UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, DC 20301-4000

PERSONNEL AND
READINESS

MAR 24 2014

The Honorable Carl Levin
Chairman
Committee on Armed Services
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

The enclosed final report responds to House Report 112-479, pages 171-172, accompanying H.R. 4310, the National Defense Authorization Act for Fiscal Year 2013. Although encouraged by initial feedback on Integrated Disability Evaluation System performance, the Committee expressed concern about inadequate staffing, training, and experience of the Physical Evaluation Board Liaison Officer (PEBLO) workforce.

House Report 112-479 requests the Secretary of Defense to report on the adequacy of the Department's standard for the ratio of PEBLOs to Service members, the sufficiency of experience levels within the PEBLO workforce, and the effectiveness of PEBLO training programs. This final report supplements the interim report provided to the congressional defense committees on July 9, 2013, and addresses the optimal PEBLO-to-case ratio utilizing military department manpower studies and provides a more thorough analysis of the sufficiency of PEBLO experience.

Thank you for your continued interest and support of our Service members, veterans, and their families. A similar letter is being sent to the Chairpersons of the other congressional defense committees.

Sincerely,

Jessica L. Wright
Acting

Enclosure:
As stated

cc:
The Honorable James M. Inhofe
Ranking Member

UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, DC 20301-4000

PERSONNEL AND
READINESS

MAR 24 2014

The Honorable Harold Rogers
Chairman
Committee on Appropriations
U.S. House of Representatives
Washington, DC 20515

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Acting

Enclosure:
As stated

cc:
The Honorable Nita M. Lowey
Ranking Member

UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, DC 20301-4000

PERSONNEL AND
READINESS

MAR 24 2014

The Honorable Barbara A. Mikulski
Chairwoman
Committee on Appropriations
United States Senate
Washington, DC 20510

Dear Madam Chairwoman:

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Acting

Enclosure:
As stated

cc:
The Honorable Richard C. Shelby
Vice Chairman

UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, DC 20301-4000

PERSONNEL AND
READINESS

MAR 24 2014

The Honorable Howard P. "Buck" McKeon
Chairman
Committee on Armed Services
U.S. House of Representatives
Washington, DC 20515

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Sincerely,

Jessica L. Wright
Acting

Enclosure:
As stated

cc:
The Honorable Adam Smith
Ranking Member

Report to Congressional Committees

Final Report on the Military Departments' Management of Physical Evaluation Board Liaison Officers

Requested by: House Report 112-479, pages 171-172, accompanying H.R. 4310, the National Defense Authorization Act for Fiscal Year 2013

The estimated cost of report or study for the Department of Defense is approximately $187,600 in Fiscal Years 2013 - 2014. This includes $150,400 in expenses and $37,200 in DoD labor.
Generated on Dec. 16, 2013. RefID: 0-48B2C4E

EXECUTIVE SUMMARY

In House Report 112-479, pages 171-172, accompanying H.R. 4310, the National Defense Authorization Act for Fiscal Year 2013, the House Armed Services Committee (HASC) expressed concern with the Department of Defense's (DoD) management of Physical Evaluation Board Liaison Officers (PEBLOs) within the Integrated Disability Evaluation System (IDES). The HASC requested the Secretary of Defense report on:

- PEBLO-to-case staffing ratio
- PEBLO staffing by position, grade, and installation
- Effectiveness of PEBLO training
- Adequacy of the PEBLO-to-case ratio
- Sufficiency of PEBLO experience

To fulfill these requests, DoD separated its response into an interim and a final report. DoD delivered its interim report on July 9, 2013. The interim report addressed the current PEBLO staffing ratio, PEBLO staffing levels by grade and installation (number authorized, assigned, and vacancies), Military Department PEBLO training program effectiveness, and current PEBLO experience levels.

DoD conducted two additional analyses to address the remaining congressional defense committee concerns regarding 1) an adequate PEBLO-to-case staffing ratio and 2) sufficiency of PEBLO experience. A manpower analysis included an operational audit to determine the required time to complete each IDES task for all PEBLO activities as reported by the Military Departments. DoD completed this analysis for each Military Department and across all Military Treatment Facilities (MTFs). DoD captured these tasks, addressed discrepancies in the data, and incorporated a predicted IDES caseload based on FY13 IDES referrals to calculate the total time required to complete the average IDES case. DoD did not include Service unique PEBLO tasks outside of the IDES process in order to calculate a baseline requirement for each Military Department. The results of this analysis included a new recommended baseline PEBLO-to-case staffing ratio for the DoD (1:34) and each of the Military Departments (Army 1:30, Navy 1:48, and Air Force 1:55). These ratios represent the minimum staffing requirement for each Military Department to complete the IDES process, allowing flexibility to hire additional PEBLOs depending on the Service unique tasks required. The customized ratios provide a better representation of the variation in each of the Military Departments as compared to the prior overall DoD recommended PEBLO-to-case ratio of 1:20.

To address congressional concern regarding sufficiency of PEBLO experience, DoD conducted further statistical analyses to determine the impact of PEBLO experience on PEBLO performance. Based on Military Department feedback, DoD identified a number of PEBLO experience factors (e.g., prior medical experience, time in position) which influence the staffing requirements for PEBLOs at different MTFs and across each Military Department. DoD used the results of this statistical analysis, combined with the recommended Military Department baseline ratios, to calculate adjusted PEBLO-to-case ratios by MTF. Depending upon the profile of PEBLO experience factors for a given MTF, the ratio adjusted accordingly either requiring fewer or more PEBLOs.

The results of both the operational audit and statistical analyses enabled DoD to determine if each Military Department currently has adequate staffing to complete the baseline IDES PEBLO tasks. In addition, DoD gained insight into the sufficiency of PEBLO experience, accounting for differences between Military Departments and MTFs, and developed a method to potentially integrate experience factors into PEBLO staffing considerations. The results indicate that DoD is momentarily overstaffed due to aggressive hiring to address a surge in IDES referrals and the Military Departments assigning Service-unique related duties to the PEBLOs that are not part of the formal IDES process.

Ultimately, DoD will develop and issue PEBLO-to-case ratio policy to the Military Department Secretaries. The policy will address both the recommended DoD and Military Department baseline and MTF specific adjusted ratios, while providing Military Departments implementation flexibility given their unique differences. Each Military Department will be permitted to staff at a PEBLO-to-case ratio of anywhere between 1:1 and their baseline ratio (Army 1:30, Navy 1:48, and Air Force 1:55) through requesting an exception to policy if they require more PEBLOs than recommended by this study. The DoD standard recommended ratio will be 1:34.

DoD also found that some experience factors such as grade/level and prior medical experience influence PEBLO performance and should be given consideration when hiring and training new staff, while other factors such as time in position and education level do not appear to have a significant influence on performance. Overall, the varied experience across DoD PEBLOs appears to be sufficient to perform all required duties, however; each Military Treatment Facility (MTF) should continue to review the makeup of its PEBLO workforce in order to assure optimal performance.

While DoD assessed and determined appropriate PEBLO-to-case staffing ratios, it recognizes these assessments and determinations were made during a period of transition. During this period, the Department experienced high levels of case inflow resulting from engagement in Iraq and Afghanistan, the Army almost doubled its PEBLO staffing, and the Department of Veterans Affairs (VA) experienced elevated demand due to VA policy changes. As a result of these factors, IDES experienced stress on both sides of the system. DoD will periodically evaluate and update ratios based on fluctuations in the case inflow, the results of the IDES Quality Assurance Program, changing U.S. military engagements, and budgetary constraints.

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OVERVIEW

House Report 112-479, pages 171-172, accompanying H.R. 4310, the National Defense Authorization Act for Fiscal Year 2013 reflected House Armed Services Committee (HASC) concern that there is "...an inadequate number of Physical Evaluation Board Liaison Officers (PEBLOs) at some DoD installations and some of the PEBLOs are inadequately trained and lack sufficient experience to fulfill their job responsibilities." Given current budgetary constraints, Congress is also concerned "...DoD officials responsible for managing the DES have overlooked the importance of PEBLOs to the successful operation of the system and the appropriate care and fair treatment for service members with disabilities."

The HASC requested the Secretary of Defense report on "...the ratio of assigned PEBLOs to the number of Service members meeting PEBs, the number of vacant PEBLO positions, and the authorized grades of PEBLO positions by installation across the Department of Defense." The HASC also requested DoD report the adequacy of the Department's standard for the ratio of PEBLOs to Service members meeting PEBs, the sufficiency of experience levels within the PEBLO workforce, and the effectiveness of PEBLO training programs. Appendix A contains a full transcript of the relevant congressional language.

To fulfill congressional requirements, DoD separated its response into an interim and a final report. DoD delivered its interim report on July 9, 2013. The interim report addressed PEBLO effectiveness, current PEBLO staffing ratio, PEBLO staffing levels by installation (number authorized, assigned, and vacancies), PEBLO experience levels, and Military Department PEBLO training program effectiveness. Results from the interim report suggest the following:

- The Military Departments' yearlong hiring surge resulted in filling 96 percent of PEBLO positions (1,255 authorized / 1,206 assigned).
- The hiring increase resulted in PEBLOs exceeding allocated space and support resources at select Military Treatment Facilities.
- Overall, PEBLOs are sufficiently trained to perform their respective duties required as outlined in DoD policy despite select training curricula gaps.
- PEBLO experience, as defined by time in position and grade/rank, varies widely across the Military Departments.

To address additional congressional concern regarding the appropriate PEBLO-to-case ratio and sufficiency of PEBLO experience, DoD provides the following addendum to the interim report which includes additional information, including results of 1) a detailed manpower analysis used to determine recommended PEBLO staffing ratio requirements by Military Department, and 2) a more extensive analysis of the sufficiency and impact of experience on PEBLO performance.

BACKGROUND

DoD and VA piloted the IDES in 2007 as a joint process whereby DoD determines fitness for duty and both Departments determine eligibility for disability compensation and benefits for wounded, ill, or injured Service members. IDES addressed congressional commission and task force recommendations to improve timeliness and consistency of disability benefit decisions. DoD surveys suggest Service members prefer the IDES program over the "Legacy" DES. IDES has proven to be faster, more equitable, and more transparent than the prior, separate DoD and VA disability processes. As of the third quarter of FY 13 IDES accounted for 97 percent of all DoD disability evaluation cases.

THE PEBLO ROLE

DoD created the PEBLO position to enable centralized case management and disseminate consistent information to Service members throughout IDES. DoD policy[1] defines the role and responsibilities of the PEBLO and directs the Military Departments to staff PEBLO positions to a 1:20 PEBLO-to-case ratio. The Military Departments have divided PEBLO duties among three position types: PEBLOs, Contact Representatives, and PEBLO Administrative Assistants. Administrative Assistants do not normally receive full PEBLO training and certification, but handle administrative duties (photocopying, records management, etc.) to allow PEBLOs to concentrate on higher skilled functions. PEBLOs and Contact Representatives each receive full PEBLO training and certification and are hereafter collectively referred to as PEBLOs in this report. The Military Departments define the PEBLOs' pay grades, determine required skills, and identify initial and follow-on training requirements as part of their responsibility to organize, train, and equip the force.

