

USMC PERSONALITY DISORDER DISCHARGES		
	ACTIVE	RESERVE
FY02	505	19
FY03	499	35
FY04	509	38
FY05	722	45
FY06	666	48
FY07	714	41
FY08	396	29
FY09	325	23
FY10	129	3
1 OCT 10 - 31 JAN 11	26	0
TOTALS	4491	281

MALE	3849	245
FEMALE	645	36

OIF	305	13
OEF	36	1
OND	0	0

MULTIPLE TOURS/ LOCATION	58 TOTAL = 44 IRAQ AND 14 AFGHANISTAN	3 TOTAL IN IRAQ
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ENLISTED	4481	278
OFFICERS	10	3

ENCLOSURE (1)

11-L-0109 VVA (USMC) 1

USMC CONVENIENCE OF GVMT DISCHARGES		
	ACTIVE	RESERVE
FY02	1112	128
FY03	1376	184
FY04	1288	198
FY05	1151	179
FY06	1509	206
FY07	1277	165
FY08	1518	198
FY09	1392	227
FY10	1527	296
1 OCT 10 - 31 JAN 11	557	73
TOTALS	12707	1854

MALE	10916	1724
FEMALE	1791	130

OIF	166	1
OEF	28	8
OND	5	0

MULTIPLE TOURS/ LOCATION	39 TOTAL = 33 IRAQ AND 6 AFGHANISTAN	2 TOTAL= 1 IRAQ AND 1 AFGHANISTAN
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ENLISTED	12695	1851
OFFICERS	12	3



UNITED STATES MARINE CORPS

HEADQUARTERS UNITED STATES MARINE CORPS
3280 RUSSELL ROAD
QUANTICO, VIRGINIA 22134-5103

IN REPLY REFER TO :

1900

MMSR

16 Apr 08

MEMORANDUM FOR ASSISTANT SECRETARY OF THE NAVY (MANPOWER & RESERVE AFFAIRS)

Subj: REVISION OF DOD INSTRUCTION (DODI) 1332.14 ENLISTED
ADMINISTRATIVE SEPARATIONS

Encl: (1) DoDI 1332.14 with comments
(2) Comments Matrix for DoD Issuances for DoDI 1332.14
(3) HQMC Departmental responses

1. HQMC has reviewed the subject directive. We recommend the following:

Paragraph E3.3.1.8.3: Recommend removal of the two year time limit. Combat stress illness may manifest itself over time. Because of stigma associated with mental health diagnoses, members may refrain from seeking help for extended periods while attempting other coping mechanisms. There appears to be no evidence-based rationale for the two year limit.

Paragraph E3.3.1.8.3: Recommend requiring the treating physician's mental health diagnosis to be corroborated by a peer or higher level mental health professional prior to being endorsed by the senior Surgeon of each Major Subordinate Command. In stating that all personality diagnoses be reviewed by a peer or higher level mental health professional and the Surgeon General of the Service, the potential to significantly impact both the administrative manpower processing of the Marine Corps and the mental health services of the Navy is great. This alternative proposal would satisfy the objectives of providing oversight over personality disorder diagnosis while minimizing the administrative burden and would still ensure that three mental health professionals would concur on each personality disorder diagnosis. If this is not acceptable, add "or Medical Officer of the Marine Corps" after the word "concerned" in the last sentence of the paragraph.

ENCLOSURE (3)

11-L-0109 VVA (USMC) 3

Subj: REVISION OF DOD INSTRUCTION (DODI) 1332.14 ENLISTED
ADMINISTRATIVE SEPARATIONS

Paragraph E3.3.1.8.6: Recommend adding "Documentation must include evidence, not only that the Service member is unable to function effectively because of a personality disorder, but that the disorder was clearly evident prior to enlistment."

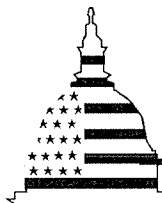
2. Point of contact is Linda Heeren at (703) 784-9323.

S. M. HANSCOM
Head, Separation and
Retirement Branch
By the direction of the
Commandant of the Marine Corps

October 2008

DEFENSE HEALTH CARE

Additional Efforts Needed to Ensure Compliance with Personality Disorder Separation Requirements



GAO

Accountability * Integrity * Reliability

ENCLOSURE (4)



Highlights of GAO-09-31, a report to congressional addressees

Why GAO Did This Study

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

What GAO Recommends

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

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

DEFENSE HEALTH CARE

Additional Efforts Needed to Ensure Compliance with Personality Disorder Separation Requirements

What GAO Found

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

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

Contents

Letter		1
	Results in Brief	7
	Background	9
	Selected Military Installations' Compliance with Three Key Personality Disorder Separation Requirements Varied	12
	DOD Does Not Have Reasonable Assurance That Its Separation Requirements Have Been Followed	16
	Enlisted Servicemembers' Selection of Protections Available During and After Separation Varied	17
	Conclusions	19
	Recommendations for Executive Action	19
	Agency Comments and Our Evaluation	20

Appendix I	Scope and Methodology	24
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Appendix II	Comments from the Department of Defense	30
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Appendix III	GAO Contact and Staff Acknowledgments	34
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Tables		
	Table 1: Criteria to Determine Compliance from Review of Separation Packets in Enlisted Servicemembers' Personnel Records	6
	Table 2: Criteria to Determine Compliance from Review of Separation Packets in Enlisted Servicemembers' Personnel Records	28

Figures		
	Figure 1: Rate of Documented Compliance at Selected Military Installations with Requirement That Enlisted Servicemembers Be Diagnosed with a Personality Disorder by a Psychiatrist or Psychologist Who Determines That the Personality Disorder Interferes with Servicemembers' Ability to Function in the Military, for	

Separations Completed from November 1, 2001, through June 30, 2007	13
Figure 2: Rate of Documented Compliance at Selected Military Installations with Requirement That Enlisted Servicemembers Receive Formal Counseling about Their Problem with Functioning in the Military, for Separations Completed from November 1, 2001, through June 30, 2007	15

Abbreviations

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

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United States Government Accountability Office
Washington, DC 20548

October 31, 2008

Congressional Addressees

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

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

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

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

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

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

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

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

- must receive notification of their impending separation because of a personality disorder;
- must receive, prior to the notification, a diagnosis of personality disorder by a psychiatrist or psychologist⁶ who determines that the personality disorder interferes with servicemembers' ability to function in the military; and
- must receive formal counseling about their problem with functioning in the military.⁷

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

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

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

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

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

To determine the extent to which selected military installations⁹ complied with DOD's personality disorder separation requirements, we reviewed DOD and the military services' separation regulations and instructions to identify the key requirements for separating enlisted servicemembers because of a personality disorder. We included only enlisted servicemembers because officers generally are able to resign at any time rather than be involuntarily separated. We obtained DOD data for enlisted OEF/OIF servicemembers separated because of a personality disorder from November 1, 2001, through June 30, 2007, which we determined to be sufficiently reliable for our purposes by corroborating these data with information in the servicemembers' personnel records. We analyzed these data to determine which installations across the military services had the highest number of enlisted OEF/OIF servicemembers separated because of a personality disorder. We selected four installations to visit—Fort Carson (Army), Fort Hood (Army), Davis-Monthan Air Force Base (Air Force), and Camp Pendleton (Marine Corps)—because these installations accounted for the highest or second highest number of enlisted OEF/OIF servicemembers separated because of a personality disorder from November 1, 2001, through June 30, 2007, among their military service's

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

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

installations.^{10,11} For three of the installations we visited, we obtained and reviewed personnel records for a random sample of enlisted servicemembers whose certificates of release¹² indicated that they were separated from these installations because of a personality disorder. For the fourth installation, we obtained and reviewed personnel records for all of the enlisted servicemembers whose certificates of release indicated that they were separated from that installation because of a personality disorder. We reviewed all of these enlisted servicemembers' records because the total number of servicemembers separated from this installation was too small to draw a random, generalizable sample. Our findings based on our compliance review can be generalized to each of the four installations but cannot be generalized to the military services.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Results in Brief

