



SECRETARY OF THE AIR FORCE
WASHINGTON

03 MAY 2024

The Honorable Spencer Cox
Governor of Utah
350 N. State Street, Suite 200
P.O. Box 142220
Salt Lake City, UT 84114-2220

Dear Governor Cox,

Thank you for your letter to the Secretary of Defense regarding space missions currently performed by the Air National Guard (ANG). I am responding on Secretary Austin's behalf.

The Department of Defense (DoD) and the Department of the Air Force (DAF) value greatly our partnership with the Nation's Governors in advancing our national security at home and abroad. In particular, we value hearing your concerns with a legislative proposal submitted by the Department to Congress for its consideration. Consistent with the Administration's position regarding the disposition of the space missions performed by the ANG, the proposal would facilitate a one-time transfer of certain missions into the United States Space Force. The proposal does not authorize the transfer of any other units from the National Guard, nor is it meant to set a precedent for the transfer of other units or disregard the critical role of Governors.

Rather, the proposal would help complete the work of standing up the U.S. Space Force—the first new military service since 1947. Since its creation four and a half years ago, the U.S. Space Force has integrated space missions previously performed by the Air Force, Army, Navy, and Marine Corps, and has begun the process to integrate space professionals from the Air Force Reserve. After careful study, the DAF has determined that space missions performed by the ANG should also become a part of the U.S. Space Force. These missions—and the professionals who perform them—are essential to the unity of command and mission success of the U.S. Space Force.

Section 924 of National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2024 directed a review of the feasibility and advisability of transferring the space missions performed by the ANG to the U.S. Space Force. I am pleased to provide you with a copy of our report to Congress. As described in the report, the Department of the Air Force recommends transferring nine units determined to be performing covered space missions of the eleven units analyzed, totaling 578 billets in six states. The average reduction of affected states' total National Guard billets due to the transfer is 1.16 percent (reductions range from a low of 0.4 percent to a high of 2.2 percent).

Because of the recent enactment of the U.S. Space Force Personnel Management Act (SFPMA), also a part of the NDAA for FY 2024, the U.S. Space Force looks forward to welcoming Guardsmen into the U.S. Space Force on a full- or part-time basis. Should Congress authorize the transfer of the nine recommended missions and associated units, Guardsmen will have the opportunity to volunteer to join the U.S. Space Force. If a Guardsman chooses not to join, he or she will be provided opportunities to re-train and remain in the ANG. Also, all units will remain in their current location.

I look forward to continuing the dialogue on this important matter. Thank you for your continued support of our Total Force and their families.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Kendall", is positioned above the printed name.

Frank Kendall



PERSONNEL AND
READINESS

OFFICE OF THE UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

APR 24 2024

The Honorable Jack Reed
Chairman
Committee on Armed Services
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

Pursuant to section 924 of the National Defense Authorization Act for Fiscal Year 2024 (Public Law 118-31), the Secretary of Defense asked the Department of the Air Force (DAF) to conduct a study on the feasibility and advisability of transferring all covered space functions of the Air National Guard (ANG) to the Space Force. The Secretary of the Air Force recommends transferring all covered space functions of the ANG to the Space Force. I concur with the Secretary of the Air Force's recommendation.

When Congress authorized the Space Force in 2019, the space missions in the regular Air Force, as well as those within the Departments of the Army and Navy, transferred to the Space Force. However, existing space units remained in the Air Force Reserve (AFR) and the ANG. Since the Air Force no longer had a space mission, as the Space Force matured, standards and culture in the Components diverged. Additionally, retaining space missions in the AFR and ANG required Space Force to work through Reserve Component (RC) bureaucracy to access, but not manage these personnel.

With the enactment of the Space Force Personnel Management Act (SFPMA), which the Department fully supported, Congress authorized the DAF to correct this divergence for the AFR but not for the ANG. SFPMA eliminates the existing regular and RC structures and instead creates a construct for AFR space professionals into a single organization consisting of full-time and part-time positions – a Space Force without Component. SFPMA also reduces bureaucracy associated with the traditional regular and RC structure and is designed to create an adaptive talent management construct given the small size of the Space Force.

In view of the above, I believe the best solution is to consolidate all covered space functions of the ANG in the Space Force and use SFPMA to manage all personnel who perform space functions in a Service without Component. This will allow the Department to fully leverage this groundbreaking approach to managing a total force.

Sincerely,

Ashish S. Vazirani
Performing the Duties of the Under Secretary of
Defense for Personnel and Readiness

cc:
The Honorable Roger F. Wicker
Ranking Member



Department of the Air Force

Report to Congressional Committees

Report on the Feasibility of the Consolidation or Transfer of Space Functions of the National Guard to the Space Force

April 2024

The estimated cost of this study for the Department of Defense is approximately \$106,000 for the 2024 Fiscal Year. This includes \$15,000 in expenses and \$91,000 in DoD labor.



Report on the Feasibility of the Consolidation or Transfer of Space Functions of the National Guard to the Space Force

Section 924 of the Fiscal Year 2024 (FY24) National Defense Authorization Act (NDAA) directs a report from the Department of Defense concerning a feasibility study on the consolidation or transfer of space functions of the National Guard to the Space Force. The study was conducted by the Department of the Air Force (DAF) and the National Guard Bureau, in consultation with the Office of the Under-Secretary of Defense for Personnel & Readiness. The research examines three courses of action for the disposition of 11 operational units and associated support and headquarters elements of the Air National Guard (ANG) that are engaged in, or support space missions.

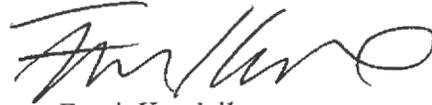
These space missions have remained in the ANG, while corresponding missions within the Regular Air Force, the Army, and the Navy were transferred into the Space Force beginning at its establishment in 2019. Air National Guardsmen and Air Force Reserve members continue to conduct space missions with professionalism and integrity, providing crucial capabilities directly supporting the National Defense Strategy. However, as the Space Force mission, organization, and culture evolves for competitive endurance in the space domain, there is misalignment of operational functions and units as a portion of space capability remains in the Air Force Reserve and ANG components of the Air Force. This situation needs to be resolved. It has created management and leadership issues and uncertainty about their future for the affected units and people. The DAF is grateful Congress enacted the Space Force Personnel Management Act (SFPMA) in the FY24 NDAA, enabling the DAF to correct this divergence of space functions in the Air Force Reserve. However, the FY24 NDAA did not address the space functions in the ANG and instead asked for analysis of three courses of action: remain in the ANG, movement to the Space Force under the SFPMA, or creation of a Space National Guard. The Congress also asked for a definition of which units and individuals should be considered “covered” elements of the Department’s space capabilities.

This report presents the findings of this analysis. It includes the feasibility and advisability of: (1) retaining space functions in the ANG; (2) transferring all covered space functions of the National Guard to the Space Force; or (3) transferring space functions into a Space National Guard as a reserve component of the Space Force. Based on this study and in consultation with the Chief of Space Operations, I recommend transferring nine of the 11 analyzed units with covered space functions from the ANG to the Space Force. These units include a total of 578 space billets, 224 of which are full-time and 354 are part-time. The Chief of Space Operations and the Under Secretary of Defense for Personnel and Readiness support this recommendation. To put this in perspective, this represents approximately one half of one percent of the overall ANG billets and less than 3% of the ANG billets in any of the six states that would be affected. My recommendation to the Congress is to move the affected nine covered units and 578 billets to the Space Force for management under the SFPMA. At the request of the Congressional defense committees, a legislative proposal to accomplish the transfer has been provided for their consideration. The proposed transfer is an artifact of the creation of the Space Force—the first new military service since 1947—and is not intended to set a precedent for transfer of any other units.

