



441 G St. N.W.
Washington, DC 20548

April 17, 2025

The Honorable Roger F. Wicker
Chairman
The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Mike Rogers
Chairman
The Honorable Adam Smith
Ranking Member
Committee on Armed Services
House of Representatives

Department of Defense: DEI Workforce Reductions

Provisions within the National Defense Authorization Act for Fiscal Year 2024 required the Department of Defense (DOD) to make changes to its diversity, equity, and inclusion (DEI) workforce. For example, section 1101 of the act prohibited DOD from appointing or employing any civilian in a position with primary duties related to DEI above a certain rate of pay. Section 1101 further required DOD to reassign civilian employees already in such positions.¹

Senate Report 118-58 contains a provision for us to review DOD's DEI workforce, including the number and grade of federal civilian, military, and contract personnel employed to develop and implement DEI policy across the department.² This letter and attached briefing slides provide observations on the following:

1. How did DOD's implementation of requirements in section 1101 of the National Defense Authorization Act for Fiscal Year 2024 change the number of federal civilian and military personnel it employs to develop and implement DEI policy?
2. How did DOD use contractors to develop and implement DEI activities across the department?
3. How did DOD's workforce support and implement its DEI efforts?

To address these objectives, we reviewed policy and other documents, guidance, and memorandums regarding DOD's DEI workforce. We also collected DOD DEI workforce data from the Office of the Under Secretary of Defense for Personnel and Readiness and each

¹Pub. L. No. 118-31, § 1101 (2023).

²S. Rep. No. 118-58, at 139-40 (2023).

military service. We further searched relevant data systems for active DEI contracts; identified and reviewed congressional reporting requirements related to DEI work; collected and assessed DEI training information and requirements; and interviewed cognizant officials.

We conducted this performance audit from February 2024 to April 2025 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.

We provided briefings on the results of our review to your staff on January 28 and 29, 2025, respectively. Those briefing slides as presented are attached as enclosure I to this letter.

In summary, we reported the following:

- DOD reduced its civilian workforce when it implemented section 1101 by abolishing 32 DEI positions and restructuring 115 positions to reduce or eliminate the positions' DEI duties. As a result, DOD maintained 41 DEI positions—25 military and 16 civilians—as of July 2024. In addition, DOD officials told us that DOD had planned to restructure some DEI offices.
- DOD did not widely use contractors to develop and implement DEI activities across the department, according to our review of DOD contracts in the fiscal year 2023 Federal Procurement Data System and officials from the Office of the Secretary of Defense and the service headquarters DEI offices.
- As of the time of our briefing, DOD's workforce supported and implemented its DEI program goals and efforts by developing training, supporting DEI committees and working groups, maintaining and analyzing data, and responding to reporting requirements, according to DOD officials.

As we finalized the briefing slides, executive actions further affected DOD's DEI workforce included in the scope of our review. On January 20, 2025, the President signed executive orders that revoked earlier 2021 executive orders expanding diversity, equity, inclusion, and accessibility in executive branch agencies and directed the termination of all DEI programs, mandates, policies, programs, preferences, and activities in the federal government.³ Further, on January 27, 2025, the President issued Executive Order 14185 directing the Secretary of Defense and the Secretary of Homeland Security to abolish every DEI office within DOD and the Department of Homeland Security with regard to the U.S. Coast Guard, respectively.⁴ This included any vestiges of DEI offices, such as suboffices, programs, elements, or initiatives.

Since briefing your staffs, we conducted additional work to determine the outcomes of the 41 DEI positions that remained after DOD restructured its DEI workforce in July 2024 in response to section 1101.⁵ We reviewed the positions for which the primary duties included developing,

³Exec. Order No. 14,148, *Initial Recissions of Harmful Executive Orders and Actions*, 90 Fed. Reg. 8,237 (Jan. 20, 2025). Exec. Order No. 14,151, *Ending Radical and Wasteful Government DEI Programs and Preferencing*, 90 Fed. Reg. 8,339 (Jan. 20, 2025).

⁴Exec. Order No. 14,185, *Restoring America's Fighting Force*, 90 Fed. Reg. 8,763 (Jan. 27, 2025).

⁵These civilian and military positions appear on slide 12 and slide 13, table 1 of enclosure 1.

refining, and implementing DEI policy; leading working groups and councils in developing DEI goals and objectives to measure performance and outcomes; or creating and implementing DEI education, training courses, and workshops for military and civilian personnel.

Specifically, all of the 41 remaining civilian and military positions that were not subject to section 1101 requirements were abolished or restructured through DOD's implementation of January 2025 executive orders.⁶ Therefore, none of the DEI positions that we identified were scheduled to remain after April 2025, as indicated in figure 1 below.

Figure 1: Results of Department of Defense (DOD) Implementation of Executive Orders on Diversity, Equity, and Inclusion (DEI) Positions

Office/service	Not subject to section 1101 in July 2024 ^a		After January 2025 executive orders	
	Civilian positions	Military positions	Civilian positions	Military positions
DOD components	6 ^b	0	0	0
Army	7	5	0	0
Navy	3	1	0	0
Air Force/Space Force	0	19	0	0
Total	16	25	0	0

Source: GAO analysis of Department of Defense (DOD) data. | GAO-25-107397

^aDOD data indicated these civilian and military positions are not subject to section 1101 of the National Defense Authorization Act for Fiscal Year 2024.

