a member not being able to participate as a board recorder, a pilot who may have to or has turned in his wings because for similar issues, and that TRACEN Cape May sends between 5 – 10 recruits a year to Medical for speech/communication evaluations.

As the DAC our goal is to determine whether the issue that speech could affect job performance is real or perceived. If it is real, is it systemic or isolated? As the CG becomes more diverse, the possibility of speech affecting job performance increases. Whether this problem is real, perceived, systemic, or isolated, we feel that the solution should be supportive and should include training for all Coast Guard members.

We understand that our mission has to be the priority and our members need to communicate clearly to the nation and world we serve. We owe it to our shipmates to work to improve the speaking and listening skills of all Coast Guard members.

The DAC briefed this issue to the Commandant in fall 2010, and will continue to research it over the next 6 months. The following recommendations were briefed to the Commandant.

1. Publishing a Flag Voice or ALCOAST similar to Flag Voice 257 (July, 2005) "Other Than English at the Workplace." This Flag Voice speaks of our "changing demographics" and how "valuing a multi-lingual capability" is "more critical than ever." A similar Flag Voice or ALCOAST should be published emphasizing and complimenting those who have the ability to speak multiple languages. It also should be written in a way that would encourage training and tolerance for all Coast Guard members.
2. Consider using organizational survey data available to determine prevalence of speech issues affecting the workforce. This will help senior leadership determine if this is an organizational problem, and if we need to draft a policy to address possible concerns.

CG-I Comments: *We will work with the DAC to research this issue further.*

CCG Comments:

Issue 3: Diversity at remote units

At Sector Northern New England we had several remote small boat stations under our purview. Females assigned to us were a minority with only a couple at each unit. I would like to see the ratio of men to women at remote units decrease; females would feel more comfortable and have more opportunities for networking/mentoring/social options. Feedback from a Women's Symposium we held was that, shy of getting all of them together at the Sector once per year, they felt they had little means/opportunities to network with other women. Retention may increase if our first-term female POs had more women to work with.

Determination:

Minorities may not tend to choose certain geographic locations, including locations with remote units. Affinity group conferences can be support networks for diverse members at smaller units. OPM and EPM do consider transfers on a case by case basis. A mentoring program could also facilitate these members' success.

While the assignment of minority members may not be an issue within the DAC's purview, the success of minority members at small and remote units may be more effectively addressed. The DAC will research over the next 6 months, and report to the Commandant in spring 2011.

CG-1 Comments: *Concur with researching this issue further.*

CCG Comments:

Issue 4: Collateral vs. Regional EEO representatives: Diminished Customer Service

Since collateral duty EEOCs/CROs were removed from the unit level to a regional staff, there has been a marked loss of professionalism and logical process for resolution of EEOC complaints. Commands no longer have a local EEO advocate who understands the needs of the service and to help prevent or resolve EEO problems. The Regional EEOCs are not in touch with their customers and do not have an understanding of "chain of command" or the importance of utilizing it to resolve issues at the lowest level of management. Having a sanctioned unit advocate who has received training and can address potential issues at the lowest level gives aggrieved members more control and much better counseling/mediation. The new model of regional EEO representatives has actually increased workload on our staff by having to jump through additional hoops when an issue is raised. Additionally, aggrieved members do not feel they have a dedicated EEO/CR advocate at the command. Going to a resource outside the command bypasses the chain of command - a vital component in any military organization - and does not give unit leaders an opportunity to address issues. Once an issue is raised outside the unit, it unnecessarily escalates the issue and causes excessive work by the unit to address the issue via the new regional EEO channel.

Determination:

The Civil Rights Directorate briefed the DAC on the new Civil Rights complaint process and the directorate chain of command. DAC discussion centered on the lack of education within the field of the current complaint process, and the importance of the Active Duty chain of command within that process. The Active Duty chain of command can either foster or hinder the Civil Rights complaint process, and should be considered as a crucial point in the process.

The DAC felt that this issue warranted review. Of particular interest to the DAC are:

1. Whether this is a natural organizational change management issue to which the Coast Guard will adjust with time and exposure to the new/current process, or
2. Whether there is now a gap at the unit level that should be filled to provide local liaison resources to assist members in contacting the Regional Staff for EEOC/CR issue resolution.

