

*Women Warriors: Will General Mark Milley Allow  
Women in the 75<sup>th</sup> Ranger Regiment?*

---

Audrey Davis  
Tulane University, New Orleans, Louisiana, USA



**Abstract:** On January 24<sup>th</sup>, 2013, Secretary of Defense Leon Panetta issued a memorandum commanding each branch of the military to fully integrate women into more positions. Panetta demanded that if any military position remains closed to women, military leaders must submit a request for exemption by January 1, 2016. Following this policy change, Army Chief of Staff Mark Milley allowed the first class of women to enter Ranger School, one of the most rigorous training programs in the Army. Two of these women, Kristen Griest and Shaye Haver, graduated in August of 2015. As the deadline approaches, Milley considers whether or not he will allow Griest and Haver to serve as Army Rangers, the next step in the career of most soldiers who graduate from Army Ranger School. Milley has stated that he remains conflicted about his upcoming decision. Many academic scholars, military personnel, and members of the American public hold strong opinions concerning the service of women in combat positions. Milley will consider these positions before making his final decision in January 2016. These perspectives include consideration of the physical capabilities of women, their effect on unit cohesion, sexual harassment of women, women's health and hygiene, and other issues of equality.

**Introduction**

On August 21, 2015 Kristen Griest and Shaye Haver made history as the first women to graduate from Army Ranger School. The Army Ranger School opened enrollment to women in April 2015. Griest and Haver were in the first group of 20 women to enroll. Despite the fact that the Ranger School seeks to train its students for realistic combat leadership roles and most Ranger graduates proceed to a position in the 75<sup>th</sup> Ranger Regiment, established policies barred Griest and Haver from serving in this elite unit. For this reason, they remain blocked from realizing their full potential as military personnel.

On January 24<sup>th</sup>, 2013, Secretary of Defense Leon Panetta issued a memorandum commanding each branch of the military to fully integrate women into more positions (see Appendix A). Panetta demanded that if any position remained closed to women, military leaders must submit a request for exemption by January 1, 2016. As the deadline approaches, Milley must consider whether or not he will allow Griest and Haver to serve as Army Rangers, the next step in the career of most soldiers who graduate from Army Ranger School.

**Policy Regarding Women in the Military**

While ideals of masculinity largely dominate military culture, women have taken part in combat roles in the United States Military since the American Revolutionary War (Kamarck 2015). According to the Pentagon, women filled 14.5% of active-duty offices in the military in 2011 (CNN 2013). More currently, the Department of Defense has restricted women's participation in the military. For example, existing policies bar women from officially filling

direct combat roles (Tilghman 2015). In more recent years, however, the United States Military has established policies that rescind many of these rules and offer more ways for women to participate.

### **1988 “Risk Rule”**

In 1988, Secretary of Defense Frank Carlucci established the Task Force on Women in the Military. According to the task force’s first report, Carlucci aimed to address:

...attitudes toward and treatment of women in the military, and their impact on the morale and quality of life for women; consistency in application of combat exclusion statutes and policies, and their effective utilization of women; and the manner in which various force management policies may impact adversely on women’s career development (U.S. Department of Defense 1988, 1).

In this report, the task force addressed three main issues: sexual assault, exclusion from combat, and career development. The report explained that while the Department of Defense specifically banned women from engaging in direct combat in the Navy and in the Marine Corps, they failed to clarify how women can participate in other sectors of the military, such as the Army (19). They also recommended that the Department of Defense consistently regulate the exclusion of women from combat roles.

Due to the ambiguity of this report, many military departments subscribed to the “Risk Rule,” or statutes that aimed to “protect women from the most serious risks of harm or capture” (9). The task force argued that the subjective interpretation of “risk” kept women from attaining combat jobs and led to inconsistent exclusion policies between different military services. The task force claimed that the ambiguity and wide-ranging interpretations of the “Risk Rule” compromised women’s ability to fully participate in the military (1).