^bThree civilian positions from the Defense Human Resources Activity were associated with a Federal Advisory Committee scheduled to end by March 31, 2025. DOD officials told us the occupants of those positions would be reassigned to non-DEI positions by mid-April 2025.

In addition, DOD officials told us the department was working to implement executive orders to which it was subject related to its DEI workforce and programs. For example, according to DOD officials, the department rescinded two DEI related policies and disbanded the Defense Advisory Committee on Diversity and Inclusion, a Federal Advisory Committee that commissioned studies and collected data to determine service members' needs regarding DEI matters.⁷ The committee was composed of volunteers and supported by three federal civilian positions.

Further, officials stated that in February 2025, in response to direction from the Secretary of Defense, the department initiated a task force under the Office of the Under Secretary of Defense for Personnel and Readiness to oversee the department's efforts to abolish DEI offices. The task force comprises personnel from the Office of the Secretary of Defense and a liaison from each military service, the Joint Staff, and the National Guard Bureau. The task force adopted the definition of DEI offices in Executive Order 14185, to include an office, division, job,

⁶The 41 positions were not subject to section 1101 requirements because, for example, their pay rate was less than a General Schedule (GS)-10, they were military positions, or DOD determined that DEI was not the primary reason the position existed.

⁷Officials identified the rescinded policies as Department of Defense Instruction (DODI) 1020.05, *DOD Diversity and Inclusion Management Program* (Sept. 9, 2020) and DODI 1350.03, *Affirmative Action Planning and Assessment Process* (Feb. 29, 1988).

or other unit of an institution established for the purpose of influencing hiring or employment practices or promoting preferential treatment on the basis of race, sex, color, or ethnicity.⁸

On March 1, 2025, this task force reported that the military services, the Joint Staff, and the other DOD components conducted evaluations and certified that there is no use of gender, race, or ethnicity-based goals for organizational composition, academic admissions, or career fields. Further, the report identified key actions the military services and DOD components took to ensure that no boards, councils, and working groups promote DEI and other related concepts. The task force will validate these findings and plans to submit its final reports to the Secretary of Defense and the White House on June 1, 2025, and July 26, 2025, respectively.

Agency Comments

We provided a draft of this letter and the attached slides to DOD. DOD submitted technical comments that we incorporated as appropriate.

- - - - -

We are sending copies of this report to the appropriate congressional committees, the Secretary of Defense, and other interested parties. The report is also available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff members have any questions about this report, please contact me at berrickc@gao.gov. Contact points for our Offices of Congressional Relations and Office of Public Affairs may be found on the last page of this report.

//SIGNED//

Cathleen A. Berrick
Managing Director, Defense Capabilities and Management

Enclosure

⁸See Exec. Order No. 14,185, § 3(a), 90 Fed. Reg. 8,763 (Jan. 27, 2025); Secretary of Defense Memorandum, *Restoring America's Fighting Force* (Jan. 29, 2025).



Diversity, Equity, and Inclusion: Department of Defense Reduced Its Civilian DEI Workforce in Response to a Statutory Requirement

Briefing for the Armed Services Committees January 28 and 29, 2025

For more information, contact Cathleen A. Berrick at berrickc@gao.gov.

Slide 1

Introduction

Department of Defense (DOD) definitions for diversity, equity, inclusion, and accessibility (DEIA) include, in part, the following:

- **Diversity.** All the different characteristics and attributes of individuals from varying demographics.¹
- **Equity.** The consistent and systematic fair, just, and impartial treatment of all individuals, including those who belong to underserved communities.²
- **Inclusion.** A set of behaviors that encourages personnel to feel valued for unique qualities and to experience a sense of belonging.³
- **Accessibility.** The provision of facilities, technology, programs, and services that all people, including people with disabilities, can use fully and independently.⁴

¹Department of Defense Instruction (DODI) 1020.05, *DOD Diversity and Inclusion Management Program* (Sept. 9, 2020).

²Department of Defense, *Department of Defense Diversity, Equity, Inclusion, and Accessibility Strategic Plan, Fiscal Years 2022-2023* (Sept. 30, 2022).

³DODI 1020.05.

⁴Department of Defense, *Department of Defense Diversity, Equity, Inclusion, and Accessibility Strategic Plan, Fiscal Years 2022-2023* (Sept. 30, 2022).

Introduction

- Executive orders issued in 2021 expanded the number of civilians working to develop and implement DEIA policy across the federal government.
- However, on January 20, 2025, the President issued an Executive Order titled *Initial Recissions of Harmful Executive Orders and Actions*, revoking those executive orders.
- Additionally, on January 21 and 24, 2025, the Administration announced and issued guidance outlining steps to close agency DEIA offices. As GAO conducted its work under this engagement prior to those issuances, these slides do not reflect or discuss the revocation of the executive orders or their effects.

