Report No. DODIG-2024-081

ATTITITI AND



INSPECTOR GENERAL

U.S. Department of Defense

MAY 7, 2024



Review of the DoD's Implementation of Expedited Transfer Policy Requirements

INDEPENDENCE * INTEGRITY * EXCELLENCE * TRANSPARENCY





May 7, 2024

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR PERSONNEL AND READINESS CHIEF OF THE NATIONAL GUARD BUREAU DIRECTOR, DOD SEXUAL ASSAULT PREVENTION AND RESPONSE OFFICE AUDITOR GENERAL, DEPARTMENT OF THE ARMY AUDITOR GENERAL, DEPARTMENT OF THE NAVY AUDITOR GENERAL, DEPARTMENT OF THE AIR FORCE

SUBJECT: Review of the DoD's Implementation of Expedited Transfer Policy Requirements (Report No. DODIG-2024-081)

This final report provides the results of the DoD Office of Inspector General's review. We previously provided copies of the draft report and requested written comments on the recommendations. We considered management's comments on the draft report when preparing the final report. These comments are included in the report.

This report contains six recommendations that are considered unresolved because the Acting Under Secretary of Defense for Personnel and Readiness and the Sexual Assault Prevention and Response Office Director did not agree with or did not fully address the recommendations presented in the report. Therefore, the recommendations remain open. We will track these recommendations until management has agreed to take actions that we determine to be sufficient to meet the intent of the recommendations and management officials submit adequate documentation showing that all agreed-upon actions are completed. DoD Instruction 7650.03 requires that recommendations be resolved promptly. Therefore, please provide us within 30 days your response concerning specific actions in process or alternative corrective actions proposed on the recommendations. Send your response to DIEMReporting@dodig.mil.

If you have any questions or would like to meet to discuss the review, please contact me at

. We appreciate the cooperation and assistance received

during the review.

FOR THE INSPECTOR GENERAL:

Seon Mibone

Sean McDonald Acting Deputy Inspector General for Diversity and Inclusion and Extremism in the Military



Introduction

Executive Summary

Based on our review of the FY 2023 Expedited Transfer data and interviews with DoD officials responsible for oversight of the Sexual Assault Prevention and Response (SAPR) program, we determined that the Military Services did not execute the requirements of the DoD's Expedited Transfer policy in accordance with DoD policy. Specifically, the Military Services did not consistently process and record data on Expedited Transfers as required. Furthermore, we concluded that the DoD did not properly oversee the Military Services by requiring and tracking data on the timeframe for completing Expedited Transfers.

In 2023, the Government Accountability Office highlighted sexual assault and sexual harassment as two of the causes of the DoD's recruitment and retention challenges. Improving the effectiveness of the Military Services' execution of Expedited Transfer policy requirements and the DoD's oversight of the Military Services could increase Service members' and the overall public's trust in the DoD's ability to support victims of sexual assault. In turn, this may improve the DoD's recruiting and retention efforts, which are critical to maintaining military readiness and national security.

Objective

The objective of this review was to determine whether the DoD effectively executed the requirements of the Expedited Transfer policy for the SAPR program in accordance with Federal law and DoD policies.

Background

Federal Law and DoD Policy for Expedited Transfers

The purpose of the DoD's Expedited Transfer policy is to assist victims of sexual assault in their recovery by moving them to a new location where they feel comfortable, no one knows about the assault, and they can work without fear of ostracism or retaliation. The FY 2019 National Defense Authorization Act (NDAA) required the Secretary of Defense to standardize the Expedited Transfer process across the Department for members of the Armed Forces who are the alleged victims of sexual assault.¹ The FY 2019 NDAA also required the Secretary of

¹ Public Law 115-232, "John S. McCain National Defense Authorization Act for Fiscal Year 2019," August 13, 2018. The FY 2019 NDAA also required the Secretary of Defense to establish a standardized Expedited Transfer process for alleged victims of physical domestic violence. This review focused on Expedited Transfers of alleged victims of sexual assault.

Defense to establish a policy to allow the transfer of a member of the Armed Forces whose dependent is the victim of sexual assault perpetrated by a member of the Armed Forces not related to the victim.

DoD Instruction (DoDI) 6495.02, volume 1, outlines the process for requesting and processing an Expedited Transfer for Service members and adult dependents that are the victims of sexual assault.² According to DoDI 6495.02, volume 1, Service members who file an Unrestricted report of sexual assault (a report that initiates an investigation, and notifies the victim's chain of command) are eligible to request an Expedited Transfer from their assigned command.³ For Expedited Transfers of adult military dependents, DoDI 6495.02, volume 1 requires Service members to initiate an Expedited Transfer request for their adult dependent.

Expedited Transfer Process

A Service member can request two types of Expedited Transfers, a local transfer or a permanent change of station (PCS) transfer. Figure 1 illustrates the different types of Expedited Transfers a Service member can request.

Figure 1. Types of Expedited Transfers



Source: The DoD OIG.

To submit a request for an Expedited Transfer, a Service member must submit a written request to their commander, who must either approve or deny the request within five calendar days of receipt of the request. According to DoDI 6495.02, volume 1, to approve the request, the commander, or the appropriate approving

² DoD Instruction 6495.02, Volume 1, "Sexual Assault Prevention and Response: Program Procedures," March 28, 2013 (Incorporating Change 7, September 6, 2022). Procedures to request and process Expedited Transfers for victims of sexual assault perpetrated by a spouse or intimate partner, and for military dependents under the age of 18 who are sexually assaulted are outlined in DoD Instruction 6400.06, "DoD Coordinated Community Response to Domestic Abuse Involving DoD Military and Certain Affiliated Personnel," December 15, 2021 (Incorporating Change 2, May 16, 2023).

³ For this review, "Service members" refers to members of the U.S. Army, U.S. Marine Corps, U.S. Navy, U.S. Air Force, U.S. Space Force, and the National Guard.

authority, must determine whether the sexual assault report is credible by considering the advice of the supporting judge advocate, or other legal advisor concerned, and the available evidence based on a military criminal investigative organizations' investigation (if available). If the commander denies the Expedited Transfer request, the Service member can appeal the decision and request that a senior-level official review the request.⁴ According to DoDI 6495.02, volume 1, "in most circumstances," PCS transfers "should be completed within 30 calendar days from the date the transfer is approved," while local transfers "should be completed within one week from the date the transfer is approved."⁵ Figure 2 illustrates the Expedited Transfer process as outlined in DoDI 6495.02, volume 1.