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

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

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

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

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

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

Background

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

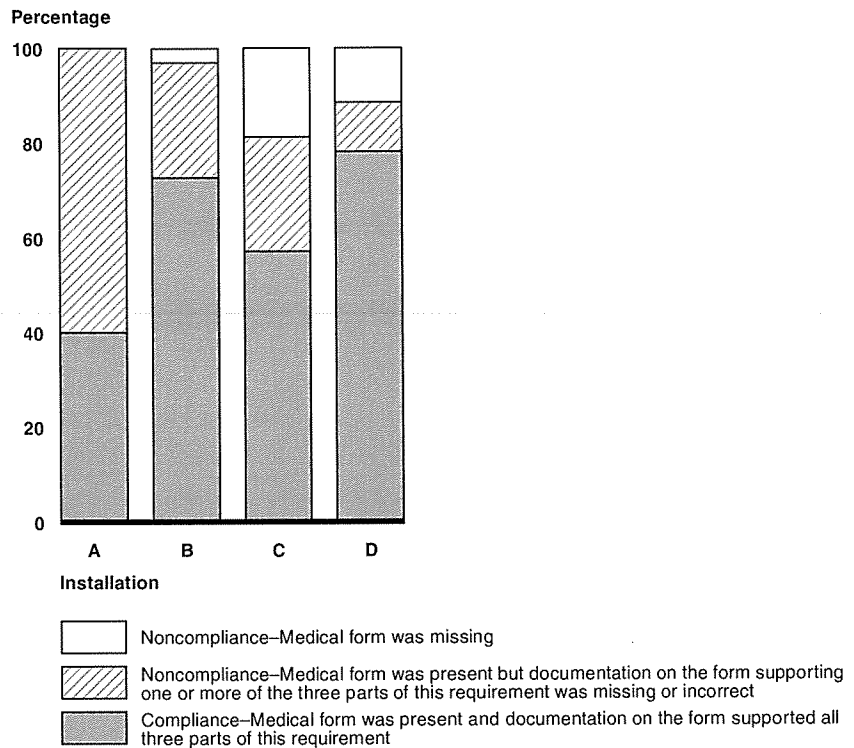
Compliance with the Notification Requirement Ranged from 98 to 100 Percent

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

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

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

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



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

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

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

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

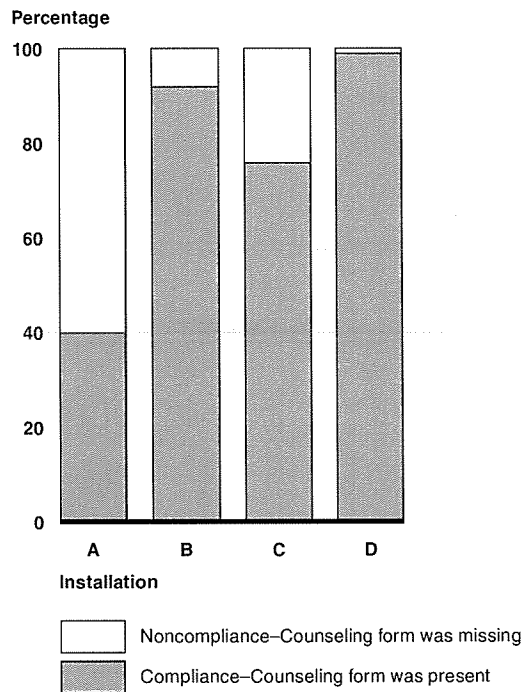
that the servicemember had been diagnosed with a personality disorder, but there was also information in the medical form indicating that the diagnosis was not made by a psychiatrist or psychologist. In some of these cases, we found that the diagnosis of a personality disorder was made by a licensed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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Conclusions

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

Recommendations for Executive Action

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

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

Agency Comments and Our Evaluation

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

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

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

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

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

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

If you or your staff have any questions about this report, please contact me at (202) 512-7114 or williamsonr@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix III.



Randall B. Williamson
Director, Health Care

List of Congressional Addressees

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

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

The Honorable Daniel K. Akaka
United States Senate

The Honorable Wayne Allard
United States Senate

The Honorable Christopher S. Bond
United States Senate

The Honorable Barbara Boxer
United States Senate

The Honorable Tom Harkin
United States Senate

The Honorable Joseph I. Lieberman
United States Senate

The Honorable Claire C. McCaskill
United States Senate

The Honorable Patty Murray
United States Senate

The Honorable Barack Obama
United States Senate

The Honorable Ken Salazar
United States Senate

The Honorable Bernard Sanders
United States Senate

Appendix I: Scope and Methodology

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

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

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

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

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

In addition to the four military installations we visited, we visited Naval Base San Diego. We selected Naval Base San Diego based on DMDC's data, which identified this naval base as having the second highest number of enlisted OEF/OIF Navy servicemembers separated because of a personality disorder from November 1, 2001, through June 30, 2007.¹ During the course of our review, Navy officials at this base told us that enlisted Navy servicemembers selected for our review were transferred to

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix II: Comments from the Department of Defense



PERSONNEL AND
READINESS

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

OCT 8 2008

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

Dear Mr. Williamson,

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

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

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

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

Sincerely,

David S. C. Chu

Enclosure:
As stated



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

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

DEPARTMENT OF DEFENSE COMMENTS

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

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

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

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

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

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

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

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

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

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

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

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

DEPARTMENT OF DEFENSE COMMENTS
TO THE RECOMMENDATIONS

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

DOD RESPONSE: Concur.

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

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

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

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

Acknowledgments

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

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DEPARTMENT OF THE NAVY

BUREAU OF MEDICINE AND SURGERY
2300 E STREET NW
WASHINGTON DC 20372-7300

IN REPLY REFER TO

6000

Ser M3/5/ E08UGEN-016191c

DEC 19 2008

MEMORANDUM FOR COMMANDER, NAVY MEDICINE EAST
COMMANDER, NAVY MEDICINE WEST
COMMANDER, NAVY MEDICINE NATIONAL CAPITAL AREA
COMMANDER, NAVY MEDICINE SUPPORT COMMAND

SUBJECT: Implementation of Enlisted Administrative Separation Policy – Personality Disorder

Ref: (a) DoD Directive 1332.14, Enlisted Administrative Separations
(b) Diagnostic and Statistical Manual of Mental Disorders (DSM) IV-TR

Encl: (1) Sample Letter

Reference (a) seeks to promote the readiness of the Department of the Navy by providing an orderly means to evaluate suitability, while at the same time safeguarding the rights and responsibilities of its service members through proper notification, diagnostic and review procedures.

This memorandum directs the implementation of reference (a) which indicates a change in the Enlisted Administrative Separation Policy for those Service Members that have served, or are currently serving, in an imminent danger pay area who may be exhibiting symptoms consistent with Personality Disorder according to reference (b). However, Navy Medicine will apply these new procedures to all enlisted members who have completed 6 months or more of active duty service.

Privileged psychiatrists and PhD-level psychologists are specifically identified as providers who may make diagnoses and participate in the mandated peer review for both voluntary and involuntary mental health evaluations where the provider recommends an administrative separation based on personality disorder. For providers without access to peer review by a privileged psychiatrist or PhD-level psychologist, support may be coordinated with the Navy Medicine Regional Command.

Reference (a) further requires Navy Surgeon General endorsement of the diagnosis of a personality disorder and recommendation for administrative separation to ensure compliance with the policy. This endorsement is hereby delegated to the Regional Commander. The procedure is as follows:

- (1) Evaluation is conducted by a privileged psychiatrist or PhD-level psychologist.
- (2) Peer review is performed by a privileged psychiatrist or PhD-level psychologist. Recommend reviewer use the following statement to concur: "Upon review of this note, I agree with the findings and recommendations."

NAVMED POLICY 08-026

ENCLOSURE (5)

11-L-0109 VVA (USMC) 44

SUBJECT: Implementation of Enlisted Administrative Separation Policy – Personality Disorder

(3) The privileged provider should forward a letter to the Regional Commander to obtain an endorsement of the diagnosis of personality disorder and recommendation for administrative separation.

(4) The Regional Commander should forward a signed endorsement letter to the Service Member's Commanding Officer for inclusion in the administrative separation package.

My point of contact for questions regarding the enclosed is CAPT Robert Koffman, MC, USN, who may be reached at (202) 762-3072 or email: Robert.Koffman@med.navy.mil.



T. R. CULLISON
Vice Chief

SAMPLE LETTER

SSIC
Ser
(Date)

From: Commander, Navy Medicine (West/East/NCA/Support Command)

To: Commanding Officer (of Member)

Subj: LETTER FOR ADMINISTRATIVE SEPARATION DUE TO PERSONALITY
DISORDER ICO (Member's Name, Rate/Rank)

1. The above member voluntarily (involuntarily) presented to the (location) for evaluation by Dr. (name), (credentials), on (date). Findings were as follows:

a. Impressions: Mental Health Evaluation determined Personality Disorder (type).

b. Recommendation(s): The member is not considered to be mentally ill (no medically boardable condition), but does manifest a long-standing disorder of character and behavior, which is of such severity as to render this individual unsuitable for continued military service. This diagnosis addresses post-traumatic stress disorder (PTSD) or other mental illness comorbidity. The member is competent. Short-term psychiatric treatment for this condition is of limited benefit, and long-term treatment is not available within the military. The member is deemed suitable to return to duty for immediate processing for (expeditious) administrative separation in accordance with NAVMILPERSMAN 1910-122 or MARCORSEPSMAN P1900.16F.

2. The aforementioned diagnosis and treatment recommendations were discussed with and understood by the member.

3. The aforementioned diagnosis and recommendations were reviewed and agreed upon by Dr. (name) in accordance with DoDI 1332.14.