Slide 3

Introduction

- Executive Order 13985, rescinded on January 20, 2025, called for a systematic approach to advance equity across the federal government and embed fairness in decision-making, with the goal to provide everyone an opportunity to reach their full potential.⁵
- In response to Executive Order 13985, DOD issued its first Equity Action Plan in April 2022 and an update in February 2024 regarding potential barriers that underserved communities and individuals face.⁶ They contain five action areas that comprise a strategy for cultivating equitable change:
 1. Procurement and contracting;
 2. Military installations;
 3. Military families;
 4. Equitable artificial intelligence (AI) research and development; and
 5. Underserved community investment.

⁵Exec. Order No. 13,985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, 86 Fed. Reg. 7009 (Jan. 20, 2021).
⁶Department of Defense, *Department of Defense Equity Action Plan*, (Apr. 2022); and *Equity Action Plan 2023 Update*, (Feb. 2024).

Introduction

- Executive Order 14035, rescinded on January 20, 2025, called for executive branch agencies to make advancing DEIA a component of the management agenda and strategic planning, and to submit to the Assistant to the President for Domestic Policy, the Director of the Office of Personnel Management (OPM), and the Deputy Director for Management of the Office of Management and Budget (1) a preliminary assessment of the current state of DEIA and (2) an annual agency-specific DEIA strategic plan.⁷ It also instructed agencies to provide resources and staffing to support implementation of the DEIA strategic plan.
- In response to Executive Order 14035, DOD
 - assessed areas for improvement in human resource employment practices; and
 - submitted a DEIA strategic plan in 2022 that calls for improvements in data collection and assessment, the construction of formal DEIA policy, and increased coordination regarding DEIA efforts.⁸

⁷Exec. Order No. 14,035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, 86 Fed. Reg. 34,593 (June 25, 2021).

⁸Department of Defense, *Department of Defense Diversity, Equity, Inclusion, and Accessibility Strategic Plan, Fiscal Years 2022-2023* (Sept. 30, 2022).

Source of GAO Work and Objectives

Senate Report 118-58 contains a provision for the Comptroller General to review DOD's DEI workforce, including the number and grade of federal civilian, military, and contract personnel employed to develop and implement diversity, equity, and inclusion policy across the department.⁹ Our observations examine:

1. How did DOD's implementation of requirements in section 1101 of the National Defense Authorization Act (NDAA) for Fiscal Year 2024 change the number of federal civilian and military personnel it employs to develop and implement DEI policy?
2. How does DOD use contractors to develop and implement DEI activities across the department?
3. How does DOD's workforce support and implement its DEI efforts?

⁹S. Rep. No. 118-58, at 139-40 (2023). Accessibility is not mentioned in the provision and is therefore not in the scope of our review. We use the acronym DEI throughout this briefing unless the source document specifically references DEIA. Slide 6

Scope

We interviewed and gathered data on DEI positions and activities from the following DOD components:

- Office of the Under Secretary of Defense for Personnel and Readiness (OUSD(P&R))
 - Office for Diversity, Equity, and Inclusion
 - DOD Federal Advisory Committee Executive Staff
 - Defense Advisory Committee on Diversity and Inclusion
 - Defense Advisory Committee on Women in the Services
 - Defense Equal Opportunity Management Institute (DEOMI)
- U.S. Army Equity and Inclusion Agency
- Office of the Assistant Secretary of the Navy Manpower and Reserve Affairs and Office of Civilian Human Resources
- Office of the Assistant Secretary of the Air Force for Manpower and Reserve Affairs, Office of Force Resilience
- National Guard Bureau Office of Diversity, Equity and Inclusion

Slide 7



Methodology

Objective 1 – Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

- We reviewed policy and other documents, guidance, and memorandums regarding DOD's DEI workforce.
- We collected and analyzed DEI workforce data from the OUSD(P&R) and each service, including information about job series, grades, ranks, hiring authorities, and position descriptions, and compared the size of that workforce prior to and after section 1101 implementation.
- We interviewed DOD officials within OUSD(P&R), Army, Navy, Marine Corps, Air Force/Space Force, and the National Guard Bureau regarding implementation of sections 529B and 1101 of the NDAA for Fiscal Year 2024.

Objective 2 – Contractor Support of DEI Activities

- We identified DOD's DEI contracts active in fiscal year 2023 by searching DEI-related terms in the Federal Procurement Data System and discussed selected contracts with DOD officials.

Slide 8

Methodology (continued)

Objective 3 – DOD Workforce Support of DEI Activities

- We identified and reviewed congressionally directed reporting requirements and associated documentation related to DEI work.
- We collected and assessed evidence of DEI training development, training requirements, and information related to DEI advisory committees and working groups across DOD.
- We interviewed DOD officials within OUSD(P&R), Army, Navy, Marine Corps, Air Force/Space Force, and the National Guard Bureau regarding DEI-related activities such as training, advisory committees and working groups, data, and congressional reporting requirements.

We provided a copy of this briefing to DOD for technical comment, and incorporated revisions as appropriate.