The Space Force was established with the intention of creating a small, lean organization with as little complexity and bureaucracy as possible. The Congress just last year passed the SFPMA

to simplify personnel management for the Space Force and the Space Force is currently bringing Air Force Reserve units and members into the Space Force with no significant issues. Creating a new Space National Guard or leaving the nine space units in the Air National Guard is inconsistent with and directly contrary to this intent. The Chief of the National Guard Bureau disagrees with this conclusion and recommends the creation of a Space National Guard. We look forward to engaging with Congress on this analysis and responding to any additional questions that might arise based on these findings.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Kendall", with a stylized flourish at the end.

Frank Kendall

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Executive Summary

Section 924 of the FY24 NDAA (Public Law 118-31) directed the Secretary of Defense to “conduct a study to assess the feasibility and advisability of transferring all covered space functions of the National Guard to the Space Force,” analyzing three potential courses of action (COAs): COA 1, maintaining the current model under which the ANG has units and personnel performing such functions; COA 2, transferring such functions, including units and personnel, to the Space Force; and COA 3, the establishment of a new National Guard component of the Space Force to perform such functions. The Secretary delegated the preparation of this report to the Secretary of the Air Force.

The Secretary of the Air Force directed the report to conduct analysis on assessing 11 ANG units in seven states, as well as a headquarters element, as covered space functions. These units contain 702 space positions identified by Space Force Specialty Code (SFSC) and 124 embedded Air Force Specialty Coded (AFSC) positions. These units perform electromagnetic warfare, missile warning, satellite communications, intelligence, and command and control missions in support of the Space Force and the National Reconnaissance Office. Additionally, there are 305 AFSC positions in four support units (one in Alaska, three in Colorado). AFSC positions will remain in the ANG under any of the COAs.

The Secretary of the Air Force directed a multi-service, cross-functional analysis team complete the data collection, analysis, and reporting. Thirty action officers from the National Guard Bureau, ANG, Space Force, Air Force, National Reconnaissance Office, and Office of the Secretary of the Air Force jointly developed a draft of the requested report. With Office of the Under Secretary of Defense for Personnel & Readiness and Administration concurrence, the team briefed interim findings to the Armed Services Committees in February and March 2024, prior to submission of this report.

To analyze the three COAs, the team used eight planning factors derived from the Joint Planning Process to evaluate the impact, risks, and benefits of each COA on the Space Force’s ability to meet objectives of the National Defense Strategy. The eight planning factors are: Readiness, Unity of Command, Unity of Effort, Feasibility, Simplicity, Timeliness, Cost, and Recruiting and Retention.

The first COA, retaining the space units in the ANG, presents concerns for readiness, unity of command, and unity of effort since it preserves space capability in an Air Force component that no longer has a space mission. Similarly, it retains space specialties in the ANG that no longer exist in the Air Force. As a result, COA 1 would impose different readiness standards and reporting requirements on space units than air units, and these space units would continue to fall under the command of predominantly air organizations. COA 1 would need policy changes and potentially legislative changes to clarify the composition of the ANG and its support relationship to two services. Finally, there would be fewer career development opportunities for airmen in ANG space units and they would not be as culturally aligned to the predominant air missions in the ANG, a concern for retention,

promotion, and future recruiting. These issues can be partially addressed through coordination and cooperation between the Air Force and Space Force. This is a feasible COA. In the view of the Secretary of the Air Force and the Chief of Space Operations (CSO) it is not an advisable option.

The second COA transfers space missions, units, resources, and manpower to the Space Force, removing them from the ANG. Based on the CSO's analysis and approved by the Secretary of the Air Force, only nine of the 11 Air National Guard units considered execute covered Space Force missions and therefore, only nine units would transfer to the Space Force and two units would remain in the ANG. COA 2 addresses the readiness, unity of command, and unity of effort concerns of COA 1 because the units and manpower would be Space Force and the personnel would be Guardians. The Space Force Personnel Management Act (SFPMA) enacted by Congress in the FY24 NDAA creates the option for Guardians to serve in either full-time or part-time positions and provides flexibility for Guardians to easily move between full- and part-time service. This unique authority will allow the Space Force to keep the space missions performed by the nine ANG space units in place and will permit ANG personnel to voluntarily transfer to full-time or part-time Space Force positions. Using authorities granted by SFPMA, COA 2 is the least complex long-term solution since units and positions would be in the Space Force, but it does require disposition of the embedded AFSC positions, and a phased implementation to allow members in SFSC positions the opportunity to transfer. It also requires State governors' consent to approve the changes to mission or composition of ANG units or Congressional action. Notably, COA 2 does not change the current cost of the space units. While some data exists that implies a reluctance to transfer to the Space Force, the affected Air National Guard members have not been provided with the specific options that this COA would make available nor made aware that the transition would be largely seamless and preserve their current service arrangements. This is a feasible option and by far the most advisable from the perspective of the CSO and the Secretary of the Air Force.

COA 3 creates the Space National Guard as the reserve component of the Space Force and transfers units and positions into the Space National Guard. The AFSC support positions would also remain in place as Air National Guardsmen. A Space National Guard also addresses the readiness and unity of effort concerns of COA 1 and creates cross-state mission deltas aligned to Space Force Deltas. This COA would provide a reserve component to the Space Force and preserve small investments of guard manpower for state missions. It creates new command elements for a very small reserve component, establishing associate Deltas to Space Force Deltas responsible for conducting space missions. (By comparison, the ANG end strength was authorized at 105,000 in the FY24 NDAA. The Army National Guard was authorized at 325,000. The Space National Guard would be no more than 702 personnel, at most.) COA 3 raises concerns over recruiting and retaining forces into space missions, and the limitations of career developing opportunities for Space National Guardsmen within a small footprint persist in this COA. Provisions of the SFPMA would require revision to establish a reserve component to the Space Force. There is also a cost increase associated with this COA that is difficult to quantify or predict, though with aggressive management it should not be exorbitant. This COA would require law and policy

changes. It is feasible and could be implemented quickly after law and policy changes are made.

The three COAs were assessed on eight planning factors. Based on assessment of the COAs and their benefits, costs, and risks, the Secretary of the Air Force and the CSO recommend COA 2, the transfer of covered space functions from the ANG to the Space Force. This COA allows the Space Force to preserve current mission capability without adding new organizational echelons, offers flexible service options for full- and part-time Guardians, and continues to execute the space functions in place with full-time and part-time positions.

The National Guard Bureau is capable of continuing missions with minimal disruption regardless of the COA selected. However, they have consistently stated and remain of the opinion that the transfer of covered space functions from the ANG into a new Space National Guard component (COA 3) provides the best option for airmen performing space missions in the ANG today. The National Guard Bureau also recommends transfer of all 11 units considered into a Space National Guard, instead of the nine determined by the Secretary of the Air Force to be “covered space missions.” The Department of the Air Force, the Department of Defense, and the Administration disagree with this position.¹

¹ See <https://www.whitehouse.gov/wp-content/uploads/2022/10/S4543-NDAA-SAP.pdf>, “Statement of Administrative Policy S. 4543 – James M. Inhofe National Defense Authorization Act for Fiscal Year 2023,” October 18, 2022 & <https://www.whitehouse.gov/wp-content/uploads/2021/09/SAP-HR-4350.pdf>, “Statement of Administrative Policy H.R. 4350 – National Defense Authorization Act for Fiscal Year 2022,” September 21, 2021

Introduction

This report is provided in response to section 924 of the National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2024 (P.L. 118-31, 22 DEC 23).