4. Point of contact for this evaluation is Dr. (name) at (phone number).

(Signature Block)

Copy to:
As appropriate

ENCLOSURE (5)

11-L-0109 VVA (USMC) 46



PERSONNEL AND
READINESS

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

JAN 14 2009

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS

SUBJECT: Request for Compliance Report on Personality Disorder (PD) Separations

Recently the Government Accountability Office released a report titled, *Additional Efforts Needed to Ensure Compliance with Personality Disorder Separation Requirements* (attached), which found that the Military Departments were not wholly compliant with DoD personality disorder separation guidance contained in DoD Instruction 1332.14, *Enlisted Administrative Separations*. The Department endorsed the subsequent recommendation that DoD review compliance on a regular basis.

As a result, the Military Departments are hereby directed to provide a report on compliance with DoD PD separation guidance contained in DoDI 1332.14 for PD separations during fiscal year (FY) 2008 and FY2009. The report on FY08 PD separations is due by June 30, 2009 and the FY09 PD report is due by March 31, 2010.

The report provided shall be based, at a minimum, on a random sampling of at least 10 percent of all PD separations for your respective Military Department for the designated FY. Each case file sampled shall be checked for compliance with the DoD requirements listed in the attached document titled, "DoD Personality Disorder Separation Requirements." Additionally, the report shall include the total number of PD separations for the applicable FY and the total number of PD separations that were of Service members who had served in imminent danger pay areas since September 11, 2001.

If a Military Department finds that compliance with any DoD PD separation requirement is less than 90 percent, then the report shall also contain the Military Department's plan for correcting compliance deficiencies.

If you should have any questions regarding this matter, please contact my action officer, Lt Col Scott Brady, at 703-697-4959 or scott.brady@osd.mil.

David S. C. Chu

Attachments:
As stated

cc:
ASA(M&RA)
ASN(M&RA)
SAF(MR)

ENCLOSURE (6)

11-L-0109 VVA (USMC) 47

DoD Personality Disorder (PD) Separation Requirements

All references listed refer to DoD Instruction 1332.14, *Enlisted Administrative Separations*, August 28, 2008.

- Member received formal counseling and was afforded adequate opportunity to improve his or her behavior prior to being separated on the basis of PD (Ref: Paragraph 3.a.(8)(a)).
- Member's PD diagnosis was made by a psychiatrist or Ph.D.-level psychologist (Ref: Paragraph 3.a.(8)(c)).
- The PD diagnosis included a statement or judgment from the psychiatrist or Ph.D.-level psychologist that the Service member's disorder was so severe that the member's ability to function effectively in the military environment was significantly impaired. (Ref: Paragraph 3.a.(8)(c)).
- Member received written notification of his or her impending separation based on PD diagnoses (Ref: Paragraph 3.a.(8)(f) and Enclosure 6, paragraph 2.a)
- Member was advised that that the diagnosis of a personality disorder does not qualify as a disability (ref: Paragraph 3.a.(8)(a)) – **(only required for PD separations after August 28, 2008)**.
- For Service members separated on the basis of PD who served in imminent danger pay areas (**only required for PD separations after August 28, 2008**).
 - Member's PD diagnosis was corroborated by a peer psychiatrist or Ph.D.-level psychologist or higher level mental health professional (Ref: paragraph 3.a.(8)(c)).
 - Member's PD diagnosis addressed PTSD or other mental illness co-morbidity (Ref: paragraph 3.a.(8)(c)). (NOTE: According to paragraph 3.a.(8)(d), unless found fit for duty by the disability evaluation system, a separation for PD is not authorized if service-related PTSD is also diagnosed.)
 - Member's PD diagnosis was endorsed by The Surgeon General of the Military Department concerned prior to discharge (Ref: Paragraph 3.a.(8)(c))

ENCLOSURE (6)

11-L-0109 VVA (USMC) 48



DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
3280 RUSSELL ROAD
QUANTICO, VIRGINIA 22134-5103

14 JAN 22 2009

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE

SUBJECT: Request for Compliance Report on Personality Disorder
(PD) Separations

Per USD Memo dated January 14, 2009, a detailed report on FY08 PD separation compliance for the Marine Corps is attached. In FY08, 409 Marines were separated for personality disorder (PD) and 60 had served in an imminent danger pay area since September 11, 2001.

The Marine Corps achieved 90% compliance of only item 5. Items 2,3,6,7, and 8 are medical requirements and the Marine Corps defers further comments on these items to the Bureau of Medicine and Surgery (BUMED). For those sample separations occurring after August 28, 2008, items 6, 7, and 8, it should be noted that the BUMED memorandum, *Implementation of Enlisted Administrative Separation Policy-Personality Disorder* (attached), was not issued until December 19, 2008.

To correct these compliance deficiencies, the Marine Corps will further educate all commands of the requirements for PD separations emphasizing the changes in DoDI 1332.14 dated August 28, 2008. A checklist of these new requirements will be a component of PD separation documentation and the General Court Martial Convening Authority will certify in their endorsement that the requirements of DoDI 1332.14 have been met.

Point of contact is Mrs. Laurie Bennett at 703-784-9322 or laurie.bennett@usmc.mil.

S. M. Hanscom
Head, Separation and Retirement
Branch
Headquarters, U.S. Marine Corps
By direction of the Commandant of
the Marine Corps

Attachments:
As stated

ENCLOSURE (7)

11-L-0109 VVA (USMC) 49

USMC FY08 PERSONALITY DISORDER DISCHARGE STATISTICS

409 PERSONALITY DISORDER DISCHARGES TOTAL in FY08
60 OF 409 MARINES SERVED IN IMMINENT DANGER PAY AREAS
10% OR 41 PERSONALITY DISORDER DISCHARGES WERE EXAMINED
6 OF 41 MARINES WERE DISCHARGED AFTER 28 AUG 2008

PERCENTAGES OF COMPLIANCE

BLACK=Determined by HQMC

RED=Determined by Health Services/BUMED

ITEM# DOD PERSONALITY DISORDER (PD) SEPARATION REQUIREMENTS

- 1 Member received formal counseling and was afforded adequate opportunity to improve his or her behavior prior to being separated.

80% compliant 20% information unavailable in records

- 2 Member's PD diagnosis was made by a psychiatrist or Ph.D.-level psychologist.

83% compliant 17% not compliant

- 3 PD diagnosis included a psychiatrist or Ph.D. level psychologist's statement or judgement that SNM's disorder was so severe it impaired SNM's ability to function in military environment.

71% compliant 21% not compliant 2% information unavailable in records

- 4 Member received written notification of his or her impending separation based on PD diagnosis.

88% compliant 12% information unavailable in records

- 5 Member was advised that PD diagnosis does not qualify as a disability. Only required for PD separations after August 28, 2008.

90% compliant 10% not compliant

SERVED IN IMMINENT DANGER PAY AREAS AFTER 28 AUGUST 2008

- 6 Member's PD diagnosis was corroborated by a peer psychiatrist or Ph.D. level psychologist or mental health professional.

33% compliant 50% not compliant 17% information unavailable in records

- 7 Member's PD diagnosis addressed PTSD and other mental illness co-morbidity.

50% compliant 33% not compliant 17% information unavailable in records

- 8 Member's PD diagnosis was endorsed by the Surgeon General of the Military Department prior to discharge.

0% compliant 83% not compliant 17% information unavailable in records

ENCLOSURE (7)

DOD PERSONALITY DISORDERS COMPLIANCE CHECKLIST FY08

NAME	SEP DATE	ITEM #1	ITEM #2	ITEM #3	ITEM #4	ITEM #5
ALLEN, DAVID, J	080514	c	a	b	a	d
ALLINGHAM, DEVIN, R	080227	a	b	b	a	d
ARMKNECHT, KEVIN, M	080324	a	a	a	a	d
BAUGHMAN, MICHAEL P	071005	a	b	b	c	d
BEENE, MICHAEL, Z	080814	a	a	a	c	d
BOUDREAUX JR, SHANE, P	080729	c	a	a	c	d
CHASE, JEFFREY, M	080606	c	a	a	c	d
COOPERSMITH, BRANDON	080826	a	a	a	a	d
DELUNA, MICHAEL, S	071119	a	a	a	a	d
DIAL, CHRISTOPHER, W	071214	a	a	a	a	d
FARRAR, EMMANUEL, L	080617	c	a	b	a	d
GAMEZ, GILBERTO	080429	c	a	a	c	d
GARCIA III, ENRIQUE, I	080115	a	a	a	a	d
GARNICA, ADAM, L	080221	a	a	a	a	d
GARZA JR, ROMEO	080721	a	a	b	a	d
GOODWIN, MATTHEW, H	071214	a	a	a	a	d
HALL, WILLIAM, J	080428	a	b	b	a	d
HEATHERTON, ADAM, S	080410	c	a	a	a	d
HOLLEY JR, DOUGLAS, A	071016	c	a	b	a	d
HUNTER, ROBERT, A	080820	c	a	a	a	d
JOHNSON, MATTHEW, L	080611	a	a	a	a	d
JONES, JESSE, L	080411	a	b	b	a	d
KEHRET, JOSHUA, A	080105	a	a	a	a	d
KOVAR, AARON, E	071228	a	a	a	a	d
LEE, MICHAEL, Y	080221	a	a	b	a	d
LOFTUS, MICHAEL, G	071016	a	a	a	a	d
MCNALLY, COLIN, L	080529	a	b	b	a	d
OVERHOLT, KEITH, M	071003	a	b	b	a	d
PAKULAK, ALEX, J	080814	a	a	a	a	d
PARK, ROBERT, J	080213	a	a	a	a	d
ROCHA JR, FRANK	080201	a	a	a	a	d

a=Yes
b=No
c=N/A
d=N/A

ENCLOSURE (7)