### **1994 Direct Combat Exclusion Rule**

In 1993, Secretary of Defense Les Aspin released a memorandum that called for the opening of more positions to women in the military (Kamarck 2015, 7). By 1994, Secretary Aspin officially repealed the “Risk Rule” and introduced the Direct Ground Combat and Assignment Rule, otherwise known as the Direct Combat Exclusion Rule. This statute prevented women from holding positions in “units below the brigade level whose primary mission is to engage in direct combat on the ground” (Kamarck 2015, 11). A key addition to this policy, which followed the recommendations of the 1988 report from the Task Force on Women in the Military, was Aspin’s inclusion of a clear definition of “direct combat” and a list of specifications regarding the ways women could and could not participate in the military (Kamarck 2015, 13). While this list of exclusions might sound restrictive of women, they actually required military departments to follow established rules instead of creating their own, thus making various military positions available to women (Kamarck 2015, 14). Two court cases followed this policy change: *Faulkner v. Jones* and *United States v. Virginia et. al.* Both cases paralleled the 1994 Direct Combat Exclusion Rule by pushing military institutions to establish clearer roles regarding women in the military.

***Faulkner v. Jones (1994)***

In 1995, the United States District Court ruled that the Citadel violated Susan Faulkner's rights under the Equal Protection Clause of the Fourteenth Amendment. This ruling allowed her to become the first female cadet accepted into the college (*Faulkner v. Jones* 1994). The Citadel, a state-funded military college in South Carolina, originally rejected Susan Faulkner's application on the grounds of her sex. Since its founding in 1842, the Citadel had only admitted men.

According to the Citadel, it lacked a demand for female admission, which justified its exclusion of all women (*Faulkner v. Jones* 1994). Additionally, the Citadel claimed that its interests lied in providing the best education to its students. According to Judge Kenneth Hall, however, this case had little to do with education, but rather with "wealth, power, and the ability of those who have it now to determine who will have it later" (*Faulkner v. Jones* 1994). The Fourth Circuit of the Court of Appeals ultimately ruled in favor of Faulkner and demanded her immediate admission into the Cadet Corps.

***United States v. Virginia et. al. (1996)***

In a similar lawsuit in 1996, the United States sued the state of Virginia and the Virginia Military Institute (VMI) for violating the Equal Protection Clause of the Fourteenth Amendment by failing to admit women into VMI. In this lawsuit, however, the defendant responded more calculatedly. *Virginia et. al.* first claimed that single-sex education provided "important educational benefits" for its students. Secondly, they contended that their "adversative method of training provides educational benefits that cannot be made available, unmodified, to women, and that alterations accommodating women would necessarily be so drastic as to destroy VMI's program." The District Court ruled in Virginia's favor.

Shortly after, the United States filed an appeal and the Fourth Circuit of the Court of Appeals reversed this ruling, ordering VMI to remedy their constitutional violation. Virginia proposed the creation of a separate program for women, the Virginia Women's Institute for Leadership (VWIL). The Court of Appeals concluded that students at both programs would receive "substantively comparable" benefits and approved the program. Unsatisfied with this solution, the case was taken to the Supreme Court.

The Supreme Court ruled VMI's all-male admission policy unconstitutional and opposed the Court of Appeals' previous ruling by finding that the VWIL would not provide women with the same rigorous training environment as VMI. The Supreme Court stated that "the VWIL program is a pale shadow of VMI in terms of the range of curricular choices and faculty stature, funding, prestige, alumni support and influence." Once again, the judicial system required the admission of women into a previously male-dominated military facility and curriculum.

**2013 Secretary of Defense rescinds the Direct Ground Combat Exclusion Rule**

In 2013, Secretary of Defense Leon Panetta officially rescinded the Direct Ground Combat Exclusion Rule, another step towards including more women in the military (see Appendix A). Panetta issued a memorandum explaining his decision: "Today, women make up 15% of the U.S. military and are indispensable to the national security mission. In fact, thousands of women have served alongside men in Iraq and Afghanistan, and like men, have been exposed to hostile enemy action in those countries" (Dempsey and Panetta 2013).