The DAC is sensitive to the importance of the Civil Rights program as well as the visibility related issues receive across the Coast Guard and in the general public. Our approach to this research will involve current Civil Rights programs and the teams that have been driving these important initiatives.

A secondary element of this issue centers on the impact of organizational changes on member perceptions of command climate.

The DAC will research over the next 6 months, and report to the Commandant in spring 2011.

CG-1 Comments: *Concur with researching this issue further.*

CCG Comments:

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Issue 5: Contract EEO investigators: Unprofessional and inadequate

Contract EEO investigators do not understand the military culture and are impersonal, disembodied voices limited by the interactions solely relegated to the telephone to gather witness statements that are used to determine the validity of very important matters of EEOC complaints. In a recent EEO investigation, a contract investigator stated in a letter to a "witness" that failure to comply with the investigative process would cause decision makers to draw an adverse inference that the requested information would have reflected unfavorably on the party refusing to provide the information. The investigator also took the liberty to make up an answer to a question that was not asked and subsequently asked the affiant to sign a typed statement, which contained the assumptive response. This was a fraudulent representation of fact and a gross violation of the fiduciary responsibility of an investigator. In addition, one's silence in response to questions is a constitutional right and evidence obtained by coercion during discovery of evidence is illegal. The notion of obtaining a sworn affidavit over the telephone is also a breach of the professional investigative process and significantly discounts the importance of the interview. A telephone interview gives no consideration for the non-verbal aspects of communication which cannot be captured in a telephone conversation. Further demeaning the seriousness and value of the interview is the manner in which sworn statements are currently obtained. Neither the affiant's identity nor the physical raising of the affiant's right hand can be properly verified over the phone. Furthermore, the affiant has no way to verify the credentials of the interviewer.

Determination:

The Civil Rights Directorate briefed the DAC on the new Civil Rights investigation process, the duties of the contracted investigators, and the contracting process. DAC discussion centered on the lack of education within the field of the current investigation process.

The DAC is sensitive to the importance of the Civil Rights program as well as the visibility related issues receive across the Coast Guard and in the general public. Our approach to this research will involve current Civil Rights programs and the teams that have been driving these important initiatives.

The DAC will research over the next 6 months, and report to the Commandant in spring 2011.

CG-1 Comments: *Concur with researching this issue further.*

CCG Comments:

Issue 6: Command Climate

Command Climate is a significant factor in service member retention. It has consistently come up as reason for member separation in exit interviews and surveys, and may affect underrepresented members more than majority members.

Determination:

The DAC will research and discuss the attributes of a positive command climate over the next 6 months, and report to the Commandant in spring 2011.

CG-1 Comments: *Concur with researching this issue further.*

<p>CCG Comments:</p>
<p>Issue 7: Female Grooming Standards</p> <p>The language in the policy currently prohibiting dreadlocks needs to be clarified so that black or African American women may wear their hair in professional styles that require less upkeep because black or African American women have difficulty getting hair treatments in remote locations, underway, or at training commands involving pool sessions.</p>
<p>Determination:</p> <p>The DAC will research over the next few months, and report prior to the next Uniform Board or during the spring 2011 DAC, whichever comes sooner.</p>
<p>CG-I Comments: <i>Comment</i></p>
<p>CCG Comments:</p>

7. The following issues were submitted by CG members, but were referred to a more appropriate authority, were recently addressed by the DAC, were outside of the DAC’s scope of influence, or were not diversity issues; and will therefore not be researched within the next year.

