

United States Senate

WASHINGTON, DC 20510-3205

October 20, 2020

The Honorable Adam Smith
Chairman
House Armed Services Committee
2216 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Mac Thornberry
Ranking Member
House Armed Services Committee
2216 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Jim Inhofe
Chairman
Senate Armed Services Committee
205 Russell Senate Office Building
Washington, D.C. 20510

The Honorable Jack Reed
Ranking Member
Senate Armed Services Committee
228 Russell Senate Office Building
Washington, D.C. 20510

Dear Chairman Inhofe, Chairman Smith, Ranking Member Reed, and Ranking Member Thornberry:

As House and Senate conferees negotiate the Fiscal Year (FY) 2021 National Defense Authorization Act (NDAA), we encourage you to ensure that the conference report retains Section 592, *Limitation on the Implementation of Army Combat Fitness Test*, from the Senate version of this bill. Since the Department of the Army has initiated the new Army Combat Fitness Test (ACFT), significant concerns have been raised regarding the data used to develop the test, initial test scores, and logistical issues. The ACFT will determine the career path and success of all soldiers currently serving, yet many information gaps and unknowns remain. On September 24th, *The Washington Post* published an article stating that the Army initiative to create a stronger, fitter fighting force has yielded a dramatic gender gap and that this fitness test will elevate physical prowess over other qualities, such as effective and ethical leadership.¹ Clearly, rolling out this new test is premature. The Senate provision directs the Secretary of the Army to withhold implementation of the ACFT until a study is conducted by an independent entity that examines the extent to which this test will adversely impact soldiers deployed or stationed in climates that make outdoor physical training prohibitive and the extent to which this test would affect recruitment and retention in critical support military occupational specialties (MOS).

For the past forty years, soldiers have been tested on physical fitness using timed push-ups, sit-ups, and a two-mile run with the Army Physical Fitness Test (APFT). The general consensus was that this test did not accurately test combat readiness and substantial reform was needed. The

¹ Ryan, Missy. "The Army Is Rolling out a New Fitness Test: Will It Hold Back Women?" *The Washington Post*, WP Company, 24 Sept. 2020, www.washingtonpost.com/national-security/army-fitness-test-women/2020/09/24/20ed51e2-e244-11ea-ade1-28daf1a5e919_story.html.

Army began to reconsider the way physical fitness is determined and to develop a test that was gender neutral and based on occupation following the repeal of the direct ground combat exclusion rule. The FY2015 NDAA required that these modern and gender-neutral occupational standards must “(1) accurately predict performance of actual, regular, and recurring duties of a military occupation; and (2) are applied equitably to measure individual capabilities.”² Though we support this goal, we believe the Army has missed the mark.

In order to develop the ACFT, the Army conducted the Baseline Soldier Physical Readiness Requirements Study (BSPRRS). The goal of this study was to identify which fitness events most predict performance on simulation tests of common physically demanding military tasks. Analysis of the BSPRRS final report identified flaws within the study, including conflicting findings and a considerable gap in test participants. While the Army claims the ACFT is 80 percent predictive when promoting the assessment of regular and recurring duties of a military occupation, the BSPRRS demonstrates that the leg tuck was not a significant predictive variable.³ Yet, it was still chosen as one of the six events to be included in the final test without any supporting data. Furthermore, females were vastly underrepresented in the BSPRRS test group. The average participant was 24 years old and male. During Phase II, only 14.3% of test participants were female, and in Phase III only 10.5% of participants were female. This is not even representative of the total Army force. The study that the Army has used to make its claims that the AFCT is 80% predictive used a mere 16 women, all volunteers, with an average age of 23. As a result, an external review by the University of Iowa Virtual Soldier Research Center criticized the BSPRRS study, finding that due to the "inherently unbalanced study design...determination of which tasks best predict or represent performance could be influenced towards strategies used predominantly by men."⁴

In 2019, the Army identified the six events of the ACFT and began conducting field tests within 63 battalions across the organization. Preliminary data was leaked showing an overall failure rate of 84% for females and 30% for males within these battalions. The Army refuted these numbers and stated the slides with these test scores were not official documents. Since then, the Army has provided limited data, but what they have released depicts a consistent 65% failure rate for females and 10% failure rate for males in the moderate physical demand category (the lowest Army standard). The conclusions drawn from the data have never been good, yet the Army continues to pour money and resources into administering and preparing for the flawed test instead of questioning the validity of the test.

The event which has caused the highest number of test failures is the leg tuck, the same event which has no proven predictive value to military occupation. The University of Iowa study showed that if the leg tuck event was eliminated, the likelihood of failure is significantly reduced.⁵ The Army has failed to show that the leg tuck has any nexus to the skills necessary for combat.

² Pub. L. 113-291, 2014.

³ “Technical Report: T19.041-13.1 Baseline Soldier Physical Readiness Requirements Study” (November 2019: Research and Analysis Division, U.S. Army Center for Initial Entry Training, FT Eustis, VA, Whitfield B. East, Ed.D., MAJ David DeGroot, Ph.D., Stephanie Muraca-Grabowski, Ph.D.).

⁴ “Review Report: Baseline Soldier Physical Readiness Requirements Study” (1 April 2020, The University of Iowa. Karim A. Malek, Ph.D., 6.2 Kevin C. Kregel, Ph.D., Laura A Frey-Law, Ph.D., PT, Landon Evans, MS, RD, CSCS, Rajan Bhatt, Ph.D.).

⁵ *Id.*

While the ACFT 2.0 provides the option for a two-minute plank as an alternative to the leg tuck, the Army has reiterated this is only a temporary option. Furthermore, only 60 points will be issued for the two-minute plank, greatly reducing the participant's overall score.

The Army Physical Fitness Test (APFT) required a \$3 stopwatch. The ACFT requires approximately \$3,000 worth of equipment to put one individual through the test. In order to train and prepare, soldiers are personally procuring equipment. Further, the test relies upon ideal weather conditions and a large open area for both training and administration. In the best-case scenario, it is conducted at a large indoor facility. However, this is not widely possible throughout the entire area of operations, especially not in austere environments, which creates inequalities across the force. Some may have ideal conditions and others may have to battle the elements, causing variations in scoring to no fault of the soldier.

We support advances in the Army physical fitness program and policies that promote the equal treatment of male and female soldiers. However, the ACFT as it currently stands, lowers standards and expectations for young, male soldiers while setting unrealistic standards for others including those with fewer physical responsibilities such as medical personnel, judge advocates, or cyber warriors. This test runs counter to the Army's new talent strategy that aims to create a 21st century talent management system with policies, programs, and processes that recognize and capitalize upon the unique knowledge, skills, and behaviors possessed by certain individuals. Lastly, for decades the Army has relied heavily upon physical fitness test scores to determine access to training and career progression. We acknowledge that the ACFT 2.0 is a work in progress, but we have considerable concerns regarding the negative impact it may already be having on so many careers. It is imperative that we pause implementation until all questions and concerns are answered. Soldiers' careers depend on it and the continued lethality of our force requires it.

We commend you on your leadership and commitment to our service members, and we urge you to preserve this provision in the final FY 2021 NDAA.

Sincerely,


Kirsten Gillibrand
United States Senator


Richard Blumenthal
United States Senator