In addition, the memorandum established clear orders for military leaders. It required that each military department submit their plans for the full integration of women to the Secretary of

Defense by May of 2013 and urged that these changes take place “as expeditiously as possible.” The memorandum forced military leaders to actively work toward placing more women in military positions. If leaders of a military department intended to keep certain positions closed to women, the memorandum required that they submit a specific request to the Secretary of Defense for an exemption. Furthermore, it required military departments to submit quarterly progress reports detailing their implementation of the memo. At the time, the Army Ranger School and the 75<sup>th</sup> Ranger Regiment remained closed to women. This memo forced Chief of Staff of the Army Mike Milley to reconsider this exclusion at the beginning of his term in 2015.

### **Army Ranger School**

The Army’s Ranger School is one of the most rigorous training courses offered in the Army. According to the Army Rangers website, the school trains its students to be “experts in leading soldiers on difficult missions” through the “development of individual combat skills and abilities through the application of the principles of leadership” (U.S. Army 2015). The school creates realistic wartime scenarios in order to prepare its students for some of the most stressful experiences they might encounter in combat. Students are pushed to their mental and physical limits and must endure this intensive training for 61 days. In an article from the *New York Times*, authors Richard Oppel and Helene Cooper (2015) note that they train on “little sleep, carrying packs and combat equipment that typically weigh between 65 and 90 pounds.” Oppel and Cooper (2015) claim that over the course of 61 days, they carry out patrols that cover the same distance as walking from New York City to Boston. In the first phase of training, students complete a 12-mile march on foot without water while carrying a load of 35 pounds. Only about two of five students graduate each term.

### **Kristen Griest and Shaye Haver**

On August 21, 2015 Kristen Griest and Shaye Haver made history as the first women to graduate from Army Ranger School. Ranger School opened enrollment to women in April of 2015, and Griest and Haver were of the first group of 20 women permitted to attend. Shaye Haver attended high school in Texas and went on to graduate from the United States Military Academy at West Point in 2012 (Lamothe 2015). Prior to beginning her Ranger School training, Haver served as an Apache attack helicopter pilot (Booker 2015). Griest also attended West Point, but graduated a year earlier than Haver. In a “pre-Ranger” preparatory course, Griest’s unit designated her as an honor graduate from the program (Lamothe 2015). Prior to entering Ranger School, Griest served as a military police platoon leader (Booker 2015).

A few days before attending their graduation ceremony from Ranger School, journalist, Dan Lamothe, from *The Washington Post* asked the two women if they had ever thought about quitting the program. Griest and Haver both noted that they did struggle, especially during the third phase of the training (which takes place in the swamps of Florida). Griest stated, “I never actually thought anything was going to be too difficult that it was worth leaving the course” (Booker 2015). Beyond the motivation to earn the Ranger badge, Griest explained: “I was thinking really of future generations of women that I would like them to have that opportunity so I had that pressure on myself” (Booker 2015).

Despite the fact that the Ranger School seeks to train its students for realistic combat leadership roles, military policies still bar Griest and Haver from serving in the 75<sup>th</sup> Ranger Regiment. Most graduates of the Ranger School move on to take part in this elite unit of the

Military. However, active policies blocked Griest and Haver from realizing their potential as military personnel.

### **75<sup>th</sup> Ranger Regiment**

The 75<sup>th</sup> Ranger Regiment is a special operations unit that the U.S. Military's website describes as a "lethal, agile and flexible force, capable of conducting many complex, joint special operations missions." Similar to the Navy SEALs, Army Rangers are highly trained military personnel. Their superiors can call Rangers to service within 18 hours of notice. They train their students to carry out direct-action strikes, or offensive attacks made in politically sensitive environments to "achieve military, diplomatic, informational, and/or economic objectives employing military capabilities for which there is no broad conventional force requirement" (U.S. Department of Defense 2010, 68). This type of combat differs from conventional attacks because it requires a higher level of physical and political risk, more complex operational techniques, and greater independence from support (U.S. Department of Defense 2010, 68). Rangers are trained to carry out missions that either have a high risk of direct combat or explicitly entail direct combat. For instance, they might engage in reconnaissance in which Rangers obtain resources and information about the activities of enemy forces (U.S. Department of Defense 2010, 200). They might also engage in rescue missions, in which they rescue a prisoner of war from a hostile area (U.S. Department of Defense 2010, 199). Although military policies bar women from entering this unit, the rescission of the Direct Combat Exclusion Rule in 2013 required that Chief of Staff of the Army Mark Milley either open this unit to women by January 1, 2016 or apply for an exemption from the Secretary of Defense.

