U.S. Special Operations Forces (SOF): Background and Issues for Congress

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Summary

Special Operations Forces (SOF) play a significant role in U.S. military operations and, in recent years, have been given greater responsibility for planning and conducting worldwide counterterrorism operations. U.S. Special Operations Command (USSOCOM) has about 70,000 Active Duty, National Guard, and reserve personnel from all four services and Department of Defense (DOD) civilians assigned to its headquarters, its four Service component commands, and eight sub-unified commands.

In 2013, based on a request from USSOCOM (with the concurrence of Geographic and Functional Combatant Commanders and the Military Service Chiefs and Secretaries), the Secretary of Defense assigned command of the Theater Special Operations Commands (TSOCs) to USSOCOM. USSOCOM now has the responsibility to organize, train, and equip TSOCs. While USSOCOM is now responsible for the organizing, training, and equipping of TSOCs, the Geographic Combatant Commands will continue to have operational control over the TSOCs. Because the TSOCs are now classified as sub-unified commands, the Services are responsible to provide non-SOF support to the TSOCs in the same manner in which they provided support to the Geographic Combatant Command headquarters.

The current Unified Command Plan (UCP) stipulates USSOCOM responsibility for synchronizing planning for global operations to combat terrorist networks. This limits its ability to conduct activities designed to deter emerging threats, build relationships with foreign militaries, and potentially develop greater access to foreign militaries. USSOCOM is proposing changes that would, in addition to current responsibilities, include the responsibility for synchronizing the planning, coordination, deployment, and, when directed, the employment of special operations forces globally and will do so with the approval of the Geographic Combatant Commanders, the Services and, as directed, appropriate U.S. government agencies. Further, the proposed changes would give broader responsibility to USSOCOM beyond counterterrorism activities, to include activities against other threat networks.

Potential issues for Congress include DOD’s upcoming classified National Military Strategy and USSOCOM and Service reductions and the impact on USSOCOM.
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Background

Overview
Special Operations are military operations requiring unique modes of employment, tactical techniques, equipment, and training. These operations are often conducted in hostile, denied, or politically sensitive environments and are characterized by one or more of the following: time sensitive, clandestine, low visibility, conducted with and/or through indigenous forces, requiring regional expertise, and/or a high degree of risk. Special Operations Forces (SOF) are those active and reserve component forces of the services designated by the Secretary of Defense and specifically organized, trained, and equipped to conduct and support special operations. The U.S. Special Operations Command (USSOCOM), headquartered at MacDill Air Force Base in Tampa, FL, is a functional combatant command responsible for training, doctrine, and equipping for all U.S. SOF units.

Command Structures and Components
In 1986, Congress, concerned about the status of SOF within overall U.S. defense planning, passed legislation (P.L. 99-661) to strengthen special operations’ position within the defense community and to strengthen interoperability among the branches of U.S. SOF. These actions included the establishment of USSOCOM as a new unified command. USSOCOM headquarters currently consists of approximately 2,500 military and Department of Defense (DOD) civilians (not including government contractors).\(^1\) As stipulated by U.S.C. Title X, Section 167, the commander of USSOCOM is a four-star officer who may be from any military service. U.S. Army General Raymond A. Thomas III is the current USSOCOM Commander. The USSOCOM Commander reports directly to the Secretary of Defense. The Assistant Secretary of Defense for Special Operations and Low Intensity Conflict (ASD/SOLIC), a member of the Office of the Secretary of Defense for Policy (OSD-P), provides civilian oversight over USSOCOM activities. The current ASD/SOLIC is Mr. Michael Lumpkin, a former Navy SEAL officer.

USSOCOM currently has about 56,000 active duty, 7,400 reserve and 6,600 civilian personnel assigned to its headquarters, its four components, and sub-unified commands.\(^2\) USSOCOM’s components are the U.S. Army Special Operations Command (USASOC); the Naval Special Warfare Command (NSWC); the Air Force Special Operations Command (AFSOC); and the Marine Corps Forces Special Operations Command (MARSOC). The Joint Special Operations Command (JSOC) is a USSOCOM sub-unified command.

Theater Special Operations Commands (TSOCs)
Theater-level command and control responsibilities are vested in Theater Special Operations Commands (TSOCs). TSOCs are sub-unified commands under their respective Geographic Combatant Commanders (GCCs). TSOCs are special operational headquarters elements designed to support a GCC’s special operations logistics, planning, and operational command and control requirements, and are normally commanded by a general officer.

