

To Members of the DoD Military Family Readiness Council,

Military families are very appreciative of the Council's consistent focus on EFMP issues over the entire span of its existence. As the Council considers recommendations to the Congress and the Secretary of Defense for its next annual report and the new fiscal year, at the upcoming meeting on the 14th of Sept, I request that you consider focusing on the EFMP program. For a brief history of this issue and the council's interaction, please note the following timeline:

- **October 2009**, President Obama signs the 2010 NDAA, creating the Office of Community Support for Military Families with Special Needs, otherwise called the Office of Special Needs (OSN). Its legislative purpose,

*"to enhance and improve Department of Defense support around the world for military families with special needs (whether medical or educational needs) through the development of appropriate policies, enhancement and dissemination of appropriate information throughout the Department of Defense, support for such families in obtaining referrals for services and in obtaining service, and oversight of the activities of the military departments in support of such families."*¹.

The 2010 NDAA Conference Report states,

*"The conferees believe that expanding support for families with special needs is a critical requirement for the all-volunteer force. Regrettably such programs have not been a priority for the Department...The conferees expect that implementation of this section will result in substantial improvements in identification and outreach to larger numbers of individuals who need support and coordination of available services, expansion of case management services, more direct training and counseling for parents and families, and timely access to information and referral to both Department of Defense and other federal, State, and local special needs resources and services."*²

- **May 2011, DoD MFRC Annual Recommendation**,
*"2. Assess the issues surrounding the Exceptional Family Member Program (EFMP) to build robust assistance systems for military families with special needs"*³
- **June 2012**, I testified before the Senate Armed Services Subcommittee on Personnel, noting, among other things, that no policy had been written per the requirements of the 2010 NDAA,
*"Our families ask that appropriate oversight be provided to ensure that the Office of Special Needs has the funding and personnel to carry out its mandates and then ensure that they are completed in a reasonable amount of time."*⁴
- **February 2013, DoD MFRC Annual Recommendation:**
"4. Recommend standardizing the EFMP across the Services. On joint bases, where multiple Services are present, EFMP offerings that differ by Service are increasingly

¹ Title 10, USC 1781c

² 2010 NDAA Conference Report, Page 738

³ MFRC 2010 Annual Report: <http://download.militaryonesource.mil/12038/MOS/Reports/FY2010-MFRC-Report.pdf>

⁴ SASC Hearing: <http://www.armed-services.senate.gov/hearings/oversight-military-families-with-special-needs>

apparent. Standardization of the EFMP offerings across the Services is required to establish parity across the Services.”⁵

- **May 2013 MFRC Meeting:** Dr. Ed Tyner, of the Office of Special Needs, briefed the council members on OSN’s efforts *“to standardize the EFMP Program”* including, developing DoD Instruction 1315.19 as standardized DoD EFMP policy. When asked by Mrs. Chandler, Council member and the spouse of the Sergeant Major of the Army, *“When do you think that the standardization will happen?”* Dr. Tyner replied, *“This summer.”⁶*
- **February 2014, DoD MFRC Annual Recommendation**
“2. Recommend the continued focus on standardization and consistency of EFMP policies across all Military Services as Service members transition between installations and transition from Service to civilian life, to include collaboration and continuity with community resources.”⁷
- **June 2014 MFRC Meeting,** Dr. Ed Tyner, of the OSN, provides a “Status Update on Standardization of the Exceptional Family Member (EFMP) program.” Mrs. Wright (USD for P&R) added that OUSD (P&R) will “review the recommended implementation process and ensure that it is implemented successfully.”⁸
- **November 2015,** In an interview with Military.com, Dr. Tyner noted the following:
 - (1) *“We’ve probably had over 800 meetings trying to hammer out some issues,”*
 - (2) *“When I first started this I thought, ‘Oh good, we could do this in a couple years, this will be easy.’ It’s been a real learning experience for me with how many road blocks you have to work around.”*
 - (3) *“The sluggish standardization pace can be at least partially blamed on the hesitancy of the services to change their ways”*
 - (4) *“the process for creating a unified system is likely to take another three to five years...And once we get the policies done, it’s going to take some time to institutionalize those procedures.”⁹*
- **February 2016:** Comment period closes on proposed EFMP federal regulations implementing the law from the 2010 NDAA. The comments by both military families and MSO’s were quite critical.¹⁰

We have not heard how much longer it will take before these regulations will be finalized and published, or for DoD and service regulations to then be written. I am concerned that, without senior leadership intervention, by the time the EFMP system is reformed and in compliance with federal law, an entire generation of military kids will have come and gone. My daughter was 6 when this process started; on the current schedule, she will be 16 when it is complete. We know that DoD can act swiftly in certain circumstances; 11 months after writing a memo, Secretary of Defense Carter signed a new DoD Instruction regarding treatment of transgender service members¹¹. Military families simply don’t understand why it takes a decade or more to do the same for military kids and spouses with disabilities.

⁵ MFRC 2012 Annual Report: <http://download.militaryonesource.mil/12038/MOS/Reports/FY2012-MFRC-Report.pdf>

⁶ May 2013 Mtg: <http://download.militaryonesource.mil/12038/MOS/MFRC/May-1-2013-MFRC-minutes.pdf>

⁷ MFRC 2013 Annual Report: <http://download.militaryonesource.mil/12038/MOS/Reports/FY2013-MFRC-Report.pdf>

⁸ Jun 14 Mtg <http://download.militaryonesource.mil/12038/MOS/MFRC/Military-Family-Readiness-Council-Minutes-25Jun2014.pdf>

⁹ Military.com <http://www.military.com/daily-news/2015/11/11/pentagons-special-needs-program-to-take-years-longer.html>

¹⁰ Link to comments: <https://www.linkedin.com/pulse/efmp-reform-update-jeremy-hilton?trk=mp-reader-card>

¹¹ In-Service Transition for Transgender Service Members <http://www.dtic.mil/whs/directives/corres/pdf/130028p.pdf>

A decade might be expected for many weapons systems. It is unacceptable for reforming military family programs, especially one which our most vulnerable military families are counting on to be competent.

Our elected officials appear to concur, as the Senate version of the 2017 NDAA, contains a GAO study to evaluate the EFMP program, notably asking what is left unaccomplished since the GAO last made recommendations regarding the DoD Office of Special Needs in 2002¹² and “An assessment of the uniform policy [and its implementation] for the Department regarding families with special needs required by section 1781c(e) of title 10.”¹³

I don't know whether the problem is in leadership, in not enough personnel, in not enough funds, or a little bit of each (perhaps it's simply that our families don't have enough political pull?). Whatever the problem, it should be fixed expeditiously. Once the new regulations are published, it will be imperative that follow-up policies are written at the DoD and service level and implemented immediately, especially given the six-year delay just to get to this point. Senior leadership in OSD and the OCJCS should provide oversight until the policy is in place and being executed appropriately.

I respectfully request that the Military Family Readiness Council include implementation of EFMP reform as one its recommendations to the Secretary of Defense and the Congress. On behalf of tens of thousands of military families impacted by a disability or chronic medical condition, thank you for your consideration of this request.

Sincerely,

Jeremy Hilton
ktp1995@gmail.com

¹²GAO: “Better Oversight Needed to Improve Services for Children with Special Needs” <http://www.gao.gov/products/GAO-12-680>

¹³[SEC. 580, Page 233 GAO REPORT ON EXCEPTIONAL FAMILY MEMBER PROGRAMS](#)