### **The Debate**

General Mark Milley assumed his role as the 39<sup>th</sup> Chief of Staff of the U.S. Army in August of 2015. Within his first month of serving as Chief of Staff, he stated, "Right now I would call myself right on the line," regarding women in combat positions (Burns 2015). Although he had seen many women in combat during his tours as a commander in Iraq and Afghanistan, he does not know whether or not allowing more women to participate in combat would help or harm the Army's performance. In October of 2015, Milley will meet with a group of military leaders at the U.S. Army's annual national convention to discuss his decision (Lemmon 2015). He will also consider the Army assessment of the experiences of women who serve in combat in Israel and in the U.S. Marine Corps (Burns 2015).

According to Leon Panetta's memorandum in 2013, Milley must ensure that including women will not compromise "readiness, morale, or war-fighting capacity" (Dempsey and Panetta 2013). In other words, the participation of women must not impede the Army's ability to quickly call its personnel into action and to effectively fight in combat. This consideration remains only one of many potential benefits or setbacks of allowing the participation of women in combat units such as the 75<sup>th</sup> Ranger Regiment. Many academic scholars, military leaders, and American citizens have voiced their opinions regarding this issue and have published these opinions in the form of books and articles in academic journals. Media sources, such as *CNN* and *The Washington Post*, have also covered the debate. These sources present mixed conclusions. As Milley remains conflicted, he will consider the salient points within this discourse and seek council from other military leaders before making his final decision (Burns 2015).

### **Physical Capabilities of Women**

Some argue that because of the assumed biological differences between men and women, allowing women to hold certain military positions will negatively affect readiness, or their ability to come to arms. Military theorist Martin Van Creveld stresses that women have weaker builds, which would harm the readiness of combat forces (Zeigler and Gunderson 2005, 54). The Presidential Commission on the Assignment of Women in the Armed Forces in 1992 offered evidence suggesting that women are less physically capable than men. For example, these studies showed that the top 20 percent of female military personnel received the same scores as the bottom 20 percent of men in Army physical fitness tests (United States 1992).

Because the average strength of a woman differs from that of a man, many argued that women should not be allowed to participate in ground combat. Ground combat duties included hand-to-hand fighting, carrying heavy loads over long distances, and digging trenches. Many argued that because of this constant physical strain, women will hold back their units and should not be allowed to fill these roles (Zeigler and Gunderson 2005, 55).

On the other hand, proponents of women serving in combat roles argue that physical fitness tests would eliminate this problem. If men and women are held to the same physical standards, more men than women would likely pass, but the issue of gender would make no difference. If a soldier passes the fitness test, proponents argue that it should not matter if that soldier is a man or a woman. In other words, the U.S. Military should not exclude women who are willing and capable of serving in combat roles only because the majority of women cannot (58). A proponent of women in combat, Lorry Fenner, states:

The Services cannot match individuals to appropriate jobs by relying on some imagined or generalized group stereotype; they must allow each person the opportunity to measure herself or himself against appropriate standards to field the most physically effective military force (Fenner 2001, 7).

### **Unit Cohesion**

Military theorists agree that unit cohesion is key to success in combat. The battlefield can be violent, unorganized, chaotic, and unpredictable. Feeling connected to the group and united in the face of potential death had been proven a critical component to success in combat (Owens 1998). Opponents argue that women will negatively affect combat unit cohesion because in an actual combat situation, male soldiers would follow their “chivalric instincts” and seek to protect female soldiers, therefore distracting themselves from their professional duties and endangering the safety of the entire unit (Skaine 2011, 63). From the perspective of some opponents, the male soldier’s role as a “protector” remains inherent to his character. A male marine offers his insight: “Males are typically protective of the female and [this feeling results from] that macho image ... I think that most male Marines would feel ultimately responsible or more responsible for that female [than a male in the case of death]” (Archer 2012). Others suggested that women disrupt bonding because they “do not have the experience of team sports and competition that men do” (Fenner and DeYoung 2001, 18).