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\(^2\) Statement of General Joseph L. Votel, Commander, United States Special Operations Command, Before the House Armed Services Committee, Subcommittee on Emerging Threats and Capabilities, March 1, 2016, p. 1.
In February 2013, based on a request from USSOCOM and with the concurrence of every geographic and functional combatant commander and military service chiefs and Secretaries, the Secretary of Defense transferred combatant command of the TSOCs from the GCCs to USSOCOM. This means USSOCOM now has the responsibility to organize, train, and equip TSOCs as it previously had for all assigned SOF units as specified in U.S. Code, Title 10, Section 167. This change is intended to enable USSOCOM to standardize, to the extent possible, TSOC capabilities and manpower requirements. While USSOCOM is now responsible for the organizing, training, and equipping of TSOCs, the GCCs continue to have operational control over the TSOCs and all special operations in their respective theaters. TSOC commanders are the senior SOF advisors for their respective GCCs. Each TSOC is capable of forming the core of a joint task force headquarters for short-term operations, and can provide command and control for all SOF in theater on a continuous basis. The Services have what the DOD calls “Combatant Command Service Agency (CCSA)” responsibilities for providing manpower, non-SOF peculiar equipment, and logistic support to the TSOCs. The current TSOCs, the GCCs they support, and the CCSA responsibility for those TSOCs are as follows:

Current TSOCs are

- Special Operations Command South (SOCSOUTH), Homestead Air Force Base, FL; supports U.S. Southern Command; its CCSA is the Army;
- Special Operations Command Africa (SOCAFRICA), Stuttgart, Germany; supports U.S. Africa Command, its CCSA is the Army;
- Special Operations Command Europe (SOCEUR), Stuttgart, Germany; supports U.S. European Command; CCSA is the Army;
- Special Operations Command Central (SOCCENT), MacDill Air Force Base, FL; supports U.S. Central Command; its CCSA is the Air Force;
- Special Operations Command Pacific (SOCPAC), Camp Smith, HI; supports U.S. Pacific Command; its CCSA is the Navy;
- Special Operations Command Korea (SOCKOR), Yongsang, Korea; supports U.S. Forces Korea, its CCSA is the Army; and
- Special Operations Command U.S. Northern Command (SOCNORTH), Peterson Air Force Base, CO; supports U.S. Northern Command; its CCSA is the Air Force.

Additional USSOCOM Responsibilities

In addition to Title 10 authorities and responsibilities, USSOCOM has been given additional responsibilities. In the 2004 Unified Command Plan (UCP), USSOCOM was given the responsibility for synchronizing DOD planning against global terrorist networks and, as directed, conducting global operations against those networks. In this regard, USSOCOM “receives, reviews, coordinates and prioritizes all DOD plans that support the global campaign against terror, and then makes recommendations to the Joint Staff regarding force and resource

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allocations to meet global requirements." In October 2008, USSOCOM was designated the DOD proponent for Security Force Assistance (SFA). In this role, USSOCOM performs a synchronizing function in global training and assistance planning similar to the previously described role of planning against terrorist networks.

**Army Special Operations Command**

U.S. Army SOF (ARSOF) includes approximately 27,000 soldiers from the active Army, National Guard, and Army Reserve organized into Special Forces, Ranger, and special operations aviation units, along with civil affairs units, military information units, and special operations support units. ARSOF Headquarters and other resources, such as the John F. Kennedy Special Warfare Center and School, are located at Fort Bragg, NC. Five active Special Forces (SF) Groups (Airborne), consisting of about 1,400 soldiers each, are stationed at Fort Bragg and at Fort Lewis, WA; Fort Campbell, KY; Fort Carson, CO; and Eglin Air Force Base, FL. Special Forces soldiers—also known as the Green Berets—are trained in various skills, including foreign languages, that allow teams to operate independently throughout the world.