<p>Issue 1: Perception that pregnant cadets given choice to abort the child or be disenrolled from the Coast Guard Academy.</p> <p>Currently, the Coast Guard Academy allows cadets to take a one to two year sabbatical for religious or personal reasons. Mormon cadets, for example, leave CGA for two years after their sophomore year to complete their religious obligations, and return two years later at the same rank where they left off. Cadets who desire to complete mission work are allowed to take a yearlong sabbatical from the Academy, and even cadets who would like to try out other colleges are given the opportunity to take a year off and return without loss of rank.</p> <p>However, the perception is that if a female cadet becomes pregnant, she has two options: abort the child and remain at the Academy or leave the Academy. This policy unfairly affects women, as male cadets who may be equally responsible for pregnancies are not given the same ultimatum. Understandably, cadets are not allowed to support dependents until they graduate, and this is often cited as the reason for the policy. However, if female cadets were allowed to take a year-long sabbatical and give the child up for adoption, we would easily address this requirement.</p> <p>Although timing may be an issue (religious and personal sabbaticals can be timed to coincide with the end of a schoolyear), this could also be addressed by a clear policy requiring the pregnant cadet to return at the beginning point of the highest cadet rank achieved within two years. For example, a cadet halfway through her 2/c year would return at the beginning of the 2/c year for the class either one or two years behind her original class.</p>
<p>Determination:</p>

In looking through the Regulations of the Corps of Cadets, speaking with the Academy director of diversity, and the Academy legal office, the DAC found that the language addressing parental responsibilities reflected similar options to the sabbatical program. The Superintendent of the Coast Guard Academy is the final authority in determining whether a cadet who incurs parental responsibilities will resign, be disenrolled, or receive a hardship resignation, which is similar to a sabbatical. If cadets are not aware of these options, they may not feel comfortable telling their command if they incur parental responsibilities.

This perception is caused by the lack of understanding and adherence to the regulations. The staff and cadets should both know that being pregnant does not result in automatic disenrollment. The DAC will not research this issue further, and will refer this issue to Academy leadership.

CG-1 Comments: *Concur. CGA will address this issue.*

CCG Comments:

Issue 2: PHA providers lack ability to perform comprehensive health assessments for women.

The PHA does not provide adequate health assessments for women due to the limited expertise provided by lowest bid contract procedures. My experience receiving the PHA was subpar due to the nature of the facility and staff. I was cycled through the physical with no specific interest or tailored needs for my exam...The lowest bid contract should not be the determining factor for health care; the cost is paid by the members and ultimately the organization since I was told to reschedule by referral.

Determination:

After receiving information on the medical complaint process, the DAC felt that the medical complaint process addressed this issue more adequately than would any recommendations given by the DAC. The DAC will not research this issue further.

CG-1 Comments: *Concur. CG-11 will address this issue.*

CCG Comments:

Issue 3: Lack of diversity in Senior Leadership, especially enlisted. (i.e. Silver badge, Gold badge, Commanding Officer)

Determination: Similar issued addressed in the Fall 2009 Report

This issue has been submitted to the DAC numerous times, and was briefed to the Commandant in Fall 2009 and forwarded to the LAC for consideration. The below recommendations were briefed to the Commandant in Fall 2009.

1. Monitor the percentages of members advancing to the senior enlisted ranks and being commissioned into the officer corps on an annual basis and compare them to previous years to ascertain if the positive trend stays positive. Also, research what other aspects of diversity are being fostered or sought after in our

<p>Chief's Mess.</p> <ol style="list-style-type: none"> 2. This issue applies to multiple areas of our organization. The numbers show we are heading in the right direction, but it will take time for us to realize the fruits of our labor. We should monitor recruiting efforts and utilize CGBI to watch diversity trends. 3. Recommended further research: we should look at the difference in advancement rates between white males v. females, and white males v. minorities. We should strive for equality in advancement rates across the board. We should also look at advancement rates between white females v. minority females. We should concentrate on finding solutions where there are disparities.
<p>CG-1 Comments: <i>Concur. Achieving our Diversity Strategic Plan Goals will improve remove this issue.</i></p>
<p>CCG Comments:</p>

<p>Issue 4: Update the CG's breastfeeding policy</p> <p>Currently, the Personnel Manual states, "During pregnancy and for six months after childbirth, the Service defers assigning otherwise eligible pregnant women on CONUS shore duty to shipboard or OCONUS assignments, unless they volunteer for earlier rotation to a shipboard or OCONUS tour." However, recent guidance from Military Treatment Facilities (MTFs) agrees with leading national agencies that this time period should be extended to one year. DOD parenting classes and materials provided by US MTFs endorse research by the American Academy of Pediatrics as well as U.S. Department of Health and Human Services by recommending breastfeeding through the child's first year. The Coast Guard's policy is out of date and restricts parents' abilities to provide for their children by sending mothers who desire to breastfeed back underway. This policy is detrimental to the physiological functions required for continued breastfeeding and should be changed not only to better care for our shipmates, but because it is the right thing to do.</p>
<p>Determination:</p> <p>Information regarding a recommendation for future research is stated in Paragraph 5, Issue 6 of this report.</p>
<p>CG-1 Comments: <i>CG-11 and CG-12 are will address this issue.</i></p>
<p>CCG Comments:</p>