Background

- In April 2022, the Under Secretary of Defense for Personnel and Readiness was designated DOD's chief diversity and inclusion officer.
- The Director of DOD's Office for Diversity, Equity, and Inclusion is responsible for promoting a strategic vision for diversity efforts and developing and implementing DOD's diversity and inclusion strategic plan.
- Further, each military department Secretary appointed a Senior Advisor for Diversity and Inclusion to provide advice, guidance, and coordination on diversity and inclusion efforts in response to a statutory requirement.¹⁰ Such efforts include developing a strategic plan and establishing training, evaluation, and assessment measures.
- DOD's DEI program instruction says the department promotes a diverse workforce that reflects the population of the United States.
- In addition, the instruction states that data metrics are to be used in a manner consistent with merit-based principles and not to establish quotas based on diversity characteristics.¹¹

¹⁰Pub. L. No. 116-283 § 913 (2021).

¹¹DODI 1020.05.

Background

Within the NDAA for Fiscal Year 2024:

- Section 529B limits DOD from establishing new or filling any vacant positions responsible for matters related to diversity, equity, and inclusion until GAO completes its review.¹²
- Section 1101 prohibits DOD from appointing or employing any civilian in a position with primary duties related to DEI at a rate of pay exceeding General Schedule (GS)-10.¹³
- Section 1101 also required DOD to reassign any civilian employee in such a position with a rate of pay exceeding GS-10 not later than June 19, 2024.

¹²Pub. L. No. 118-31, § 529B (2023).

¹³*Id.* § 1101. Section 1101(b) specifies the covered duties.



Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

- DOD reduced its civilian workforce when it implemented section 1101 by abolishing 32 DEI positions and restructuring 115 positions to reduce or eliminate the DEI duties.¹⁴
- Table 1 on slide 13 shows that as of July 2024, when OUSD(P&R) directed DOD senior leadership to complete the implementation of section 1101, DOD maintained
 - 25 military DEI positions, and
 - 16 civilian positions that it identified were not subject to section 1101.
- Before it implemented section 1101, we found that DOD maintained a total of 188 military and federal civilian DEI positions.
 - 25 positions were military
 - 163 positions were civilian

¹⁴For example, according to DOD position descriptions, reduced DEI duties comprise less than 50 percent of a position's major duties or duties that relate to command culture, organizational culture, and command climate, among other things.



Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

Table 1: Results of DOD Implementation of Section 1101 by Number of Diversity, Equity, and Inclusion (DEI) Positions

Office/service	Prior to section 1101	After section 1101		Not subject to section 1101	
	Civilian DEI positions	Civilian DEI positions abolished ^a	Civilian DEI positions restructured ^b	Civilian positions ^c	Military DEI positions
DOD components	14	1	7	6	0
Army	19	7	5	7	5
Marine Corps	2	1	1	0	0
Navy	31	4	24	3	1
Air Force/Space Force	84	8	76	0	19
National Guard	13	11	2	0	0
Total	163	32	115	16	25

Source: GAO analysis of Department of Defense (DOD) data. | GAO-25-107397

^aDOD officials told us that the services did not lose billets for abolished positions.

^bAccording to DOD officials, restructuring involves changing the focus and scope of a position. In addition, our analysis of position descriptions found that the job duties of many former DEI positions were restructured to focus on equal employment opportunity or command climate and culture. DOD data indicated that 25 of the restructured positions were vacant and no action has been taken due to the hiring freeze. An official from the Department of the Air Force told us that commanders and directors have the authority to repurpose its 17 vacant positions at their discretion.

^cDOD data identified that these positions were not subject to section 1101.

Slide 13



Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

Figure 1: Results of DOD Implementation of Section 1101 by Number of Diversity, Equity, and Inclusion (DEI) Positions



Source: GAO analysis of Department of Defense (DOD) data. | GAO-25-107397

Slide 14



Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

To implement section 1101, OUSD(P&R) requested that component heads identify civilian positions for which the primary duties—those that represent the primary reason for the position’s existence and govern the qualification requirements—include one or more of the following:

- Developing, refining, and implementing DEI policy;
- Leading working groups and councils in developing DEI goals and objectives to measure performance and outcomes; and
- Creating and implementing DEI education, training courses, and workshops for military and civilian personnel.

Slide 15



Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

- In addition to reducing positions to implement section 1101, DOD officials told us that DOD plans to restructure some DEI offices. For example, the National Guard Bureau will restructure its Office of Diversity, Equity, and Inclusion to the Office of Equal Opportunity Compliance.
- DOD also began to restructure the Office for Diversity, Equity, and Inclusion to become a component of the Office of Force Resiliency before it implemented section 1101. That restructure was not yet complete at the time GAO provided this briefing.

Slide 16



Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

Before DOD implemented section 1101 of the NDAA for Fiscal Year 2024, examples of federal civilian DEI position primary duties included:

- Develops, coordinates, reviews, evaluates, and analyzes plans, strategies, policies, and other deliverables or initiatives that advance diversity and inclusion policy in DOD.
- Assesses and provides strategic direction for the development of diversity and inclusion policies and procedures.
- Reviews, analyzes, and interprets diversity, equity, inclusion, and accessibility policy, legislation, programs, and initiatives for DOD.
- Utilizes available personnel databases to facilitate compilation of statistics on various diversity measures.
- Oversees the compilation of diversity and inclusion training curriculum to include developing new and revising existing training materials and methods with a focus on leadership development.