SEWARD, AMBER, M	080415	a	a	a	a	a	a	a	a	d
SHAW, KIMBERLY, A	071221	a	a	a	a	a	a	a	a	d
THORNTON, GERALD, D	080603	a	a	a	a	a	a	a	a	d
YOUNG, GREGORY, A	080606	a	a	a	a	a	a	a	a	d

TOTAL YES 27 29 24 30 30 35
TOTAL NO 0 6 11 0 0 0
TOTAL NO INFO AVAIL 8 0 0 5 5 0
TOTAL NOT APPLICABLE 0 0 0 0 0 0

SERVED IN IMMINENT DANGER PAY AREA AND DISCHARGED AFTER 28 AUG 08

NAME	SEP DATE	ITEM #1	ITEM #2	ITEM #3	ITEM #4	ITEM #5	ITEM #6	ITEM #7	ITEM #8
CUI, MICHAEL, X	080912	a	b	c	a	a	b	b	b
EVANS, HENRY, M	080928	a	a	a	a	c	a	a	b
FINNEY, JOSHUA, A	080914	a	a	a	a	a	a	a	b
HARDWICK JR, DONALD, J	080911	a	a	a	a	c	b	b	b
KEIFFER, JOHN, W	080923	a	a	a	a	c	c	c	c
KOLB, MICHAEL, A	080910	a	a	a	a	c	b	a	b

TOTAL YES 6 5 5 6 2 2 2 3 3
TOTAL NO 0 1 0 0 0 0 0 3 2
TOTAL NO INFO AVAIL 0 0 1 0 0 0 4 1 1
TOTAL NOT APPLICABLE 0 0 0 0 0 0 0 0 0

ACTUAL TOTAL YES/PERCENTAGE	33 / 80%	34 / 83%	29 / 71%	36 / 88%	37 / 90%	2 / 33%	3 / 50%	3 / 50%	0
ACTUAL TOTAL NO/PERCENTAGE	0 / 7 / 17%	11 / 27%	0	0	0	0	2 / 33%	2 / 33%	5 / 83%
TOTAL NO INFO AVAIL/PERCENTAGE	8 / 20%	0	0	5 / 12%	4 / 10%	1 / 17%	1 / 17%	1 / 17%	1 / 17%
TOTAL NOT APPLIC/PERCENTAGE	0	0	0	0	0	0	0	0	0

ENCLOSURE (7)

COMPLIANCE WITH PERSONALITY DISORDER SEPARATION REQUIREMENTS

Date Signed: 7/21/2009

MARADMIN Active Number: 0432/09

R 210931Z JUL 09

UNCLASSIFIED//

MARADMIN 0432/09

MSGID/GENADMIN,USMTF,2007/CMC WASHINGTON DC MRA MM//

SUBJ/COMPLIANCE WITH PERSONALITY DISORDER SEPARATION REQUIREMENTS//

REF/A/MSGID:MEMO/DOD/14JAN2009//

REF/B/MSGID:DOC/DOD/28AUG2008//

REF/C/MSGID:DOC/MMSR/06JUN2007//

REF/D/MSGID:MEMO/BUMED/19DEC2008//

NARR/REF A IS A REQUEST FOR COMPLIANCE REPORT ON PERSONALITY DISORDER (PD) SEPARATIONS. REF B, DODI 1332.14, IS ENLISTED ADMINISTRATIVE SEPARATIONS. REF C, MCO 1900.16F, IS THE MARINE CORPS SEPARATION AND RETIREMENT MANUAL. REF D IS THE IMPLEMENTATION OF ENLISTED ADMINISTRATIVE SEPARATION POLICY-PERSONALITY DISORDER// POC/L. A. BENNETT/CIV/UNIT:MMSR/-/TEL:DSN 278-9322/TEL:(703) 784-9322 /EMAIL:LURIE.BENNETT@USMC.MIL// POC/L. HEEREN/CIV/UNIT:MMSR/-/TEL:DSN 278-9322 /TEL:(703) 784-9322 /EMAIL:LINDA.HEEREN@USMC.MIL// GENTEXT/REMARKS/1. THIS MARADMIN CLARIFIES THE REQUIREMENTS FOR DISCHARGING MARINES FOR PERSONALITY DISORDER.

2. GENERAL. PER REF A, THE UNDERSECRETARY OF DEFENSE DIRECTED THE MILITARY DEPARTMENTS TO PROVIDE ANNUAL REPORTS ON COMPLIANCE WITH THE DEPARTMENT OF DEFENSE PERSONALITY DISORDER (PD) SEPARATION REQUIREMENTS CONTAINED IN REF B PARA 3.A(8).
3. BACKGROUND. THIS MARADMIN ADDRESSES DOD SPECIFIC PD SEPARATION REQUIREMENTS OUTLINED IN REFS B AND C.
4. PD SEPARATION REQUIREMENTS ARE AS FOLLOWS:
 - A. DIAGNOSIS MUST BE MADE BY A PSYCHIATRIST OR PH.D.-LEVEL PSYCHOLOGIST.
 - B. DIAGNOSIS MUST INCLUDE A STATEMENT OR JUDGEMENT FROM THE PSYCHIATRIST OR PH.D.-LEVEL PSYCHOLOGIST THAT THE MARINE'S DISORDER IS SO SEVERE THAT THE MARINE'S ABILITY TO FUNCTION EFFECTIVELY IN THE MILITARY ENVIRONMENT IS SIGNIFICANTLY IMPAIRED.
 - C. WRITTEN NOTIFICATION OF HIS OR HER IMPENDING SEPARATION MUST BE RECEIVED BASED ON A PD DIAGNOSIS PER REF B ENCL 3 PARA 3.A(8)(F).
 - D. MARINE MUST BE ADVISED THAT THE DIAGNOSIS OF PD DOES NOT QUALIFY AS A DISABILITY.
 - E. DIAGNOSIS MUST BE CORROBORATED BY A PEER PSYCHIATRIST OR PH.D.-LEVEL PSYCHOLOGIST OR HIGHER LEVEL MENTAL HEALTH PROFESSIONAL.
 - F. DIAGNOSIS MUST ADDRESS PTSD OR OTHER MENTAL ILLNESS CO-MORBIDITY. NOTE THAT UNLESS FOUND FIT FOR DUTY BY THE DISABILITY EVALUATION SYSTEM, A SEPARATION FOR PD IS NOT AUTHORIZED IF SERVICE-RELATED PTSD IS ALSO DIAGNOSED.
 - G. DIAGNOSIS MUST BE ENDORSED BY THE REGIONAL NAVAL MEDICAL COMMANDER PER REF D.
 - H. PER REF C PAR 6105, MARINES DIAGNOSED WITH A PERSONALITY DISORDER AND RECOMMENDED FOR ADMINISTRATIVE SEPARATION MUST BE FORMALLY COUNSELED ON THEIR DEFICIENCIES AND AFFORDED AN OPPORTUNITY TO CORRECT THESE DEFICIENCIES BEFORE SEPARATION PROCESSING IS INITIATED. THE OPPORTUNITY TO CORRECT DEFICIENCIES NEED NOT EXTEND FOR A PROTRACTED OBSERVATION PERIOD. AT ANY TIME AFTER FORMAL COUNSELING, MARINES REPEATING OR CONTINUING BEHAVIORS THAT INTERFERE WITH THE PERFORMANCE OF THEIR DUTIES OR DISRUPT THE GOOD ORDER AND DISCIPLINE OF THEIR UNIT, MAY BE PROCESSED FOR ADMINISTRATIVE SEPARATION.
 - I. SEPARATION SOLELY FOR PD WARRANTS RE-CODE 3P.
5. CONFIRMATION OF COMPLIANCE WITH THE REQUIREMENTS IN PARAGRAPH 4 WILL BE INCLUDED IN THE GCMCA ENDORSEMENT AUTHORIZING SEPARATIONS FOR PD.
6. THE NEXT CHANGE TO REF C WILL ADDRESS THE NEW REQUIREMENTS IN REF B.
7. COMMANDERS SHOULD BE PREPARED TO SUBMIT ANNUAL REPORTS ON PD SEPARATIONS ADDRESSING COMPLIANCE WITH PARAGRAPH 4.
8. RELEASE AUTHORIZED BY MR. C. F. SWAIN, DIRECTOR, MANPOWER MANAGEMENT DIVISION (ACTING).//

ENCLOSURE (8)

11-L-0109 VVA (USMC) 53



DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
3280 RUSSELL ROAD
QUANTICO, VIRGINIA 22134-5103

MAR 19 2010

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE

SUBJECT: Request for Compliance Report on Personality Disorder
(PD) Separations

Per USD Memo dated January 14, 2009, a detailed report on FY09 PD separation compliance for the Marine Corps, *USMC FY09 PD Discharge Statistics*, is attached. In FY09, 339 Marines were separated for personality disorder (PD) and 39 had served in an imminent danger pay area.