Figure 2. Expedited Transfer Process

Source: The DoD OIG.

Capturing and Tracking Data on Expedited Transfers

Once a final decision is made on an Expedited Transfer request, Sexual Assault Response Coordinators (SARCs) must enter specific data into the Defense Sexual Assault Incident Database (DSAID), such as the date the Service member requested the transfer, the date the transfer was approved, and the date the Service member transferred. DSAID is the authoritative database used to collect and maintain

⁴ For this review, "senior-level official" refers to a General Officer, Flag Officer, or Senior Executive Service equivalent.

⁵ DoDI 6495.02, volume 1, does not identify circumstances that would justify an exception to the 30 calendar day transfer timeline for PCS transfers or the one week transfer timeline for local transfers.

uniform information about sexual assault cases involving Service members. SARCs serve as the single point of contact to coordinate sexual assault response and coordinate 24/7 victim care and case management for adult sexual assault victims from initial reporting through final disposition and resolution.

From FY 2022 through FY 2023, the Services received 1,735 Expedited Transfer requests, approved 1,689 requests, and denied 46 requests. The following table displays the total number of Expedited Transfers that each Service received, approved and denied.

Military	FY 2022			FY 2023 ¹		
Service	Received	Approved	Denied	Received	Approved	Denied
Army ²	252	242	10	142	138	4
Navy	330	326	4	328	320	8
Marine Corps	87	85	2	89	83	6
Air Force	222	217	5	229	224	5
Space Force	2	2	0	2	2	0
National Guard	28	26	2	24	24	0
Totals	921	898	23	814	791	23

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¹ 815 Expedited Transfers were requested in FY 2023; however, one approved PCS transfer request did not identify the victim's military affiliation and is therefore not accounted for in the Table.

² The cause for the decline in the quantity of Expedited Transfer requests the Army received in FY 2023 versus FY 2022 was beyond the scope of this review.

Source: The DSAID.

Oversight Roles and Responsibilities for DoD Expedited Transfers

The Under Secretary of Defense for Personnel and Readiness (USD[P&R]) develops overall SAPR policy, directs DoD Component implementation of the policy, and monitors compliance with SAPR program procedures. Additionally, the USD(P&R) is responsible for providing oversight of the DoD Sexual Assault Prevention and Response Office (SAPRO), which is the DoD's single point of authority, accountability, and oversight for the DoD SAPR program, including Expedited Transfers. SAPRO represents the Secretary of Defense as the central authority charged with preventing sexual assault in the military and facilitating recovery for survivors. The SAPRO Director is responsible for overseeing the Services' implementation of SAPR program requirements, to include the Services' implementation and use of the DSAID to capture and track Expedited Transfer requests. According to SAPRO officials, each fiscal year, SAPRO conducts an annual data validation of DSAID to ensure the accuracy and completeness of the data entered into the system, and to aid in the development of the DoD's annual report to Congress on sexual assault in the military, which is required by the FY 2011 NDAA.⁶ The annual validation process includes each of the Military Services' DSAID program managers conducting data checks, ensuring corrections or updates are made, and providing feedback to SAPRO.

According to SAPRO officials, commanders, SARCs, and other installation officials discuss the status of Expedited Transfer requests during monthly case management group (CMG) meetings.⁷ Installation Commanders (or their deputies) chair the CMG meetings with installation SARCs serving as the co-chairs. DoDI 6495.02, volume 1, requires that CMG meeting minutes document the circumstances that caused the delay for all Expedited Transfers taking more than 30 calendar days. As of June 2023, CMG officials are required to document CMG meeting notes in a DD Form 2910-5, "Monthly Case Management Group (CMG) Meeting Notes for the Sexual Assault Prevention and Response (SAPR) Program," to include ensuring that the circumstances causing delayed Expedited Transfers are documented in the CMG minutes. Military Service CMG officials must upload the DD Form 2910-5 to DSAID following the monthly CMG meeting.

⁶ Public Law 111-383, "Ike Skelton National Defense Authorization Act for Fiscal Year 2011," dated January 7, 2011, requires the Secretary of Defense to submit an annual report to Congress on sexual assaults involving members of the Armed Forces from the preceding year.

⁷ The CMG is a multi-disciplinary group that meets monthly to oversee individual cases of Unrestricted reports of sexual assault.

Results

The Military Services Did Not Consistently Process Expedited Transfers in Accordance with DoD Policy

The Military Services did not effectively execute the requirements of the DoD's Expedited Transfer policy for the SAPR program. While the Military Services responded to 731 (89.7 percent) of 815 of Expedited Transfer requests in FY 2023 within 5 calendar days as required, they did not process the transfers in accordance with DoD timelines. Specifically, the Military Services did not process 45 (51.1 percent) of 88 approved local Expedited Transfers within one week, and 293 (52.3 percent) of 560 approved PCS Expedited Transfers within 30 calendar days.

In addition, the Military Services did not ensure accurate information on Expedited Transfers was entered into DSAID in a timely manner. As a result, we could not determine whether the Services transferred 144 individuals in accordance with the DoD's Expedited Transfer policy timelines. This occurred because SAPRO did not properly oversee the Military Services' execution of the Expedited Transfer policy by requiring and tracking data on the timeframe for completing the transfers. Instead, SAPRO relied on installation Commanders and SARCs to ensure Expedited Transfers were completed in accordance with DoD guidance. However, DoD Directive 6495.01 assigns SAPRO as the single point of authority, accountability, and oversight for the SAPR program, including the Expedited Transfer policy.