Two Army National Guard Special Forces groups are headquartered in Utah and Alabama. In addition, an elite airborne light infantry unit specializing in direct action operations, the 75th Ranger Regiment, is headquartered at Fort Benning, GA, and consists of three battalions of about 800 soldiers each and a regimental special troops battalion providing support to the three Ranger battalions. The Army’s special operations aviation unit, the 160th Special Operations Aviation Regiment (Airborne) (SOAR), consists of five battalions and is headquartered at Fort Campbell, KY. The 160th SOAR features pilots trained to fly the most sophisticated Army rotary-wing aircraft in the harshest environments, day or night, and in adverse weather and supports all USSOCOM components not just exclusively Army units.

Some of the most frequently deployed SOF assets are Civil Affairs (CA) units, which provide experts in every area of civil government to help administer civilian affairs in operational theaters. The 95th Civil Affairs Brigade (Airborne) is the only active CA unit that exclusively supports USSOCOM. In September 2011 the 85th Civil Affairs Brigade was activated to support U.S. Army General Purpose Forces (GPFs). All other CA units reside in the Reserves and are affiliated with Army GPF units. Military Information Support Operations (formerly known as psychological operations) units disseminate information to large foreign audiences through mass media. Two active duty Military Information Support Groups (MISG)—the 4th Military

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6 Ibid.


8 Information in this section, unless otherwise noted is taken from “U.S. Special Operations Command Factbook 2016” USSOCOM Public Affairs, 2015, p. 18.

9 Airborne refers to “personnel, troops especially trained to effect, following transport by air, an assault debarkation, either by parachuting or touchdown.” Joint Publication 1-02, Department of Defense Dictionary of Military and Associated Terms, 12 April 2001 (As Amended Through 31 July 2010).

10 Direct action operations are short-duration strikes and other small-scale offensive actions conducted as a special operation in hostile, denied, or politically sensitive environments, as well as employing specialized military capabilities to seize, destroy, capture, exploit, recover, or damage designated targets. Direct action differs from conventional offensive actions in the level of physical and political risk, operational techniques, and the degree of discriminate and precise use of force to achieve specific objectives.
Information Support Group (MISG) (Airborne) and 8th Military Information Support Group (MISG) (Airborne)—are stationed at Fort Bragg, and their subordinate units are aligned with Geographic Combatant Commands.

**Air Force Special Operations Command**

The Air Force Special Operations Command (AFSOC) is one of the Air Force’s 10 major commands, with approximately 19,500 active, reserve, and civilian personnel.11 AFSOC units operate out of four major continental United States (CONUS) locations and two overseas locations. The headquarters for AFSOC, the 1st Special Operations Wing (1st SOW), 24th Special Operations Wing (24th SOW), and the Air Force Special Operations Air Warfare Center (AFSOAWC) are located at Hurlburt Field, FL.12 The AFSOAWC is responsible for training, education, irregular warfare program, innovation development, and operational testing.13 From AFSOAWC’s fact sheet:

The AFSOAWC’s mission includes non-standard aviation in support of Army, Navy, Air Force, Marine and allied special operations forces.

The following units are consolidated under the Air Warfare Center [AFSOAWC]:

- U.S. Air Force Special Operations School, Hurlburt Field, FL
- 6th Special Operations Squadron, Duke Field, FL
- 19th Special Operations Squadron, Hurlburt Field, FL
- 551st Special Operations Squadron, Cannon Air Force Base, NM
- 5th Special Operations Squadron, a reserve unit from the 919th Special Operations Wing, Duke Field, FL
- 371st Special Operations Combat Training Squadron, Hurlburt Field, FL
- 18th Flight Test Squadron, Hurlburt Field, FL
- 592nd Special Operations Maintenance Squadron, Duke Field, FL
- 209th Civil Engineer Squadron, a guard unit from Gulfport, MS
- 280th Special Operations Communications Squadron, a guard unit from Dothan, AL

The Air Warfare Center provides mission qualification training in SOF aviation platforms to include AC-130U, AC-130W, U-28, MQ-1, MQ-9, C-145, C-146 as well as small unmanned aerial systems (SUAS), Combat Aviation Advisors, medical element personnel, and AFSOC Security Forces. In addition to AFSOC personnel, AFSOAWC is responsible for educating and training other USSOCOM components and joint/intergency/coalition partners.14

The 27th SOW is at Cannon AFB, NM. The 352nd and 353rd Special Operations Wings provide forward presence in Europe (RAF Mildenhall, England) and in the Pacific (Kadena Air Base, Japan), respectively. The 6th SOS’s mission is to assess, train, and advise partner nation aviation

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11 Information in this section, unless otherwise noted, is taken from “U.S. Special Operations Command Factbook 2016” USSOCOM Public Affairs, 2015, p. 26.
13 Ibid.
14 Ibid.
units with the intent to raise their capability and capacity to interdict threats to their nation. The 6th SOS provides aviation expertise to U.S. foreign internal defense (FID) missions. The Air National Guard’s 193rd SOW at Harrisburg, PA, and the Air Force Reserve Command’s 919th SOW at Duke Field, FL, complete AFSOC’s major flying units.