Some say, on the other hand, that due to the difficulty of accurately assessing how the presence of women affects unit cohesion, opponents have based many of their claims in hypothetical situations and generalizations (Skaine 2011, 63). Additionally, they claim that studies of the U.S. Air Force Academy show that men and women do bond in military settings (Kier 1998). Others cite the rather seamless integration of women into previously male-

dominated jobs such as firefighters and police officers as an example of how men and women could work well together in combat (Segrave 1995).

### **Sexual Harassment**

Some believe that integrating women into more positions will lead to more cases of sexual assault and more importantly in the eyes of military institutions, more unwanted lawsuits. Marie DeYoung, the director of the Newman Catholic Center at Northwest Missouri State University and a captain in the U.S. Army Reserves, wrote an article titled “A Feminist Analysis in Support of the U.S. Army Ground Combat Exclusion for Women.” She contends that “ground combat units can’t afford to pause for sexual harassment investigations” (DeYoung 2001, 118). DeYoung claims to have known some women who chose to become pregnant as a strategic way to be relieved of their duties. She argues that combat units cannot “be crippled” by the sexual harassment cases that are “thrust upon sergeants and officers who strive to hold women to task” (DeYoung 2001, 119).

DeYoung cites the Tailhook scandal, a sexual harassment case from 1994, in which several male peers assaulted Lieutenant Paula Coughlin in a hallway of a Hilton Hotel at an aviation convention. Coughlin sued the Hilton Hotel arguing that she developed posttraumatic stress from the incident as well as a peptic ulcer. The court ruled in her favor and rewarded her \$7 million. DeYoung offers her comments on the case: “If her disability was real, she was a menace to her flight crew every time she flew after that one physical encounter. If her disability was not real, Coughlin’s legal exploitation of sexual harassment laws to make a quick fortune cost the Hilton Hotel \$7 million. Worse, at least \$0.5 million of the Navy’s training funds was wasted” (DeYoung 2001, 119). Some believe that the fundamental characteristics of men will inevitably lead to sexual encounters between men and women in combat, whether or not women desire these encounters. A male captain in the Marine Corps’ bluntly states, “There are two things that motivate men: they want to kick some ass and get some ass. And that’s all that motivates them. When I’m fed and I’ve slept, there’s only one thing on my mind” (Archer 2012). According to this perspective, incidents such as the Tailhook scandal as well as consensual sexual relations will occur if women engage in combat.

On the other hand, Lorry Fenner, a colonel in the Air Force and the Vice Wing Commander of the 70<sup>th</sup> Intelligence Wing, argues that “sex happens” whether or not women are present: “The presence of military women obviously does not cause men to have sex. Men have sex with civilian women or each other (as heterosexuals) when military women are not present” (Fenner 2001, 14). Additionally, sexual harassment remains an issue in the absence of women. Interviews from the documentary *The Invisible War* offer evidence that male military personnel assault other male military personnel (Dick 2012).

Beyond sexual harassment, some argue that willing sexual relations between men and women in combat positions will also decrease unit readiness and morale. The 1992 Presidential Commission cites the experience of a sergeant who served in a mixed-gender combat unit, known as Operation Desert Storm, during the Persian Gulf War of 1990-91. This sergeant claimed that because of the presence of women, “they had a very bad situation”:

We had females and males that would go on guard duty together and be caught necking, and they’re supposed to be out there protecting us and pulling guard duty at 2:00, 3:00, 4:00 o’clock in the morning. And they had no idea what was going on out there (United States 1992).

Conversely, proponents contend that soldiers in combat are preoccupied with concerns more pressing than sexual encounters. Gregory Gunderson, a former officer in the United States Army Military Police Corps and academic scholar specializing in military reform and international security, draws upon his own experiences and argues that soldiers in combat “are most likely exhausted, filthy, cold (or, alternatively, uncomfortably hot), hungry, scared, and quite likely, in danger of losing their life or suffering grievous harm. Under these conditions, thoughts of sex, even in the presence of the opposite gender, are probably low on the list of items with which to be concerned” (Zeigler and Gunderson 2005, 52-53).