The PEBLO is responsible for working with Service members from IDES referral to separation or return to duty; however, the PEBLO provides the majority of the support during the Medical Evaluation Board (MEB) Phase of disability evaluation. The tasks assigned to PEBLOs by the Military Departments during this phase tend to be more time consuming and involve closer interaction between the PEBLO and Service member than later phases in the process. During the MEB phase, the PEBLO is required to perform the following:

- Assemble the Service member's case file;
- Counsel the Service member and family on the process and specialized resources available;
- Continuously access and update multiple DES systems;
- Refer the Service member to legal counsel, career services, social security, TRICARE, and other stakeholders; and
- Actively manage the case between process steps within the military treatment facility (MTF) and VA Military Service Coordinator (MSC).

[1] Under Secretary of Defense for Personnel and Readiness (USD(P&R)), Policy and Procedural Update for the Disability Evaluation System (DES) Pilot Program, December 11, 2008; Under Secretary of Defense for Personnel and Readiness (USD(P&R)), Directive-Type Memorandum (DTM) 11-015 – Integrated Disability Evaluation System (IDES), December 19, 2011

During the Physical Evaluation Board (PEB) phase, the PEBLO will:

- Monitor the case during PEB processing;
- Brief the Service member on PEB findings, and;
- Assist the Service member with rebuttals and appeals.

The PEBLO has no defined role in DoD policy during the Transition and Veterans Affairs (VA) Benefits phases of IDES but often provides general administrative support for Service members and other stakeholders during this period, maintaining awareness of various out-processing activities.

PEBLO-TO-CASE RATIO

In 2007, DoD began tracking the ratio of fully-trained PEBLOs to Service members at each MTF to measure the adequacy of PEBLO staffing. Through a review of industry standards for non-clinical case manager staffing ratios, DoD determined the optimal PEBLO staffing ratio as 1:20. DoD promulgated this standard through Department policy and monitored the ratio at each MTF through an IDES implementation checklist and site assessment tool. DoD used the checklist and site assessment to evaluate sites prior to implementation of the IDES and assure sufficient staffing. Following worldwide implementation of the IDES in September 2011, DoD requested Military Departments periodically report the ratio of PEBLOs to cases for each of their MTFs.

The FY 2012 staffing levels reported by the Military Departments for the interim PEBLO report indicate an average PEBLO-to-case ratio of 1:8 across DoD using the most current calculation method (see Figure 1 below). However, DoD believes this method of ratio calculation is insufficient to capture the true workload requirements of every MTF. The current method of PEBLO ratio calculation does not account for the differences in workload requirements for PEBLOs in different Services, the varying complexity (for example, number and types of medical conditions) of each Service member's case, and the differences in each PEBLO's level of experience and expertise. In addition, the PEBLO ratio does not seem to correlate with actual IDES processing performance at a number of MTFs, with some locations meeting the 1:20 goal but failing the IDES process timeliness standards. The following sections will review how DoD devised the current ratio calculation and will identify the limitations of those calculations which revealed the need for comprehensive manpower studies as part of this report.

INITIAL APPROACH TO CALCULATING THE PEBLO-TO-CASE RATIO

Although DoD policy has required a 1:20 PEBLO staffing ratio since 2007, the method of calculating this metric has evolved over time. Initially, DoD defined the PEBLO ratio as simply the number of fully trained PEBLO full-time equivalents divided by the inventory of Service members enrolled in the disability evaluation process at a given point in time (Figure 1).

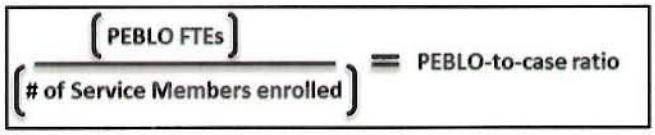

Figure 1: PEBLO-to-case Ratio Calculation Method One

This ratio calculation offered a simplistic representation of PEBLO workload. It also allowed the Military Departments to use their discretion to define what constitutes an "enrolled" Service member (for example, include or exclude the cases of Veterans who were temporarily retired for disability). DoD identified two limitations to this approach. DoD determined the simplistic PEBLO staffing ratio calculation did not accurately reflect changes in active PEBLO involvement in disability evaluation cases at different points in the DES process. Additionally, the simplistic ratio changed too quickly with case enrollment over time to make funding and staffing adjustments.

ADDRESSING LIMITATIONS OF THE CURRENT PEBLO-TO-CASE RATIO

In December 2010, DoD made two changes to the PEBLO ratio calculation to adjust for these limitations. DoD revised the PEBLO staff ratio calculation (Figure 2) to reflect that the majority of the PEBLO's workload occurs during the MEB Phase of the IDES process (that is, the first 100 days). Additionally, DoD stabilized the ratio by replacing the number of Service members currently enrolled with the predicted number of new cases enrolled during a year (using the past year's enrollment as a predictor).

$$\frac{\text{PEBLO FTEs}}{\left(\frac{100}{365} \times \text{\# of new referred cases per year}\right)} = \text{PEBLO-to-case ratio}$$

Figure 2: PEBLO-to-case Ratio Calculation Method Two

PEBLO-TO-CASE RATIO REMAINS LIMITED

Although the adjusted PEBLO-to-case ratio provides a more nuanced portrayal of the PEBLO workload, neither method is considered fully capable of capturing the variation in staffing requirements across installations caused by unique PEBLO experience levels, complexity of caseload, and location specific PEBLO requirements. The number of PEBLOs varies considerably across installations and even locations which meet the 1:20 ratio of PEBLOs to cases do not always meet disability evaluation timeliness standards. Unmet timeliness goals may be explained by inadequate staffing or training of other IDES personnel (for example, health care providers and legal counsel) who play an equally important role in contributing to the timely adjudication of cases or other timeliness factors outside the PEBLO's control. DoD also found that applying a ratio requirement to individual PEBLOs (that is, requiring each PEBLO maintain fewer than 20 active cases) was also problematic because of wide variations in case complexity (e.g., number of referred medical conditions, DoD adjusted rating percentage) and differences in PEBLOs' experience levels (e.g., prior medical experience, time in position). Although in FY13 the Military Departments met the 1:20 PEBLO ratio policy requirement using Calculation Method Two, it was unclear if this standard was appropriate at all locations without a more detailed understanding of variation in workload between locations and Military Departments.

METHODOLOGY

MANPOWER STUDIES

To more accurately determine adequate PEBLO staffing levels at all locations, DoD requested each Military Department participate in a manpower study employing an operational audit on the PEBLO position. An operational audit is a DoD-approved[2] methodology for identifying, developing, and justifying manpower requirements. The operational audit methodology also provides transparency to the manpower requirements process by identifying the level of effort to perform specific tasks without the additional time needed to conduct a labor intensive time in motion study. This process also ensures the manpower requirements are built on validated functions and tasks that are clearly aligned to mission requirements. This audit consisted of 1) determining the missions, functions, and tasks associated with the PEBLO position across all Military Departments, and 2) estimating the time required to complete each task for the average PEBLO. DoD used the resulting data to develop a new, more precise, recommended PEBLO-to-case ratio.

IDENTIFICATION OF PEBLO TASKS

DoD utilized the PEBLO procedures outlined in DoD policy[3] as an initial guide to determine the minimum list of tasks required of the PEBLO. Working with subject matter experts from each of the Military Departments, DoD expanded this task list to include Service specific PEBLO job requirements resulting in a comprehensive, tailored PEBLO task list by Military Department. DoD evaluated the unique Service specific PEBLO tasks individually to assure each aligned with the core IDES process as detailed in policy. DoD identified multiple tasks based on IDES policy as outside the IDES process. Some of these tasks included: pre-referral activities, Temporary Duty Retirement List (TDRL) case processing, legacy DES case processing, and other collateral duties. These tasks were not included in the PEBLO-to-case ratio calculation. DoD understands Military Departments may assign PEBLOs to perform additional tasks outside their IDES duties. In addition to the Service specific PEBLO tasks, DoD allowed individual military treatment facilities to add location specific PEBLO tasks. DoD required clearly articulated justification for each additional location specific PEBLO task. Appendix B contains a full listing of all DoD, Military Department, and location specific IDES PEBLO tasks.

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[2] Joint Chiefs of Staff (JCS), *Joint Manpower and Personnel Program,* Chairman of the Joint Chiefs of Staff Instruction 1001.01, March 13, 2008.

[3] Under Secretary of Defense for Personnel and Readiness (USD(P&R)), Policy and Procedural Directive Type Memorandum (DTM) for the Disability Evaluation System (DES) Pilot Program, November 21, 2007; Under Secretary of Defense for Personnel and Readiness (USD(P&R)), Directive-Type Memorandum (DTM) 11-015 – Integrated Disability Evaluation System (IDES), December 19, 2011; Under Secretary of Defense for Personnel and Readiness (USD(P&R)), Policy and Procedural Update for the Disability Evaluation System (DES) Pilot Program, December 11, 2008.

MANPOWER DATA COLLECTION

DoD integrated the resulting, combined list of PEBLO tasks into a data collection tool (see Figure 3).

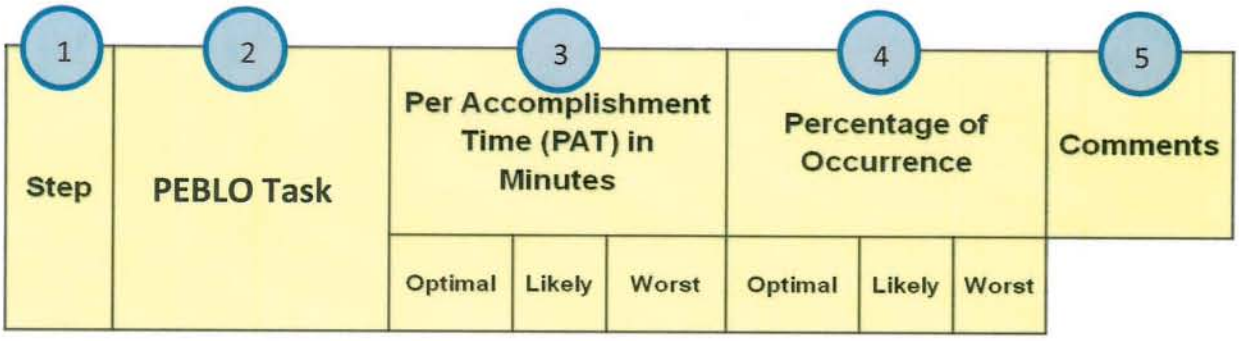

Figure 3: Operational Audit Data Collection Tool

DoD distributed the data collection tool to Military Departments with column one (task step number) and column two (PEBLO task description) completed. DoD requested each Military Department determine and submit the following:

1. The time required to complete each individual task (column three) portrayed in three levels; optimal (the most favorable result with no delays), likely (the common result with some delays), worst (the least favorable result with major delays)
2. The estimated frequency (column four) with which a PEBLO performs the task portrayed in three levels; optimal (how often most favorable result occurred in comparison to likely and worst), likely (how often most common result occurred in comparison to optimal and worst), worst (how often least favorable result occurred in comparison to optimal and likely); and
3. Unique circumstances at an MTF that might affect time estimates (column five).