Without proper oversight, the DoD cannot be assured that the Expedited Transfer program is effectively assisting victims of sexual assault in their recovery. In 2023, the Government Accountability Office highlighted sexual assault and sexual harassment as two of the causes of the DoD's recruitment and retention challenges.⁸ Responding to and processing Expedited Transfers in a timely manner is one way that the DoD can support victims of sexual assault. As stated by the Secretary of Defense in a memorandum addressing sexual assault and sexual harassment in the military, the most critical asset to the DoD is its people, and those people are "inextricably linked" to military readiness.⁹

⁸ GAO-23-106551, "National Security Snapshot: DoD Active-Duty Recruitment and Retention Challenges," March 2023.

⁹ Secretary of Defense memorandum, "Department of Defense Actions and Implementation Guidance to address Sexual Assault and Sexual Harassment in the Military," July 2, 2021.

Commanders Generally Responded to Expedited Transfer Requests in a Timely Manner

The Military Services generally complied with the DoDI 6495.02, volume 1 requirement to respond to Expedited Transfer requests within five calendar days. Specifically, commanders approved or denied 731 (89.7 percent) of 815 Expedited Transfer requests from FY 2023 within five calendar days of receiving the request. However, we concluded that the commanders did not approve or deny 84 (10.3 percent) of 815 Expedited Transfers requested in FY 2023 within five calendar days. Figure 3 illustrates the number of Expedited Transfers approved or denied beyond five calendar days by elapsed day intervals.



Figure 3. Expedited Transfers Approved or Denied Beyond Five Calendar Days

* The Air Force had four requests with approval dates before the date the Service member requested the transfer.

Source: The DoD OIG.

The number of days commanders took to approve or deny an Expedited Transfer request varied, with 10 taking between 30 to 90 calendar days, and 2 taking over 90 calendar days. For instance, we identified a Service member who requested an Expedited Transfer on February 15, 2023, and did not receive a decision on whether their request was approved until October 12, 2023, 239 days after the Service member submitted the request. We reviewed the data in DSAID on this Expedited Transfer request to determine if the cause of the delay was annotated in the system and could not identify a reason. To determine the cause of the delay,

we requested the DD Form 2910-5 and CMG meeting minutes associated with this Expedited Transfer request from SAPRO in January 2024. SAPRO officials provided two DD Forms 2910-5 associated with this case. We reviewed the forms and noted that the CMG chair attested that they reviewed the status of each Expedited Transfer, tracked the number of days of the transfer, and confirmed that all approved requests taking longer than 30 days had documented circumstances. However, the forms did not include a reason why the Service member's commander took 239 calendar days to approve the request. Moreover, SAPRO officials stated that they could not access the CMG meeting minutes in DSAID because access to these minutes was restricted to the SARCs in accordance with their Service specific policies.¹⁰ Consequently, we could not determine the cause of the 239 calendar day delay. The DoD's goal is to create a culture free of sexual assault through an environment of prevention, victim support, and appropriate accountability that enhances the safety and well-being of all Service members and their dependents. While the Military Services responded to almost 90 percent (731 of 815) of Expedited Transfer requests in a timely manner, excessive delays such as this can hinder a victim's recovery and weakens confidence in the DoD's ability and commitment to support Service members and their adult dependents who are sexually assaulted.

The Military Services Did Not Transfer Service Members in a Timely Manner

The Military Services did not consistently transfer Service members with approved Expedited Transfer requests within the timelines outlined in DoDI 6495.02, volume 1. Specifically, we concluded that 45 (51.1 percent) of 88 local transfers and 293 (52.3 percent) of 560 PCS transfers did not meet the DoD's suggested timelines.¹¹ According to DoDI 6495.02, volume 1, "in most circumstances," PCS transfers "should be completed within 30 calendar days from the date the transfer is approved," while local transfers "should be completed within 1 week from the date the transfer is approved." Figures 4 and 5 display the number of local and PCS Expedited Transfers each Service processed at various elapsed day intervals.

¹⁰ This review focused on the execution of the Expedited Transfer policy requirements at the DoD and Military Service level; therefore, we did not request the CMG meeting minutes from the specific installation commanders and SARCs.

¹¹ We could not determine whether 20 Service members who requested a local transfer and 124 Service members who requested a PCS transfer were transferred within 1 week and 30 days respectively, because either the date the Service members transferred was omitted or was before the Expedited Transfer approval date, the data indicated the victim was not transferred despite having an approved transfer, or the data did not indicate whether the victim was transferred.





Local Expedited Transfers

Source: The DoD OIG.





* One PCS Expedited Transfer request did not include the victim's military affiliation; as a result, we were unable to include the individual in the figure.

Source: The DoD OIG.

Transferring Service members with an approved Expedited Transfer request in a timely manner is critical to protecting the physical and emotional health of the victims. This is especially critical in instances where a Service member reports

being sexually assaulted and requests an Expedited Transfer to physically distance themselves from the alleged perpetrator. For instance, we identified a Service member who requested a PCS Expedited Transfer on December 12, 2022, and was not transferred until April 3, 2023, 108 calendar days after their transfer request was approved. In another

We identified a Service member who requested a PCS Expedited Transfer on December 12, 2022, and was not transferred until April 3, 2023, 108 calendar days after their transfer request was approved.

instance, we identified an adult dependent who requested a PCS Expedited Transfer on November 9, 2022, and was not transferred until February 28, 2023, 110 calendar days after their transfer request was approved. To determine the cause of the delays, we requested the DD Forms 2910-5 and the CMG meeting minutes associated with these two Expedited Transfer requests from SAPRO in

In another instance, we identified an adult dependent who requested a PCS Expedited Transfer on November 9, 2022, and was not transferred until February 28, 2023, 110 calendar days after their transfer request was approved. January 2024. SAPRO officials stated that they could not provide the DD Forms 2910-5 for these requests because one of the cases was closed before the DD Form 2910-5 was released for DoD use, and the other case was closed before the form storage feature was available in DSAID.¹² Therefore, we could not determine the cause of the 108 and 110 calendar day delays.