### **Feminine Hygiene and Health**

Opponents of the inclusion of women in the military argue that necessities for feminine hygiene would lead to supply problems in combat. Army veteran Brian Mitchell wrote in his book, *Women in the Military: Flirting with Disaster* (1998), that, in his experience, sanitation became a problem for women who did not have the proper supplies and subsequently developed higher rates of urinary tract and yeast infections. At a military conference, an Army major claimed that if women were sent into combat, bullets and meals would be left behind so that “ladies could have kotex” (Ziegler and Gunderson 2005, 53). Gunderson, however, notes that hygiene had always been a problem for soldiers in the barracks, regardless of gender and that “logistical planning should be able to resolve the situation without having to leave the ‘bullets and ‘MREs’ [meals-ready-to-eat] behind” (Ziegler and Gunderson 2005, 53).

In response to arguments made about how pregnancy and women’s hygiene compromise performance in the military, proponents of women in combat point out that this line of thinking is usually only supported by anecdotal evidence and questionable statistics. Fenner, a colonel in the Air Force and the vice wing commander of the 70<sup>th</sup> Intelligence Wing, claims that “most women are not permanently disabled by pregnancy; none are pregnant all the time, and many military women are never pregnant” (Fenner 2001, 13). She argues that in order to understand unit readiness, one should consider not only those who are pregnant but also those who are non-deployable, stating, “When we conscientiously define the problem and tally *all* non-deployable personnel, we find that men are proportionally...more often non-deployable than women” (Fenner 2001, 13).

### **Issue of Equality**

Proponents contend that barring women from combat positions violates the Equal Protection Clause of the Fourteenth Amendment, the same argument used in *Faulkner v. Jones* and *United States v. Virginia et. al.* Gunderson notes that experience in combat is one’s “ticket to the top” in the military world; in order to climb the ranks, one must serve in combat. By excluding women from these roles, he argues that the U.S. Military systematically prevents women from obtaining the most prestigious positions in the military (Gunderson 2005, 44).

He also notes that serving in combat can be considered a fundamental right of American citizenship and excluding women from combat roles infringes on this basic liberty and denies them “full” citizenship (Gunderson 2005, 63). The Service Women’s Action Network (SWAN) takes a similar position. SWAN is an organization that seeks to secure “equal opportunity and freedom to serve without discrimination, harassment or assault” for women. They believe that in order to create “equal opportunity,” the U.S. Military should integrate women into all sectors and establish gender-neutral standards for entering these positions (Service Women Action Network 2015).

### **The Decision**

Considering this wide range of opinions, Milley has a tough decision to make. Griest and Haver have proven their physical capabilities by graduating from Ranger School. Should he allow these women to participate in the 75<sup>th</sup> Ranger Regiment? More broadly, should he seek to create equal opportunity for women by opening all combat units to women, but possibly be perceived as risking the performance of these units? Or should he listen to opponents of women in combat and apply for an exemption from the Secretary of Defense?

### **Epilogue**

On December 3, 2015, Secretary of Defense Ash Carter announced his decision to open all combat roles to women. Rather than allowing the leaders of each branch of the military, like Army Chief of Staff Mark Milley, to make their own choices on the matter, Carter instead established an all-encompassing policy change. He stated that he believes the military should operate under a common set of standards (Carter 2015). During this press conference, Carter stressed that “there will be no exemptions” for any positions. While it remains uncertain whether or not Mark Milley would have requested an exemption regarding former Secretary of Defense Leon Panetta’s 2013 memorandum, he did state in a press conference on February 2, 2016 that, “It is my professional judgment that some women can perform every single job in the United States Army to include infantry, armor and special forces” (Milley 2016).

