

REPORT
OF THE
COAST GUARD RESERVE POLICY BOARD

CONVENED AT
COAST GUARD HEADQUARTERS
WASHINGTON, DC

26-27 MARCH 2014

TO CONSIDER, RECOMMEND, AND REPORT ON COAST GUARD RESERVE POLICY
MATTERS

Stephen B. Nye
Captain, U.S. Coast Guard Reserve
Acting Director of Reserve
And Military Personnel

REVIEWED: _____


None

COMMENTS: _____

DATE: _____

MAY 15 2014

Daniel A. Neptun
Rear Admiral, U.S. Coast Guard
Assistant Commandant for
Human Resources

REVIEWED: _____



COMMENTS: _____

DATE: _____

MAY 21 2014

PROCEEDINGS

1. The Coast Guard Reserve Policy Board met to consider, recommend, and report to the Secretary, Department of Homeland Security on Coast Guard Reserve policy matters, in accordance with 14 U.S.C. §703. The delegation of authority contained in Department of Homeland Security Delegation Number: 0170 delegates to the Commandant the duties assigned to the Service Secretary in 14 U.S.C. §703. The Board convened at 0900, on 26 March 2014 and adjourned at 1600 on 27 March 2013.

2. Present:

RADM John S. Welch, USCGR – President
CAPT Willard Ellis, USCGR – Member
CAPT Douglas Dawson, USCGR – Member
CAPT Phillip Brookings, USCGR – Member
CAPT Robert Hanley, USCGR – Member
CAPT Richard Timme, USCG – Member
CAPT Craig Henzel, USCGR – Member
CAPT Dirk Stringer, USCGR – Member
CDR Jennifer Grzelak-Ledoux, USCGR – Member
MCPO George Williamson, USCGR – Member
MCPO Kirk Murphy, USCGR – Member

LCDR Joseph Foley, USCGR - Non-voting Advisor

CDR Mark Freymuth, USCGR - Non-voting Facilitator
LTJG Travis Thornell, USCGR - Non-voting Recorder

3. The Board sat with closed doors.

4. The members of the Board and recorder were duly sworn.

5. The President waived the reading of the precept, dated 24 February 2014, since all members were provided a copy and indicated they had read it.

6. The Reserve Policy Board received a total of 12 submissions for consideration. There were six submissions which were identified as policy issues, and six submissions which were identified to be non-policy issues, policy issues that were already in progress, or already completed. The Board then considered three additional issues brought forth by Board members. A complete list of non-policy submissions and associated Board recommendations for these submissions are provided in Enclosure (1).

FINDINGS AND RECOMMENDATIONS

7. The Board addressed the six policy issues as indicated below:

Policy Issue #1: Inactive Duty Training (IDT)/Readiness Management Period (RMP) pay approval change from unit supervisor to Servicing Personnel Office (SPO).

Description: Inactive Duty Training (IDT) and Readiness Management Period (RMP) drills are currently able to be approved for pay by any supervisor with the appropriate Direct Access (DA) authority. Each Reservist is currently authorized 48 IDT drills and one RMP drill per fiscal year, potentially equaling over 390,000 pay transactions throughout the Coast Guard. The Reserve Policy Manual, COMDTINST M1001.28B, chapter 2.B.1.a.(2) states, "IDT drills are scheduled and approved by the command." When the command approves an IDT/RMP drill in Direct Access (DA), a pay transaction is submitted through the Pay and Personnel Center's (PPC) Joint Uniform Military Pay System (JUMPS). The present process confers tacit Payment Approving Official (PAO) status to thousands of command personnel who do not work directly for a Servicing Personnel Office (SPO). This action is in conflict with the Personnel and Pay Procedures Manual, PPCINST M1000.2B, chapter 1.1.3, which assigns SPO's as the sole authorized source for all pay data entry for DA/JUMPS.

Board Recommendation: Removing unit supervisor authority to approve IDT/RMP drills may cause a strain on a SPO that will have to take on this responsibility for its subordinate units. This shift may require a manpower assessment to distribute workload and/or create billets to support this increase. The Board recommends that units formally designate one or more members, E-6 or above (in each division), and all Senior Enlisted Reserve Advisors (SERAs) in outlying units to act as sole PAO for IDT/RMP drills. This designation will allow the PAO to meet all training and accountability requirements as outlined above, and ensure IDT/RMP attendance is verified, fiscal limitations are tracked, and training is completed.

Policy Issue #2: Participation Standards for Reserve Good Conduct Medal.