Although the DoDI states that in most cases transfers should meet the aforementioned timelines, we concluded that 45 (51.1 percent) of 88 local transfers and 293 (52.3 percent) of 560 PCS transfers did not meet the DoD's suggested timelines. Not processing Expedited Transfers in a timely manner can present unnecessary stress and harm to Service members who are victims of sexual assault, weakening trust in the DoD and negatively impacting the DoD's ability to recruit and retain personnel. Therefore, the USD(P&R) should revise DoDI 6495.02, volume 1 to clarify that the Military Services and the National Guard must transfer Service members and their dependents with approved local Expedited Transfers within 7 calendar days and approved PCS transfers within 30 calendar days, unless an exception to policy applies. Additionally, the USD(P&R) should

¹² According to SAPRO officials, DSAID did not include the capability to store DD Form 2910-5 until December 2023.

identify exceptions to the transfer timelines for approved Expedited Transfers and establish and implement an exception to policy process for transfers that cannot be processed within the required timelines, to include identifying the appropriate approving official for the exceptions.

The Military Services Did Not Maintain Complete Expedited Transfer Data in DSAID

The Military Services did not maintain a complete account of the required data for all approved Expedited Transfer requests in DSAID. Specifically, Military Service SARCs did not consistently document the date Service members were transferred in DSAID. DoDI 6495.02, volume 1, mandates the use of DSAID to document and manage sexual assault cases through final disposition or until the victim no longer desires SAPR program services. Additionally, the DoDI requires the Secretaries of the Military Departments to establish procedures to regularly review and assure the quality of data entered into DSAID. In October 2023, we reviewed an extract of data from DSAID for Expedited Transfers requested in FY 2023 and identified incomplete data fields in DSAID for 50 approved local transfers and 290 approved PCS transfers that indicated the transfer was complete. For instance, we determined that Navy officials did not document the transfer date

We determined that Navy officials did not document the transfer date for 214 of 279 approved Expedited Transfers in FY 2023. for 214 of 279 approved Expedited Transfers in FY 2023. According to Navy personnel, although SARCs are responsible for documenting Expedited Transfer requests in DSAID, they are not always aware of when a transfer has been executed. However, both the

DoD and Navy policies require SARCs to conduct an out-brief with Service members to discuss the transfer process and schedule an intake meeting with the SARC at the Service member's gaining command or installation.¹³ Therefore, the SARCs should be aware of when a victim is transferred, and should populate DSAID with the applicable transfer date to assist in scheduling the required intake meeting.

The Military Services did not document the date Service members were transferred in DSAID consistently because SAPRO did not enforce the DoD requirement for SARCs to maintain a complete record of Expedited Transfer data in DSAID. DoDI 6495.02, volume 1, requires SARCs to annotate Expedited Transfer requests and subsequent decisions in DSAID, ensuring all fields are completed, including the transfer date. When we discussed this topic with SAPRO officials, they

¹³ DoD Instruction 6495.02, Volume 1, "Sexual Assault Prevention and Response: Program Procedures," March 28, 2013 (Incorporating Change 7, September 6, 2022). Naval Military Personnel Manual 1300-1205, "Expedited Transfers," February 7, 2022. SARC out-brief and intake meetings were not included in the scope of this Review.

acknowledged missing and incomplete data fields exist within DSAID and stated that they complete an annual validation process with Military Service SAPR personnel to ensure the accuracy and completeness of the data in the system.

SAPRO officials stated that they completed their annual validation process for FY 2023 in November 2023. As a result, in January 2024, we reviewed an updated data set from DSAID and determined that Military Service SAPR officials corrected 296 of the 340 instances of incomplete data we had originally independently identified. Although the Military Service SAPR officials corrected 296 of the 340 instances of incomplete data, we found that the data set provided in January 2024 included an additional 64 Expedited Transfer requests for FY 2023. These were not included in our original data set requested in October 2023 despite SAPRO officials pulling the original data set 26 calendar days after the end of the fiscal year. SAPRO officials acknowledged that Military Service SAPR personnel do not complete all of the required data fields in DSAID until the end of the year when SAPRO is preparing to issue the annual congressional report. However, it is imperative that the Military Services maintain accurate and timely sexual assault case data in DSAID as the data in the system assists with victim case management, SAPRO's oversight of the SAPR program, and congressional reporting. Therefore, the SAPRO Director should review the effectiveness of the Military Departments' procedures to regularly review and assure the quality of data entered into DSAID, and implement additional training, reminders, or other corrective actions, as necessary.

SAPRO Did Not Provide Sufficient Oversight of the DoD's Expedited Transfers

Although SAPRO relied on installation leadership and SAPR personnel to monitor and track Expedited Transfers and performed an annual validation of DSAID data, SAPRO did not provide sufficient oversight of the Military Services' implementation of DoD Expedited Transfer policy requirements. Specifically, SAPRO did not track or monitor the Services' actions to approve, deny, and transfer Service members with approved Expedited Transfer requests to ensure the requests were completed within the timeframes outlined in DoDI 6495.02, volume 1. According to SAPRO personnel, ensuring Expedited Transfers are responded to and processed in accordance with DoD guidance is the responsibility of the installation CMGs. DoDI 6495.02 volume 1, requires CMG Chairs (Installation Commanders and SARCs) to oversee the completion of all Expedited Transfers taking more than 30 calendar days. This includes ensuring the circumstances that caused the delay are documented in monthly CMG meeting minutes, reviewing the circumstances to determine whether the delay appreciably increases the risk of harm to the victim, and taking action, if necessary. However, SAPRO officials stated that they do not attend the CMG meetings, nor do they regularly review the meeting minutes, because the CMG meetings occur at the installation level and are led by the installation Commander and SARC.

We determined that 45 (51.1 percent) of 88 local transfers and 293 (52.3 percent) of 560 PCS transfers in FY 2023 were not completed within the generally applicable timeframes in DoDI 6495.02, volume 1. Regularly reviewing the CMG meeting minutes associated with these transfers could assist SAPRO in identifying systemic issues affecting the timeliness of completing an Expedited Transfer and improve the effectiveness of the SAPR program. DoD Directive 6495.01 assigns SAPRO as the single point of authority, accountability, and oversight for the SAPR program, including the Expedited Transfer policy. As such, SAPRO should have taken a more

SAPRO should have taken a more active role in ensuring that the Services were properly executing the requirements of the Expedited Transfer policy. active role in ensuring that the Services were properly executing the requirements of the Expedited Transfer policy.¹⁴ Therefore, the SAPRO Director should develop and implement a process to periodically review DSAID data on

Expedited Transfers outside of the annual validation period, and applicable CMG meeting minutes to determine whether the Services are properly executing the requirements of the Expedited Transfer policy.