Due to Carter’s decision, the opportunities for women in the military have expanded. Griest and Haver, for example, will now have the freedom to realize their potentials as Army Rangers. The military will also lift its ban against women in the Navy SEALs and Air force Special Tactics Units (McLeary 2015). Women will now have the ability to gain official recognition for their efforts in combat roles, and such recognition remains essential for career advancement and overall gender equality. Although this change in policy has opened many military positions to women, Carter believes that it does not guarantee the full integration of women into the army. At the December 3<sup>rd</sup> press conference, Carter stated that senior officials and military officers still have to overcome the belief that integration will reduce readiness. In other words, he believes that complete integration will require military leaders to willingly accept the service of female military personnel (Carter 2015).

## References

- Archer, Emerald M. 2012. "The Power of Gendered Stereotypes in the US Marine Corps." *Armed Forces & Society* 39(2):359-391.
- Booker, Brakkton, 2015. "First Female Army Rangers Say They Thought Of 'Future Generations of Women'." *NPR*, 20 August, 2015.
- Burns, Robert. 2015. "New Army Chief Weighing Decision on Women in Combat." *Associated Press*, 22 August, 2015.
- CNN. 2013. "By the Numbers: Women in the U.S. Military." *CNN*, 24 January 2013.
- Carter, Ash. 2015. Press conference on 3 December, 2015.
- Dempsey, Martin and Leon Panetta. 2013. "Dempsey, Martin and Leon Panetta to Secretaries of the Military Departments Acting Under Secretary of Defense for Personnel and Readiness and Chiefs of the Military Services." 2013. *Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule* [Memorandum].
- DeYoung, Marie. 2001. "A Feminist Analysis in Support of the U.S. Army Ground Combat Exclusion for Women." *Women in Combat: Civic Duty or Military Liability?* Washington, D.C.: Georgetown University Press.
- Dick, Kirby. 2012. *The Invisible War*. Cinedign and Docurama Films.
- Faulkner v. Jones*. 1994. 858 F. Supp. 552 (District of South Carolina 1994).
- Faulkner v. Jones*. 1995. 51 F.3d 440, 42 (4<sup>th</sup> Circuit 1995).
- Fenner, Lorry M. 2001. "Moving Targets: Women's Roles in the U.S. Military in the 21<sup>st</sup> Century." *Women in Combat: Civic Duty or Military Liability?* Washington, D.C.: Georgetown University Press.
- Kamarck, Kristy N. 2015. *Women in Combat: Issues for Congress*. Washington D.C. UNT Digital Library. <http://digital.library.unt.edu/ark:/67531/metadc700843/> (Accessed 27 October, 2015).
- Kier, Elizabeth. 1998. "Homosexuals in the U.S. Military." *International Security* 23(2):5-39.
- Lemmon, Gayle. 2015. "'I Don't Know What the Debate is,' Army's Top Officer Says of Women." *Defense One*, 16 October, 2015.
- Lamothe, Dan. 2015. "These Are the Army's First Female Ranger School Graduates," *The Washington Post*, 18 August, 2015.

McLeary, Paul. 2015. "Pentagon Opens Up All Combat Jobs to Women," *Foreign Policy*, 3 December, 2015.

Milley, Mark. 2016. Press conference on 2 February, 2016.

Oppel, Richard & Cooper, Helene. 2015. "2 Graduating Rangers, Aware of Their Burden." *The New York Times*, 20 August.

Owens, Thomas Mackubin. 1998. "It's Time to Face the Gender Paradox." *U.S. Naval Institute Proceedings*. 124(70):43-49.

Segrave, Kerry. 1995. *Policewomen: A History*. Jefferson, N.C.: McFarland & Co.

Service Women's Action Network. 2015. "Women in Combat." *Service Women's Action Network*. <http://servicewomen.org/women-in-combat/> (Accessed 1 November, 2015).

Skaine, Rosemarie. 2011. *Women in Combat*. Santa Barbara: ABC-CLIO LLC.

Tilghman, Andrew. 2015. "Women in Combat Units: Final Decision Due." *Military Times*, 21 June.

United States Department of Defense. 1988. *Department of Defense Task Force on Women in the Military (UNCLAS)*. Washington, D.C.: Department of Defense.