Slide 17



Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

After DOD implemented section 1101 of the NDAA Fiscal Year 2024, examples of restructured primary duties for federal civilian positions include:

- Develops and implements merit, fairness, equal opportunity, and inclusion strategies and policies to ensure the department's military equal opportunity and civilian equal employment opportunity programs contribute to the readiness and resiliency of the total force and meet requirements of federal civil rights laws, rules, and regulations.
- Manages and directs the execution of a broad range of responsibilities focused on merit, fairness, equal opportunity, and accessibility within OUSD(P&R) components, the Office of Force Resiliency, and DOD components.
- Develops, coordinates, reviews, evaluates, and analyzes plans, strategies, policies, and other deliverables or initiatives that advance merit, fairness, equal opportunity, and accessibility research in DOD.

Slide 18



Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

According to DOD officials:

- DOD does not have DEI-specific appointments or hiring authority and does not employ a separate personnel system for its DEI workforce.
- DOD's direct-hiring authorities for critical personnel shortages are not related to DEI. Such authorities instead focus on areas including acquisition, science, technology, engineering, mathematics, medical and health, childcare services, financial management, military housing, or facilitating business transformation.¹⁵
- There is no civilian job series or military occupational specialty for DEI positions.

Most federal civilian DEI positions were in the Miscellaneous Administration and Program occupational series, as shown in table 2 on slide 20.

¹⁵Department of Defense, Under Secretary of Defense for Personnel and Readiness, *Direct Hire Authority for Certain Personnel of the Department of Defense*, Memorandum for Senior Pentagon Leadership, Commanders of the Combatant Commands, and Defense Agency and DOD Field Activity Directors (June 23, 2023); and *Expansion of Direct Hire Authority for Certain Personnel of the Department of Defense* (Oct. 15, 2021) (rescinded by the 2023 memorandum).



Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

Table 2: DOD Diversity, Equity, and Inclusion Civilian Workforce Occupational Series Prior to Section 1101 Implementation

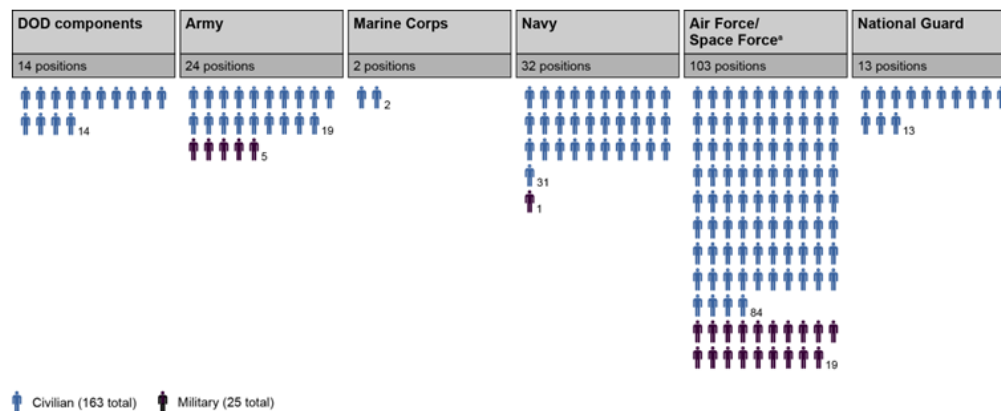
Occupational series	Example of a position in occupational series	Number of positions in occupational series
0101: Social Science	Diversity and Inclusion Analyst	2
0260: Equal Employment Opportunity	Equal Employment Manager	7
0301: Miscellaneous Administration and Program	Diversity and Inclusion Coordinator	102
0303: Miscellaneous Clerk and Assistant	Diversity Technician	1
0340: Program Management	Program Manager, Diversity, Equity, and Inclusion	5
0343: Management and Program Analysis	Program Analyst, Diversity, Equity, Inclusion, and Accessibility	31
0360: Equal Opportunity Compliance	Director, Office of Diversity, Equity, and Inclusion	1
0361: Equal Opportunity Assistance	Diversity, Equity, and Inclusion Specialist	1
0801: General Engineering	Director, Diversity, Equity, Inclusion, and Accessibility	2
1084: Visual Information	Visual Information Specialist	1
1515: Operations Research	Operations Research Analyst	3
1701: General Education and Training	Senior PE Instructor, Diversity Programs	3
1702: Education and Training Technical	Diversity and Inclusion Training Coordinator	1
1750: Instructional Systems	Instructional Systems Specialist	2
1811: Criminal Investigation	Chief Diversity and Inclusion Officer	1
Total		163

Source: GAO analysis of Department of Defense (DOD) data and Office of Personnel Management information. | GAO-25-107397

Slide 20

Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

Figure 2: DOD Military and Federal Civilian Diversity, Equity, and Inclusion Positions by Service Prior to Section 1101 Implementation