The 24th Special Operations Wing is one of three Air Force active duty special operations wings assigned to Air Force Special Operations Command. The 24 SOW is based at Hurlburt Field, Fla. The 24 SOW is the only Special Tactics wing in the Air Force.

**U.S. Air Force Special Tactics**

From the Air Force’s Special Tactics fact sheet:

The primary mission of the 24 SOW is to provide Special Tactics forces for rapid global employment to enable airpower success. The 24 SOW is U.S. Special Operation Command’s tactical air and ground integration force, and the Air Force’s special operations ground force to enable global access, precision strike, and personnel recovery operations.

Core capabilities encompass: airfield reconnaissance, assessment, and control; personnel recovery; joint terminal attack control and environmental reconnaissance.

Special Tactics is comprised of Special Tactics Officers, Combat Controllers, Combat Rescue Officers, Pararescuemen, Special Operations Weather Officers and Airmen, Air Liaison Officers, Tactical Air Control Party operators, and a number of combat support Airmen which compromise 58 Air Force specialties.

These unique skills provide a full-spectrum, air-focused special operations capability to the combatant commander in order to ensure airpower success. With their unique skill sets, Special Tactics operators are often the first special operations elements deployed into crisis situations. Special Tactics Airmen often embed with Navy SEALs, Army Green Berets and Rangers to provide everything from combat air support to medical aid and personnel recovery, depending on their specialty.

AFSOC’s Special Tactics experts include Combat Controllers, Pararescuemen, Special Operations Weather Teams, Combat Aviation Advisors, and Tactical Air Control Party (TACPs). As a collective group, they are known as Special Tactics and have also been referred to as “Battlefield Airmen.” Their basic role is to provide an interface between air and ground forces, and these airmen have highly developed skill sets. Usually embedded with Army, Navy, or Marine SOF units, they provide control of air fire support, medical and rescue expertise, or weather support, depending on the mission requirements.15

**AFSOC Aircraft**

AFSOC’s active duty and reserve component flying units operate fixed and rotary-wing aircraft, including the CV-22B, AC-130, C-130, EC-130, MC-130, MQ-1, MQ-9, U-28A, C-145A, C-146A, and PC-12.16

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Naval Special Warfare Command\textsuperscript{17}

The Naval Special Warfare Command (NSWC) is composed of approximately 10,000 personnel, including active-duty Special Warfare Operators, known as SEALs; Special Warfare Boat Operators, known as Special Warfare Combatant-craft Crewmen (SWCC); reserve personnel; support personnel; and civilians. NSWC is organized around 10 SEAL Teams, 2 SEAL Delivery Vehicle (SDV) Teams, and 3 Special Boat Teams. SEAL Teams consist of six SEAL platoons each, consisting of 2 officers and 16 enlisted personnel. The major operational components of NSWC include Naval Special Warfare Groups One, Three, and Eleven, stationed in Coronado, CA, and Naval Special Warfare Groups Two, Four, and Ten and the Naval Special Warfare Development Group in Little Creek, VA. These components deploy SEAL Teams, SEAL Delivery Vehicle Teams, and Special Boat Teams worldwide to meet the training, exercise, contingency, and wartime requirements of theater commanders. Because SEALs are considered experts in special reconnaissance and direct action missions—primary counterterrorism skills—NSWC is viewed as well postured to fight a globally dispersed enemy ashore or afloat. NSWC forces can operate in small groups and have the ability to quickly deploy from Navy ships, submarines and aircraft, overseas bases, and forward-based units.