United States. 1992. *The Presidential Commission on the Assignment of Women in the Armed Forces*. Washington, D.C.: The Commission.

United States Department of Defense. 2010. *Department of Defense Dictionary of Military and Associated Terms*. Washington, D.C.: Department of Defense.

*United States v. Virginia et. al.* 1996. 518 U.S. 515 (1996).

U.S. Army. 2015. "U.S. Army Rangers." <http://www.army.mil/ranger/> (Accessed 29 October, 2015)

Zeigler, Sara L., and Gunderson, Gregory G. 2005. *Moving Beyond G.I. Jane: Women and the U.S. Military*. Lanham, Md.: University Press of America.

**Appendix A:**



JAN 24 2013



MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS  
ACTING UNDER SECRETARY OF DEFENSE FOR PERSONNEL  
AND READINESS  
CHIEFS OF THE MILITARY SERVICES

SUBJECT: Elimination of the 1994 Direct Ground Combat Definition and Assignment Rule

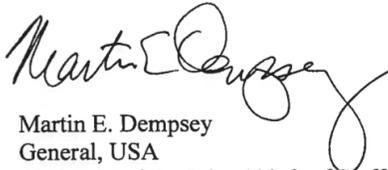
We are fully committed to removing as many barriers as possible to joining, advancing, and succeeding in the U.S. Armed Forces. Success in our military based solely on ability, qualifications, and performance is consistent with our values and enhances military readiness. Today, women make up 15% of the U.S. military and are indispensable to the national security mission. In fact, thousands of women have served alongside men in Iraq and Afghanistan, and like men, have been exposed to hostile enemy action in those countries. However, many positions in our military remain closed to women because of the 1994 Direct Ground Combat Definition and Assignment Rule.

In February 2012, in collaboration with the Joint Chiefs of Staff, we modified the 1994 Rule, thereby opening up over 14,000 positions previously closed to women. Subsequently, the Joint Chiefs of Staff reviewed the 1994 Direct Ground Combat Definition and Assignment Rule and they now propose a way forward that will fully integrate women without compromising our readiness, morale, or war-fighting capacity. We agree with their approach and guiding principles, and the milestones they propose. A copy of the memorandum explaining the advice of the Joint Chiefs of Staff is attached.

Therefore, the 1994 Direct Ground Combat Definition and Assignment Rule excluding women from assignment to units and positions whose primary mission is to engage in direct combat on the ground is rescinded effective immediately. Currently closed units and positions will be opened by each relevant Service, consistent with the guiding principles set forth in the attached memorandum and after the development and implementation of validated, gender-neutral occupational standards and the required notifications to Congress. The Military Departments shall submit by May 15, 2013, to the Secretary of Defense through the Chairman of the Joint Chiefs of Staff and the Under Secretary of Defense for Personnel and Readiness, their detailed plans for the implementation of this directive. Their plans shall be consistent with the guiding principles, and goals and milestones contained in the attached memorandum.

Integration of women into newly opened positions and units will occur as expeditiously as possible, considering good order and judicious use of fiscal resources, but must be completed no later than January 1, 2016. Any recommendation to keep an occupational specialty or unit closed to women must be personally approved first by the Chairman of the Joint Chiefs of Staff, and then

by the Secretary of Defense; this approval authority may not be delegated. Exceptions must be narrowly tailored, and based on a rigorous analysis of factual data regarding the knowledge, skills and abilities needed for the position. The Military Departments shall submit quarterly progress reports on their implementation of this memo to the Secretary of Defense through the Chairman of the Joint Chiefs of Staff and the Under Secretary of Defense for Personnel and Readiness.



Martin E. Dempsey  
General, USA  
Chairman of the Joint Chiefs of Staff



Leon E. Panetta  
Secretary of Defense

Attachment:  
As stated

cc:  
Under Secretary of Defense for Acquisition, Technology, and Logistics  
Under Secretary of Defense for Policy  
Under Secretary of Defense for Intelligence  
General Counsel of the Department of Defense  
Assistant Secretary of Defense for Legislative Affairs  
Assistant Secretary of Defense for Public Affairs