Moreover, SAPRO did not ensure that DSAID was configured to capture all required information to allow SAPRO to verify that the Services were meeting the requirements of the Expedited Transfer policy. DoDI 6495.02, volume 1, requires the SAPRO Director to oversee the implementation, use, maintenance, and function of DSAID to meet congressional reporting requirements, support Military Service SAPR program management, and conduct DoD SAPRO oversight activities. However, SAPRO did not ensure that DSAID was configured to capture the date the Service member appealed the denial of their Expedited Transfer request by their commander and requested a senior-level official review their request, despite the system capturing the date of the senior-level official's decision. According to DoDI 6495.02, volume 1, if a Service member's commander denies an Expedited Transfer request, the Service member can appeal the decision and request a senior-level official review the transfer request and either approve or deny it within five calendar days of receipt. However, without this data, SAPRO cannot determine whether the Services are meeting this metric. Monitoring and tracking data on Expedited Transfers can assist SAPRO in identifying trends and identifying areas of improvement for the Expedited Transfer policy to better support Service

¹⁴ DoD Directive 6495.01, "Sexual Assault Prevention and Response Program," January 23, 2012 (Incorporating Change 5, November 10, 2021).

members and their adult dependents who are victims of sexual assault. Therefore, the SAPRO Director should configure and update DSAID to capture the date that the Service member requests a review of their Expedited Transfer request by a senior-level official.

Insufficient Oversight Over Expedited Transfers Could Affect Military Readiness

In 2021, the Independent Review Commission on Sexual Assault in the Military found that the DoD did not track data on the time it takes to process an Expedited Transfer.¹⁵ The Commission suggested that the DoD begin tracking this information to create an official record of the time to process Expedited Transfers and that information could be monitored and studied. In this report, we highlight 338 instances in FY 2023 alone in which the Military Services did not process approved Expedited Transfers within DoD timeframes (see Figures 4 and 5). In addition, we determined that the DoD did not monitor the data it collected on Expedited Transfers. Failure to transfer victims of sexual assault in a timely manner can undermine Service members' trust in their leadership following an assault, which can adversely affect the Service's ability to retain its force. For instance, the Independent Review Commission identified broken trust in senior leaders as a common theme in their description of the state of sexual assault and sexual harassment in the military. The Commission further explained that from the perspective of Service members they interviewed, many commanders failed to respond fairly to allegations of sexual assault and sexual harassment, which led to broken trust between the Service members and their commanders. Additionally, numerous articles published in the public domain highlight the DoD's failure to process Expedited Transfer requests in a timely manner, with some instances resulting in the Service member ultimately deciding to separate from their Service.¹⁶

In December 2023, the USD(P&R) announced that the Military Services collectively fell short of their recruiting goals by nearly 41,000 recruits in FY 2023. Earlier that same year, the Government Accountability Office issued a National Security Snapshot that identified sexual assault and sexual harassment as two of the many factors that influenced the DoD's ability to recruit and retain qualified

¹⁵ Independent Review Commission on Sexual Assault in the Military, "Hard Truths and the Duty to Change: Recommendations from the Independent Review Commission on Sexual Assault in the Military," July 2, 2021.

¹⁶ Ella Torres, "Military sexual assault victims say the system is broken," ABC News, August 28, 2020, https://abcnews.go.com/US/military-sexual-assault-victims-system-broken/story?id=72499053. Haley Britzky, "The Army's 'complete failure' led to this private's suicide after she was sexually assaulted, parents say," Task & Purpose, November 19, 2020, https://taskandpurpose.com/news/army-sexual-assault-nicole-burnham/. Mariel Padilla, "Military sexual assault survivors and advocates demand accountability in a 'world of predators'," The 19th, April 14, 2022, https://19thnews.org/2022/04/military-sexual-assault-campaign/.

military personnel to maintain military readiness and morale. The Government Accountability Office's body of work reviewing sexual assault and sexual harassment in the DoD includes several recommendations to improve the effectiveness and responsiveness of the DoD SAPR program. Responding to and processing Expedited Transfers in a timely manner is one way that the DoD can support victims of sexual assault, and the failure to do so can contribute to the DoD's recruiting and retention challenges. Furthermore, if the DoD does not improve its execution and oversight of Expedited Transfer requests to include their timeliness and documentation in DSAID, the Department may be limited in its ability to achieve the SAPR program objective to enhance the safety and well-being of its people, in part, through victim support and appropriate accountability.

Management Comments on the Results and Our Response

Acting Under Secretary of Defense for Personnel and Readiness Comments

The Acting Under Secretary of Defense for Personnel and Readiness stated that it was not feasible for SAPRO to provide direct oversight of each case in DSAID and to oversee the completeness of each data point entered in the system "in real time." The Acting Under Secretary added that SAPRO fulfills its oversight role through multiple avenues, such as the annual report to Congress on sexual assault in the military which includes separate reports from each of the Military Services on their efforts to prevent and address sexual assault. The Acting Under Secretary further stated that SAPRO "institutionalized oversight of sexual assault at lower levels" through SAPR policy revisions, recently established the requirement for SARCs to upload DD Forms 2910-5 to DSAID, and emphasized that oversight of the SAPR program requires support from the Military Services.

Our Response

In this report we acknowledge SAPRO's annual validation process and its utility to facilitate the annual congressional report, as well as the Military Services' responsibilities to provide oversight of DSAID data. Additionally, we commend the Department for establishing the requirement to upload DD Forms 2910-5 in DSAID to facilitate further oversight of sexual assault cases and applicable Expedited Transfer requests. However, we did not recommend that SAPRO provide direct oversight of each sexual assault case in DSAID as such action would appear to relieve the Military Services of their oversight responsibilities, including assuring the quality of data entered in DSAID through regular reviews. The intent of our recommendation (Recommendation 3.a) is for SAPRO, as the single point of accountability and authority for the DoD SAPR program, to determine whether the Military Services' procedures to review DSAID data provide assurance on the quality of the data. Furthermore, we agree that it is not feasible for SAPRO to oversee the completeness of each data point entered in DSAID "in real time." Instead, we recommended that SAPRO increase the frequency at which they validate the Expedited Transfer data entered in DSAID as the results of this DoD OIG review indicate that limiting their validation process to an annual occurrence may not be sufficient (Recommendation 3.b).