(a) STUDY REQUIRED.—The Secretary of Defense shall conduct a study to assess the feasibility and advisability of transferring all covered space functions of the National Guard to the Space Force.

(b) ELEMENTS.—The study under subsection (a) shall include the following:

(1) An analysis and recommendations addressing, at a minimum, each of the following courses of action with respect to the covered space functions of the National Guard:

(A) Maintaining the current model under which the Air National Guard has units and personnel performing such functions.

(B) Transferring such functions, including units and personnel, to the Space Force.

(C) The establishment of a new National Guard component of the Space Force to perform such functions.

(2) A cost-benefit analysis for each course of action addressed under paragraph (1).

(3) An assessment any risks or benefits to the mission or readiness of the Space Force, including the ability of the Space Force to meet applicable objectives of the National Defense Strategy, that may be presented by transferring or consolidating units of the Air National Guard as described in paragraph (1).

(c) INTERIM BRIEFING.—Not later than February 1, 2024, the Secretary of Defense shall provide to the Committees on Armed Services of the Senate and House of Representatives an interim briefing on the preliminary results of the study conducted under subsection (a).

(d) FINAL REPORT.—

(1) IN GENERAL.—Not later than March 1, 2024, the Secretary of Defense shall submit to the Committees on Armed Services of the Senate and House of Representatives a report on the final results of the study conducted under subsection (a), including the results of the study with respect to each element specified in subsection (b).

(2) FORM OF REPORT.—The report required under paragraph (1) shall be submitted in unclassified form, but may include a classified annex.

(e) COVERED SPACE FUNCTIONS OF THE NATIONAL GUARD DEFINED.—In this section, the term “covered space functions of the National Guard” means all units, personnel billets, equipment, and resources of the Air National Guard associated with the performance of a space related function that is (as determined by the Secretary of the Air Force, in consultation with the Chief of Space Operations)— (1) a core space-related function of the Space Force; or (2) otherwise integral to the mission of the Space Force.

Background

The Department of Defense began studying how to effectively and efficiently integrate reserve components with the Space Force in October 2019, prior to the establishment of the Space Force in the FY20 NDAA. Upon establishment, the Space Force incorporated space missions and functions previously conducted by the Air Force. However,

both the Air Force Reserve and ANG continued to provide space functions (missions, units, personnel) as reserve components of the Air Force in partnership with the Space Force.

In the FY24 NDAA, Congress enacted the Space Force Personnel Management Act (SFPMA), which establishes that all Guardians will be managed through a single personnel system. It was designed to give the Space Force maximum flexibility to develop its force. This new military personnel management system allows Guardians to participate in sustained (full-time) and non-sustained (part-time or less than full-time) duty status, as well as provides other statuses for inactive and retired Guardians – obviating the need for the Space Force to maintain capabilities in a separate reserve component.

The disposition of space functions remaining in the ANG remains unresolved. Since 2020, there have been several legislative proposals—none of which were proposed or endorsed by the Department—to establish a Space National Guard as a reserve component of the Space Force. However, during the same period, the Administration and critics in Congress have expressed strong opposition to the creation of a Space National Guard. Maintaining space functions in separate services presents challenges due to separate training standards, resourcing priorities, and command echelons for a comparatively small force. The Department of the Air Force and the ANG have implemented measures to ensure effective coordination for space missions. Resolution and a permanent solution are needed. This report provides analysis for Congress to determine the best way forward for the ANG covered space functions.

Covered Space Functions

Section 924 defines covered space functions of the National Guard as *all units, personnel billets, equipment, and resources of the Air National Guard associated with the performance of a space related function that is (as determined by the Secretary of the Air Force, in consultation with the Chief of Space Operations):*

- 1) a core space-related function of the Space Force; or*
- 2) otherwise integral to the mission of the Space Force.*

Figure 1 shows the ANG units considered by this study by state, and lists their unit designation, the authorized manpower broken out as space billets (total, full-time or FT, and part-time or PT) as well as air billets, and the unit base or location. The difference between a space and air billet is as follows: space billets are those career specialties performing space related duties, identified by Space Force specialty codes (SFSCs) – these consist of space operations, cyber, intelligence, program management, and developmental engineering. Air billets, by contrast, are those career specialties not performing space related duties, but instead performing duties identified by Air Force specialty codes (AFSCs). These duties include personnel, maintenance, logistics, security forces, and others that are in support of space operations. When the Space Force was established, it was kept “lean” by a policy decision to retain many support functions for the Space Force in the Air Force, which accepted responsibility for executing these functions in support of the space mission.



Figure 1: ANG Units Analyzed for Space Contributions by State

Summary:

- 702 space operations billets in 11 units + 1 HQ element analyzed for space contributions
- 124 embedded air (admin, etc.) billets in these units + HQ element that remain in the ANG regardless of COA
- 305 support billets in 4 supporting units (AK, CO, not shown on map) that remain in the ANG regardless of COA

Table 1 shows the 11 ANG units, identified by their abbreviated designation (e.g., SWS for space warning squadron) and lists their space mission. Only nine of the 11 ANG units considered execute Space Force missions. The 234 IS OL-A in California and the 222 CACS in New York do not have an assigned Space Force mission.

State	ANG Unit	Location	Mission
AK	213 SWS	Clear SFS, AK	Mission Warning/Missile Tracking
CA	148 SOPS	Vandenberg SFB, CA	Protected MILSATCOM
CA	216 EWS	Vandenberg SFB, CA	Electromagnetic Warfare
CA	234 IS OL A	JFTB Los Alamitos, CA	Intelligence
CO	137 SWS	Greeley ANG, CO	Survivable Missile Warning
CO	138 EWS	Peterson SFB, CO	Electromagnetic Warfare
FL	114 EWS	Cape Canaveral SFS, FL	Electromagnetic Warfare
HI	150 EWS	Pacific Missile Range Facility, HI	Electromagnetic Warfare
HI	109 EWS	Joint Base Pearl Harbor-Hickam, HI	Electromagnetic Warfare
NY	222 CACS	AFRL Rome Labs, NY	Command and Control
OH	126 IS	Springfield ANGB, OH	Intelligence

Table 1: ANG Units Analyzed for Space Contributions

Additionally, while the definition of a ‘covered space function’ was specific to the ANG, the report considered whether space functions in the Army National Guard should be evaluated through the lens of the requested courses of action. The Army National Guard’s space functions are contained primarily in the 117th Space Battalion, which contributes six Army Space Support Teams that provide space integration into expeditionary Army formations. This reflects the space capability in the regular Army’s 1st and 2nd Space Battalions, which were previously determined through a Department of Defense process to remain in the Army rather than transferring to the Space Force. The analysis team determined that these functions did not meet the report criteria and therefore did not consider them in the analysis.