DATA VALIDATION

DoD examined each MTF's operational audit submission by task to determine if activities were omitted or misrepresented. DoD compared inputs of the time required to complete each individual task (hereafter referred to as per accomplishment time (PAT)) across MTFs to identify outliers, incomplete data, or other anomalies. DoD also calculated weighted PATs for all MTFs by task to create a Military Department Minimum, Median, Mean, and Maximum to help evaluate the distribution of the data and identify any additional outliers.

When DoD identified data quality issues, it consulted the Military Departments to determine the veracity and associated rationale, and reconciled such variations as possible. Examples of common data quality issues included incomplete data, extreme outliers, and Service-unique related tasks that are not part of the formal IDES process. If an individual PEBLO task PAT was missing, DoD replaced this missing data with the average PAT for the corresponding PEBLO task across the Military Department. When an extreme outlier was identified (three standard deviations from the mean), DoD either replaced these values with the average PAT for the activity or removed them from the dataset. These outliers were often caused by confusion

between "touch time" in which the PEBLO works a case directly and "wait time" where the PEBLO is waiting for a case to complete an ancillary step. For example, a PEBLO might report that completing a Line of Duty investigation requires a full week (40 hours) of time despite the actual PEBLO touch time required was only 2 hours with the rest of the time spend awaiting a response while simultaneously conducting other tasks. When a non-IDES related task was identified (i.e., a PEBLO task added by a Military Department that fell outside the core IDES process defined in DTM 11-015), DoD removed it from the PEBLO-to-case ratio calculation.

PEBLO TASK FREQUENCY

In addition to average PAT, DoD calculated the frequency of occurrence for each PEBLO task. DoD defined frequency of occurrence as how often a PEBLO task is performed given a specified caseload. DoD calculated this frequency based on FY13 cases exiting the IDES process. Cases generally exit the IDES for one of three reasons: separation/retirement from Military Service, return to duty, or administrative removal. All cases with separations and/or retirements proceed through the entire IDES process; however, cases with a return to duty or administrative removal may secede at any stage of the IDES process.

DoD tracked the cases exiting the process through FY13 and determined the average percent of the total IDES population to enter each stage. In addition, within each stage, there were some PEBLO tasks which only occur for a fraction of the PEBLO population such as independent medical reviews, appeals, and line of duty investigations. DoD used historical data where available (e.g., appeal rates) to determine the percentage of cases predicted to require one of these tasks. If historical data was unavailable (e.g., line of duty investigation rates), DoD relied on the estimated frequency of occurrence provided by PEBLO subject matter experts.

To estimate the future yearly caseload at each of the MTFs, DoD calculated the number of new cases referred to IDES during FY13. This estimated caseload was applied to the task occurrence frequency to determine the predicted number of times each task will be performed by each Military Department. Appendix C provides a breakdown of the projected yearly flow of cases by IDES Phase/Stage based on FY13 IDES referrals. DoD and the Military Departments are currently exploring alternative methods to more precisely estimate future IDES caseload. Once complete, these methods may provide more precise predictions of future caseloads which could then be applied to future manpower calculations.

FULL TIME EQUIVALENT REQUIREMENTS BY MILITARY DEPARTMENT

The PAT, associated percentage of occurrence (PO), task frequency, and IDES caseload data collected from the Military Departments fed into the manpower calculations DoD used to derive a full time equivalent (FTE) estimate for each of the Military Departments. DoD combined the PAT, PO, task frequency, and IDES caseload to derive a total time requirement (TTR) for each task for PEBLOs by location. The calculation DoD implemented to obtain a TTR for each task is illustrated below.

$$[(\text{Optimal (PAT*PO)}) + (\text{Likely (PAT*PO)}) + (\text{Worst (PAT*PO)})]/3 * (\text{Task Frequency*Yearly Caseload}) = \text{TTR}$$

DoD summed the TTR for each task to calculate the overall Total Processing Time (TPT) for each Military Department.

PEBLO Task 1 TTR + PEBLO Task 2 TTR...+ PEBLO Task X TTR = TPT

To convert TPT to FTEs, DoD leveraged the Man-hour Availability Factor (MAF) each Military Department uses to calculate its manpower requirements. MAF is defined as the average number of man-hours an assigned individual is available each year to perform primary duties considering weekends, holidays, leave, sick days, Permanent Change of Station (PCS), organizational duties, and education and training. A detailed example of Air Force MAF (per Air Force Instruction 38-201) is illustrated in Appendix D. The AF MAF equates to 1,808.4 hours annually. The Army and Navy MAFs are 1,740 and 1,741.6 hours, respectively.

TPT divided by MAF provides the total number of FTEs required to accomplish each Military Department's PEBLO mission based on caseload and averaged PAT.

TPT / MAF = FTEs

DoD calculated the FTE requirement for both the mean and the maximum TPT for each PEBLO task. While the mean staffing level would allow a Military Department to process all cases at a MTF, IDES timeliness goals require a MTF to maintain a sufficient workload during a surge of new cases or an increase in challenging cases. These surges often occur during deployments and post-deployment and may cause delays in processing time and backlog. DoD determined that to allow the Military Departments to staff appropriately to address surges in IDES workload at each MTF, the midpoint between the mean and maximum staffing levels represented the appropriate baseline FTE requirement. DoD manpower guidance[4] provides justification for a flexible staffing requirement based on the inherent error in collecting workload data through an Operational Audit process, and the unpredictability of future workload and case flow.

BASELINE PEBLO-TO-CASE RATIO

DoD used the FTE requirements for each Military Department and the projected future yearly number of new cases referred to IDES (based on FY13 referrals) to create a baseline PEBLO-to-case ratio. Because the FTE requirements are based on FY13 projected caseload for the entire IDES process, it is no longer necessary to integrate the 100/365 MEB factor used in the previous calculation method. A new baseline ratio was calculated using the following formula:

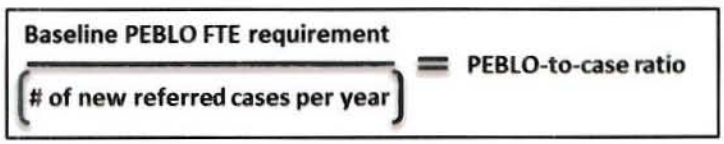

Figure 4: Recommended Baseline PEBLO-to-case Ratio Calculation Method

For each Military Department, DoD calculated the average, maximum, and recommended (midpoint of average and maximum) PEBLO-to-case ratio. For comparative purposes, DoD also

[4] Joint Chiefs of Staff (JCS), *Joint Manpower and Personnel Program,* Chairman of the Joint Chiefs of Staff Instruction 1001.01, March 13, 2008.

calculated the current PEBLO ratio for each Military Department using actual PEBLO staffing as of October 1, 2012.

INTEGRATION OF PEBLO EXPERIENCE AND CASE COMPLEXITY

While the baseline PEBLO-to-case ratio provided a standard for each Military Department, it did not allow for any variation in staffing between different MTFs. As a result of multiple MTF site visits, feedback from PEBLO Subject Matter Experts (SMEs), and historical PEBLO performance data, DoD hypothesized PEBLO experience and case complexity would impact PEBLO performance. To further examine and explore this hypothesis, DoD defined appropriate parameters including PEBLO experience, case complexity, and PEBLO performance. In order to accomplish this, DoD compiled a data set (Appendix F) integrating Veterans Affairs Tracking Application (VTA) data with Military Department PEBLO staffing and performance factors and Service member years of service data.

DEFINING PEBLO EXPERIENCE

DoD identified experience factors that might influence PEBLO performance, including position grade level, years in position, prior experience (in a medical environment, in a counseling role, in an administrative role, and in a military environment), and education level (General Educational Development (GED), Associates, Bachelor's, Graduate). DoD proposed associated assumptions listed below.

PEBLO EXPERIENCE ASSUMPTIONS

1. PEBLO performance* improves as position grade level increases.
2. PEBLO performance* improves as time in position increases.
3. PEBLO performance* improves for PEBLOs with prior medical experience.
4. PEBLO performance* improves for PEBLOs with prior military experience.
5. PEBLO performance* improves for PEBLOs with prior administrative experience.
6. PEBLO performance* improves for PEBLOs with prior counseling experience.
7. PEBLO performance* improves as education level increases.
8. PEBLO performance* declines as caseload increases.

*Performance is reflected as a decrease (improvement) and increase (decline) in MEB phase time.

DEFINING CASE COMPLEXITY

DoD also identified case complexity factors that potentially influence PEBLO performance including (by case) combined number of conditions (sum of referred and claimed conditions), DoD adjusted rating percentage, component (whether Active or Reserve), and Service member years of service. DoD proposed the associated assumptions listed below.

CASE COMPLEXITY ASSUMPTIONS

1. Cases with more combined (referred and claimed) conditions negatively impact PEBLO performance*.
2. Cases with higher DoD adjusted rating percentages negatively impact PEBLO performance*.
3. Cases with increased Service members' years of service negatively impact PEBLO performance*.
4. Reserve Component Service members' cases negatively impact PEBLO performance*.

*Performance is reflected as a decrease (improvement) and increase (decline) in MEB phase time.

DEFINING PEBLO PERFORMANCE

DoD identified the MEB phase (first 100 days of IDES) as an appropriate measure of PEBLO performance. The MEB phase is most closely aligned to the responsibilities of and attributable to the PEBLO.

Tangentially, DoD considered the results of PEBLO specific Customer Satisfaction Survey (CSS) questions as a mechanism to evaluate perceived quality of PEBLO performance. DoD intended to use results from this data set to supplement and explain the impact of experience factors on MEB phase time. However, DoD concluded the CSS data is not mature enough to support sufficient statistical analyses. CSS data will be considered as a measure of performance as time progresses and the data develops.

ADJUSTING PEBLO-TO-CASE RATIO BY EXPERIENCE AND CASE COMPLEXITY

To adjust the PEBLO-to-case ratio integrating PEBLO experience and case complexity, DoD applied the following methodology. The formula below illustrates the basic PEBLO-to-case ratio, usually represented as 1 PEBLO to Y cases. The resulting experience and case complexity multiplication weight is represented as (W).

$$1 \text{ PEBLO} = Y \text{ Cases} \left(1 + W\right)$$

Figure 5: Experience and Case Complexity PEBLO-to-case Ratio Adjustment Formula

CALCULATING THE OVERALL EXPERIENCE AND CASE COMPLEXITY WEIGHT

W is derived from a combination of the output of the statistical procedure compared to MEB phase time. The output of the statistical procedure provides a constant number and individual significant predictor variables weights (w).

$$(\text{constant}) + w1 + w2 + \ldots wx$$

The constant is a number calculated given all of the factors in the model that can be used for predicting the MEB phase time. If another significant factor is introduced into the model, the constant number will change accordingly.

Once DoD obtains the significant factor weights and constant, it can calculate MEB phase time.