The Marine Corps achieved 90% or above for one item, item 4, with 100% compliance. Items 2,3,6,7, and 8 are medical requirements and the Marine Corps defers further comments on these items to the Bureau of Medicine and Surgery (BUMED).

On July 21, 2009, approximately 2 months before the end of FY09, a MARADMIN was released clarifying the requirements for discharging Marines with PD. Improvements are expected in FY10 once units have had more time to comply with the new prerequisites. To further address compliance deficiencies, the Marine Corps will reinforce requirements for PD separations to all commands at the yearly G-1 and Judge Advocate Conferences.

If you have any questions regarding this matter, please contact Mrs. Laurie Bennett at 703-784-9322 or laurie.bennett@usmc.mil.

S. M. Hanscom
Head, Separation and
Retirement Branch
Headquarters, U.S. Marine Corps
By direction of the Commandant of
the Marine Corps

Attachments:
As stated

ENCLOSURE (9)

11-L-0109 VVA (USMC) 54

USMC FY09 PERSONALITY DISORDER DISCHARGE STATISTICS

339 PERSONALITY DISORDER DISCHARGES TOTAL in FY09
39 OF 339 MARINES SERVED IN IMMINENT DANGER PAY AREAS
10% OR 34 PERSONALITY DISORDER DISCHARGES WERE EXAMINED
2 of 34 THOSE MARINES SERVED IN IMMINENT DANGER PAY AREAS

PERCENTAGES OF COMPLIANCE

BLACK=Determined by HQMC

RED=Determined by Health Services/BUMED

ITEM# DOD PERSONALITY DISORDER (PD) SEPARATION REQUIREMENTS

- 1 Member received formal counseling and was afforded adequate opportunity to improve his or her behavior prior to being separated.

85% compliant 15% information unavailable in records

- 2 Member's PD diagnosis was made by a psychiatrist or Ph.D.-level psychologist.

85% compliant 15% not compliant

- 3 PD diagnosis included a psychiatrist or Ph.D. level psychologist's statement or judgement that SNM's disorder was so severe it impaired SNM's ability to function in military environment.

79% compliant 21% not compliant

- 4 Member received written notification of his or her impending separation based on PD diagnosis.

100% compliant

- 5 Member was advised that PD diagnosis does not qualify as a disability. Only required for PD separations after August 28, 2008.

24% compliant 76% information unavailable in records

- 6 Member's PD diagnosis was corroborated by a peer psychiatrist or Ph.D. level psychologist or mental health professional.

56% compliant 44% not compliant

- 7 Member's PD diagnosis addressed PTSD and other mental illness co-morbidity.

79% compliant 21% not compliant

- 8 Member's PD diagnosis was endorsed by the Surgeon General of the Military Department prior to discharge.

0% compliant 100% not compliant

ENCLOSURE (9)

11-L-0109 VVA (USMC) 55

RE PD report-Col brady
From: Brady, Scott COL OSD PR [Scott.Brady@osd.mil]
Sent: Wednesday, June 16, 2010 11:01 AM
To: Bennett CIV Laurie A
Cc: Gunderson, Andrew J LTCOL ASN(M&RA), MPP
Subject: RE: PD report

Thanks Laurie...

Gundy: FYI. I noticed an error on the USMC submission for the FY09 Personality Disorder Separations Report which Linda Bennett has cleared up. I'll be using her revised numbers (which are more positive than what was reported) in the final report to USD(P&R).

J. SCOTT BRADY, Colonel, USAF
Assistant Director, Assignment & Separation Policy OUSD(P&R)/DUSD/MPP/OEPM Pentagon
3C1063
(703) 697-4959 DSN (227)
scott.brady@osd.mil

-----Original Message-----

From: Bennett CIV Laurie A [mailto:laurie.bennett@usmc.mil]
Sent: Wednesday, June 16, 2010 10:50 AM
To: Brady, Scott COL OSD PR
Cc: Heeren CIV Linda
Subject: PD report

Sir,
I apologize for the error. The changes are as follows:
Item#6 100% compliant
Item #7 100% compliant
Item #8 0% compliant

Respectfully,
Laurie Bennett
Assistant Head,
Separations Section
MMSR-3

Headquarters Marine Corps
703-784-9323, DSN 278-9323

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27 May 2010

INFORMATION PAPER

Subject: PERSONALITY DISORDER DISCHARGES

1. Purpose. To provide CJCS information in response to the RFI regarding USMC handling of personality disorder discharges. **The Bottom Line - USMC is not 100% compliant with Congressional Statutes and the DoD Instruction on Personality Disorder Separations.**

2. Key Points

- The USMC has published policy in the MARCORSEPMANUAL and by MARADMIN that comply with Title 10 and the DoDI.
- New DoDI guidance for personality disorder discharges was published 28 August 2008. Not surprisingly, FY08 separations would not be in compliance with a directive published so late in the fiscal year.
- The Department of the Navy Bureau of Medicine and Surgery (BUMED) published guidance required by the DoDI on 19 December 2008 which was not fully implemented at Marine Corps locations until well into FY09.
- Not satisfied with the efforts of commands and medical authorities, on 21 July 2009 the Marine Corps again published the requirements for personality disorder discharges.
- In FY 09 the Marine Corps was 100% compliant in providing written notification to the Marine of the impending separation based on personality disorder diagnosis.
- In FY09 the Marine Corps was 85% compliant in providing the Marine formal counseling and affording adequate opportunity to improve behavior prior to being separated for personality disorder. This information was missing in 15% of the records reviewed.

ENCLOSURE (10)

11-L-0109 VVA (USMC) 57

Subject: PERSONALITY DISORDER DISCHARGES

- In FY09 the Marine Corps was 24% compliant for advising the Marine that personality disorder diagnosis does not qualify as a disability. This information was missing in 76% of the records reviewed.
- The remaining areas indicated as deficient in the presentation are under the cognizance of BUMED.
- The Marine Corps expects improved compliance in FY10 as BUMED and commanders are more familiar with these requirements.

Prepared by: Mr. Steve Hanscom, Head, MMSR, DSN 278-9304

ENCLOSURE (10)

11-L-0109 VVA (USMC) 58

REQUIREMENTS FOR MEDICAL EVALUATION OF MARINES BEFORE INVOLUNTARY ADMINISTRATIVE SEPARATION

Date Signed: 6/10/2010

MARADMIN Active Number: 328/10

R 091030Z Jun 10

UNCLASSIFIED//

MARADMIN 328/10

MSGID/GENADMIN/CMC WASHINGTON DC MRA MM//

SUBJ/REQUIREMENTS FOR MEDICAL EVALUATION OF MARINES BEFORE INVOLUNTARY ADMINISTRATIVE SEPARATION//

REF/A/MSGID:DOC/MCO P1900.16F /-//

REF/B/MSGID:DOC/NAVMED P-117, CHAPTER 15/-//

REF/C/MSGID:DOC/MARADMIN 283-06 /-//

NARR/REF A IS THE MARCORSEPMAN AND GUIDANCE FOR ADMINISTRATIVE SEPARATIONS. REF B IS MANUAL OF THE MEDICAL DEPARTMENT GUIDANCE FOR MEDICAL EVALUATION. REF C PROVIDES GUIDANCE ON DEPLOYMENT AND POST DEPLOYMENT HEALTH ASSESSMENTS.//

POC/L. A. BENNETT /-/-/TEL:DSN 278-9322/TEL:(703) 784-9322//

POC/L. HEEREN/-/-/TEL:DSN 278-9323/TEL:(703) 784-9323//

POC/GARY RICHARDSON /MR/-/-/TEL:DSN 278-9309/TEL:(703) 784-9309//

POC/R. ADAMS /CAPT/-/-/TEL:DSN 278-9308/TEL:COMM (703) 784-9308//

GENTEXT/REMARKS/1. THIS MARADMIN SUMMARIZES COMMAND REQUIREMENTS BEFORE INVOLUNTARY ADMINISTRATIVE SEPARATION OF MARINES AND COMPLIES WITH NDAA FY10 SECTION 512 FOR CASES INVOLVING POST-TRAUMATIC STRESS DISORDER (PTSD) AND TRAUMATIC BRAIN INJURY (TBI).