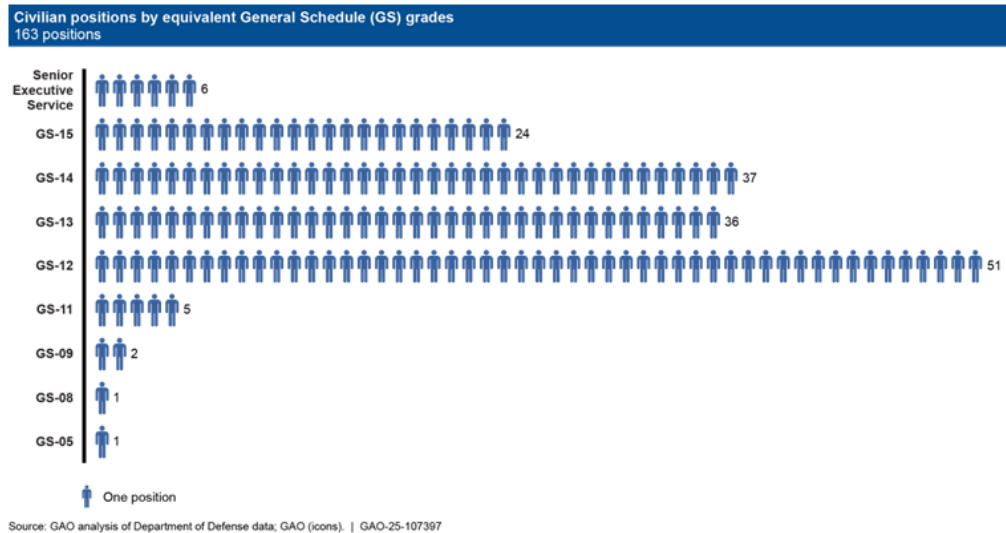


Source: GAO analysis of Department of Defense (DOD) data; GAO (icons). | GAO-25-107397

*Department of the Air Force officials told us that each of the Air Force's nine major commands and three field commands has a Chief Diversity and Inclusion position, and each installation has a Diversity and Inclusion Program Manager that typically advises the installation commanders and schedules diversity training, such as unconscious bias.

Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

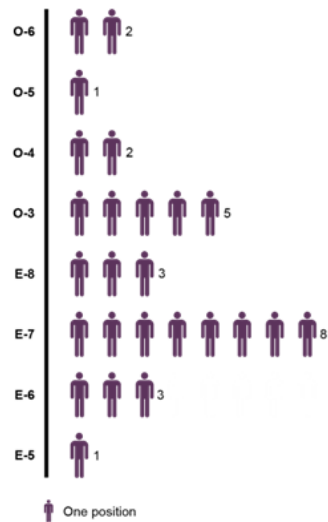
Figure 3: Grades of Department of Defense Federal Civilian Diversity, Equity, and Inclusion Positions Prior to Section 1101 Implementation



Objective 1: Number of Federal Civilian and Military Personnel to Develop and Implement DEI Policy

Figure 4: Ranks of Department of Defense Military Diversity, Equity, and Inclusion Positions Not Subject to Section 1101

Officer (O) and Enlisted (E) grades shown highest to lowest (top to bottom)
25 positions



Source: GAO analysis of Department of Defense data; GAO (icons). | GAO-25-107397

Objective 2: Contractor Support of DEI Activities

- DOD did not widely use contractors to develop and implement DEI activities across the department, according to officials from the Office of the Secretary of Defense and the service headquarter DEI offices. Specifically,
 - Officials from the Army said they identified one part-time contract DEI employee and would not exercise the option to renew the contract in December 2024.
 - An official from the Defense Advisory Committee on Diversity and Inclusion told us the committee uses two contractor personnel, one full-time administrative support position, and one part-time research position.
 - In July 2024, officials from OUSD(P&R) and the services stated they were no longer using contractor personnel for DEI activities. For example, an office chose not to exercise its option to renew a support contract for a third year.

Slide 24

Objective 2: Contractor Support of DEI Activities

- After querying the Federal Procurement Data System, we found that in fiscal year 2023, offices across DOD maintained at least 44 contracts for DEI services largely related to training. For example,
 - OUSD(P&R) had contracts for DEI training and DEI subject matter experts;
 - the Department of the Navy had a contract for a DEI summit;
 - the National Guard Bureau had a contract for DEI database services; and
 - the Department of the Air Force had a contract for training titled *Leading Inclusively Virtual Experience*.
- In addition, the Department of the Army had contracts for research and collaboration with Historically Black Colleges and Universities.
- Finally, we examined contracts for leadership training. Officials told us such training might have a DEI component, although we were not able to confirm DEI components from the available contract information.

Slide 25

Objective 3: DOD Workforce Support of DEI Activities

- According to DOD officials, DOD's workforce supports and implements its DEI program goals and efforts by conducting the following activities:
 - developing DEI training;
 - supporting DEI committees and working groups;
 - maintaining and analyzing relevant data; and
 - responding to internal DOD, executive branch, and congressional DEI reporting requirements.