Table 2 shows the equipment/weapon systems, facilities, and infrastructure associated with the 11 ANG units. Each ANG unit operates in a unique manner based upon its assigned space mission. The 213 SWS in Alaska is co-located with the 13 SWS, a Space Force unit which maintains operational control of the early warning radar at Clear Space Force Station. The 213 SWS is a tenant unit on Clear Space Force Station (SFS), with base support provided by the Space Force through a host-tenant support agreement (HTSA). These agreements are common when units of one service or component are housed on base facilities provided by another service or component. The 213 SWS provides dedicated mission manpower for the Space Force mission at Clear in an employed-in-place role. Similarly, the 148 SOPS in California provides mission manpower for an employed-in-place satellite communications mission on Vandenberg Space Force Base (SFB).

Five electromagnetic warfare squadrons (EWS) located in California (216 EWS), Colorado (138 EWS), Florida (114 EWS), and Hawaii (109 EWS and 150 EWS) provide manpower and operate mission systems to conduct electromagnetic warfare missions. While they train in their home state, Guardsmen deploy to forward locations for mission execution. The Space Force provides and maintains the mission systems (Counter Communication System and Bounty Hunter) these units use in training and deployment locations.

Of the two intelligence units (126 IS in Ohio and 234 IS OL-A in California) only the 126 IS is assigned Space Force intelligence missions. The 126 IS supports institutional space intelligence missions that have recently re-aligned under two Space Force Deltas. The 234 IS OL-A is a Distributed Common Ground Station (DCGS) unit which is primarily an Air Force mission. While the ANG has considered options for assigning the unit a space

mission, the 234 IS OL-A has no operational relationship with any Space Force organization or space mission at this time.

State	ANG Unit	Equipment/Mission Systems ¹	Facilities ²	Infrastructure
AK	213 SWS	No mission systems - USSF 13 SWS operates Upgraded Early Warning Radar (UEWR) and assoc. radars	Co-located with 13 SWS in shared space facility at Clear SFS	USSF maintains infrastructure with HTSA
CA	148 SOPS	1 Advanced Satellite Mission Control Subsystem (ASMCS)	Facility on Vandenberg SFB	USSF maintains infrastructure with HTSA
CA	216 EWS	2 Counter Communication Systems (CCS)	Facility on Vandenberg SFB	USSF maintains infrastructure with HTSA
CA	234 IS OL-A	No mission systems	Facility on Joint Force Training Base Los Alamitos	CA ARNG maintains infrastructure
CO	137 SWS	6 Mobile Ground Station (MGS) Force Packages (FPAKS) of 6 tractor/trailer vehicles each	Facilities on Greeley ANG	CO ANG maintains infrastructure
CO	138 EWS	2 Counter Communication Systems (CCS)	Facility on Peterson SFB	USSF maintains infrastructure with HTSA
FL	114 EWS	2 Counter Communication Systems (CCS)	Facility on Cape Canaveral SFS	USSF maintains infrastructure with HTSA
HI	150 EWS	2 Counter Communication Systems (CCS)	Facility on Pacific Missile Range Facility	USN maintains infrastructure with HTSA
HI	109 EWS	1 Bounty Hunter system (BH)	Facility on Joint Base Pearl Harbor-Hickam	USAF maintains infrastructure with HTSA
NY	222 CACS	No mission systems	Facility on AFRL Rome Labs	USAF maintains infrastructure with HTSA
OH	126 IS	No mission systems	Facility on Springfield ANGB	OH ANG maintains infrastructure

Table 2: ANG unit manpower, equipment/mission systems, facilities, and infrastructure

Note 1: Non weapon-system accountable property (e.g., personal computers) that transfers as a result of COA selection will be accounted for on the gaining organization’s general ledger through an Accountable Property System of Record (APSR)

Note 2: Any changes to real property (existence, completeness, valuation, rights and ownership) as a result of COA selection, and any corresponding environmental liabilities will be coordinated and reported through proper mechanisms. No significant changes are expected at this time.

The 222 CACS (New York) augments the National Reconnaissance Office (NRO), performing a non-Space Force mission from home station and mission partner locations. The Space Force does not currently have any command and control squadrons and does not execute command and control functions for the NRO. While these units do not operate space mission systems, their facilities include necessary information systems and connectivity to complete training and mission objectives.

The 137 SWS which operates from Greeley Air National Guard Station (ANGS) in Colorado is unique among the space units. It performs the nation’s only survivable and endurable missile warning mission, deploying from garrison in higher states of readiness. Falling under the 233 Space Group (SG), the only dedicated space group in the ANG, 137 SWS deploys in concert with other support units of the 233rd SG which perform communications, maintenance, and security missions.

Additionally, the ANG staffs a headquarters element at the Pentagon with direct oversight of the ANG space missions. This element, known as National Guard Bureau – Space Operations (NGB-SO), is part of the ANG manning documents. The element serves as a liaison with Space Force headquarters, ensuring readiness as well as advocating for space equities in the ANG. NGB-SO is manned by 34 full-time space operations and support personnel.

Section 924 directed the Secretary of the Air Force to determine which units meet the criteria for “covered space functions” in consultation with the Chief of Space Operations (CSO). Based on the analysis done by this study, the CSO assessed that only nine of the analyzed 11 units meet the criteria for a “core space-related function of the Space Force” or are “otherwise integral to the mission of the Space Force.” The 213 SWS and 137 SWS contribute unique and critical capability to the missile warning mission. 148 SOPS helps assure 24/7 military satellite communications capability. The five EWSs contribute capacity for the Space Force’s deployable electromagnetic warfare mission, using the same equipment as their active counterparts in Space Delta 3. The 126 IS currently contributes analytic capacity in support of Space Deltas 7 and 18, the National Space Intelligence Center.

Conversely, the NRO augmentation performed by the 222 CACS does not support any Space Force mission. Command and control of NRO spacecraft is not a core function of the Space Force and can continue to be performed by Airmen (and in fact all the military services are represented within the NRO workforce). Similarly, while the 134 IS OL-A could transition to support for a space intelligence mission in the future, it does not currently perform those functions, and therefore does not meet the NDAA’s definition of a covered space function. The CSO recommended to the Secretary of the Air Force that the 222 CACS and the 134 IS OL-A not be considered “covered space functions,” and the Secretary concurred with that recommendation (See Appendix B).

Embedded Support Personnel and Support Units

Air National Guard space units have a mix of space related duties and non-space related duties typically provided to the Space Force by Air Force personnel. For example, space operations officers hold a 13S Air Force Specialty Code (AFSC); maintenance enlisted members embedded in some ANG space units hold a 2A6 AFSC. Personnel with an AFSC that corresponds to a Space Force Specialty Code (SFSC) held by a Space Force Guardian are space-related or simply ‘space.’ This came about as similar personnel that transferred from the Air Force to the Space Force were awarded a corresponding SFSC. Personnel with an AFSC that has no parallel in Space Force are considered in support of the space mission or ‘support.’ Their AFSCs correspond to AFSCs held by regular Air Force members embedded, attached, or in direct support of Space Force units.

Table 3 shows the mix of space versus administrative or support positions in ANG space units. This distinction is important for decisions that realign units and manpower from ANG to either the Space Force or to a Space National Guard, because personnel in support positions cannot transfer into the Space Force or Space National Guard. Therefore, in all three COAs, support personnel would remain in the ANG. In COA 2 or COA 3, Air National

Guardsmen in these positions would be administratively realigned to another ANG unit within their state and continue to perform the same duties in support of the space unit after its transfer to the Space Force.

Including all 11 ANG units and the HQ element, there are 826 total positions, 291 of which are considered full-time, and 535 part-time. Of those positions, 702 are space billets and 124 are embedded support billets. As previously noted, these support positions would remain in the ANG no matter which COA is directed and continue to support space missions in the same manner the Air Force does today. In the nine units that would transfer to the Space Force in COA 2, there are a total of 578 space positions, 224 of which are considered full-time, and 354 part-time positions.