U.S. Marine Corps Forces Special Operations Command (MARSOC)\textsuperscript{18}

On November 1, 2005, DOD announced the creation of the Marine Special Operations Command (MARSOC) as a component of USSOCOM. Now referred to as the U.S. Marine Corps Forces Special Operations Command, MARSOC consists of the Marine Raider Regiment, which includes 1\textsuperscript{st}, 2\textsuperscript{nd}, and 3\textsuperscript{rd} Marine Raider Battalions; the Marine Raider Support Group; 1\textsuperscript{st}, 2\textsuperscript{nd}, and 3\textsuperscript{rd} Marine Raider Support Battalions; and the Marine Special Operations School. MARSOC headquarters, the 2\textsuperscript{nd} and 3\textsuperscript{rd} Marine Raider Battalions, the Marine Special Operations School, and the Marine Raider Support Group are stationed at Camp Lejeune, NC. The 1\textsuperscript{st} Marine Raider Battalion is stationed at Camp Pendleton, CA. MARSOC forces have been deployed worldwide to conduct a full range of special operations activities. MARSOC missions include direct action, special reconnaissance, foreign internal defense, counterterrorism, and information operations. MARSOC currently has approximately 3,000 personnel assigned.\textsuperscript{19}

Joint Special Operations Command (JSOC)\textsuperscript{20}

From USSOCOM’s official website:

The Joint Special Operations Command (JSOC) is a subunified command of the US Special Operations Command (USSOCOM). It is charged to study special operations requirements and techniques, ensure interoperability and equipment standardization, plan

\textsuperscript{17} Information in this section, unless otherwise noted is taken from “U.S. Special Operations Command Factbook 2016” USSOCOM Public Affairs, 2015, p. 22.

\textsuperscript{18} Information in this section is from “Fact Book: United States Special Operations Command,” USSOCOM Public Affairs, February 2013, p. 20; “U.S. Special Operations Command Factbook 2015” USSOCOM Public Affairs, p. 30; and CRS discussions with USSOCOM staff, September 10, 2013.

\textsuperscript{19} U.S. Special Operations Command Factbook 2016” USSOCOM Public Affairs, 2015, p. 30.

and conduct special operations exercises and training, and develop joint special operations tactics.

Despite its innocuous sounding charter, JSOC has made incredible strides in the special operations field and is comprised of an impressive amalgamation of rigorously screened and accessed Soldiers, Sailors, Airmen, Marines, and Civilians. These men and women possess unique and specialized skills, and are routinely among the best in their field. Among them are seasoned combat veterans who cut their teeth by participating in joint special operations like the Son Tay Prison Raid in Vietnam War which took place in 1970, long before JSOC was activated. More recent members of the Command include active duty special operations veterans of all services who have successfully completed the toughest training regiments and demonstrated their mettle under the most challenging and difficult circumstances, including combat. As a result, past and present members of JSOC have participated in all of our Nation’s wars and contingency operations since it was activated in 1980. Included among the places that military and civilian members of the Command have previously served our Nation are Desert One in Iran (1980), Grenada (1983), the Mediterranean Sea during the Achille Lauro hijacking (1985), Panama (1989), the Midcast during the Gulf War (1991), Somalia (1993), Haiti (1994), the Balkans (1996-2002), Afghanistan (2001-present), and Iraq (2003-present).

The Command is always decisively engaged in working to fulfill its charter and typically has members located throughout the world at any given time. An incredibly busy Command, JSOC accomplished its assigned missions successfully in the face of expanding commitments largely due to the quality, dedication, and patriotism of its military and civilian members and the family members who support them.

**Budgetary Issues**

**FY2017 USSOCOM Budget Request**

USSOCOM’s FY2017 budget request for Operations and Maintenance, Research, Development, Testing & Evaluation, Procurement, and Military Construction is outlined in **Table 1**.

**Table 1. FY2017 USSOCOM Budget Request**

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<td>$435.981 M</td>
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21 Information in this section is taken from Department of Defense Fiscal Year (FY) 2017 President’s Budget Submission, United States Special Operations Command, February 2016.
Potential Issues for Congress

DOD’s Upcoming Classified National Military Strategy and USSOCOM

Currently, Congress and DOD are reviewing the 30 year-old Goldwaters–Nichols DOD Reorganization Act of 1986, examining authorities, organizations, acquisition, and planning and procedures. The Chairman of the Joint Chiefs of Staff, Marine General Joseph Dunford, reportedly has indicated that the next U.S. military strategy document will be kept classified and will address, among other things, how the United States addresses “grey area” threats—described as actions that fall just shy of overt provocation. In his testimony to the House Armed Services Committee Subcommittee on Emerging Threats and Capabilities on March 18, 2015, former USSOCOM Commander Army General Joseph Votel described U.S. SOF’s unique capabilities regarding “grey area” threats.