2. GENERAL. THE MARINE CORPS REMAINS FULLY COMMITTED TO THE COMPREHENSIVE CARE AND TREATMENT OF OUR WOUNDED, ILL AND INJURED WARRIORS WHO ARE EXPECTED TO MAINTAIN THE SAME HIGH STANDARDS OF GOOD ORDER AND DISCIPLINE THAT THE NATION EXPECTS OF ALL MARINES, REGARDLESS OF THEIR MEDICAL STATUS. ALL LEADERS, COMMANDERS AND GENERAL COURT MARTIAL CONVENING AUTHORITIES (GCMCA) PLAY CRUCIAL ROLES THAT BALANCE THE WELFARE OF THE INDIVIDUAL MARINE WITH GOOD ORDER, DISCIPLINE AND MISSION ACCOMPLISHMENT.

3. PRIOR TO APPROVING ANY INVOLUNTARY ADMINISTRATIVE SEPARATION INITIATED UNDER THE PROVISIONS OF REFERENCE A FOR MARINES WITH MORE THAN 180 DAYS OF ACTIVE DUTY, THE SEPARATION AUTHORITY MUST ENSURE THAT A MEDICAL EVALUATION OF THE MARINE IS PERFORMED PER REFERENCES B AND C AND MUST REVIEW THE RESULTS OF THAT EVALUATION. THESE MEDICAL EVALUATIONS SHALL BE COMPLETED BY MEDICAL PROVIDERS AUTHORIZED TO PERFORM SEPARATION EVALUATIONS AND SHALL BE SUFFICIENT IN SCOPE AND TIMING TO MEET SEPARATION MEDICAL REQUIREMENTS. THE INTENT OF PERFORMING THESE EVALUATIONS IS TO ENSURE THAT SEPARATION AUTHORITIES HAVE ALL PERTINENT INFORMATION ABOUT ANY MEDICAL CONDITIONS THAT MAY HAVE A MATERIAL IMPACT ON A MARINES BEHAVIOR, ESPECIALLY ANY MARINE WHO HAS OR REASONABLY ALLEGES TO HAVE A TRAUMATIC BRAIN INJURY OR POST TRAUMATIC STRESS DISORDER. INHERENT IN ANY SEPARATION ACTION IS THAT AUTHORITY'S DISCRETION TO DIRECT ADDITIONAL MEDICAL TREATMENT AND DETERMINE THE DATE OF SEPARATION OR DIRECT RETENTION AS APPROPRIATE.

4. THE SEPARATION AUTHORITY FOR ENTRY LEVEL MARINES OR SELECTED MARINE CORPS RESERVE (SMCR) MARINES WITH NO HISTORY OF COMBAT SERVICE OR DEPLOYMENT WILL BE EXEMPT FROM REVIEWING THE FINAL MEDICAL EVALUATION; HOWEVER, THE COMMANDER INITIATING SEPARATION WILL BE REQUIRED TO CERTIFY THAT THESE MARINES HAD NO COMBAT SERVICE OR DEPLOYMENT AND WERE NOT DIAGNOSED WITH PTSD OR TBI. THE FINAL MEDICAL EVALUATION WILL ALSO BE EXEMPTED IN INSTANCES WHERE SMCR MARINES HAVE A HISTORY OF COMBAT SERVICE OR DEPLOYMENT, ARE UNDERGOING ADMINISTRATIVE SEPARATION PROCEEDINGS AND DO NOT RESPOND TO NOTIFICATION AND OTHER REQUIREMENTS FOR ADMINISTRATIVE SEPARATION.

5. MEDICAL PROVIDERS PERFORMING THESE EVALUATIONS SHALL ENSURE MARINES

ENCLOSURE (11)

11-L-0109 VVA (USMC) 59

DIAGNOSED WITH OR WHO HAVE CONCERNING SYMPTOMS OF PTSD OR TBI WILL BE FURTHER EVALUATED BY APPROPRIATELY PRIVILEGED PHYSICIANS OR OTHER LICENSED MEDICAL PROFESSIONALS SUCH AS A CLINICAL PSYCHOLOGIST OR PSYCHIATRIST. PTSD AND TBI EVALUATIONS MUST SPECIFICALLY INCLUDE COMMENTS ON THE PRESENCE OR ABSENCE OF THESE CONDITIONS AND, IF PRESENT, THE EXTENT TO WHICH THEY AFFECTED THE MARINE'S JUDGMENT AND MAY HAVE BEEN A CONTRIBUTING FACTOR IN THE BASIS FOR SEPARATION. FOR THOSE CASES IN WHICH THE SERVICE CHARACTERIZATION IS DETERMINED TO BE GENERAL UNDER HONORABLE OR OTHER THAN HONORABLE, THE GCMCA'S SEPARATION ENDORSEMENT SHALL, IN LIGHT OF AN IDENTIFIED PTSD OR TBI CONTRIBUTING FACTOR, EXPLAIN THE REASONS FOR THE RESPONDENT'S SEPARATION AND THE CHARACTERIZATION OF SERVICE.

6. IF THE MEDICAL EVALUATION RESULTS IN A DIAGNOSIS OF PTSD OR TBI AND THE SEPARATION AUTHORITY DETERMINES IT IS SERVICE RELATED, SUFFICIENTLY MITIGATING, AND AMOUNTS TO A SIGNIFICANT DISABILITY, THE SEPARATION AUTHORITY SHOULD CONSIDER PROCESSING FOR SEPARATION UNDER CHAPTER EIGHT OF REFERENCE A FOR PHYSICAL DISABILITY. THESE PROCEDURES CONSTITUTE A CHANGE TO PARAGRAPH 8508 OF REFERENCE A.

7. MARINES SEPARATED UNDER THESE PROVISIONS SHALL BE DIRECTED TO CONSULT WITH A REPRESENTATIVE FROM THE DEPARTMENT OF VETERAN AFFAIRS REGARDING VETERAN BENEFITS AND SERVICES PRIOR TO SEPARATION WITH THAT COUNSELLING DATED AND SIGNED IN BLOCK 17 OF DD FORM 2648, PRESEPARATION COUNSELING CHECKLIST.

8. THIS POLICY DOES NOT PROVIDE AN ADDITIONAL PROCEDURAL BASIS OF APPEAL OR REDRESS FOR RESPONDENTS. THE MEDICAL EXAMINATION PROCEDURES REQUIRED IN THIS MARADMIN DO NOT APPLY TO COURT-MARTIAL OR OTHER PROCEEDINGS CONDUCTED PURSUANT TO THE UNIFORM CODE OF MILITARY JUSTICE

9. THE NEXT CHANGE TO REF A WILL INCLUDE THESE REQUIREMENTS.

10. RELEASE AUTHORIZED BY MAJGEN A. SALINAS, DIRECTOR, MANPOWER MANAGEMENT DIVISION.//

ENCLOSURE (11)

11-L-0109 VVA (USMC) 60



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

SEP 10 2010

PERSONNEL AND
READINESS

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS

SUBJECT: Continued Compliance Reporting on Personality Disorder (PD) Separations

Reference: USD (P&R) Memorandum, dated January 14, 2009

In October 2008, the Government Accountability Office released a report titled, *Additional Efforts Needed to Ensure Compliance with Personality Disorder Separation Requirements*, which found that the Military Departments were not wholly compliant with DoD personality disorder separation guidance contained in DoD Instruction 1332.14, *Enlisted Administrative Separations*. The Department endorsed the subsequent recommendation that DoD review compliance on a regular basis.

In January 2009, the Military Departments were directed (reference) to provide a report on compliance with DoD PD separation guidance contained in DoDI 1332.14 for PD separations during fiscal year (FY) 2008 and FY2009. While improvement has occurred, it is clear that compliance reporting should continue through FY2012. Your report is due by March 31 of the year following the close of the FY.

The report provided shall be based, at a minimum, on a random sampling of at least 10 percent of all PD separations for your respective Military Department for the designated FY. Each case file sampled shall be checked for compliance with the DoD requirements listed in the attached document titled, "DoD Personality Disorder Separation Requirements." Additionally, the report shall include the total number of PD separations for the applicable FY and the total number of PD separations of Service members who had served in imminent danger pay areas since September 11, 2001.

If a Military Department finds that compliance with any DoD PD separation requirement is less than 90 percent, then the report shall also contain the Military Department's plan for correcting compliance deficiencies.

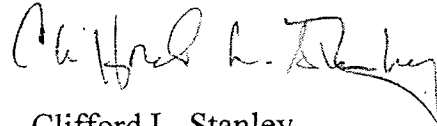
We owe special care to those Service members who have deployed in support of a contingency operation since September 11, 2001, and were later administratively separated for a personality disorder, regardless of years of service, without completing the enhanced screening requirements for Post-Traumatic Stress Disorder (PTSD) and Traumatic Brain Injury (TBI). Our knowledge in these areas has evolved significantly and we need to make every effort to ensure our veterans are advantaged by the latest medical knowledge in this area.