EXAMPLE 1

For example, consider the significant factor PEBLO position grade level. For every PEBLO position grade level increase, case processing time increased 11.6 days; a PEBLO possessing position grade level three would process a case 34.8 (11.6 * 3 = 34.8) days slower. If this was the only significant factor in the model and the constant number was included (50.99), then the MEB phase time would equal:

$$34.8\ (w_1) + 50.99\ (\text{constant}) = 85.79 = \text{MEB Phase Time}$$

However, the statistical model results in more than one significant factor. For example, consider the addition of prior medical experience in the model. Results showed that a PEBLO possessing prior medical experience processed a case 11.7 days faster through the MEB phase; a PEBLO with prior medical experience and PEBLO position grade level three would change the equation as follows.

$$34.8\ (w_1) - 11.7\ (w_2) + 50.99\ (\text{constant}) = 74.09 = \text{MEB Phase Time}$$

Once the adjusted MEB phase time was calculated, DoD compared this number to the goal MEB phase time of 100 to obtain a percentage difference. To obtain this percentage difference, DoD subtracted the adjusted MEB phase time from the goal MEB phase time, then divided the result by 100.

$$\text{(goal MEB phase time) } 100 - 74.09\ \text{(overall adjusted MEB phase time)} =$$

$$25.91/100 = .2591$$

The resulting percentage .2591 would be the overall PEBLO experience and case complexity multiplication weight (W) given the two significant factors for this single case.

DoD plugged W into the formula mentioned previously (Figure 5) to obtain an adjusted PEBLO-to-case ratio. For example, if the baseline ratio for this particular scenario was 1:34, then the overall PEBLO experience and case complexity weight would adjust the ratio to

$$\text{(baseline ratio) } 1{:}34\ (W)$$

$$1{:}34\ (1 + .2591)$$

$$1{:}42.8094 \text{ or } 1{:}43 = \text{Adjusted ratio}$$

Example one demonstrates how the adjusted PEBLO-to-case ratio shifts given the single case. Although PEBLO position grade level had a negative effect on PEBLO performance; prior medical experience helped to balance out the adjusted MEB phase time and ultimately adjusted the ratio to require fewer PEBLOs.

EXAMPLE 2

Consider another example showing how the opposite might occur. For every position grade level increase, case processing time increased 11.6 days; a PEBLO possessing position grade level six would process a case 69.6 days slower. If this same PEBLO did not possess prior medical experience and the case contained a DoD Adjusted Rating percentage of 80 (processed 1.32 days slower for every 10 percent increase (8 * 1.32 = 10.56)), then the adjusted MEB phase time would be:

$$69.6\ (w_1) + 10.56\ (w_2) + 50.99\ (\text{constant}) = 131.15 = \text{MEB Phase Time}$$

The percentage difference between adjusted MEB phase time and goal MEB phase time would be:

$$(\text{goal MEB phase time})\ 100 - 131.15\ (\text{adjusted MEB phase time}) =$$

$$-31.15/100 = -.3115\ (W)$$

If DoD plugged this into the adjusted PEBLO-to-case ratio formula the results would be:

$$(\text{baseline ratio})\ 1{:}34\ (W)$$

$$1{:}34\ (1 + (-.3115))$$

$$1{:}23.409 \text{ or } 1{:}24 = \text{Adjusted ratio}$$

Example two shows how the main significant factor, PEBLO position grade level, negatively affected the adjusted MEB phase time, ultimately resulting in a requirement for more PEBLOs.

Both of these examples illustrate an adjusted ratio integrating experience and case complexity factors for one case. In practice, this adjusted ratio is calculated for multiple cases. To ensure the overall experience and case complexity multiplication weight remained appropriately reasonable, DoD calculated the average weight for each significant factor as illustrated below.

$$\text{average}\ (w_1) + \text{average}\ (w_2) + \ldots\text{average}\ (w_x) + (\text{constant}) = \text{overall adjusted MEB phase time}$$

RESULTS

BASELINE PEBLO-TO-CASE RATIO

DoD calculated a baseline PEBLO-to-case ratio for the DoD and each of the Military Departments following the methodology outlined previously. This ratio was based on FTE requirements derived from the manpower analysis and projected new cases referred into IDES estimated based on FY13 referrals. DoD saw differences in Military Departments based on differing processing steps and time required at various stages of the IDES. Appendix E provides a more detailed comparison between the Military Department TPT estimates at each stage of the IDES process. The results of the ratio calculations are presented in the following sections.

DEPARTMENT OF THE ARMY PEBLO-TO-CASE RATIO

The Army reported the highest estimated level of PEBLO task workload per case. Army subject matter experts estimated that PEBLO tasks within each IDES case require approximately 40.58 hours to complete on average and 102.18 hours to complete given maximum workload estimates. The Army listed 88 PEBLO tasks required for completion per case with 37 of those tasks unique to the Army. Appendix B provides a listing of all Army required PEBLO tasks. Table 1 provides the projected FTE and PEBLO-to-case ratio requirements given FY13 caseload of 22,469 referrals. Table 1 also provides an associated mean, maximum, and recommended baseline PEBLO-to-case ratio.

Table 1: Army Recommended Baseline PEBLO-to-case Ratio

	Mean	Maximum	Recommended Baseline
FTEs	417.41	1092.67	755.04
PEBLO-to-case Ratio	1:54	1:21	1:30

Army's additional staffing needs may be explained by its more labor intensive MEB process used to complete the IDES when compared to the other Military Departments. Army adjudicators require more in-depth documentation and more detailed narrative summaries resulting in a greater associated PEBLO workload when assembling case files. These added requirements cause additional workload for the PEBLO specifically during the Referral and MEB Stages. In addition, Army PEBLOs spend significantly more time than their counterparts in the other Services completing data entry in various tracking systems to include the Veterans Tracking Application (VTA), electronic DES, electronic MEB, electronic PEB, and local databases. The Army also is the only Military Department to require significant additional tasks from their PEBLOs during the Transition Phase, assisting Service members with out-processing, acquisition of final orders, and Defense Document (DD) 214 "Certificate of Release or Discharge from Active Duty" administrative tasks.

DEPARTMENT OF THE NAVY RATIO

The estimated Navy PEBLO workload per case lies between the Army and the Air Force. Navy subject matter experts estimated that PEBLO tasks within each IDES case require approximately 32.10 hours to complete on average and 68.35 hours to complete given maximum workload

estimates. The Navy listed 78 tasks accomplished by their PEBLOs with 27 of those tasks unique to its Military Department. Appendix B provides a listing of all Navy required PEBLO tasks. Table 2 provides the projected FTE and PEBLO-to-case ratio requirements for the average, maximum, and baseline circumstances. The projected requirements listed in Table 2 are based on a given FY13 caseload of 5,777 referrals.

Table 2: Navy Recommended PEBLO-to-case Ratio

	Mean	Maximum	Recommended Baseline
FTEs	78.53	161.96	120.25
PEBLO-to-case Ratio	1:74	1:36	1:48

The Navy MEB and narrative summary process is less detailed and requires less work than the Army's. Although Navy PEBLOs have data entry responsibilities (VTA, Medical Boards Online Tracking System (MEDBOLTS), and local tracking systems), the estimated PEBLO task time required for data entry was not as extensive as the Army. Navy divides its PEBLO responsibilities between Medical Evaluation Board Liaison Officers (MEBLOs focused solely on MEB tasks) and PEBLOs (focused solely on PEB tasks) at some of its larger locations; however, this does not affect the PEBLO responsibilities and estimated amount of time required for the overall PEBLO tasks when compared to the other Military Departments.

DEPARTMENT OF THE AIR FORCE RATIO

The Air Force has the smallest estimated PEBLO task workload requirement of the Military Departments; however, much of this disparity may be due to significant differences in the Air Force MEB process. The Air Force conducts a pre-IDES screening process, the Deployment Availability Working Group (DAWG), where the PEBLO creates a full case file with all associated medical records. If the case moves from this pre-referral stage into the IDES, the case file rarely needs updating or additional documentation, requiring significantly less work for the PEBLO within the IDES process. In addition, Air Force PEBLOs conduct duties related to Return in Lieu of (RILO) cases which are also evaluated separately prior to entry into IDES. If these Service-unique related activities were included in the PEBLO ratio requirement, DoD predicts that their recommended staffing requirement would be significantly higher. Finally, Air Force PEBLOs stationed outside the continental United States (OCONUS) follow a distinctly different process than those stationed in the United States. OCONUS Service members in the Air Force are placed in a temporary duty (TDY) status and travel to the continental United States (CONUS) to complete the medical examination portion of their process, outside of those PEBLOs' control. CONUS Air Force PEBLOs assist the Service member with their medical examinations. The Army and Navy do not employ PEBLOs with IDES duties overseas as they transfer Service members entering the IDES through a permanent change of station (PCS) to undergo the process at a CONUS location, with some exception for extenuating circumstances. DoD therefore calculated two separate FTE requirements for the Air Force. Air Force subject matter experts estimated that CONUS PEBLO tasks for each IDES case take approximately 19.47 hours to complete on average and 73.28 hours to complete given maximum workload estimates.

The Air Force estimated OCONUS PEBLO tasks for each IDES case take approximately 14.37 hours on average and 40.51 hours to complete given maximum workload estimates. The Air Force listed 90 tasks accomplished by their PEBLOs with 39 of those tasks unique to their Military Department. Appendix B provides a listing of all Air Force required PEBLO tasks. Tables 3 (CONUS) and 4 (OCONUS) provide the projected FTE and PEBLO-to-case ratio requirements for the average, maximum, and baseline circumstances. The projected requirements in Tables 3 and 4 are based on a given caseload of 3,215 and 237 new referrals, respectively.

Table 3: Air Force Recommended CONUS PEBLO-to-case Ratio

	Mean	Maximum	Recommended Baseline
FTEs	24.50	93.25	58.88
PEBLO-to-case Ratio	1:131	1:34	1:55

Table 4: Air Force Recommended OCONUS PEBLO-to-case Ratio

	Mean	Maximum	Recommended Baseline
FTEs	1.24	3.55	2.40
PEBLO-to-case Ratio	1:190	1:67	1:99

DoD estimates the most significant factor causing the smaller Air Force IDES workload is the difference in process mentioned above. Because the Air Force completes a major portion of its PEBLO task workload prior to IDES referral, this time is not included within the ratio. This pre-work diminishes the amount of work PEBLOs complete during the Referral and MEB stages of the IDES. Although the Air Force counts this time toward their PEBLO workload internally, DoD cannot include these tasks in the PEBLO ratio calculation as they do not fall within the core IDES processes (as outlined in DTM 11-015).

In addition, the Air Force requires many of its PEBLOs to manage additional collateral duties such as RILO cases which DoD has not factored into the ratio. While the Air Force PEBLO-to-case ratio is significantly constrained due to the above mentioned rationale, the Air Force's PEB Phase and Medical Evaluation Stage PEBLO task workloads are comparable to the other Military Departments.