Recommendations, Management Comments, and Our Response

Recommendation 1

We recommend that the Under Secretary of Defense for Personnel and Readiness revise DoD Instruction 6495.02, volume 1, to clarify that the Military Services and the National Guard must transfer Service members and their dependents with approved local Expedited Transfers within 7 calendar days and approved permanent change of station transfers within 30 calendar days, unless an exception to policy applies.

Acting Under Secretary of Defense for Personnel and Readiness Comments

The Acting Under Secretary of Defense for Personnel and Readiness disagreed with the recommendation, stating that while they appreciated the intent of the recommendation, certain circumstances may prevent the Department from completing local transfers within 7 days and PCS transfers within 30 days. In addition, the Acting Under Secretary stated that the current Expedited Transfer policy is designed to give flexibility to the commander and the victim based on circumstances related to the needs of the victim and the mission.

Our Response

Comments from the Acting Under Secretary did not address the specifics of the recommendation; therefore, the recommendation is unresolved. While we agree that certain circumstances may impact the ability to complete an Expedited Transfer within the DoDI 6495.02, volume 1 timelines, these circumstances need to be documented and reviewed to ensure that the Expedited Transfer policy requirements are met. The intent of the recommendation is not to limit the flexibility of the victim or commander, but to ensure that timelines are consistently adhered to unless an authorized circumstance for a delay, such as the preference of the victim, is documented and approved by the appropriate official. Therefore, we

request that the Acting Under Secretary provide comments within 30 days of the final report addressing what actions they plan to take to clarify the requirements for the Military Services and National Guard to transfer Service members and their dependents with approved Expedited Transfers within the timelines outlined in DoDI 6495.02, volume 1, unless an exception to policy applies.

Recommendation 2

We recommend that the Under Secretary of Defense for Personnel and Readiness:

- a. identify exceptions to the transfer timelines for approved Expedited Transfers; and
- b. establish and implement an exception to policy process for transfers that cannot be processed within the required timelines, to include identifying the appropriate approving official for the exceptions.

Acting Under Secretary of Defense for Personnel and Readiness Comments

The Acting Under Secretary of Defense for Personnel and Readiness disagreed with the recommendations, stating that updating existing Expedited Transfer policy without an understanding or analysis of the reasons behind the delays would be premature. In addition, the Acting Under Secretary stated that an overly prescriptive requirement to complete local Expedited Transfers in 7 days and PCS transfers in 30 days may result in the unintended consequence that the preferences of the victim are not taken into account, or the victim is moved to the first available vacancy without taking into account the impact on the victim's career.

Our Response

Comments from the Acting Under Secretary did not address the specifics of the recommendation; therefore, the recommendation is unresolved. The intent of the recommendation is not to redefine the existing requirements, but to ensure that the Department applies the requirements consistently and equitably. While we agree that an analysis is necessary to determine the causes of the delays, a process is also needed to identify acceptable reasons for delaying an Expedited Transfer, such as the preferences of the victim, to ensure the consistent and equitable application of the Expedited Transfer policy. Therefore, we request that the Acting Under Secretary provide additional comments within 30 days of the final report addressing what actions they plan to take to identify acceptable exceptions to the transfer timelines for approved Expedited Transfers, and to establish an exception to policy process for transfers that cannot be processed within the required timelines, to include identifying the appropriate approving official for the exceptions.

Recommendation 3

We recommend that the Sexual Assault Prevention and Response Office Director:

- a. review the effectiveness of the Military Departments' procedures to regularly review and assure the quality of data entered into the Defense Sexual Assault Incident Database, and implement additional training, reminders, or other corrective actions, as necessary;
- b. develop and implement a process to periodically review Defense Sexual Assault Incident Database data on Expedited Transfers, outside of the annual validation period, and applicable Case Management Group meeting minutes, to determine whether the Services are properly executing the requirements of the Expedited Transfer policy; and
- c. configure the Defense Sexual Assault Incident Database to capture the date that the Service member requested a review of their Expedited Transfer request by a senior-level official.

Acting Under Secretary of Defense for Personnel and Readiness Comments

The Acting Under Secretary of Defense for Personnel and Readiness, responding for the Sexual Assault Prevention and Response Office Director, agreed with the recommendation, stating implementation actions are expected to be completed by FY 2025.

Our Response

Comments from the Acting Under Secretary did not address the specifics of the recommendation; therefore, the recommendation is unresolved. Although the Acting Under Secretary agreed with the recommendation, they did not describe the implementation actions that the Department plans to take to address the recommendation. Therefore, we request that the Sexual Assault Prevention and Response Office Director provide additional comments within 30 days of the final report addressing planned actions to review the effectiveness of the Military Departments' procedures to assure the quality of data entered in DSAID, develop and implement a process to periodically review DSAID data on Expedited Transfers, and applicable CMG meeting minutes, outside of the annual validation period, and configure DSAID to capture the date that a Service member requested a review of their Expedited Transfer request by a senior-level official.

Summary of Recommendations Status

Management	Recommendations Unresolved	Recommendations Resolved	Recommendations Closed
Under Secretary of Defense for Personnel and Readiness	1, 2.a, 2.b		
Director, Sexual Assault Prevention and Response Office	3.a, 3.b, 3.c		

Please provide Management Comments by June 6, 2024.

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

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

Appendix

Scope and Methodology

We reviewed the Army, Navy, Marine Corps, Air Force, Space Force, and National Guard's implementation of Expedited Transfer policy requirements for transfers requested in FY 2023. We also reviewed the DoD's oversight of the Expedited Transfers policy requirements.

To determine whether the DoD was effectively executing the requirements of the Expedited Transfer policy, we reviewed Federal laws and DoD policies, interviewed DoD personnel responsible for the oversight and execution of the DoD SAPR program, and reviewed FY 2023 Expedited Transfer data from the DSAID. Specifically, we reviewed the following Federal laws and DoD and Service-level policies and procedural documents.