Description: The Coast Guard measures reserve participation standards based on fiscal year in accordance with chapter 4.B of the Reserve Policy Manual, COMDTINST M1001.28B. The Reserve Good Conduct Medal (RGCM) is awarded to reserve enlisted members who earn at least 70 retirement points during each of three consecutive anniversary years. Fiscal year and anniversary year are two different timelines, with anniversary year specific to when a member enters the Reserve Component. Reservists are required by 10 U.S.C. § 12642 to earn a minimum of 50 retirement points during each anniversary year. Due to the differences in the fiscal year based participation requirement and the statutory based anniversary year (50 point) requirement, a member could meet the minimum standards for fiscal year participation and earn 50 points in their anniversary year, but fail to earn 70 points to qualify for the RGCM.

Board Recommendation: The Board recommends changing the eligibility criteria for awarding the RGCM. Members who have completed three consecutive satisfactory years for retirement (50 points per anniversary year), in addition to all other applicable requirements listed in Article 4.B of the Reserve Policy Manual, COMDTINST M1001.28B for satisfactory participation, should be eligible to receive a RGCM. This policy change would not be applied retroactively but should take into account a split year between old and new policy.

Policy Issue #3: Qualification and Career Path Roadblocks for Reserve Members Assigned to Prevention Billets and Marine Safety Specialist Response (MSSR) warrant progression.

Description: Recent changes to qualification requirements have severely restricted the Prevention career track for reservists. ALCGRSV 108/13 announced, "All Marine Safety Specialist Deck (MSSD) and Marine Safety Specialist Engineering (MSSE) billets will convert to MSSR billets in CY2014." This conversion hinders the Chief Warrant Officer (CWO) career path for enlisted Reserve members in Prevention billets. ALCOAST 434/13 requires MSSR applicants be billeted in Response within the previous five years and have the Operations Section Chief, Type 3 (OSC3) qualification and either Federal On-Scene Coordinator Representative (FOSCR) or Response Supervisor (RS) qualifications. Enlisted Reserve members would need to be assigned to Response, Incident Management Division (IMD) for an extended period (five to ten plus years required for qualification and experience) if they wish to become a CWO. These programmatic changes will require long-term, strategic planning to develop a proficient and sustainable work force in the Reserve Component.

Obtaining vessel inspection qualifications for newly commissioned officers in Prevention billets is extremely difficult. Vessel inspection qualifications require resident courses at TRACEN Yorktown that are non-waiverable and may have a long waiting list.

ALCOAST 515/13 announced an update to Marine Safety Manual Volume II, COMDTINST M16000.7B. This update contains changes to Port State Control exam procedures including limiting the number of trainees on exams, limiting exam team size, and virtually eliminating Petty Officer-lead exams. These changes will make it very difficult for reserve members assigned to Port State Control billets to obtain/maintain qualifications.

Board Recommendation: The Board recognizes that the prerequisite qualifications for both MSSR and Port State Control are difficult to obtain and may be better supported by assignment in certain geographical areas, but are not Reserve policy issues. The Board recommends that the AREAS review their billet structure and consider reprogramming billets to align with training capacity, if necessary. The Board further recommends a review of required training course quotas and availability to Reservists.

Policy Issue #4: Change of Reserve Service Wide Exam (RSWE) Date.

Description: Recommend the RSWE be moved to a later date that does not coincide with the beginning of the fiscal year to reduce conflict with government funding and budget cycles. The RSWE is currently held on the third Saturday in October.

Board Recommendation: The Board concurs that administering the RSWE the third Saturday in October may be problematic in some fiscal years due to delayed appropriation. However, based on the Board's understanding of the workload timeline of stakeholders in the RSWE process, moving the exam to any other month also proves problematic due to the need for new course writer timelines, new RSWE eligibility requirement timelines, overlap with active duty service-wide exam, etc. Therefore, the Board recommends that the RSWE be held on the last Saturday of October to allow more time for appropriations to pass without putting extra strain on current RSWE stakeholders.

Policy Issue #5: Change to Semi-annual Weigh-in Timeframes.

Description: Recommend that semi-annual weigh-ins be changed from the October and April time frames to better accommodate budgetary issues that affect Reservists at the start of the fiscal year. November and May, or January and July may better fit the current fiscal climate.