<p>Issue 5: Institutional Racism Against Black Females in the Coast Guard</p> <p>There appears to be institutional, systematic racism against black women in the Coast Guard, both in the officer and enlisted corps. The rates of promotion and advancement are very low. The highest ranking black female officer is a CDR, while white women have achieved the rank of flag officer and Vice Commandant.</p>
<p>Determination:</p> <p>All gender/racial/ethnic info is masked for boards. OPM is working on a report on promotion which will be finalized in March and published in June. The Military Leadership Diversity Commission (MLDC) also researched/reviewed processes regarding promotion for all military services, and their report will be published in January.</p>

Because PSC is already researching, the DAC will not research this issue further. (POC LCDR Engrum)
CG-1 Comments: <i>Will provide PSC report once completed.</i>
CCG Comments:

Issue 6: Needs of the Service and the assignment process
<p>Detailers often assign "based on the needs of the service." This has a significant impact on career progression and retention. Opinions differ regarding the true needs of the service. For example, we have a retention and promotion problem among African American officers in the ranks of LCDR and above. Historically, African Americans are assigned to less career enhancing billets. The detailing process lacks transparency, and as a result may be a source of discrimination in the workplace. Be open and candid about what "needs of the service" are. Lack of transparency = ability to discriminate with no accountability. The COMDT should sign and release a precept for OPM on the "needs of the service" for assignment season, similar to the precept for promotion boards but more specific. If we need to retain and promote officers of a certain specialty, the precept should say that. If diversity in all of the ranks is a priority, say so. Detailers should have to justify their actions, specifically when someone does not get a job on their dream sheet because of "needs of the service."</p>
<p>Determination:</p> <p>OPM and EPM briefed the DAC on the assignment process. The needs of the service change with each assignment, and specific billets become more or less competitive based on how many members apply. The DAC will not research this issue further.</p>
CG-1 Comments: <i>We have a team (OPM, EPM, MCPDCC, FC) looking at alternatives to improve our assignment process.</i>
CCG Comments:

Issue 7: Accounting for "Other than leave" on OER's
<p>When doing OER's maternity or paternity days off are accounted for in the "Other than leave" block which could be mistaken as something negative when up for a review board which could lead to them being passed over.</p>
<p>Determination:</p> <p>This issue was briefed to the Commandant in Fall 2010 as part of the pregnancy brief. OPM stated the Days Not Observed block is a conduit for a member to write a letter explaining a personal matter (maternity leave, illness, etc) that may have affected their performance evaluation. Information regarding future recommendations is stated in Paragraph 5, Issue 6 of this report.</p>
CG-1 Comments: <i>CG-12 staff is working on this issue.</i>

CCG Comments:

Issue 8: Retention of women in the workforce

Women with families or single mothers who are unable/unwilling to get underway or deploy worldwide are not eligible for advancement if in a rating with a sea time requirement.

Determination:

This issue extends beyond the DAC's purview as it pertains to sea time requirements and eligibility for worldwide deployment. The DAC will not research this issue further.

CG-1 Comments: *we have a group looking at this issue led by Romc King.*

CCG Comments:

Issue 9: Entitlements for single members

Single members are discriminated against when they PCS and lose their BAH entitlement while members with dependants keep receiving BAH throughout the PCS transfer. Allow single members to keep their BAH until they report in at their new PDS or stop BAH for all members when departing their old PDS during a transfer.

Determination:

This is not necessarily true - nobody "loses" their BAH. However; single members, while they are actually traveling from their old PDS to their new PDS, will have their BAH temporarily held until they effectively check-in to their new PDS. Once they have reported into the SPO their BAH will begin to run again crediting them the BAH while they traveled.