Slide 26



Objective 3: DOD Workforce Support of DEI Activities – Developing Training

- DOD and service guidance directs personnel from the Office of Diversity, Equity, and Inclusion, the Defense Equal Opportunity Management Institute (DEOMI), and the military services to develop or implement DEI-related training segments.¹⁶
- Specifically, a DOD instruction directs:
 - DOD component heads to establish diversity and inclusion training requirements for practitioners that includes courses developed by DEOMI.
 - the Director of the Diversity Management Operations Center to ensure that DEOMI plans, manages, and delivers diversity and inclusion training at all levels of professional military education.¹⁷
- However, this guidance does not contain broad requirements for military or civilian personnel to complete DEI training. Officials confirmed that DEI training is not required for civilians or professional military education.

¹⁶Army People Strategy, *Diversity, Equity, and Inclusion Annex* (Sept. 1, 2020); Office of the Chief of Naval Operations Instruction 5420.115A, *Navy Diversity, Equity, and Inclusion Policy* (May 26, 2022); Air Force Instruction 36-7001, *Diversity & Inclusion* (Feb. 19, 2019).

¹⁷DODI 1020.05. DOD officials told us that the Diversity Management Operations Center was disbanded in 2023.



Objective 3: DOD Workforce Support of DEI Activities – Developing Training

- As of October 2024, officials from the Office for Diversity, Equity, and Inclusion; the services; and DEOMI told us that, while they took initial steps to develop DEI training for professional military education in 2020 to align with the direction to do so in DOD instruction,¹⁸ those efforts did not progress further than initial stages. DOD does not plan to continue development of the training due to section 1101 of the NDAA for Fiscal Year 2024 implementation.
- DEOMI offers Equal Opportunity and Equal Employment Opportunity training to practitioners across DOD. DEOMI also provides education and training to civilian and military personnel to enhance combat readiness by fostering positive relationships.
 - For example, DEOMI's *Leadership Team Awareness Seminar* contains modules on Diversity & Inclusion and Unconscious Bias.¹⁹ DEOMI will continue to offer this seminar in fiscal years 2024 and 2025. DEOMI officials told us they provided this seminar to 806 participants and provided other equal opportunity professional training courses that include elements of DEI to 770 participants in fiscal year 2023.

¹⁸DODI 1020.05.

¹⁹Defense Equal Opportunity Management Institute, *Course Catalog, Academic Year: FY24* (Patrick Space Force Base, FL: July 17, 2023).



Objective 3: DOD Workforce Support of DEI Activities – Developing Training

Table 3: Examples of Diversity, Equity, and Inclusion (DEI) Training Courses Offered by the Services

Service	Examples
Army	The U.S. Army War College has one 3-hour DEI lesson within the program’s Strategic Leadership core course. This lesson focuses on leading diverse organizations and explores how and why diverse backgrounds, perception, and organizational climate influence individual and organizational performance. It also offers three electives that might be considered DEI, such as <i>Inclusive Leadership</i> .
Marine Corps	Unconscious bias education for leaders provides tools and methods for adjusting ingrained patterns of thinking and eliminating discriminatory behaviors.
Navy	DEI 101 includes information about key terms, concepts, and strategies for DEI practitioners and individuals tasked with facilitating DEI initiatives.
Air Force/Space Force	DEI is a component of unconscious bias training for civilian hiring panelists prior to screening or interviewing candidates.

Source: GAO analysis of Department of Defense (DOD) testimonial evidence. | GAO-25-107397

Slide 29



Objective 3: DOD Workforce Support of DEI Activities – Supporting Committees and Working Groups

- DOD personnel support a Federal Advisory Committee—the **Defense Advisory Committee on Diversity and Inclusion (DACODAI)**—that looks at DEI-related issues. The committee commissions studies and collects data to determine service members' needs regarding DEI matters and makes and tracks recommendations to the Secretary of Defense.
 - DOD maintains three federal civilian positions that support the DACODAI, reflected on slides 13, 14, and 21.
 - Committee members are selected to ensure a balanced portfolio of relevant expertise and are not
 - DOD federal civilian employees or military personnel; or
 - according to an official, compensated for their service.
 - DOD officials told us that DACODAI does not develop or implement DEI policy and therefore the committee was not subject to section 1101.
 - A DACODAI official said none of DACODAI's civilian and contract positions or operations were impacted by DOD's implementation of section 1101 because the positions that support the committee spend more than half of their job duties on administrative tasks related to federal advisory committee requirements, such as preparing meeting minutes and making all materials available to the public.
-

Slide 30



Objective 3: DOD Workforce Support of DEI Activities – Supporting Committees and Working Groups

- The **Defense Advisory Committee on Women in the Services (DACOWITS)** is a Federal Advisory Committee that has operated since 1951. It provides independent advice and recommendations to the Secretary of Defense on matters relating to the recruitment, retention, employment, integration, well-being, and treatment of women in the Armed Forces.
- According to DACOWITS officials, none of its civilian staff positions or operations were impacted by DOD's implementation of section 1101 and the committee does not develop or implement DEI policy.
- We determined that the DACOWITS is DEI-adjacent and did not count its four positions, two federal civilian and two military, in our totals.

Slide 31



Objective 3: DOD Workforce Support of DEI Activities – Supporting Committees and Working Groups

Separate from the two Federal Advisory Committees, DOD personnel support at least 25 internal committees and working groups with a DEI-related mission. Two of these committees were disbanded, while at least four are active and at least eight are inactive, according to officials.