State	ANG Unit	Unit Manpower ¹	Space (SFSC)	Support (AFSC)
AK	213 SWS	Total: 45 / FT: 40 / PT: 5	Total: 33 / FT: 30 / PT: 3	Total: 12 / FT: 10 / PT: 2
CA	148 SOPS	Total: 59 / FT: 25 / PT: 34	Total: 53 / FT: 23 / PT: 30	Total: 6 / FT: 2 / PT: 4
CA	216 EWS	Total: 88 / FT: 27 / PT: 61	Total: 73 / FT: 20 / PT: 53	Total: 15 / FT: 7 / PT: 8
CA	<i>234 IS OL-A</i>	<i>Total: 54 / FT: 3 / PT: 51</i>	<i>Total: 54 / FT: 3 / PT: 51</i>	<i>Total: 0 / FT: 0 / PT: 0</i>
CO	137 SWS	Total: 69 / FT: 37 / PT: 32	Total: 44 / FT: 31 / PT: 13	Total: 25 / FT: 6 / PT: 19
CO	138 EWS	Total: 88 / FT: 26 / PT: 62	Total: 75 / FT: 19 / PT: 56	Total: 13 / FT: 7 / PT: 6
FL	114 EWS	Total: 89 / FT: 27 / PT: 62	Total: 75 / FT: 23 / PT: 52	Total: 14 / FT: 4 / PT: 10
HI	150 EWS	Total: 88 / FT: 28 / PT: 60	Total: 75 / FT: 22 / PT: 53	Total: 13 / FT: 6 / PT: 7
HI	109 EWS	Total: 62 / FT: 17 / PT: 45	Total: 55 / FT: 13 / PT: 42	Total: 7 / FT: 4 / PT: 3
NY	<i>222 CACS</i>	<i>Total: 80 / FT: 10 / PT: 70</i>	<i>Total: 70 / FT: 7 / PT: 63</i>	<i>Total: 10 / FT: 3 / PT: 7</i>
OH	126 IS	Total: 70 / FT: 17 / PT: 53	Total: 69 / FT: 17 / PT: 52	Total: 1 / FT: 0 / PT: 1
	HQ Element	Total: 34 / FT: 34 / PT: 0	Total: 26 / FT: 26 / PT: 0	Total: 8 / FT: 8 / PT: 0
<i>Total, Considered Units</i>		<i>Total: 826 / FT: 291 / PT: 535</i>	<i>Total: 702 / FT: 234 / PT: 468</i>	<i>Total: 124 / FT: 57 / PT: 67</i>
Total, Covered Space Functions Only		Total: 692 / FT: 278 / PT: 414	Total: 578 / FT: 224 / PT: 354	Total: 114 / FT: 54 / PT: 60

Table 3: ANG unit manpower, space vs support positions

Note 1: FT refers to full-time Guardsmen, including Active Guard Reserve (AGR) and Military Technicians. PT refers to part-time Guardsmen, typically known as Duty Status Guardsmen (DSG). There are 53 Military Technicians in the space units – technicians have both FT civilian and PT DSG positions on UMDs. Military Technicians are counted as full-time for this report.

Note 2: Units in italics were determined to not meet the criteria for “covered space functions,” but data is included here for completeness.

Authorized (funded) manpower impacts resourcing decisions, but actual personnel assigned offers a different perspective on decisions which potentially realign positions to the Space Force or a Space National Guard. Table 4 shows fill rates (as a function of assigned personnel / authorized positions). Data reflects personnel data as of 1 Jan 24 and will fluctuate as new members are assigned and others transfer, separate, or retire.

Table 4 shows actual manpower of 702 assigned personnel for an overall fill rate of 85%. Exempting the two Hawaii units currently in conversion status (i.e. converting from an air mission to a space mission), the overall fill rate is 95%.

State	ANG Unit	Authorized	Assigned	Fill Rate
AK	213 SWS	45	43	96%
CA	148 SOPS	59	50	85%
CA	216 EWS	88	81	92%
CA	234 IS OL-A	54	50	93%
CO	137 SWS	69	58	84%
CO	138 EWS	88	75	85%
FL	114 EWS	89	84	94%
HI	150 EWS	88	51	58%
HI	109 EWS	62	36	58%
NY	222 CACS	80	80	100%
OH	126 IS	70	60	86%
	HHQ	34	34	100%
Total		826	702	85%

Table 4: ANG unit authorized vs assigned (as of 1 Jan 2024)

In addition to the support embedded in the 11 units considered, there are four dedicated support units associated with ANG space units. Those units are shown in Table 5 with a summary of the unit manpower and missions. Together, they account for 305 positions. None of these units or personnel would transfer to the Space Force or a Space National Guard. The continued support of these ANG units is assumed for all COAs.

State	Unit	Support Manpower (AFSC)	Mission
AK	268 SFS	Total: 69 / FT: 60 / PT: 9	Security forces
CO	233 LRF	Total: 17 / FT: 4 / PT: 13	Logistics and maintenance
CO	233 SFS	Total: 126 / FT: 46 / PT: 80	Security forces
CO	233 SCS	Total: 93 / FT: 45 / PT: 48	Communications

Table 5: Support unit manpower and missions

Analysis Team Composition

The Secretary of the Air Force directed a multi-service, cross-functional analysis team complete the required data collection, analysis, and report drafting. A team of thirty action officers from the National Guard Bureau, ANG, Space Force, Air Force, National Reconnaissance Office, and Department of the Air Force Secretariat jointly developed the requested briefing and reports, with regular oversight from service and department executive leadership. Expertise provided by the team included operations, intelligence, programming, budgeting, base operations support, maintenance, logistics, manpower, personnel, legal, legislative, and reserve component matters.

The analysis team drew on cost data previously collected by the Space Force and National Guard Bureau to develop cost estimates. Additionally, the team collected current manpower and personnel data and mission performance data to provide a more comprehensive analysis.

With Office of the Under Secretary of Defense for Personnel & Readiness and Administration concurrence, the team briefed interim findings to the Armed Services Committees in February and March 2024, prior to submission of this report.

Summary

As determined by the Secretary of the Air Force in consultation with the Chief of Space Operations, ANG space missions in six states, performed by nine units (plus a HQ element) encompass the covered space functions. Together, these units and staff account for 578 space positions and an additional 114 embedded admin/support positions. The report provides data-driven analysis and findings concerning the disposition of these units and the outcomes, costs, and risks associated with the three courses of action for these units.

Analysis

This section addresses the three courses of action (COAs) requested by Congress and provides analysis for each. *(a) STUDY REQUIRED.—The Secretary of Defense shall conduct a study to assess the feasibility and advisability of transferring all covered space functions of the National Guard to the Space Force.*

Feasibility and Advisability Criteria – Planning Factors

The analysis team utilized joint military doctrine (ref Joint Publication 5-0, *Joint Operation Planning*, 11 Aug 2011) which prescribes a comprehensive set of planning factors as criteria to evaluate military operational COAs. While different in focus, applying the criteria to COAs concerning disposition of ANG space units provides a robust and multi-faceted framework with which to assess feasibility and advisability. Table 6 shows the planning factors evaluated in the analysis, along with their definitions.