ENCLOSURE (12)

11-L-0109 VVA (USMC) 61

Accordingly, I am directing that your FY2010 Compliance Report on Personality Disorder Separations include actions taken to: 1) identify these discharged Service members; 2) inform them of the correction of discharge characterization process; 3) inform them on how to obtain a mental health assessment through the Department of Veterans Affairs; and 4) identify these individuals to the Department of Veterans Affairs

If you should have any questions regarding this matter, please contact my action officer, Michael Pachuta, at (703) 695-6461 or michael.pachuta@osd.mil.



Clifford L. Stanley

Attachment:

As stated

cc:

ASA(M&RA)

ASN(M&RA)

SAF(MR

ENCLOSURE (12)

11-L-0109 VVA (USMC) 62

DoD Personality Disorder (PD) Separation Requirements

All references listed refer to DoD Instruction 1332.14, *Enlisted Administrative Separations*, August 28, 2008.

- Member received formal counseling and was afforded adequate opportunity to improve his or her behavior prior to being separated on the basis of PD (Ref: Paragraph 3.a.(8)(a)).
- Member's PD diagnosis was made by a psychiatrist or Ph.D.-level psychologist (Ref: Paragraph 3.a.(8)(c)).
- The PD diagnosis included a statement or judgment from the psychiatrist or Ph.D.-level psychologist that the Service member's disorder was so severe that the member's ability to function effectively in the military environment was significantly impaired (Ref: Paragraph 3.a.(8)(c)).
- Member received written notification of his or her impending separation based on PD diagnoses (Ref: Paragraph 3.a.(8)(f) and Enclosure 6, Paragraph 2.a).
- Member was advised that the diagnosis of a personality disorder does not qualify as a disability (ref: Paragraph 3.a.(8)(a)) – **(only required for PD separations after August 28, 2008)**.
- For Service members separated on the basis of PD who served in imminent danger pay areas **(only required for PD separations after August 28, 2008)**.
 - Member's PD diagnosis was corroborated by a peer psychiatrist or Ph.D.-level psychologist or higher level mental health professional (Ref: Paragraph 3.a.(8)(c)).
 - Member's PD diagnosis addressed Post-Traumatic Stress Disorder (PTSD) or other mental illness co-morbidity (Ref: paragraph 3.a.(8)(c)). (NOTE: According to paragraph 3.a.(8)(d), unless found fit for duty by the disability evaluation system, a separation for PD is not authorized if Service-related PTSD is also diagnosed.)
 - Member's PD diagnosis was endorsed by The Surgeon General of the Military Department concerned prior to discharge (Ref: Paragraph 3.a.(8)(c)).

ENCLOSURE (12)

11-L-0109 VVA (USMC) 63

MCO P1900, 16F
Jun 06 2007

6203

MARINE CORPS SEPARATION AND RETIREMENT MANUAL

(3) If the PEB determines that the refusal of medical treatment was "unreasonable" or provides a finding of intentional misconduct/willful neglect, the commander may consider the following:

(a) Administrative separation for unsatisfactory performance per paragraph 6206 or misconduct per paragraph 6210.

* (b) Administrative reduction. See MCO P1400.32 series regarding nonpunitive reductions relating to professional incompetence and competency review boards.

(c) Characterization of Service. If a finding of intentional misconduct/willful neglect or other negative aspects of a Marine's performance outweigh positive aspects of performance, to include proficiency and conduct average markings, and administrative separation is warranted, the least favorable characterization of service is general under honorable conditions.

* (4) Refusing inoculations. Service members are required to submit to required immunizations according to Navy Regulations, article 1144. The medical evaluation board and PEB procedures described in paragraph 6203.2.b(1) are not required for members refusing inoculations. Disciplinary action and separation for orders violations may be appropriate based upon the commander's decision.

c. Separation processing may not be initiated until the Marine has been counseled and allowed an opportunity to correct the deficiency per paragraph 6105. If a member is separated for "unreasonable" refusal of medical treatment, the following items must be included as part of the notification requirements of paragraph 6303:

(1) A reenlistment code of RE-4, not recommended for reenlistment, will be assigned and the member will be discharged and not transferred or eligible for service in the IRR.

(2) A finding of intentional misconduct/willful neglect requires the following notifications:

(a) Assignment of separation code _____ (basis determined).

(b) The member is not disabled and the condition did not occur in the line of duty.

(c) The Department of Veteran Affairs and the Social Security Administration may deny future medical benefits for this condition.

3. Personality Disorder

a. Basis for processing. Separation under this paragraph is authorized only if, due to personality disorder, the Marine's ability to function effectively in the military environment is significantly impaired and if no other basis for separation applies. For example, if separation can be based on another basis, including another basis under Convenience of the Government, misconduct, or unsatisfactory performance, use one of those bases in spite of the existence of personality disorder. Initiate separation proceedings per paragraph 6303 or 6304 as appropriate.

b. Documentation. Two forms are required in all cases.

* (1) Medical. Separation under this paragraph is authorized only if a diagnosis by a psychiatrist or psychologist concludes, under Article 15-23 of the MANMED, that the disorder is so severe that the Marine's ability to function effectively in the military environment is significantly impaired. Personality disorders are described in Axis II of the multiaxial classification in the Diagnostic and Statistical Manual (DSM-IV) of Mental Disorders. Commanders must comply with SECNAVINST 6320.24 series and DODDIR 6409.1 series when referring a Marine to a mental health evaluation.

(2) Nonmedical. Written nonmedical evidence must be submitted to show specific examples of how the Marine is unable to function in the Marine Corps. These can be counseling entries on page 11 of the SRB or statements from witnesses.

*c. Documentation. Documentation for separation under this paragraph must include evidence not only that the Marine is unable to function effectively because of a personality disorder, but also that the disorder of personality was clearly evident prior to enlistment.

*d. Counseling. Before initiating separation, the command must have counseled the Marine in accordance with paragraph 6105; given the Marine a reasonable opportunity to correct deficiencies; and have documentation of failure to correct those deficiencies. However, counseling is not required if a psychiatrist or psychologist determines that the Marine is an imminent or potential danger to himself or others.

*4. Action in lieu of approved punitive discharge. A member may be separated if placed on appellate leave pursuant to 10 U.S.C. 706 and whose punitive discharge is set aside, suspended, remitted, or disapproved during the review process. In this case, separation processing must be based upon an applicable provision of this chapter and may proceed without the member being present. The member, however, must have been notified of the separation processing prior to beginning appellate leave, or be afforded the rights under paragraph 6303 or 6304, as appropriate, and either waives those rights or fails to respond within 30 days of receipt of notification of separation proceedings. Further, the characterization limitations of paragraph 6203 do not apply and characterization will be based upon the guidelines contained in paragraph 1004.

5. Disenrolled Involuntarily from Officer Candidate Program. A member may be separated after being involuntarily disenrolled from an officer candidate program under conditions in which the candidate did not incur, or does not have, any remaining service obligation. (For voluntary disenrollment, see paragraph 6411).

*6. Failure or Disenrollment From Lateral School Seat Assignment. A member who reenlisted under MCO 1220.5 series, Lateral Move Program, may be separated for failure to comply with an express condition of enlistment/reenlistment; e.g., after failing, or being voluntarily or involuntarily disenrolled from, an MOS school/OJT under conditions not resulting in a service obligation to the member.

6204. DEFECTIVE ENLISTMENT AND INDUCTION. Marines may be separated for the following specific reasons:

1. Minority

a. If a Marine is under age 17, the enlistment is void and the Marine shall be separated. The Marine shall receive an order of release from the

ENCLOSURE (3)
Ch 2



DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
3280 RUSSELL ROAD
QUANTICO, VIRGINIA 22134-5103

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE

SUBJECT: Request for Compliance Report on Personality Disorder
(PD) Separations

Encl: (1) DOD Personality Disorder Separation Requirements
(2) FY02-FY10 USMC PD Separation Statistics
(3) PD letter to IDP Marines

Per USD Memo dated September 10, 2010, enclosure (1), a detailed report on FY10 PD separation compliance for the Marine Corps is provided. Enclosure (2) contains FY02 through FY10 statistics. One hundred thirty-two Marines were separated for personality disorder (PD) in FY10 and 23 of those Marines had served in an imminent danger pay area. The number of Marines separated for PD from FY02 through FY10, who served in an imminent danger pay area, totaled 651, of which 467 served in Iraq or Afghanistan.

The Marine Corps achieved 100% compliance for all but one item identified by DoD. Seventy-one percent compliance was achieved for item number 5, acknowledgement that personality disorder does not qualify as a disability. To correct this compliance deficiency, the Marine Corps will direct enclosure (1) be a part of every PD separation package and require the date each action was completed. Any action not accomplished will preclude separation. Additionally, the general court martial convening authority's separation endorsement/certification and this checklist will be provided to the Commandant of the Marine Corps (MMSR-3).

Enclosure (3) has been sent to the 651 Marines who served in an imminent danger pay area from FY02 through FY10 informing them on how to obtain a mental health assessment through the Department of Veterans Affairs. The names and other relevant information about these Marines have been provided to the Department of Veteran Affairs.