DOD PEBLO-TO-CASE RATIO

DoD calculated an overall, Department-wide PEBLO-to-case ratio using the total number of new referrals into IDES for FY13 and the overall Department-wide FTE requirement. To obtain the Department-wide FTE requirement, DoD summed the mean, maximum, and baseline PEBLO FTE requirements from each of the individual Military Departments. The resulting numbers are listed in Table 5. DoD calculated the baseline PEBLO-to-case ratio for the entire Department by dividing the total number of new referrals into IDES for FY13 (31,698) by the overall Department-wide FTE requirement. Table 5 provides a summary of the recommended Department-wide mean, baseline, and maximum PEBLO-to-case ratio.

Table 5: DoD Recommended PEBLO-to-case Ratio

	Mean	Maximum	Recommended Baseline
FTEs	521.79	1352.59	936.69
PEBLO-to-case Ratio	1:61	1:23	1:34

ADJUSTED RATIO BY PEBLO EXPERIENCE AND CASE COMPLEXITY

DoD utilized appropriate statistical procedures (see Appendix G) to determine the impact of PEBLO experience and case complexity on MEB phase time. These results served as the basis for customizing the PEBLO-to-case ratio by MTF.

To analyze the potential impact of each PEBLO experience and case complexity factor on MEB phase time, DoD implemented a commonly used and validated statistical method—multivariate regression analysis (see Appendix G). The results of this analysis provide DoD with a set of multiplication weights for each statistically significant PEBLO experience and case complexity factor. These weights will be implemented in an adjusted PEBLO-to-case ratio.

RESULTS DISCUSSION

Results confirm, oppose, or have no effect on the previously identified PEBLO experience and case complexity assumptions as outlined in Table 6. Table 6 includes select results including initial assumptions, the statistical results, and how the results affect PEBLO performance.

Table 6: PEBLO Experience and Case Complexity Results

Experience or case complexity factor	Description	Effect on MEB phase time	# days	⬇⬆
Grade level	For every increase in PEBLO grade level	increases	11.6	⬆
Prior medical experience	If a PEBLO possesses prior medical experience	decreases	-11.7	⬇
Caseload	For every case a PEBLO is assigned	decreases	-.19	⬇
Number of conditions	For each additional referred or claimed condition	increases	.35	⬆
DoD adjusted rating	For every 10% increase in DoD adjusted rating	increases	1.32	⬆
Component	Every active component case	decreases	-8.37	⬇

PEBLO EXPERIENCE AND CASE COMPLEXITY FACTORS

Results validated some PEBLO experience and case complexity factor assumptions. For example, prior medical experience is not only validated by the results, but appears to have the greatest impact on PEBLO performance improvement. Because PEBLOs operate in a medical environment, it is reasonable PEBLOs with prior medical experience are better able to process Service members' cases more quickly through the MEB phase. The assumption that higher DoD adjusted ratings equal more complex cases is also validated by the resulting data. Cases with higher DoD adjusted ratings have a negative impact on PEBLO performance.

Other factor assumptions were opposed by the resulting data including PEBLO position grade level. These unanticipated results may emerge because PEBLOs with higher grade levels are responsible for more tasks outside the PEBLO core responsibilities thereby competing with their time and resulting in lower levels of performance as reflected in MEB phase timeliness. In the interim report, DoD posited PEBLOs with higher position grade levels were assigned more complex cases. However, after analyzing the data more fully, DoD found this explanation invalid.

Some factor assumptions were nullified by the resulting data. In other words, the data suggests that some factors, such as prior administrative experience, do not have any statistically significant impact (positive or negative) on PEBLO performance.

DETERMINING ADEQUACY OF PEBLO STAFFING

The baseline and adjusted PEBLO-to-case ratios provide DoD a more precise mechanism to determine adequacy of PEBLO staffing. DoD can determine staffing adequacy by comparing the current PEBLO-to-case ratio to the baseline ratio (at the DoD and Military Department levels) or the adjusted ratio (MTF level). DoD outlines each of these comparisons below. These comparisons do not consider PEBLO activities outside of the IDES, which may be utilized to justify higher staffing levels.

COMPARISON: CURRENT PEBLO-TO-CASE RATIO TO THE BASELINE RATIO

Example 1: If the current PEBLO-to-case ratio for Military Department X was 1:28 and the recommended baseline ratio was 1:34, then DoD could compare the ratios to determine adequacy of staffing.

Current ratio = 1:28

Recommended baseline Military Department ratio = 1:34

According to this comparison, Military Department X is operating at 121% (34/28 = 1.214) capacity and is overstaffed. If Military Department X currently employs 120 PEBLOs, then given the recommended baseline Military Department ratio, this MTF should decrease its staff to 99 PEBLOs.

However, if Military Department X's current ratio was 1:45, it would be operating at 76% (34/45 = .755) capacity and would be understaffed. If Military Department X currently employs 120 PEBLOs, then given the recommended baseline Military Department ratio, this Military Department should increase its staff to 149 PEBLOs.

Table 7 shows a comparison of actual current to recommended baseline ratios for the DoD and each Military Department.

Table 7: Comparison of Current to Recommended Baseline PEBLO-to-case Ratios

Current Ratio Compared to Baseline Ratio					
	Army	Navy	Air Force CONUS	Air Force OCONUS	DoD
Recommended FTEs	755.0	120.3	58.9	2.4	936.7
Current FTEs	822	111	159	15	1107
Baseline Ratio	1:30	1:48	1:55	1:99	1:34
Current Ratio	1:26	1:52	1:20	1:21	1:28

Based on the baseline recommended PEBLO ratio, DoD is currently adequately staffed with PEBLOs and may be slightly overstaffed. The Navy may be slightly understaffed based on its

1:52 current ratio and would need to hire 9 more PEBLOs to reach the recommended staffing level. The Army and the Air Force are currently overstaffed based on the recommended baseline ratios. Army's FY11-FY12 hiring surge may have overstaffed the PEBLOs at some MTFs, which could be the cause of some of the excess personnel. While the Air Force appears to be significantly overstaffed, the fact that it has a pre-IDES process and assigns its PEBLOs a significant number of tasks outside of the core IDES process most likely explains much of the discrepancy. As stated previously, Air Force PEBLOs create case files during the DAWG and RILO processes, relieving workload during the IDES but this workload cannot be include in the IDES ratio calculation. In addition, the Air Force reported full PEBLO FTEs at a number of small locations where the manpower study results indicate only a proportion of an FTE is required. It is likely that the Air Force is employing these PEBLOs with other collateral duties at these locations where the IDES workload is insufficient to merit a full specialized position. Similarly, the Military Departments may have included PEBLOs who perform non-IDES related work, such as TDRL and legacy DES case processing, when providing their current IDES staffing which would inflate their current PEBLO FTE and ratio numbers. For example, Army PEBLOs will occasionally be asked to complete additional tasks for designated OCONUS cases to be managed by a "TDY and return" process, wherein the Service member remains in the OCONUS assignment and travels to a CONUS location for specified portions of the IDES process. Although the Military Departments have designated PEBLOs to complete these types of tasks, DoD did not consider them for the purposes of this study. A fully comprehensive review of PEBLO staffing may require the Military Departments to perform a separate review of all Service-unique related activities currently assigned to PEBLOs..

COMPARISON: CURRENT PEBLO-TO-CASE RATIO TO THE ADJUSTED RATIO

Example 2: MTF X possesses a PEBLO-to-case ratio of 1:28. This ratio can be compared to the adjusted PEBLO-to-case ratio integrating experience and case complexity factors for that same MTF.

Current ratio = 1:28

MTF X adjusted ratio = 1:44

According to this comparison, MTF X is operating at 143% (44/28 = 1.43) capacity and is overstaffed. If MTF X's current ratio was 1:54, it would be operating at 81% (44/54 = .814) capacity and would be understaffed. DoD provides results of comparing current to adjusted PEBLO-to-case ratios for each MTF in Appendix H.

DETERMINING SUFFICIENCY OF PEBLO EXPERIENCE

The analyses conducted for this report provide DoD a more transparent view of the impact of PEBLO experience factors on MEB phase time. As previously discussed, higher levels of experience do not necessarily equate to higher levels of PEBLO performance (e.g., PEBLOs with higher position grade levels show greater time delays than PEBLOs with lower position grade levels). Due to these results, DoD may require a shift in how it considers sufficiency of experience. Sufficiency of experience may not simply consist of whether a PEBLO possesses

the highest level of experience, but rather if a certain mixture of PEBLOs with diverse levels of experience is appropriate given the associated case complexity at that particular MTF.

In example 2 above, MTF X shows a sufficient mixture of PEBLO experience given its associated case complexity. In fact, MTF X demonstrates an excess of PEBLO experience based on its associated caseload. If an MTF, or Military Department possesses an excess of experience, it may need to consider adjusting its staffing levels to bring the ratio in sync with the recommended adjusted ratio.

However, consider an MTF that is under experienced. For example, if MTF X's current ratio was 1:54, and the recommended adjusted ratio was 1:44, then it would be operating at 81% (44/54 = .814) capacity and would be under experienced. MTF X could either hire more PEBLOs to fill this void, or it could adjust its PEBLO workforce experience appropriately to result in a net performance increase. One factor that lends itself to potential training includes prior medical experience. PEBLOs with prior medical experience have a fairly large positive impact on performance (decrease in MEB phase time). If MTF X reviewed its PEBLOs collective performance profile and determined multiple PEBLOs lacked this experience, it could try to improve performance by providing appropriate experiential training on the topic to its PEBLOs.

A similar type of PEBLO experience adjustment could be made for PEBLOs possessing high position grade levels. If MTF X determined most of its PEBLOs possessed high position grade levels, it could consider hiring more junior level PEBLOs to increase overall performance.

CONCLUSIONS

DoD collected data from Military Departments for an Operational Audit of the PEBLO position at each of their MTFs to more accurately determine adequate PEBLO staffing levels. This audit consisted of 1) determining the missions, functions, and tasks associated with the PEBLO position across all Military Departments, and 2) estimating the time required to complete each task for the average PEBLO. DoD calculated a Military Department PEBLO-to-case ratio using the results of the Operational Audit. Each Military Department's ratio differed, with the Army requiring the greatest number of PEBLOs per case and the Air Force the fewest. DoD believes that the Army's more labor intensive referral and MEB stage processes and additional duties assigned for data entry and Transition Phase out-processing explain their greater workload requirements. The Air Force has a smaller workload requirement due to the pre-referral DAWG process which reduces labor required within the referral and MEB stages but cannot be included within the ratio because these Service-unique related duties fall outside of the core IDES process. The Navy workload requirement reflects a slightly less intensive referral and MEB stage when compared to the Army. Overall, the PEB Phase and Medical Evaluation stage PEBLO workload is comparable across all three Departments.