Table 4: Examples of Service Diversity, Equity, and Inclusion Committees

Service	Committee	Status ^a
Office of the Secretary of Defense	Defense 2040 Task Force	Disbanded
Army	Diversity, Equity, and Inclusion Council	Inactive
Marine Corps	Diversity, Equity, and Inclusion Review Board	Active
Navy	Diversity, Equity, and Inclusion Council	Inactive
Air Force/Space Force	Executive Diversity and Inclusion Council	Inactive
National Guard Bureau	National Guard Joint Diversity Executive Council	Under revision

Source: GAO analysis of Department of Defense (DOD) information. | GAO-25-107397

^aAccording to DOD officials, the Defense 2040 Task Force was disbanded in June 2024 as part of the implementation of section 1101 of the National Defense Authorization Act for Fiscal Year 2024. We categorize "Active" as having met at least once within the 12 months prior to our data request and "Inactive" as not having met within this period.

Slide 32



Objective 3: DOD Workforce Support of DEI Activities – Maintaining and Analyzing Relevant Data

DOD personnel collect and analyze relevant data that can be used for DEI purposes. For example:

- DOD's strategic plan includes an objective on the development of a standardized, DOD-wide data collection and analysis process leveraging a platform for advanced analytics. The goal of the process is to transform relevant personnel data into actionable insights to inform decision-making.²⁰ However, DOD officials said they did not know how DOD's strategic goals and objectives will be impacted by its implementation of section 1101.
- In June 2023, we reported that DOD's Office for Diversity, Equity, and Inclusion (ODEI) developed a data dashboard to provide on-demand analysis of the active-duty military and civilian workforces. With the dashboard, ODEI can compare different organizations, occupations, or demographics in the military and civilian workforces.²¹

²⁰Department of Defense, *Department of Defense Diversity, Equity, Inclusion, and Accessibility Strategic Plan, Fiscal Years 2022-2023* (Sept. 30, 2022).

²¹GAO, *DOD Civilian Workforce: Actions Needed to Analyze and Eliminate Barriers to Diversity*, GAO-23-105284 (Washington, D.C.: June 21, 2023).



Objective 3: DOD Workforce Support of DEI Activities – Maintaining and Analyzing Relevant Data

- Department of Defense Status of Forces Surveys and Active Duty/Reserve Component Spouse Surveys provide data on spouse employment, wellness, food security, and other key quality of life areas pertaining to equity.
- DOD's DEI-related advisory committees collect and analyze qualitative and quantitative data during site visits to military installations. For example, the DACODAI uses quantitative data to provide recommendations regarding diversity and inclusion policies and procedures to the Secretary of Defense. DACODAI staff have coordinated directly with the services to gather these data since 2022, according to a knowledgeable official.

Slide 34



Objective 3: DOD Workforce Support of DEI Activities – Responding to Congressional Reporting Requirements

In addition to the requirement in Executive Order 14035—rescinded on January 20, 2025—for DOD to develop and annually update a DEI strategic plan, DOD personnel stated that they respond to reporting requirements related to DEI matters. These requirements include, but are not limited to the following:

- Annual report to the President and Congress on the state of diversity and inclusion in DOD;
- Report with demographic information accompanying each National Defense Strategy; and
- Military department annual reports with racial, ethnic, and sex demographic information of members in the military justice system.

Slide 35



Objective 3: DOD Workforce Support of DEI Activities – Responding to Congressional Reporting Requirements

DOD officials told us the department responds to 43 unique diversity and inclusion statutory requirements across 15 laws, as well as to direction from congressional committees, including on:

- Mentoring and career counseling programs meant to improve diversity in military leadership;
- Personnel hours and financial resources that DOD allocates to DEI programs;
- Impacts of DEI trainings, initiatives, and policies; and
- Impact of efforts to combat discrimination on the basis of gender identity or sexual orientation as well as related discrimination complaints.²²

As of October 2024, DOD officials said they responded to most reporting requirements for the current fiscal year. However, those officials said they did not know whether DOD would have the capacity to respond in future years due to the workforce reductions related to section 1101.

²²10 U.S.C. § 113(c)(2); 10 U.S.C. § 486; William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Pub. L. No. 116-283, § 571 (2021); S. Rep. No. 118-58, at 147; H.R. Rep. No. 118-125, at 155; H.R. Rep. No. 118-125, at 140.

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through our website. Each weekday afternoon, GAO posts on its [website](#) newly released reports, testimony, and correspondence. You can also [subscribe](#) to GAO's email updates to receive notification of newly posted products.

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [X](#), [LinkedIn](#), [Instagram](#), and [YouTube](#).
Subscribe to our [Email Updates](#). Listen to our [Podcasts](#).
Visit GAO on the web at <https://www.gao.gov>.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/about/what-gao-does/fraudnet>

Automated answering system: (800) 424-5454

Media Relations

Sarah Kaczmarek, Managing Director, Media@gao.gov

Congressional Relations

A. Nicole Clowers, Managing Director, CongRel@gao.gov

General Inquiries

<https://www.gao.gov/about/contact-us>



Please Print on Recycled Paper.