Planning Factors	Definition
Readiness	Impact on ability of military forces to meet demands of NDS objectives
Unity of Command	Commander directs all forces in pursuit of common purpose
Unity of Effort	Achieves effectiveness and efficiency in organizational efforts
Feasibility	Implementation is viable long term
Simplicity	Simple enough as to not create unnecessary risk to mission
Timeliness	May be implemented in a deliberate manner without delay
Cost	Estimated resourcing based on FY23 dollars
Recruiting and Retention	Impact on recruiting and retention of space professionals

Table 6: Planning factors; derived from Joint Publication 5-0 (1 December 2020)

Using this framework, each COA is described in terms of all eight planning factors. Additional information on this framework is explained throughout the report with final analysis being captured in Recommendation section.

COA Analysis

(b)(1)(A) Analysis and recommendations concerning maintaining the current model under which the ANG has units and personnel performing such functions

COA 1 Analysis: The first course of action (COA 1) would retain ANG space functions; that is, the existing units and personnel performing space missions would continue in the ANG, a reserve component to the Air Force.

Readiness: Readiness is a core function of a military service; it represents the services' capability and means to employ a credible force. The Space Force was created in large part to focus resources and attention on the unique readiness requirements of space units, as the other Services do with respect to the air, land, and sea domains. For that reason, Air Force and Space Force readiness are necessarily different as each is optimized for a different problem set.

Air National Guard space units currently follow Air Force Generation (AFFORGEN) models of force presentation, which is a different model than Space Force units follow, known as the Space Force Generation (SPAFORGEN) model. While similar in intent, AFFORGEN is optimized for rotational deployments to forward locations, while SPAFORGEN is optimized for employed-in-place 24/7 operations. Additionally, both models utilize distinct reporting tools maintained separately by the services. The two important differences are force presentation, and readiness standards and reporting.

As Air Component forces, ANG space units should be presented to Combatant Commanders through combat air forces. The combat air force provider to United States Space Command is 1st Air Force, a Numbered Air Force under Air Combat Command. By contrast, space forces presented to United States Space Command are presented through Space Forces-Space, a component of the Space Force.

AFFORGEN and SPAFORGEN also impose different readiness standards and reporting. Space Operations Command ensures the day-to-day unit readiness (including resourcing and training) for Space Force operational units; Air Combat Command would perform a similar function on behalf of ANG space units. Air National Guard and Space Force units with the same mission (e.g., space electromagnetic warfare) would account for unit readiness through separate chains of command, duplicating certain administrative oversight and necessitating Air Force and Space Force coordination for personnel standards, training, exercise support, weapon system sustainment, and other functions required to maintain unit operational readiness. This disconnect would likely degrade readiness over time.

Unity of Command: Air National Guard space units would continue to fall under existing chains of command, organized by state. Those chains of command are shown in Table 7. Based on the preponderance of assigned forces (predominantly air assets), ANG space units fall under air versus space command chains reporting to state Assistant Adjutant Generals (ATAGs) for air. The Colorado units under the 233rd Space Group are an exception since they are organized in a space group, although the 233rd Space Group itself falls under an air wing (140th Wing). Air wings, including the fighter and attack wings, report to their state ATAG for Air, and fall administratively under the ANG. NGB-Space Operations (SO) separately liaises with and advises ATAGs on the relationship with the Space Force. Air National Guard space units organized under groups and wings present a

different force structure than Space Force units which are organized under Deltas. This COA would create permanent barriers to unity of command.

Unity of Effort: The ANG would retain personnel in a space operations specialty code (13S for officers, 1C6 for enlisted members), which the regular Air Force no longer maintains because those functions were transferred from the Air Force to the Space Force. Organizationally, the O-6 command echelons of groups and wings over ANG space units are not found in the Space Force, which instead employ a single O-6 command echelon of Space Deltas as the command structure over squadrons. This COA would create permanent barriers to unity of effort.

State	ANG Unit	Assigned Group	Assigned Wing
AK	213 SWS	168 th Operations Group	168 th Wing
CA	148 SOPS	195 th Operations Group	195 th Wing
CA	216 EWS	195 th Operations Group	195 th Wing
CA	234 IS OL-A	195 th Intelligence, Surveillance, and Reconnaissance Group	195 th Wing
CO	137 SWS	233 rd Space Group	140 th Wing
CO	138 EWS	233 rd Space Group	140 th Wing
FL	114 EWS	125 th Operations Group	125 th Fighter Wing
HI	150 EWS	154 th Regional Support Group	154 th Wing
HI	109 EWS	154 th Regional Support Group	154 th Wing
NY	222 CACS	107 th Operations Group	107 th Attack Wing
OH	126 IS	178 th Intelligence, Surveillance, and Reconnaissance Group	178 th Wing

Table 7: ANG units – state chains of command

Feasibility: Feasibility as a planning factor refers to the long-term viability of the COA. COA 1 is closely aligned to the status quo of over the past four years. It is feasible with policy changes and a formal structure of workarounds. Legislative change may also be required to make this enduring. Title 32 United States Code Section 104(b) specifies the organization of the ANG and that the composition of its units shall be the same as those prescribed for the Air Force, which may necessitate a change to the statute or a specific exemption, since Space Force organization and units are not found in the Air Force. Additionally, legislation may be needed to clarify end strength reporting for space operations personnel in an air component.

Additional policy changes would be needed to, for example, exempt ANG space units from the AFFORGEN readiness cycle and reporting guidelines, instead allowing them to follow SPAFORGEN. Policy might also dictate dual training standards for ANG cyber officers and enlisted members, since both Air Force and Space Force have cyber specialties, albeit with different requirements and standards.

Simplicity: If implemented, COA 1 would require the ANG to support two services in policy, resourcing, and commitment. Air National Guardsmen would be subject to involuntary activation in support of a different service. Additionally, the small footprint of Airmen conducting space missions would be operating in a legacy culture, while their Guardian counterparts are in the process of building an intentionally different Space Force culture. Individual unit commanders would likely have to navigate conflicting guidance and standards. The Air Force and Space Force may also find themselves manually deconflicting

competing processes for the sake of ANG space units, requiring additional headquarters oversight.

Timeliness: COA 1 is timely and requires the least disruption of the COAs. The COA requires no shift in resources between components or services.

Cost: COA 1 imposes no additional costs for manpower, operations, weapon systems, facilities, or training. The considered ANG units have an annual total obligation authority of \$83.4M (FY23 dollars) for military and civilian pay (military technicians are also civilian employees), and unit operating costs. Associated with these units are certain facilities, services, repair, and maintenance (FSRM) costs normally broken out by base and not associated with specific units – FSRM are not considered in this analysis. Across the considered units, the ANG annually trains around 100 new service members, including air and space specialties, but numbers of trainees per unit and per state may vary widely. The ANG estimates training costs at \$526/day for a Duty Status Guardsman (DSG) officer, \$380/day for a DSG enlisted member, and \$150/day for a full-time Active Guard Reserve (AGR) member (less because their military pay is funded separately). This translates to an annual training bill of approximately \$10M. Because training costs depend on the member's status and the length of training, they are not considered in this analysis but are noted as an additional cost borne to maintain space units.

As noted, COA 1 may result in opportunity costs from increased coordination demands between Air Force, ANG, and Space Force. While this coordination might result in a slight increase in administrative personnel, it is more likely manifest as an increase in headquarter processes and functions for existing personnel, slightly reducing their capability to perform other functions as a result.