- Public Law 115-232, "John S. McCain National Defense Authorization Act for Fiscal Year 2019," August 13, 2018
- Public Law 116-238, "William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021," January 1, 2021
- DoD Directive 6495.01, "Sexual Assault Prevention and Response Program (SAPR)," January 23, 2012 (Incorporating Change 5, November 10, 2021)
- DoDI 6495.02, Volume 1, "Sexual Assault Prevention and Response: Program Procedures," March 28, 2013 (Incorporating Change 7, September 6, 2022)
- Army Regulation 600-20, "Army Command Policy," July 24, 2020
- Army Regulation 614-100, "Officer Assignment Policies, Details and Transfers," December 3, 2019
- Army Regulation 614-200, "Enlisted Assignments and Utilization Management," January 25, 2019
- All Army Activities 047/2023, "Additional Sexual Harassment/Assault Response and Prevention Program Guidance: Expedited Transfers, 24-Month Sexual Assault Response Coordinator and Victim Advocate Stabilization, and SHARP Personnel Incentives," June 21, 2023
- Office of the Chief of Naval Operations Instruction 1752.1C, "Navy Sexual Assault Prevention and Response Program," August 13, 2015
- Naval Military Personnel Manual 1300-1205, "Expedited Transfers," February 7, 2022
- Navy Marine Corps 1752.5, "Sexual Assault Prevention and Response Procedures," June 5, 2019

- Marine Corps Order 1752.5C, "Sexual Assault Prevention and Response (SAPR) Program," June 3, 2019
- Department of the Air Force Instruction 36-2110, "Total Force Assignments," November 15, 2021 (Incorporating Change 1, November 16, 2022)
- Department of the Air Force Instruction 90-6001, "Sexual Assault Prevention and Response (SAPR) Program," July 15, 2020 (Incorporating Change 1, March 26, 2021)
- Chief of the National Guard Bureau Instruction 1300.01, "National Guard Sexual Assault Prevention and Response Program," June 26, 2020
- Chief of the National Guard Bureau Manual 1300.04A, "National Guard Bureau Expedited Transfer Program for Unrestricted Reports of Sexual Assault," November 18, 2022

We interviewed personnel from the DoD SAPRO and the Army Directorate of Prevention, Resilience, and Readiness. Additionally, we obtained sexual assault case data from DSAID for FY 2021, FY 2022, and FY 2023, from the DoD SAPRO in October 2023 and January 2024. We also obtained sexual assault case data from DSAID for FY 2021, FY 2022, and FY 2023, from the National Guard Bureau in February 2024. We analyzed the data to quantify the Expedited Transfers requested in FY 2023 by Service and to determine whether the Services complied with the following DoDI 6495.02, volume 1 requirements.

- Document the date and time Service members requested an Expedited Transfer.
- Review and approve or deny Service members' Expedited Transfer requests within five calendar days from the date of the requests.
- Approve or deny appealed Expedited Transfer requests within five calendar days.
- Process approved local Expedited Transfer requests within one week.
- Process approved PCS Expedited Transfer requests within 30 calendar days.
- Annotate in DSAID all information associated with Expedited Transfer requests.

We conducted this review with integrity, objectivity, and independence, as required by the Council of the Inspectors General on Integrity and Efficiency's "Quality Standards for Federal Offices of Inspector General," August 2012.

Management Comments

Under Secretary of Defense for Personnel and Readiness

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MEMOR	ANDUM FOR INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE
SUBJEC'	T: Review of Department of Defense Inspector General Draft Report, "Review of the DoD's Implementation of Expedited Transfer Policy Requirements" (Project No. D2024-D0DIEM-0004.000)
of Defens	ease find attached the Department's official response to the March 7, 2024 Department the Office of the Inspector General (DoDIG) draft report, "Review of the DoD's nation of Expedited Transfer Policy Requirements" (Project No. D2024-D0DIEM-).
Tl report.	ne Department does not concur with the following recommendations in the draft DoDIC
•	Recommendation 1: "We recommend that the Under Secretary of Defense for Personnel and Readiness revise DoD Instruction 6495.02, volume 1 to clarify that the Military Services and the National Guard must transfer Service members and their dependents with approved local Expedited Transfers within 7 calendar days and approved permanent change of station transfers within 30 calendar days, unless an exception to policy applies."
	 The Department non-concurs with this recommendation as written. While we appreciate the intent of the recommendation, certain circumstances may preclude effecting a local transfer within 7 days and permanent transfer within 30 days. The policy is designed to give flexibility to the commander and the victim based on circumstances related to the needs of the victim and the mission.
	If the recommendation were reworded as follows, the Department would concur: We recommend that the Under Secretary of Defense for Personnel and Readiness direct that upon approval of an expedited transfer request, the Military Services and National Guard, make every effort to transfer Service members and their dependents within 7 calendar days for a local transfer and approved permanent change of station transfers within 30 calendar days where possible, subject to the needs of the mission and input from the victim.
٠	Recommendation 2: "We recommend that the Under Secretary of Defense for Personnel and Readiness: a. identify exceptions to the transfer timelines for approved Expedited Transfers; b. establish and implement an exception to policy process for transfers that cannot be processed within the required timelines, to include identifying the appropriate approving official for the exceptions."