DoD also developed a methodology to further adjust the baseline PEBLO-to-case ratio by integrating PEBLO experience and case complexity factors. DoD implemented an appropriate statistical procedure, multiple linear regression, to calculate the impacts of PEBLO experience and case complexity on PEBLO performance. Preliminary results of this analysis were mixed and serve to validate, nullify, or oppose the previously identified PEBLO experience and case complexity assumptions. For example, PEBLOs with prior medical experience process Service members' cases through the MEB phase faster than PEBLOs without such experience. DoD's prior assumption was validated with the resulting data. However, PEBLOs with prior military experience do not impact PEBLO performance either negatively or positively. These results nullified the associated assumption. Finally, although DoD assumed PEBLO position grade level would improve performance, the opposite was found; higher grade level PEBLOs' additional supervisory tasks appear to compete with and negatively affect core PEBLO performance. DoD calculated and compared results the same way for case complexity factors. The results from the multiple linear regression analysis using PEBLO experience and case complexity factors will provide DoD and the Military Departments a mechanism to calculate more precise, adjusted PEBLO-to-case ratios appropriate for their installations if they so desire. However, DoD does not feel that an adjusted ratio need be mandated for each Military Department without further exploration of the effect of experience and case complexity on PEBLO performance.

The baseline and adjusted PEBLO-to-case ratios provide DoD a mechanism to determine adequacy of current PEBLO staffing. This can be accomplished by comparing the current PEBLO-to-case ratio to either the baseline ratio (at the DoD and Military Department levels) or adjusted ratio (MTF level). The baseline or adjusted ratio represents the minimum staffing requirement in order to complete the IDES within a Military Department and does not account for other tasks assigned to PEBLOs which may justify a higher level of staffing.

The multiple linear regression statistical procedure provides DoD a more transparent view of the impact of PEBLO experience factors on MEB phase time. Results demonstrate that higher levels

of experience do not necessarily equate to higher levels of PEBLO performance (e.g., PEBLOs with higher position grade levels show greater time delays than PEBLOs with lower position grade levels). Due to these results, DoD may need to shift how it considers sufficiency of experience. Sufficiency of experience may not simply be defined as whether a PEBLO possesses the highest level of experience, but rather if the mixture of PEBLOs is appropriate given the associated case complexity. Overall, the varied experience across DoD PEBLOs appears to be sufficient to perform all required duties, however; each MTF should continue to review the makeup of its PEBLO staff in order to assure optimal performance.

RECOMMENDATIONS

In coordination with the Military Departments, DoD will periodically:

- Develop and disseminate policy to the Military Departments regarding implementation of the recommended baseline and adjusted PEBLO-to-case ratios; allowing each Department to request an exception to policy, if necessary, to include staffing for non-IDES PEBLO responsibilities or to deviate from recommended staffing levels to account for variability in the manpower data submitted. Each Military Department will be permitted to staff at a PEBLO-to-case ratio of anywhere between 1:1 and their baseline ratio (Army 1:30, Navy 1:48, and Air Force 1:55), through requesting an exception to policy, if they require more PEBLOs than recommended by this study. The DoD standard recommended ratio will remain 1:34.
- Calculate new baseline and adjusted PEBLO-to-case ratios on a yearly basis built on Military Department mission requirements and case inflow.
- Develop and implement PEBLO training programs for prior PEBLO experience factors that have a significant positive impact on PEBLO performance.
- Ensure all Military Departments implement the recommended baseline PEBLO-to-case ratios with the flexibility of integrating the experience and case complexity factors, while allowing Military Departments to request exception to policy to adjust ratios if desired.

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APPENDIX A: CONGRESSIONAL WORDING

House Report Number 112-479

Physical Evaluation Board Liaison Officers

The committee continues to receive information that suggests there is an inadequate number of Physical Evaluation Board Liaison Officers (PEBLO) at some Department of Defense (DOD) installations, and that some of the PEBLOs are inadequately trained and lack sufficient experience to fulfill their job responsibilities. The committee is aware that wounded warriors and other individuals required to meet Physical Evaluation Boards (PEB) have reported that their assigned PEBLOs are overworked, yet many also lack the experience necessary to assist them successfully resolve their status within the Disability Evaluation System (DES).

The committee is concerned that in light of current budgetary constraints, DOD officials responsible for managing the DES have overlooked the importance of PEBLOs to the successful operation of the system and the appropriate care and fair treatment for service members with disabilities. Accordingly, the committee directs the Secretary of Defense to submit to the congressional defense committees a report by March 31, 2013, on the ratio of assigned PEBLOs to the number of service members meeting PEBs, the number of vacant PEBLO positions, and the authorized grades of PEBLO positions by installation across the Department of Defense. The report should also provide assessments of the adequacy of the Department's standard for the ratio of PEBLOs to service members meeting PEBs; the sufficiency of experience levels within the PEBLO workforce; and the effectiveness of PEBLO training programs.

APPENDIX B: MANPOWER METHODOLOGY – LIST OF CORE PEBLO IDES TASKS

Table 8: DoD Core PEBLO Tasks

Number	Task	IDES Stage/Phase
1	Create IDES case within VTA, enter Service member demographic information, and enter MEB Referral Date and Number of Referred Conditions data elements	Referral
2	Build the IDES case file	Referral
3	Inform the Service member of the requirement of providing all service treatment records	Referral
4	Inform the Service member of the DoD IDES process and that they may seek assistance during the IDES process from legal counsel	Referral
5	Provide Service member: a brochure detailing each step of the IDES process, link to the Compensation and Benefits Handbook, and VA Form 21-22	Referral
6	Request a non-medical assessment from the Service member's commander	Referral
7	If necessary, request the Service member's commander conduct and provide a complete line of duty investigation and determination	Referral
8	Notify the MSC that the Service member is referred to the IDES	Referral
9	Provide the MSC a copy of the member's IDES case file and service treatment record	Referral
10	When the complete STF is not available, provide the MSC a memorandum describing the actions taken to locate the missing records and the determination that the medical records are not available	Referral
11	Enter Prepare Claim Start Date within VTA	Referral
12	Inform the Service member and the Service member's commander of all scheduled VA C&P medical examinations	Medical Examination
13	Monitor the Service member's completion of IDES appointments, including VA C&P medical examinations	Medical Examination
14	Approve and coordinate the Service member's requests for rescheduling of VA examination appointments by contacting the MSC	Medical Examination
15	Inform the Service member and Service member's commander of new appointments	Medical Examination
16	Upon receipt of notification from a MSC or VA examination facility that a member failed to report for scheduled examination appointment(s), inform member's command	Medical Examination
17	Coordinate rescheduling of VA examination appointments by contacting the MSC	Medical Examination
18	Inform the Service member and Service member's commander of new appointments, and if necessary, request for the command to provide an escort	Medical Examination
19	Enter NARSUM Date within VTA	MEB

20	Assemble the DES case file to include all medical and non-medical information to be considered by the MEB	MEB
21	Inform the Service member that his/her case is being forwarded to the MEB	MEB
22	Forward the Service member's case file to the MEB	MEB
23	Provide a copy of the MEB findings to the MSC	MEB
24	Notify the Service member of the MEB results	MEB
25	Inform the Service member of his or her right to an IMR	MEB
26	When IMR is requested, serve as an independent source for review of the findings and recommendations of the MEB, and provide medical advice and counsel regarding the findings and recommendations of the MEB	MEB
27	Forward the results of the IMR or MEB rebuttal to the MEB	MEB
28	Enter IMR Start and End Dates	MEB
29	Enter MEB Rebuttal Start and End Dates	MEB
30	If the MEB finds the Service member does not meet medical retention standards, assemble the MEB case file with all attachments and forward the complete MEB case file to the PEB	MEB
31	Enter MEB End Date within VTA	MEB
32	Inform the MSC of the date of referral to the IPEB	PEB
33	Enter IPEB Counsel Start and End Dates	PEB
34	Advise the Service member of their right to legal counsel regarding the preparation of a rebuttal of his or her fitness decision or disability rating, if applicable	PEB
35	Provide a copy and inform the Service member of the IPEB findings, the VA proposed ratings and benefits estimate letter, and his or her options, including consultation with legal counsel	PEB
36	If the PEB finds the member fit, notify the MSC of that finding and provide a copy of the PEB findings to the MSC	PEB
37	Assist the Service member with the administrative portion of preparing a rebuttal to his or her IPEB Unfit for duty finding, if applicable	PEB
38	On request and with consent of the Service member, forward the Service member's legal counsel a copy of the Service member's IDES case file	PEB
39	Inform the Service member of his or her right to consult with and be represented by legal counsel	PEB
40	If applicable, administratively assist the Service member in preparing a request to reconsider the proposed VA disability ratings of unfitting conditions and provide the Service member's request for reconsideration to the PEB and MSC	PEB
41	If applicable, inform the Service member of VA's decision to propose a finding of incompetency	PEB
42	Provide the Service member's request for an FPEB to PEB administration	PEB
43	Inform the MSC and Service member's commander of the Service member's acceptance of findings, request for reconsideration, or request for an FPEB	PEB
44	Notify the Service member and his or her commander of the FPEB date	PEB

45	Monitor case progress and resolve complications related to the FPEB	PEB
46	Inform the Service member of the FPEB findings and right to appeal the findings	PEB
47	Advise the Service member of his or her right to legal counsel for assistance in the preparation of an appeal	PEB
48	Inform the Service member of the Military Department's final fitness disposition	PEB
49	Enter Final Disposition Date and Disposition	PEB
50	Notify and provide documentation of the reason for disenrollment to the MSC and PEB when Service members are disenrolled from the IDES	PEB
51	Inform the Service member (or his or her designated representative) to schedule and attend an exit interview with the MSC prior to exiting the IDES process	Transition

Table 9: Army Specific PEBLO Tasks

Number	Task	IDES Stage/Phase
1	Create a MDCO and Case file in eDES	Referral
2	Request and complete Medical Record Consent Form	Referral
3	Provide IDES Initial Counseling checklist and review DA Form 5893	Referral
4	Schedule and Participate on IDES Multi-Disciplinary Meeting	Referral
5	Assist Service Member with arranging contact with the VA, Social Security Administration and Department of Labor	Referral
6	Follow up to ensure attendance to ACAP Briefing	Referral
7	Provides Service Member/Command with Current case status	Referral
8	Review VA Form 21-0819 and VA Form21-1438 against the referring Profile for Behavioral Health Conditions	MEB
9	Continue coordination with Service Member and Command to collect all the required Administrative Documents	MEB
10	Review case file for completeness prior to contacting with MEB Results	MEB
11	Continue to provide updates to Service Members, Command and Clinical Staff	MEB
12	Request NARSUM Dictation from MEB Provider	MEB
13	Scan all required documents in eMEB (Admin/Clinical)	MEB
14	Prepare and route DA Form 3947 for review and signatures (eMEB)	MEB
15	Schedule follow-up MEB Election Appointment	MEB
16	Conduct MEB Election follow-up appointment	MEB
17	If the MEB rebuttal finds the Service member has additional conditions that requires revision of the DA Form 3947; assemble the MEB case file with all attachments and forward the complete MEB case file for Physician review	MEB
18	If rebuttal is requested, serve as an independent source for review of the rebuttal response	MEB
19	If necessary, revise MEB Proceedings and counsel SM on rebuttal response	MEB
20	If PEBLO presented with information on new condition, or change to existing condition from meet to fail, request PCM concise statement through NCM	MEB
21	Conduct a Quality Review prior to routing case to the PEB	MEB
22	Scanning and Merging all required documents prior to routing to the IDES in eMEB	MEB
23	Route case file in eMEB to ePEB	MEB
24	Check to see if case file crossed the ePEB gateway by conducting an ePEB Location Search	MEB
25	Conduct MEB counseling (Initial PEBLO, MEB findings, rebuttals)	MEB
26	Upon ePEB Notification, download the PEB Fitness Memo	PEB
27	Counsel Service Member on Preliminary PEB findings (Fit/Unfit	PEB

	determination)	
28	Assist Service Member in the completion of the COAD/COAR Packet	PEB
29	Scan and Upload final signed DA 199, DA Form 5892 and DA Form 5893 in ePEB	PEB
30	Cumulative time conducting PEB counseling (Informal PEB findings, Formal Hearing notifications, VA Rating reconsiderations)	PEB
31	Obtain Final Orders and DD 214 to include monitoring and downloading	Transition
32	Conducting out-processing counseling and follow up (Out-processing procedures, Separation Orders, Grade Determination, COAD/COAR)	Transition
33	Conduct data entry into VTA	Other
34	Conduct data entry into eDES	Other
35	Conduct data entry into ePEB	Other
36	Conduct data entry into Local Database	Other
37	Provide case updates to SM, Unit and NCM	Other