Recruiting and Retention: COA 1 would not materially change ANG space unit recruiting and retention over the status quo, in the short term. Air National Guard space recruiting has remained healthy over the last several years. The decentralized recruiting responsibilities of ANG units is a strength of this model, so long as recruits feel a cultural alignment to their service. However, COA 1 is not seen as particularly advantageous for recruiting space specialties into ANG units in the future. Airmen in space units would have few development options outside of the ANG space footprint, offering only limited career growth and paths to leadership positions, or promotions, each of which would deter those transitioning from active duty into the ANG.

COA 1 Summary: COA 1 is feasible, but it is not advisable. It is essentially the status quo, requiring the least amount of disruption, time and organizational change to implement. However, there are disadvantages regarding readiness and unity of command and unity of effort. It is contrary to the intention of the Congress in establishing the Space Force and in enacting the SFPMA. With policy changes and a formal structure of workarounds, Air National Guardsmen could continue to successfully conduct space missions serving under an ANG chain of command in peacetime. Doing so will necessitate additional Air Force and Space Force coordination, beyond what is currently in place.

(b)(1)(B) Analysis and recommendations concerning transferring such functions, including units and personnel, to the Space Force

COA 2 Analysis: This COA would transfer nine of the 11 ANG units considered, and the manpower associated with space specialties in those units, into the Space Force. (As previously highlighted in this report, 234 IS OL-A and 222 CACS were assessed to not be “covered space functions” and would therefore not be transferred.) The transfer of these nine units would result in a decrement to the ANG of 578 positions, although after the transfer, the units and positions would remain in-place in the same states and locations. The 114 support positions from those nine units would be administratively reassigned to different ANG units in their respective states, but they would continue to perform the same duties in support of the Space Force in accordance with existing agreements between the Air Force and the Space Force. The 305 support positions in the four support units in Alaska and Colorado would remain in the same units and locations performing the same missions, pending any re-missioning decisions between the Air Force and ANG.

Readiness: COA 2 addresses the readiness concerns of COA 1 and it provides more operational flexibility and responsiveness to the Space Force. The nine space units would become Space Force units, and thus would fall under Space Force readiness processes for reporting readiness and employment models. Existing policies, systems, and procedures for readiness would apply equally to existing Space Force units, as well as the units moved over from the ANG. The possibility exists that individuals would not choose to accept membership in the Space Force, reducing the readiness of these units temporarily. While some surveys have highlighted this risk, the individuals affected have not had the opportunity to evaluate the actual choices they will have under COA 2, which will essentially preserve their status and increase their opportunities. Risk can also be mitigated by a phased approach to implementation; this was the approach taken successfully with the transfer of missions from the other services, such as the Joint Tactical Ground Station mission from the Army.

Unity of Command: COA 2 addresses the unity of command concerns of COA 1. With all space units in the Space Force, there is a singular chain of command for organize, train, and equip responsibilities, as well as a singular combat commander for presentation of forces. Table 8 shows how the ANG space units would align under Space Force commands:

State	ANG Unit	Assigned USSF Delta
AK	213 SWS	Space Delta 4
CA	148 SOPS	Space Delta 8
CA	216 EWS	Space Delta 3
CO	137 SWS	Space Delta 4
CO	138 EWS	Space Delta 3
FL	114 EWS	Space Delta 3
HI	150 EWS	Space Delta 3
HI	109 EWS	Space Delta 3
OH	126 IS	Space Delta 7

Table 8: ANG space units – USSF chains of command

Unity of Effort: COA 2 addresses the unity of effort concerns inherent in COA 1. The space units would fall under the Space Force culturally, administratively, and for

resourcing, and would share both common training as well as crossflow with units and Guardians across the service, synergizing space efforts in these units as well as others. For example, unlike ANG Airmen, Space Force Guardians attend a basic military training course designed for Guardians. Beginning in the summer of 2024, all new Space Force officer accessions will attend a common Officer Training Course as well. Further, personnel currently assigned to the ANG space units would be able to volunteer to join the Space Force, and could continue in their current mission area, or broaden their skillset in other mission areas. By contrast, ANG Airmen typically stay in a single unit for their career, unless they take a headquarters tour.

Feasibility: COA 2 is feasible. As an active service with primary responsibility for warfighting in the space domain, the space units would be properly aligned doctrinally. The personnel would be Space Force Guardians and would have full-time and part-time service options as enabled by the Space Force Personnel Management Act.

However, implementing COA 2 would reduce the amount of space expertise accessible to the State Partnership Program (SPP). SPP is the program of record establishing partnerships between the National Guard of every state and partner nations across the globe. According to the National Guard Bureau, the SPP has a 30-year history of successful relationship building with over 100 nations and has been leveraged in recent efforts related to space missions with Poland and Norway, among other nations.

Three DoD entities with a primary interest in space matters have leveraged the SPP in addition to other international coordination mechanisms: Space Force International Partnerships (SF/S5P); the Office of the Secretary of the Air Force for International Affairs (SAF/IA); and United States Space Command Security Cooperation, under USSPACECOM/J5. Without a guard component with space expertise, SF/S5P would have limited to no direct access to SPP. SAF/IA would retain direct access to SPP through the ANG, although over time the ANG would have few to no space experts in its ranks. USSPACECOM would retain access to space expertise through the Army National Guard.

COA 2 would also reduce the number of Guardsmen available to governors of the six states for state missions like severe weather events, if a portion of the National Guard forces are transferred into the Space Force. Table 9 shows, by state, the reduction in ANG forces proposed in COA 2 by transferring billets to the Space Force as a percentage of the total Guard forces (Army and Air Force) in each state.

The reduction is highest for Hawaii (2.3%) and Colorado (2.2%) and is on average 1.2% across the six states. Typically, part-time or Duty Status Guardsmen are called up for state missions rather than full-time Guardsmen, so states with a lower proportion of part-time billets in their space units (such as the 213 SWS in Alaska and the 137 SWS in Colorado) would have a lower effective impact from the transition.

State	Billets Transferred to USSF	Total NG Billets	Reduction in NG Forces (%)
AK	33	4069	0.8%
CA	126	19141	0.7%
CO	119	5486	2.2%
FL	75	11957	0.6%
HI	130	5586	2.3%
OH	69	15711	0.4%

Table 9: Reduction in National Guardsmen by state from transfer to USSF

Simplicity: COA 2 is the simplest solution in the long term, since it merges the legacy reserve component of the ANG into the Space Force, rather than presenting a small reserve component to a small active service, duplicating some administrative roles and requiring increased coordination. COA 2 will require a more complex transition period than either COA 1 or COA 3. A complication is disposition of the 114 administrative and support billets in the nine space units which cannot transfer to the Space Force under COA 2. A portion of those billets would not be required to endure in support of the space missions, either because of different support structures already in place with the Air Force, or different support constructs Space Force employs to manage its force (for example, Space Force squadrons do not have first sergeants but many of the ANG space units do).

For the rest of the administrative and support billets, the functions provided must continue. In the short term, the ANG will continue to provide those functions to the Space Force and will re-organize the embedded manpower into a different unit which continues the support relationship. In the long term, the ANG might prefer to re-mission those billets—presenting a new requirement to the Regular Air Force to provide that support to the new Space Force units. Ultimately the ANG and Regular Air Force must decide the best method for providing that support and whether to use billets currently assigned in the ANG to provide it.

Title 10 and Title 32 of the United States Code include provisions requiring a State governor’s approval of changes to the mission or composition of ANG units in their state, including the transfer of those units from the ANG to the Space Force. Thus, to implement COA 2, governors must consent to the transfer, or Congress must enact legislation that waives this consent requirement for the specific units and manpower identified as covered space functions.