2

Acting Under Secretary of Defense for Personnel and Readiness Response Department of Defense Inspector General Draft Report, "Review of the DoD's Implementation of Expedited Transfer Policy Requirements" (Project No. D2024-D0DIEM-0004.000)

#	PAGE	COMMENTS, JUSTIFICATION, AND ORIGINATOR JUSTIFICATION FOR RESOLUTION	Component and POC Name, Phone, and E-mail
1 p.	p. 11	Coordinator Comment and Justification: The report currently reads: "Military Services did not consistently document in DSAID the date Service members were transferred because SAPRO did not enforce the DoD requirement for SARCs to maintain a complete record of Expedited Transfer data in DSAID. DoDI 6495.02, volume 1, requires SARCs to annotate Expedited Transfer requests and subsequent decisions in DSAID, ensuring all fields are completed, including the transfer date. When we discussed this topic with SAPRO officials, they acknowledged missing and incomplete data fields exist within DSAID and stated that they complete an annual validation process with Military Service SAPR personnel to ensure the accuracy and completeness of the data in the system" (p. 11).	
		Oversight of the SAPR program requires the support of the Military Services. It is not feasible for SAPRO to oversee the completeness of each, and every data point entered in DSAID in real time. Instead, SAPRO relies upon requirements outlined in policy for various individuals to support accurate and complete data entry, including from Sexual Assault Response Coordinators, installation commanders, and designated officials within the Military Services. In addition to oversight provided by the Military Services, SAPRO conducts an annual review of DSAID data for completeness and quality and summarizes findings in its annual report to Congress. SAPRO has also required the Military Departments to provide a formal response regarding aspects of the implementation of the expedited transfer policy, including reasons for delays in actual transfers, as part of the annual reports on sexual assault.	
		Coordinator Recommended Change: Revise text to read: "The Military Services did not consistently document in DSAID the date Service members were transferred. DoDI 6495.02, volume 1, requires SARCs to annotate Expedited Transfer requests and subsequent decisions in DSAID, ensuring all fields are completed, including the transfer date. When we discussed this topic with SAPRO officials, they acknowledged missing and incomplete data fields exist within DSAID, and stated that they complete an annual validation process with Military Service SAPR personnel to ensure the accuracy and completeness of the data in the system" Accurate and timely DSAID entry oversight is a shared responsibility with the Military Services, which necessitates that the Military Services conduct routine oversight prior to SAPRO's annual oversight.	
		Originator Response: Choose an item.	
		Originator Reasoning:	

#	PAGE	Comments, Justification, and Originator Justification for Resolution	Component and POC Name, Phone, and E-mail
2	рр. 12-13	Coordinator Comment and Justification: The report suggests that SAPRO has undertaken no action to track or monitor Services' actions related to expedited transfer requests.	
		It is not feasible for SAPRO to provide direct oversight for each case in DSAID. Instead, SAPRO fulfills its oversight role via multiple avenues. The DoD's Annual Report to Congress includes separate reports from each of the Miliary Services on their efforts to prevent and respond to sexual assault. Since as early as FY16, the data call that serves as the foundation for the Military Services' report required them to include an update on the status of the implementation of the expedited transfer policy. Since FY20, the Annual report data call has required the Services to provide additional information on expedited transfers, including the number of days between the expedited transfer request and the actual transfer and explanations for taking longer than 30 days. SAPRO has also institutionalized oversight of sexual assault at lower levels (where cases are directly managed) by updating DoD SAPR policy to require installation commanders to discuss specific aspects of each reported incident of sexual assault, including the status of expedited transfers and reasons for delays, at case management group meetings. Installation commanders are required to confirm that these discussions occurred during the CMG via a standardized form (DD Form 2910-5) and, beginning in 2023, SARCs must upload these forms to the Defense Sexual Assault Incident Database (DSAID) to facilitate further oversight. Indeed, conducting oversight to confirm that each victim has received the appropriate response (e.g., safety assessment, response to retaliation, and tracking the days for Expedited Transfer moves) will be easier because SAPRO will be able to review the CMG forms to ensure they are signed and to track progress on system-wide issues or challenges identified via the forms.	
		Coordinator Recommended Change: Delete the following statement: "SAPRO did not track or monitor the Services' actions to approve, deny, and transfer Service members with approved Expedited Transfer requests to ensure the requests were completed within the timeframes outlined in DoDI 6495.02, volume 1." (p. 12).	
		Furthermore, revise the following section header - "Lack of Oversight Over Expedited Transfers Could Impact Military Readiness" (p. 13) to be more consistent with other sections of the report and accurate regarding the oversight that SAPRO does engage in. Suggested text: "Insufficient Oversight Over Expedited Transfers Could Impact Military Readiness".	
		Originator Response: Choose an item.	
		Originator Reasoning:	

#	PAGE	Comments, Justification, and Originator Justification for Resolution	COMPONENT AND POC NAME, PHONE, AND E-MAIL
3		 Coordinator Comment and Justification: Non-concur with recommendations #1 and #2. T IG stated that in FY23, the moves after approved Expedited Transfers took longer than the allotted time by policy. They found that the Services did not transfer—45 of 88 approved local transfer requests within one week and 293 of 560 approved PCS transfer requests within 30 days. However, the IG never required the Services to provide the rationale for the delays. Consequently, this recommendation is premature, because the required complete analysis for a policy revision was not part of the audit. Furthermore, an overly prescriptive requirement of mandatory moves in 30 days (PCS) / 7 days (local) may result in the unintended consequence that the victim's wishes are not taken into account (e.g., staying until the school year is over for their child, or staying a week longer to be able to finish a needed training) or the victim is moved to the first available spot without taking into account the impact on the victim's career. We non-concur with these recommendations and suggest more time to study the issue. Recommendation #1—The Under Secretary of Defense for Personnel and Readiness revise DoDI 6495.02, volume 1, to clarify that the Military Services and the National Guard must transfer Service members and their dependents with approved local Expedited Transfers within 7 calendar days, unless an exception to policy applies. Recommendation #2—In addition, the Under Secretary of Defense for Personnel and Readiness will: identify exceptions to the transfer timelines for approved Expedited Transfers; and establish and implement an exception to policy process for transfers; and establish and implement an exception to policy applies. Recommendation #2—In addition, the Under Secretary of Defense for Personnel and Readiness will: identify exceptions to the transfer timelines for approved Expedited Transfers; and establish and implement an exception to policy proc	

3

Acronyms and Abbreviations

CMG	Case Management Group
DoDI	Department of Defense Instruction
DSAID	Defense Sexual Assault Incident Database
NDAA	National Defense Authorization Act
PCS	Permanent Change of Station
SAPR	Sexual Assault Prevention and Response
SAPRO	Sexual Assault Prevention and Response Office
SARC	Sexual Assault Response Coordinator
USD(P&R)	Under Secretary of Defense for Personnel and Readiness



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Media Contact public.affairs@dodig.mil; 703.604.8324

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