Table 10: Navy Specific PEBLO Tasks

Number	Task	IDES Stage/Phase
1	Enter Demographic Data in MEDBOLT	Referral
2	Copy all records in-patient & outpatient	Referral
3	Produce two copies of STR	Referral
4	Schedule member for IDES Consultation Seminar and inform Service member's Commander	Referral
5	If necessary, request Civilian Medical records	Referral
6	Create case in MEDBOLTS	Referral
7	If necessary, request copies of Limited Duty 6110/5 from Limited Duty Coordinator	Referral
8	Time spend entering referrals in CHCS	Referral
9	Create Tricare Authorization for members conducting VA exams at facility local to them and providing copy to MSC	Medical Examination
10	Coordinate rescheduling of VA examination appointments by contacting the VHA service provider	Medical Examination
11	Receive copy of completed VA exams from MSC, make additional copy to be routed to referring provider for review, and prepare routing folder	MEB
12	Provide copy of C&P exams to member	MEB
13	For Tri-Service Boards, assemble case file in accordance with Navy standards, review appropriateness of referral in accordance to SECNAV, and prepare case file for review by Convening Authority	MEB
14	Print all AHLTA notes and copy the STR and prepare the package for the MSC	MEB
15	Create 6100/2 Patient Signature in MEDBOLTS for member to concur or rebut Medical Board report	MEB
16	Enter MEB End Date within VTA with FEDEX Tracking # and comments	MEB
17	Create 6100/1 in MEDBOLTS and route to MEB for signature	MEB
18	Rout narrative summaries for physician signature	MEB
19	Encourage physicians to complete their narrative summaries	MEB
20	Mail via FED-EX cases to PEB	MEB
21	Update records prior to PEB submission	MEB
22	Bring boards into system	MEB
23	Prepares NAVMED 6100/5	MEB
24	Complete all required fields in MEDBOLTS once case is forwarded to PEB	MEB
25	Update VTA with request for FPEB	PEB
26	Update records for FPEB	PEB
27	Review weekly JDETS received from PEB for accuracy and relay inconsistencies to PEB for correction	PEB

Table 11: Air Force Specific PEBLO Tasks

Number	Task	IDES Stage/Phase
1	Follow up with Service member for medical records from civilian facilities	Referral
2	Process Line of Duty determinations	Referral
3	Enter referrals	Referral
4	Request SF 88/93 of SF2808/2807-1 MEPS physical medical history through ARMS	Referral
5	Request assistance from Referral Management to request off base consult notes	Referral
6	Request Commander's Mission Impact Statement from SM's CC and Res/Guard from Medical unit	Referral
7	Complete Section 1 of VA Claim form 21-0819 and get PCM signatures	Referral
8	Consult with Legal on Dual Action Cases	Referral
9	Coordinate appointments for ARC members in the Mental Health clinic	Medical Examination
10	Contacting ARC Units for additional medical information, completed LOD, status on Service members	Medical Examination
11	Arrange TDY to VA/Sacramento, coordinate travel with patients, conduct pre-TDY patient briefing and finalize itinerary	Medical Examination
12	Input MEB patients into Defense Travel System for their VA appointments	Medical Examination
13	Include any Service specific VA Examination or NARSUM related actions or process steps	Medical Examination
14	Include any Service specific MEB related actions or process steps	MEB
15	Coordinate care for second opinions	MEB
16	Request specialist notes with CLR Office	MEB
17	Book appointments for any follow-ups needed or appointments needed for provider to write the narrative summary	MEB
18	Assist member to schedule off base appointment with specialist	MEB
19	Track the additional exams per C&P examiner needed for MEB purposes	MEB
20	Request an updated NARSUM from provider	MEB
21	Copy records for MEB office and formal board	PEB
22	Assist member with travel orders for FPEB appeal appearance	PEB
23	Scan IPEB case into RNT	PEB
24	Process fit for duty Service members	PEB
25	Update/assist Wounded Warrior Representatives	Other
26	Update all units on ARC cases	Other
27	Conduct IDES training for new providers/commanders/1st Sgts	Other
28	Brief and assist case managers	Other
29	Conduct IDES data management	Other
30	Conduct monthly data management process	Other

31	Respond to walk-in questions	Other
32	Update tracking spreadsheets	Other
33	Conduct weekly teleconference with VBA/VHA	Other
34	Conduct monthly Health Benefits teleconference	Other
35	Conduct monthly conferences with ARC units	Other
36	Rout approvals for leave out of the local area	Other
37	Create PEBLO Conference Binder	Other
38	Create MEB Continuity Binder	Other
39	Attend vector checks	Other

APPENDIX C: MANPOWER METHODOLOGY –PROJECTED IDES CASELOAD BY STAGE

Table 12: Projected DoD Future Yearly Caseload

Cases Removed from IDES Process	Entered Stage/Phase	Exited Stage/Phase (RTD or Admin)	Percent of Original Population Entering Stage
Referral	31698	89	100.0%
Medical Exam Stage	31609	442	99.7%
MEB Phase	31167	792	98.3%
PEB Phase	30375	1920	95.8%
Transition Phase	28455	243	89.8%
VA Benefits Phase	28212	28212	89.0%

APPENDIX D: MANPOWER METHODOLOGY – MANPOWER AVAILABILITY FACTORS

Air Force Instruction 38-201

Manpower and Organizations
Determining Manpower Requirements

Table 13: Manpower Availability Factor (MAF) Calculation (Air Force)

Calendar Days/Month (365.25 days/12 months)	30.4375
Less: Weekend Days/Month (30.4375/7 days X 2 days)	-8.6964
Less: Holidays/Month (10 holidays/12 months)	-0.8333
Equals: Assigned Days/Month	20.9078
Monthly Assigned Hours (20.9078 days X 8 hrs/day)	167.26
Less: Leave	-9. 2942
Less: PCS-related	-0.8193
Less: Medical (Sick Leave)	-1.9052
Less: Organizational Duties	-0.5188
Less: Education & Training	-3.9998
Monthly Hours Available to Primary Duty (Based on a 40-hour work week)	150.7
Annual Available Hours (Monthly available hours X 12 months)	1,808.4

Army Regulation 570–4

Manpower and Equipment Control Manpower Management

Table 14: Army Availability Factors for U.S. Civilians and Military

Standard Work Week	Peacetime (Normal)	Mobilization (Sustain)	Mobilization (Surge)
Computation of assigned and available hours	5 days 8 hrs/day 40 hour week	6 days 8 hrs/day 48 hour week	6 days 10 hrs/day 60 hour week
Avg calendar days/yr Less:Relief days/yr holidays	365.25 104.375 10	365.25 52.375	365.25 52.375
Congressionally Mandated work Hours/year	2087		
Net assigned Duty days/mo	20.906	26.073	26.073
Net assigned duty hours/day	× 8	× 8	× 10
Monthly assigned hours	165.25	208.58	260.73
Total non–available hrs (lv, tng, spec duty, etc.)	Mil/Civ 22.25	Mil/Civ 17.58/11.58	Mil/Civ 15.73/9.73
Monthly hours available for primary Duty	145.0*	191.0*/197.0*	245.0/251.0*

Notes:

1 *Work hours per month available for work. OCONUS commanders may assess the applicability of these figures. When appropriate, OCONUS commanders may reduce these figures by up to 2 hours.

2 Availability factors are for manpower requirements determination only; actual utilization is the policy of the local commander.

Monthly hours available for primary duty x Months per Year = MAF

145 x 12 = 1740

OPNAVINST 1000.16K (22 Aug 07)

d. U.S. Civilian Personnel Ashore CONUS and OUTUS
(1) Civilian personnel assigned to shore activities

Ship Standard Workweek: 40.00 hrs

(Routine is 8 hours per day, 5 days per week, excluding meal hours)

Productive Workweek: 33.38 hrs

Total hours available weekly: 40.00

Less non-available time:
- Training: 0.32
- Diversion: 0.20
- Leave: 4.57
- Holidays: 1.53
- Total non-available: (6.62)
- Total Hours Available for Productive Work: 33.38

Total Requirements Handbook

Table 5-2 FREQUENCY CONVERSION FACTOR COMPUTATIONS

ASSUMPTIONS:

365.25 days/YR (includes extra Leap Year day); 12 MOs/YR; 4 QTR/YR; 7 days/WK; 2 weekend days/WK; and 10 holidays/YR

CONVERSION COMPUTATIONS FACTORS

A. $\frac{365.25 \text{ (DAYS/YR)}}{7 \text{ (DAYS/WK)}}$ = 52.179 WKs/AVERAGE YR

B. $\frac{52.179 \text{ (WKs/YR)}}{12 \text{ (MOs/YR)}}$ = 4.348 WKS/AVERAGE MO

C. $\frac{365.25 \text{ (DAYS/YR)}}{12 \text{ (MOs/YR)}}$ = 30.438 DAYS/AVERAGE MO

D. $\frac{365.25 \text{ (DAYS/YR)}}{30.438 \text{ (DAYS/MO)}}$ = 11.999 (12) MOs/YR

E. $\frac{12 \text{ (MOs/YR)}}{12 \text{ (MOs/YR)}}$ = 1.000 MOs IN AVERAGE MO

APPENDIX E: MANPOWER RESULTS – TIME REQUIREMENTS BY PHASE/STAGE

Table 15: Time Requirements by Phase/Stage

Phase/Stage	Total Time Requirement (in minutes)			
	Army	Navy	Air Force CONUS	Air Force OCONUS
Referral	521.45	580.44	369.59	166.94
Medical Evaluation	120.37	129.66	109.69	91.18
MEB	775.41	733.51	237.77	211.42
PEB	504.82	470.64	412.98	332.47
Transition	105.95	11.69	9.89	10.39
Other	406.62		27.98	49.76
Total Minutes	2434.62	1925.95	1167.91	862.16
Total Hours	40.58	32.10	19.47	14.37