Point of contact is Mrs. Laurie Bennett at 703-784-9322 or laurie.bennett@usmc.mil.

A handwritten signature in black ink, appearing to read "S M Hanscom", is written over the typed name.

S. M. Hanscom
Head, Separation and Retirement
Branch
Headquarters, U.S. Marine Corps
By direction of the Commandant of
the Marine Corps

11-L-0109 VVA (USMC) 66



SECNAV ADMIN

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

2010 SEP 13 PM 12:33

SEP 10 2010

PERSONNEL AND
READINESS

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS

SUBJECT: Continued Compliance Reporting on Personality Disorder (PD) Separations

Reference: USD (P&R) Memorandum, dated January 14, 2009

In October 2008, the Government Accountability Office released a report titled, *Additional Efforts Needed to Ensure Compliance with Personality Disorder Separation Requirements*, which found that the Military Departments were not wholly compliant with DoD personality disorder separation guidance contained in DoD Instruction 1332.14, *Enlisted Administrative Separations*. The Department endorsed the subsequent recommendation that DoD review compliance on a regular basis.

In January 2009, the Military Departments were directed (reference) to provide a report on compliance with DoD PD separation guidance contained in DoDI 1332.14 for PD separations during fiscal year (FY) 2008 and FY2009. While improvement has occurred, it is clear that compliance reporting should continue through FY2012. Your report is due by March 31 of the year following the close of the FY.

The report provided shall be based, at a minimum, on a random sampling of at least 10 percent of all PD separations for your respective Military Department for the designated FY. Each case file sampled shall be checked for compliance with the DoD requirements listed in the attached document titled, "DoD Personality Disorder Separation Requirements." Additionally, the report shall include the total number of PD separations for the applicable FY and the total number of PD separations of Service members who had served in imminent danger pay areas since September 11, 2001.

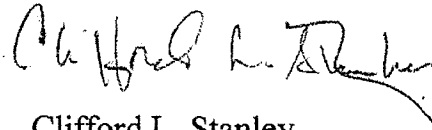
If a Military Department finds that compliance with any DoD PD separation requirement is less than 90 percent, then the report shall also contain the Military Department's plan for correcting compliance deficiencies.

We owe special care to those Service members who have deployed in support of a contingency operation since September 11, 2001, and were later administratively separated for a personality disorder, regardless of years of service, without completing the enhanced screening requirements for Post-Traumatic Stress Disorder (PTSD) and Traumatic Brain Injury (TBI). Our knowledge in these areas has evolved significantly and we need to make every effort to ensure our veterans are advantaged by the latest medical knowledge in this area.

11-L-0109 VVA (USMC) 67

Accordingly, I am directing that your FY2010 Compliance Report on Personality Disorder Separations include actions taken to: 1) identify these discharged Service members; 2) inform them of the correction of discharge characterization process; 3) inform them on how to obtain a mental health assessment through the Department of Veterans Affairs; and 4) identify these individuals to the Department of Veterans Affairs

If you should have any questions regarding this matter, please contact my action officer, Michael Pachuta, at (703) 695-6461 or michael.pachuta@osd.mil.



Clifford L. Stanley

Attachment:

As stated

cc:

ASA(M&RA)

ASN(M&RA)

SAF(MR)

DoD Personality Disorder (PD) Separation Requirements

All references listed refer to DoD Instruction 1332.14, *Enlisted Administrative Separations*, August 28, 2008.

- Member received formal counseling and was afforded adequate opportunity to improve his or her behavior prior to being separated on the basis of PD (Ref: Paragraph 3.a.(8)(a)).
- Member's PD diagnosis was made by a psychiatrist or Ph.D.-level psychologist (Ref: Paragraph 3.a.(8)(c)).
- The PD diagnosis included a statement or judgment from the psychiatrist or Ph.D.-level psychologist that the Service member's disorder was so severe that the member's ability to function effectively in the military environment was significantly impaired (Ref: Paragraph 3.a.(8)(c)).
- Member received written notification of his or her impending separation based on PD diagnoses (Ref: Paragraph 3.a.(8)(f) and Enclosure 6, Paragraph 2.a).
- Member was advised that the diagnosis of a personality disorder does not qualify as a disability (ref: Paragraph 3.a.(8)(a)) – **(only required for PD separations after August 28, 2008)**.
- For Service members separated on the basis of PD who served in imminent danger pay areas **(only required for PD separations after August 28, 2008)**.
 - Member's PD diagnosis was corroborated by a peer psychiatrist or Ph.D.-level psychologist or higher level mental health professional (Ref: Paragraph 3.a.(8)(c)).
 - Member's PD diagnosis addressed Post-Traumatic Stress Disorder (PTSD) or other mental illness co-morbidity (Ref: paragraph 3.a.(8)(c)). (NOTE: According to paragraph 3.a.(8)(d), unless found fit for duty by the disability evaluation system, a separation for PD is not authorized if Service-related PTSD is also diagnosed.)
 - Member's PD diagnosis was endorsed by The Surgeon General of the Military Department concerned prior to discharge (Ref: Paragraph 3.a.(8)(c)).

DOD PERSONALITY DISORDER (PD) SEPARATION REQUIREMENTS

ITEM#

MARINE CORPS FY10 COMPLIANCE

- 1 Member received formal counseling and was afforded adequate opportunity to improve his or her behavior prior to being separated.

100% compliant

- 2 Member's PD diagnosis was made by a psychiatrist or Ph.D.-level psychologist.

100% compliant

- 3 PD diagnosis included a psychiatrist or Ph.D. level psychologist's statement or judgement that SNM's disorder was so severe it impaired SNM's ability to function in military environment.

100% compliant

- 4 Member received written notification of his or her impending separation based on PD diagnosis.

100% compliant

- 5 Member was advised that PD diagnosis does not qualify as a disability. Only required for PD separations after August 28, 2008.

71% compliant 29% information unavailable in records

MARINES WHO SERVED IN IMMINENT DANGER PAY AREAS IN FY10

- 6 Member's PD diagnosis was corroborated by a peer psychiatrist or Ph.D. level psychologist or mental health professional.

100% compliant

- 7 Member's PD diagnosis addressed PTSD and other mental illness co-morbidity.

100% compliant

- 8 Member's PD diagnosis was endorsed by the Surgeon General of the Military Department prior to discharge.

100% compliant

USMC FY10 PERSONALITY DISORDER SEPARATION STATISTICS

From FY02 - FY10, 651 Personality Disorder Separations had served in an imminent danger pay area at some point in their service.

132 total Personality Disorder Separations in FY10.

23 OF 132 Marines had served in an imminent danger pay area.

10% OR 14 FY10 Personality Disorder Separations were examined.

5 of those 14 Marines had served in an imminent danger pay area at some point.

MARINE CORPS FY02-FY10 PERSONALITY DISORDER SEPARATION STATISTICS

FY	TOTAL PD	TOTAL IDP
2002	499	14
2003	506	31
2004	512	107
2005	725	135
2006	677	129
2007	746	103
2008	403	59
2009	340	50
2010	132	23
TOTALS	4537	651

NOTE: IDP= IMMINENT DANGER PAY AREA



UNITED STATES MARINE CORPS

HEADQUARTERS UNITED STATES MARINE CORPS
3280 RUSSELL ROAD
QUANTICO, VIRGINIA 22134-5103

IN REPLY REFER TO :

1910

MMSR

Date

Name
Address

Dear Name:

You are being contacted because our records indicate you deployed in support of a contingency operation after September 11, 2001. We want to assure that all Marines administratively discharged from military service received screening for Post-Traumatic Stress Disorder (PTSD) and Traumatic Brain Injury (TBI). Medical understanding of PTSD and TBI has evolved significantly. If you did not receive this screening and believe you have service connected PTSD or TBI-or if you have been diagnosed with PTSD or TBI following discharge outside of the Department of Veterans Affairs (VA) medical care system-you are encouraged to contact a VA facility to obtain medical assistance. Information concerning your Veterans benefits can be found at www.va.gov or you can contact the Veteran Combat Call Center at 1-877-927-8387.

If you believe the characterization of your discharge from military service was negatively influenced by service-connected PTSD or TBI not diagnosed prior to your discharge, you are encouraged to submit an application requesting a change to the characterization of your service to the Board of Correction of Naval Records. This may be done by submitting the enclosed Department of Defense Form 149, "Application for Correction of Military Record Under the Provision of Title 10 U.S. Code, Section 1552." This form is also available on the internet at, <http://www.dtic.mil/whs/directives/infomgt/forms/eforms/dd0149.pdf>. The form contains specific instructions on the procedure to file an application for correction of your military records.

We thank you for your service and hope this information can be of assistance. If you have specific questions relating to your Official Military Personnel File (OMPF), please contact the Commandant of the Marine Corps, Code MMSB-10, 2008 Elliot Road, Quantico, VA 22134-5030.

Sincerely,
A. B. WILSON
Deputy Head, Separation and
Retirement Branch

Enc 1 (3)

11-L-0109 VVA (USMC) 72