Board Recommendation: The Board recommends Commandant (CG-133) review weigh-in timeframes for both Active Duty and Reserve members. The Board recommendation is for members to be allowed a 2-month window for weigh-in; March-April and October-November. This extended window would provide more command flexibility. In addition, it would alleviate hardship for SELRES members who batch drills because of budgetary constraints and/or excessive travel requirements due to geographical assignment. This larger window is also consistent with other readiness measurements (i.e. flu shots, ASQ). Additionally, a more flexible schedule aligns with the other military services such as the Marine Corps.

Policy Issue #6: Officer Evaluation Report (OER) Submission Frequency Change.

Description: Recommend that Section 5.A.3.b. of Officer Accessions, Evaluations and Promotions Manual, COMDTINST M1003.A, be amended so that an OER be required if more than 18 months have elapsed since the change/departure of the Reporting Officer (RO) for officers on a biennial schedule, or 12 months have elapsed for officers on an annual schedule since the ending date of the last regular OER. All other exceptions for this section should remain valid should this change be made.

Board Recommendation: The Board recommends no change to the current OER submission schedule. Feedback from CG PSC (RPM) suggests that the supervisor and RO consist of at least one active duty and one reserve officer in the rating chain. Proper span of control at the unit should dissipate workload to more manageable levels and enhance OER quality.

Additional Issue Brought Forth by Board #1: Reservists performing Inactive Duty Training (IDT) /Active Duty Training - Annual Training (ADT-AT) in locations outside of the continental U.S., and its territories/possessions.

Description: The Reserve Policy Manual, COMDTINST M1001.28B states in Chapter 4.B.4.b.(3), "Reservists are not authorized to perform IDT or ADT-AT outside the United States, and its territories and possessions." Further clarification in regards to IDT/ADT-AT and Temporary Duty (TDY) orders outside of the United States should be considered.

Board Recommendation: The Reserve Policy Manual, COMDTINST M1001.28B, Chapter 4.B.4.b.(3) should be clarified to state that Reservists are authorized to perform IDT and ADT-AT outside the United States and its territories and possessions when on TDY orders from their assigned unit, the exception being a designated imminent danger area.

Additional Issue Brought Forth by Board #2: Reserve Chief Warrant Officer (CWO) Billets.

Description: The current disparity in the geographical location of reserve Chief Warrant Officer (CWO) billets for both current CWOs and newly accessed CWOs, creates significant assignment problems for these members. Reasonable Commuting Distance (RCD) does not apply to CWO billets.

Board Recommendation: The Board recommends a holistic review of the entire Reserve CWO Program, to include requirements, accessions, and streamlining the billet reprogramming and assignment policy/processes.

Additional Issue Brought Forth by Board #3: Uniform Code of Military Justice (UCMJ) Authority Over Reserve Members Performing Inactive Duty Training (IDT).

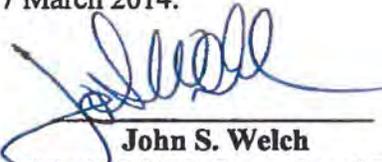
Description: The Reserve Policy Manual, COMDTINST M1001.28B and the UCMJ do not clearly define when UCMJ authority begins or ends for a reserve member performing Inactive Duty Training (IDT).

Recommendation: The Board recommends that an advisory opinion be obtained from Commandant (CG-0944). Subsequently, policy should be updated based on the advisory opinion to clearly define the period of time “on duty” during IDT that the Coast Guard has UCMJ authority over, and responsibility to the Coast Guard member. This would not include existing law/policy governing entitlement to incapacitation benefits. The Board also recommends that the time entered into Direct Access should define the member’s status as on or off duty.

8. We certify that, in the opinion of a majority of the members of the Board, the policy issues considered and the recommendations made by the Board are the best to meet the needs of the service and the Reserve Component.

ADJOURNMENT

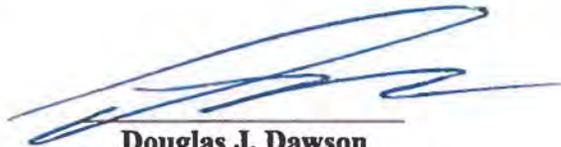
9. The Board adjourned at 1600, 27 March 2014.