The CG initiated this new policy about 4 to 5 years ago because after a study/investigation it was determined that members were not reporting in a timely fashion to their new units causing overpayment or underpayment.

The DAC determined that this is a pay issue and should be referred to PPC for review.

CG-1 Comments: *PSC/PPC is looking at this issue to see if change is needed.*

CCG Comments:

Issue 10: DEOCS survey

Is there a plan to implement a workplace climate survey that's more CG specific than the annual DEOCS survey, which is more tailored to DoD service members?
Determination: Commands can submit up to 10 questions to customize the DEOCS. The Organizational Assessment Survey (OAS) is already tailored to fit the Coast Guard, and is taken every 2 years. The DAC will not research this issue further.
CG-1 Comments: <i>Concur.</i>
CCG Comments:

Issue 11: Lack of diversity specifically in the afloat community. The diversity profile of the afloat community should reflect that of the CG in which it draws its members. Some areas are well populated such as female junior officers and African American senior enlisted, while other segments of the afloat workforce are not well represented - senior women and minority officers.
Issue 12: Recruiting - White Hull Fleet There remains within the Coast Guard a perception that going to sea, especially on the White Hull Fleet (WMEC, WHEC, WMSL), is a negative thing. In my experience, even seasoned sailors prefer the black hull or red hull fleet to the white hull fleet. I am of the opinion that this perception inhibits recruiting and impacts diversity within the fleet.
Issue 13: Lack of diversity in Officer corps/Afloat community
Determination: This issue has been a topic at recent CO Afloat and DAC Conferences. The Afloat community is standing up a working group to develop an Afloat Community Action Plan and to examine current assignment practices, afloat command climate, and any other systemic barriers that may be contributing to uneven afloat representation. As this issue is already being addressed, the DAC will not research this issue further. Will request a brief from this working group at the next DAC.
CG-1 Comments: <i>Concur.</i>
CCG Comments:

Issue 14: Diversity in the staffing of our accession sources. We have limited diversity on TRACEN Cape May's staff, both gender and ethnic. This is also true of our staffs at OCS and to a certain extent the staff at the Academy.
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Many will say this is a difficult challenge to overcome, but when new accessions look around the regiment and see no one that looks like them it provides an initial challenge to our accession and more importantly retention efforts. Similar challenges on the OCS staff - OCS is the primary source of bringing in minority officers.

Determination:

This issue has previously been submitted to the DAC. The below determination and recommendations were briefed to the Commandant in Fall 2009. The DAC will not research this issue further.

FROM FALL 2009 REPORT:

This is a continuing issue of accession and retention. Over the past three years, the number of minorities in senior enlisted billets has increased. The current lack of diversity results partly from a limited number of minorities in the CG and a limited number of Senior Enlisted billets. As these numbers improve, the DAC expects the diversity in the higher ranks to improve.

1. Monitor the percentages of members advancing to the senior enlisted ranks and being commissioned into the officer corps on an annual basis and compare them to previous years to ascertain if the positive trend stays positive. Also, research what other aspects of diversity are being fostered or sought after in our Chief's Mess.
2. This issue applies to multiple areas of our organization. The numbers show we are heading in the right direction, but it will take time for us to realize the fruits of our labor. We should monitor recruiting efforts and utilize CGBI to watch diversity trends.
3. Recommended further research: we should look at the difference in advancement rates between white males v. females, and white males v. minorities. We should strive for equality in advancement rates across the board. We should also look at advancement rates between white females v. minority females. We should concentrate on finding solutions where there are disparities.

CG-1 Comments: *Comment.*

CCG Comments:

Issue 15: Separation of women due to Work-Life balance obstacles

At the organizational level, have the conversation about: how to help people balance all this, the work environment, and the appearance of valuing the geographical bachelor over the member with a family, because the geo bachelor can work longer hours.

Make it easy for women to breast feed or pump milk upon returning to work after giving birth. It's difficult at most units, which dissuades women from doing so, and creates an unfriendly environment. We are creating a lactation room in our district office. It should be that way everywhere.

Determination:

CG-1221 is now working on lactation policy changes that will contribute to work-life balance for women. The DAC will not research this issue further.