APPENDIX F: EXPERIENCE AND CASE COMPLEXITY METHODOLOGY – DATA COLLECTION AND COMPILATION

DoD based the multivariate regression on a combined data set from FY13 including the following:

- Department of Veterans Affairs Tracking Application data – 94,750 cases
  - Army - 64,198 cases
  - Navy - 20,802 cases
  - Air Force - 9,750 cases
- Customer satisfaction survey data
  - MEB Survey data -1,719 records updated
  - PEB Survey data -1,593 records updated
- Service member years of service data
  - Active Duty -52,396 records updated
  - Reserve Duty -2,691 records updated
- Military Department PEBLO staffing and performance factors data
  - Army -55,459 records updated
  - Navy - 6,206 records updated
  - Air Force - 5,923 records updated

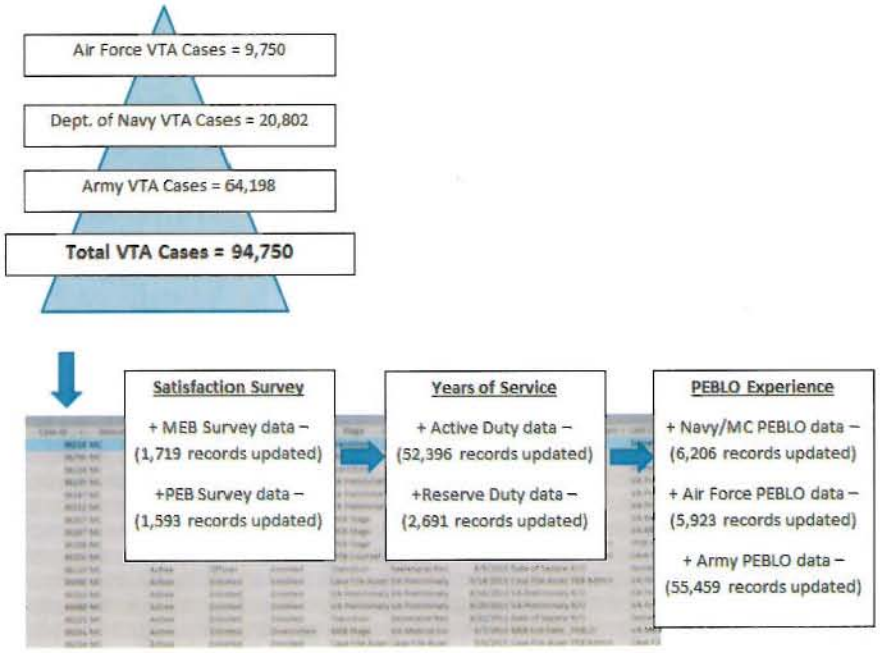

Figure 6: Data Compilation for Multiple Regression

APPENDIX G: EXPERIENCE AND CASE COMPLEXITY METHODOLOGY – STATISTICAL PROCEDURE

DoD employed multiple linear regression to develop a model to predict PEBLO performance (case processing time through the MEB phase (regression one) and customer satisfaction survey data (regression two)) based on PEBLO experience and case complexity variables. PEBLO experience variables included prior medical experience, prior military experience, prior counseling experience, prior administrative experience, position grade level, education level, caseload, and time in position (by years). Case complexity variables included Service member years of service, DoD adjusted rating, combined number of conditions (sum of referred and claimed), and component (either Active or Reserve).

Multiple linear regression is a flexible method of data analysis used to calculate the relationship of multiple predictor variables (continuous, dichotomous, ordinal, or categorical) on a dependent or criterion variable (Berger, 2003). Multiple regression enables examination of the effects of a single variable or multiple variables with or without other variables taken into consideration (Cohen, Cohen, West, & Aiken, 2003).

A sample multiple linear regression model takes the form

$$y_i = \beta_0 + \beta_1 X_{i1} + \beta_2 X_{i2} \ldots + \beta_k X_{ik} + \varepsilon_i,\ i = 1, 2, \ldots, n.$$

APPENDIX H: EXPERIENCE AND CASE COMPLEXITY METHODOLOGY – CUSTOMIZED PEBLO-TO-CASE RATIO

DoD implemented the results of statistical analysis two to calculate an adjusted PEBLO-to-case ratio at each MTF. DoD examined each MTF for all Military Departments to judge the adequacy of PEBLO-to-case ratio staffing and sufficiency of PEBLO experience. Tables 11 through 13 provide comparisons of current to baseline to adjusted PEBLO-to-case ratios for all MTFs based on current information. Certain adjusted ratios could not be calculated due to lack of data acquired from the Military Departments (represented as N/A). The number listed in each cell represents the number of cases in relation to each single PEBLO (e.g., 1 PEBLO to x cases).

Table 16: Army Examples of Current, Baseline, and Adjusted PEBLO-to-case Ratios

Army	Current	Baseline	Adjusted
Eustis JB, VA	43	30	N/A
Ft. Belvoir, VA	13	30	N/A
Ft. Benning, GA	30	30	28
Ft. Bliss, TX	28	30	24
Ft. Bragg, NC	39	30	N/A
Ft. Buchanan, PR	13	30	24
Ft. Campbell, KY	38	30	33
Ft. Carson, CO	24	30	16
Ft. Drum, NY	32	30	27
Ft. Gordon, GA	42	30	25
Ft. Hood, TX	19	30	26
Ft. Huachuca, AZ	31	30	27
Ft. Irwin, CA	55	30	33
Ft. Jackson, SC	31	30	26
Ft. Knox, KY	20	30	N/A
Ft. Leavenworth, KS	33	30	24
Ft. Lee, VA	66	30	29
Ft. Leonard Wood, MO	13	30	N/A
Ft. Meade, MD	63	30	N/A
Ft. Polk, LA	63	30	28
Ft. Riley, KS	43	30	26
Ft. Rucker, AL	33	30	29
Ft. Sill, OK	17	30	27
Ft. Stewart, GA	20	30	29
Ft. Wainwright, AK	42	30	30
Lewis JB, WA	15	30	29
Redstone Arsenal, AL	24	30	27
Richardson JB, AK	53	30	31
San Antonio JB (SH), TX	16	30	29
Tripler AMC, HI	20	30	26
Walter Reed NMMC, MD	18	30	N/A
West Point, NY	30	30	N/A

Table 17: Navy Examples of Current, Baseline, and Adjusted PEBLO-to-case Ratios

Navy	Current	Baseline	Adjusted
29 Palms NH , CA	66	48	N/A
Annapolis NHC, MD	28	48	N/A
Beaufort NH, SC	30	48	N/A
Bremerton NH, WA	61	48	40
Camp Lejeune NH, NC	67	48	N/A
Camp Pendleton NH, CA	81	48	56
Charleston NH, SC	39	48	N/A
Cherry Point NH, NC	107	48	N/A
Corpus Christi NHC, TX	23	48	N/A
Ft. Worth BHC, TX	30	48	N/A
Great Lakes FHCC, IL	52	48	N/A
Hawaii NHC, HI	48	48	N/A
Jacksonville NH, FL	48	48	N/A
Lemoore NH, CA	35	48	N/A
New England NHC, CT	29	48	N/A
Oak Harbor NH, WA	38	48	N/A
Patuxent River NHC, MD	12	48	N/A
Pensacola NH, FL	106	48	N/A
Portsmouth NMC, VA	60	48	N/A
Quantico NHC, VA	18	48	N/A
San Diego NMC, CA	57	48	53
Walter Reed NMMC, MD	36	48	N/A

Table 18: Air Force Examples of Current, Baseline, and Adjusted PEBLO-to-case Ratios

Air Force	Current	Baseline	Adjusted
Altus AFB, OK	22	55	66
Andrews JB, MD	18	55	62
Barksdale AFB, LA	36	55	67
Beale AFB, CA	24	55	75
Bolling JB, DC	12	55	N/A
Buckley AFB, CO	36	55	63
Cannon AFB, NM	34	55	81
Charleston JB (AF), SC	25	55	63
Columbus AFB, MS	5	55	61
Davis-Monthan AFB, AZ	16	55	64
Dover AFB, DE	18	55	65
Dyess AFB, TX	45	55	N/A
Edwards AFB, CA	17	55	N/A
Eglin AFB, FL	38	55	67
Eielson AFB, AK	27	55	N/A
Ellsworth AFB, SD	52	55	85
Elmendorf JB, AK	60	55	N/A
F. E. Warren AFB, WY	31	55	62
Fairchild AFB, WA	28	55	62
Goodfellow AFB, TX	8	55	N/A
Grand Forks AFB, ND	16	55	53
Hanscom AFB, MA	14	55	61
Hickam JB, HI	42	55	66
Hill AFB, UT	25	55	79
Holloman AFB, NM	25	55	66
Hurlburt Field, FL	11	55	71
Keesler AFB, MS	8	55	61
Kirtland AFB, NM	45	55	69
Langley JB, VA	13	55	64
Laughlin AFB, TX	4	55	N/A
Little Rock AFB, AR	19	55	65
Los Angeles AFB, CA	3	55	75
Luke AFB, AZ	21	55	63
MacDill AFB, FL	16	55	67
Malmstrom AFB, MT	36	55	66
Maxwell AFB, AL	16	55	75
McChord JB, WA	18	55	60
McConnell AFB, KS	14	55	N/A
McGuire JB, NJ	19	55	66

Minot AFB, ND	39	55	80
Moody AFB, GA	37	55	78
Mountain Home AFB, ID	19	55	64
Nellis AFB, NV	24	55	67
Offutt AFB, NE	23	55	71
Patrick AFB, FL	12	55	67
Peterson AFB, CO	26	55	64
Pope AFB, NC	10	55	N/A
Robins AFB, GA	23	55	74
San Antonio JB (Lackland), TX	12	55	61
San Antonio JB (Randolph), TX	14	55	61
Scott AFB, IL	18	55	64
Seymour-Johnson AFB, NC	35	55	68
Shaw AFB, SC	31	55	67
Sheppard AFB, TX	21	55	64
Tinker AFB, OK	31	55	69
Travis AFB, CA	14	55	66
Tyndall AFB, FL	35	55	65
USAF Academy, CO	17	55	59
Vance AFB, OK	18	55	64
Vandenberg AFB, CA	18	55	77
Whiteman AFB, MO	17	55	61
Wright-Patterson AFB, OH	16	55	62
Andersen AFB, Guam*	9	99	136
Aviano AB, Italy*	22	99	N/A
Incirlik AB, Turkey*	20	99	137
Kadena AB, Japan*	30	99	126
Kunsan AB, Korea*	6	99	N/A
Lajes Field, Portugal*	2	99	132
Misawa AB, Japan*	20	99	138
Osan AB, Korea*	14	99	N/A
RAF Lakenheath, UK*	42	99	142
Ramstein AB, Germany*	16	99	137
Spangdahlem AB, Germany*	17	99	151
Yokota AB, Japan*	33	99	140

*Overseas locations integrating the higher (99) baseline PEBLO-to-case ratio calculation.