John S. Welch
Rear Admiral, U. S. Coast Guard Reserve
President



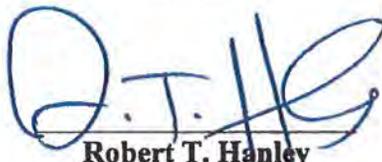
Willard S. Ellis
Captain, U.S. Coast Guard Reserve
Member



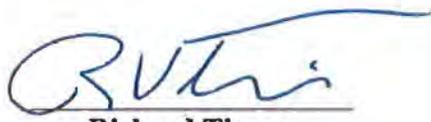
Douglas J. Dawson
Captain, U. S. Coast Guard Reserve
Member



Phillip F. Brookings
Captain, U. S. Coast Guard Reserve
Member



Robert T. Hanley
Captain, U.S. Coast Guard Reserve
Member



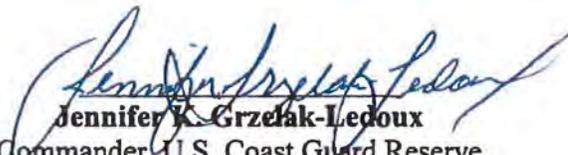
Richard Timme
Captain, U. S. Coast Guard
Member



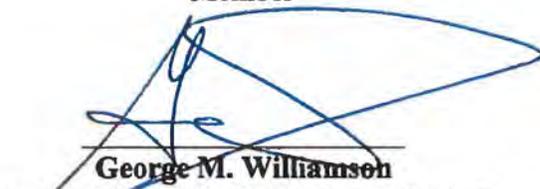
Craig R. Henzel
Captain, U.S. Coast Guard Reserve
Member



Dirk A. Stringer
Captain, U. S. Coast Guard Reserve
Member



Jennifer K. Grzelak-Ledoux
Commander, U.S. Coast Guard Reserve
Member



George M. Williamson
Master Chief, U.S. Coast Guard Reserve
Member



Kirk D. Murphy
Master Chief, U.S. Coast Guard Reserve
Member

NON-POLICY SUBMISSIONS AND RECOMMENDATIONS

Non-Policy Submission #1: Establishment of a Reserve Engineering Corps.

Description: Civilian professional engineers and civilian licensed marine engineers are currently serving in the Coast Guard Reserve. This expertise is currently unrecognized and underutilized by the Coast Guard.

Board Recommendation: The Board recommends that this issue be forwarded to CG-4 for evaluation and recommendation for a Manpower Requirements Analysis (MRA) to identify any need for Reserve engineering surge requirements.

Non-Policy Submission #2, 3, and 4: Reversal of Decision to Remove All Reservists from Maritime Safety and Security Teams (MSSTs).

Description: In CCG decision memo dated 21JUN12, Commandant (CG-DOD) recommended that all MSST Selected Reserve (SELRES) billets be transferred from the MSSTs to small boat stations.

Board Recommendation: The Board recognizes that these submissions have merit. There are discussions currently underway between CG LANTAREA and CG PACAREA to re-visit the recent decision to remove SELRES billets from the MSSTs.

Non-Policy Submission #5: Reserve Force Readiness System (RFRS) Billet Standardization.

Description: Sector Corpus Christi does not have any RFRS billets, and the resultant resource gap places an unmanageable Reserve Programmatic work-load on the active duty Servicing Personnel Office (SPO) and reserve administrative staff. Reserve program management in terms of strategic planning and execution will remain unattainable with our current staffing limitations being focused on the day-to-day administrative requirements of pay, travel claims, ADT orders, and basic monitoring of metrics. The strategic development and implementation of the Reserve Component as a force multiplier and mobilization asset requires full-time engagement and interface with multiple facets including the Eighth District Force Readiness Branch (DXR), Program Managers, Assignment Officers, and the Director of Operational Logistics (DOL).

Board Recommendation: While the billet standardization is not a policy issue, a review of the Full Time Support (FTS) structure is currently being conducted. The Board recommends waiting for the outcome of the review.

Non-Policy Submission #6: Streamline Regular to Reserve Officer Accession to Preserve Affiliation Health Care Coverage during Transition Process.

Description: Commissioned Coast Guard officers who voluntarily leave Active Duty (AD) to transition into the Selected Reserves (SELRES) face a potential gap in their health insurance coverage through a complex and opaque Regular to Reserve (R2R) board process. This process transfers members to the Individual Ready Reserve (IRR) until such time a SELRES billet is available. These IRR members are ineligible for Tricare coverage until they have received Permanent Change of Station (PCS) orders to a SELRES billet. Tricare Transitional Assistance Management Program, as authorized by Transition Assistance Program, COMDTINST 1900.2A, provides an additional 180 days of health care benefits to members who are involuntarily separated from AD, or who transition directly from AD to the SELRES.

Board Recommendation: Law currently prohibits members in the IRR from receiving TRICARE medical coverage. The Coast Guard is currently working with the Department of Defense (DoD) on a Unified Legislation and Budgeting (ULB) proposal to change the law to allow TRICARE coverage for IRR members.