CG-1 Comments: *Comment.*

CCG Comments:

Issue 16: Counseling for Temporarily Separating members

Provide a system to ensure that members taking the 2-yr sabbatical receive "good" counseling before and after. It is most critical that they be advised NOT to join the reserves during those 2 years. (Case in point: member serves in reserves & gets "reserve quality" OERs that cannot compete w/ active duty side, so member later gets passed over for 0-5 due to these weak OERs.)

Determination:

This issue is already being addressed by OPM, and does not apply to enlisted members using TempSep. The DAC will not research this issue further.

CG-1 Comments: *Concur.*

CCG Comments:

Issue 17: Female Uniforms

The fit, professional appearance, and attractiveness of female uniforms is a diversity issue. Allowing women options to ensure they look professional in uniform would improve morale and job satisfaction. Specific uniforms that have been mentioned as needing improvement (or a tailoring option) include the SDB jacket, the SDB/Trops pants and skirt, the ODU (tailoring), and the DDB uniform.

Determination:

1. The DDB is a Navy uniform, and as such may be difficult for the CG to change. Recommendations for policy improvements may suffice for the other uniforms.
2. **Marine Corps Alteration policy:** *"Alterations to uniform clothing to improve fit are authorized; however, such alterations will not change the intended appearance or function of the garment as designed. Wearing improperly altered uniform clothing is prohibited. Alterations to uniform clothing of enlisted personnel will be made at Government expense when authorized by organization supply officers according to instructions in the current edition of TM-10120-15/1, Technical Manual for Uniform Fitting and Alteration. Care should be taken when contracting alteration services from a commercial vendor so that unauthorized or unneeded alteration procedures are not included in the contract. Uniforms are designed so as to minimize alteration costs. Alteration contracts can be reviewed periodically by contacting the CG, ARCORSYSCOM (PM, ICE). Reports of an excessive number of fitting sessions are an indication that there may be problems with the alteration process. Commanders will ensure that all alterations, either at Government expense or at the individual's expense, conform to the spirit and intent of these regulations. Every effort will be made to ensure that proper tailoring facilities are available to all personnel of the command. Personnel will be 1008 MARINE CORPS UNIFORM REGULATIONS 1- 18 advised that alterations performed at other than designated military tailoring establishments will be the individual's responsibility and will conform strictly."*

<p>The DAC will refer the following recommendations to the Uniform Board via the Gender Policy Advisor.</p> <ol style="list-style-type: none"> 1. Recommend to Uniform Board a policy change that would allow CG women to wear the Air Force blue A-line skirt as an alternative option to the Coast Guard pleated skirt. Although the skirts are uniform in appearance, an A-line skirt may be a more flattering and professional fit for many women. 2. Recommend to Uniform Board a policy change that would allow CG women to wear the Air Force beltless pants that would be equivalent to CG trop pants. 3. Recommend to Uniform Board a policy change that would allow for tailoring of all CG uniforms to ensure proper fit and professional appearance. This is especially important for women who are not "average" sized, and who either find their uniforms too tight in certain areas or so large they appear unprofessional.
<p>CG-1 Comments: <i>Uniform Board will include these issues in the next meeting.</i></p>
<p>CCG Comments:</p>

<p>Issue 18: Pacific Islander Weight Standards</p> <p>Pacific Islanders are genetically larger people that perhaps should have a different weight standard. Many Pacific Islanders who are extremely fit may fail our current standards. I have seen more than one of my shipmates who are Pacific Islanders struggle to conform to our current weight standards. While they have been fit individuals, fitness is not taken into account by the weight standards and genetics have put them at a disadvantage to meet the standard.</p>
<p>Determination:</p> <p>This issue has been submitted to the DAC numerous times, and was briefed to the Commandant in Fall 2010. Information regarding future research and current recommendations is published in Paragraph 5, Issue 5 of this report.</p>
<p>CG-1 Comments: <i>CG-11 and CG-12 looking into this issue.</i></p>
<p>CCG Comments:</p>

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- Enclosures: (1) List of DAC attendees
 (2) Actionable Items: Command Climate, HRCs, and DSP
 (3) MSI Strategic Communications
 (4) Pregnancy and a Servicewoman's Career White Paper

Copy: CG-00H, CG-00B