Given U.S. SOF’s capabilities, it can be assumed the USSOCOM will figure prominently in DOD’s new classified military strategy document, which is currently under development and reportedly will be released by the end of the year. However, a high or increased level of U.S. SOF involvement in the nation’s new classified military strategy could come with a price. In his testimony to the House Armed Services Committee Subcommittee on Emerging Threats and Capabilities on March 1, 2016, General Votel noted, regarding the readiness of the force, that “a significant increase in the demand for SOF would prevent us from adequately resetting and retraining for the large variety of missions we are expected to execute.”

Congress, in its oversight role, will likely have the opportunity to review the new classified U.S. military strategy. As part of this review, Congress might choose to examine the roles, missions, and tasks assigned to USSOCOM as well as U.S SOF to help ensure USSOCOM and U.S SOF are not “overcommitted” under this new strategy, which could result in readiness problems. Because of U.S. SOF’s effectiveness in operating in the “grey area,” there could be a tendency to assign them an inordinate amount of responsibility under this new strategic construct. Congress could play a useful role by providing an independent assessment of this strategy ensuring it is fair and balanced.

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23 From CRS Report R42077, The Unified Command Plan and Combatant Commands: Background and Issues for Congress, the Goldwater-Nichols DOD Reorganization Act of 1986 (P.L. 99-433) is summarized as follows:

Page 5: In the aftermath of the failed 1980 multi-service mission to rescue U.S. hostages in Iran and the 1983 invasion of Grenada which featured numerous instances of poor inter-service planning and cooperation, there was renewed emphasis on “jointness” both in Congress and at the Pentagon. Goldwater-Nichols sought to “rebalance the relative power of the geographic commands versus the services. Goldwater-Nichols called for the Chairman of the JCS (CJCS) to review the missions, responsibilities, and force structure and geographic boundaries for each Combatant Command (COCOM) not less than every two years and recommend changes to the Secretary of Defense and the President. In addition, the act expanded the CJCS’s and combatant commander’s powers and gave combatant commanders greater interaction with Congress and greater participation in the DOD budget process.

24 Statement of General Joseph L. Votel, U.S. Army, Commander, United States Special Operations Command, before the House Armed Services Committee Subcommittee on Emerging Threats and Capabilities, March 18, 2015.

25 Statement of General Joseph L. Votel, U.S. Army, Commander, United States Special Operations Command, before the House Armed Services Committee Subcommittee on Emerging Threats and Capabilities, March 1, 2016, p. 15.
and equitable among the Services and Combatant Commands and not over burdensome on USSOCOM.

**Service Readiness Reductions and the Impact on USSOCOM**

In his testimony to the House Armed Services Committee Subcommittee on Emerging Threats and Capabilities on March 1, 2016, former USSOCOM Commander Army General Joseph Votel noted:

> Therefore, one of USSOCOM’s greatest concerns is the potential impacts of fiscal reductions to the Services’ readiness, which directly affect SOF. We have already seen reductions which negatively affect us in a variety of ways. Naval Special Warfare Command is seeing training challenges associated with lower fleet asset availability which impacts readiness and interoperability. Marine Forces Special Operations Command is experiencing reductions in access to some important school seats. US Army Special Operations Command is experiencing a reduction in the Military Training Specific Allotment as well as staffing at heavily-used ranges. Air Force Special Operations Command is facing risk in the AC/MC-130J recapitalization program. If further reductions become necessary, we are certain to see more examples of adverse impacts on USSOCOM like these.²⁶

With recent testimony by Service Chiefs and Secretaries about significant current and future readiness challenges to their respective organizations, it is possible the readiness problems cited by General Votel could worsen. Congress might wish to examine with USSOCOM and the Services possible mitigation strategies to address access and availability of Service-specific assets for U.S. SOF units. The interdependence of U.S. SOF and Service readiness should be emphasized in that low levels of U.S. SOF readiness and availability could result in the Services being asked to step in and fulfill certain SOF missions, thereby further stressing the Service’s readiness and availability as well.

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²⁶ Ibid., p. 17.