Timeliness: COA 2 would be implemented over the next five years, in accordance with the SFPMA, with a gradual transition of mission responsibility from the ANG to the Space Force. Once necessary law and policy changes were made, units and manpower would be reconstituted in the Space Force in a phased process, with execution-year funding transfers as Guardsmen volunteer for transfer, or alternatively ask for reassignment to a different position within the ANG. Transfers could be made to coincide with transfers from the Air Force Reserve directed by the SFPMA.

Cost: COA 2 does not materially increase costs over COA 1. It does negate the need for a separate NGB headquarters staff and administrative costs may slightly reduce in this COA, since ANG space units would no longer fall under separate chains of command and

would instead fold into existing Space Force Deltas. Cost analysis identified that any incremental or decremental cost change from this COA would be small, within +/- \$5M.

Recruiting and Retention: After a transition period, COA 2 offers advantages for recruiting and retention, since Space Force has access to the entirety of the Space Force accession and assignment pipeline to priority-fill the most important missions and units. With the units as part of the Space Force, competition for talent between separate components will be eliminated and the force will have better fidelity for forecasting gains and losses. Further, under the provisions of Subtitle F of Title 10, Guardians not only have the option to serve in either full-time or part-time positions, but also the option to flexibly move between the two participation models based on their personal needs and career desires and the needs of the Space Force. This is a new model for military service that will continue to evolve in years to come, with one of its stated objectives as attracting and retaining talent for the space enterprise.

There is some concern that currently serving guardsmen in the ANG space units will desire to remain in the ANG and be reassigned to a new unit and specialty, rather than volunteer for transfer to the Space Force. Specific options have not been presented at this point, however, nor have affected members been informed that the transition will be largely seamless and not require fundamentally different service arrangements, unit changes, or relocation. States may offer certain incentives to recruit and retain guardsmen, such as free tuition at state schools, that the Federal government does not offer. Additionally, some guardsmen may have service commitments in their State National Guard and will not be permitted to transfer into the Space Force unless released by the state governor or appropriate authority. For those that are eligible, the Space Force will seek to transfer guardsmen with minimal impact to their lives and careers. Any vacancies created by the transfer of units and manpower would be filled through the normal Space Force accessions process.

COA 2 Summary: COA 2 is feasible and advisable. COA 2 addresses readiness, unity of command and unity of effort, and to some extent the recruiting and retention concerns raised by maintaining space missions in the ANG. Over the long term, it also simplifies policies, procedures, and resourcing within the ANG by moving mis-aligned space units and specialties out of the service. By aligning all space missions under one service over a multi-year effort, formal workarounds for policies and procedures under multiple services will not be needed. Finally, it leverages the newly-enacted SFPMA to provide full-time and part-time positions, allowing for missions to continue in the same locations in the same states and with the same manning.

(b)(1)(C) Analysis and recommendations concerning the establishment of a new National Guard component of the Space Force to perform such functions.

COA 3 Analysis: COA 3 would create a new reserve component for the Space Force and would assign the nine ANG units considered and 578 space specialty positions from the ANG into the Space National Guard. The 114 embedded support positions would remain in the Space National Guard units but as Airmen in the ANG, a support relationship which mirrors the Air Force-Space Force support construct.

Additionally, the four support units located in Alaska and Colorado would re-align under existing ANG organizational structure but remain in direct support of the Space National Guard units. The Space National Guard would leverage the existing NGB-SO headquarters element that was pulled from ANG headquarters elements in 2020 as its headquarters space staff. Finally, the Space National Guard would stand up one or more cross-state Space Deltas (O-6 commands) and align the nine units under those commands, which would in turn be partnered with one or more existing Space Force Deltas for mission execution.

Readiness: COA 3 addresses some of the readiness concerns of COA 1. The nine units would fall under Space Force readiness processes for reporting readiness and employment models. Existing policies, systems, and procedures for readiness would apply equally to existing Space Force units and Space National Guard units. Space National Guard units would be force presented through Space Force commands to combatant commanders.

Unity of Command: COA 3 creates a new organization, but one that is a component of the Space Force itself—something not envisioned under SFPMA, which intentionally designed a military service without components. The Space National Guard would fall under a new Space Guard Headquarters, however, and not directly under the Space Force. The Space National Guard units would follow Space Force requirements to organize, train, and equip, as well as a singular combat commander for presentation of forces. Under direction of the Space National Guard headquarters, cross-state mission Deltas would partner with Space Force Deltas, like the association relationships common in National Guard-Regular Component support agreements. Since Space National Guard would be its own component under law, different commanders would bear responsibility for units’ readiness and mission execution than those commanders responsible for Space Force unit readiness and mission execution. However, ample experience has shown commanders are able to work together with a minimum amount of coordination and overhead to accomplish assigned missions. Table 10 shows how the Space National Guard units could align under one of four cross-state mission Deltas, headquartered in Florida (SNG Delta 1), Colorado (SNG Delta 2), California (SNG Delta 3), and Ohio (SNG Delta 4) and administratively supported by those states’ Joint Force Headquarters (JFHQ). The four Deltas shown are notional – the Director of the Space National Guard, once appointed, would approve a final structure.

State	ANG Unit	Assigned SNG Cross-State Delta	Partnered USSF Mission Delta
AK	213 SWS	SNG Delta 2	Space Delta 4
CA	148 SOPS	SNG Delta 3	Space Delta 8
CA	216 EWS	SNG Delta 1	Space Delta 3
CO	137 SWS	SNG Delta 2	Space Delta 4
CO	138 EWS	SNG Delta 1	Space Delta 3
FL	114 EWS	SNG Delta 1	Space Delta 3
HI	150 EWS	SNG Delta 1	Space Delta 3
HI	109 EWS	SNG Delta 1	Space Delta 3
OH	126 IS	SNG Delta 4	Space Delta 7

Table 10: ANG units – SNG Cross-State Deltas and USSF Mission Alignment

Unity of Effort: The ANG units would fall under a new Space National Guard, a unique reserve component to the Space Force. It would be culturally and administratively

aligned, with separate resourcing based on shared requirements, and it would also share common training. Space National Guard members would be distinct from ANG Airmen.

Feasibility: COA 3 is feasible. As a reserve component in law to the Space Force, the Space National Guard would be an operationally focused element.

Simplicity: COA 3 creates a new organization and a new headquarters. Because COA 3 establishes a reserve component for the Space Force, Congress would need to amend certain provisions in Subtitle F, as enacted in the SFPMA. The Space Force would no longer be a service “without component.” It also requires legislation to create the new reserve component in Title 10, and it will require a transfer of units, manpower, and personnel from the ANG to the Space National Guard. Because both the ANG and a Space National Guard would fall under the organization of the National Guard Bureau, this creation and transfer would be evolutions from the current force structure. The 114 administrative and support personnel in the nine units who remain in the ANG would also remain as embedded support in the Space National Guard space units, similar to how some Air Force personnel are embedded in Space Force units to provide support and skills not resident in the Space Force.

Long-term, a Space National Guard would have a limited footprint in states with a current space mission, unless the Space National Guard expands to additional states or headquarters elements. The National Guard Bureau has conveyed that no growth would be necessary, nor would it be in their power or the state’s power to implement without direction from the Secretary of the Air Force.

As a counterpoint to the perceived complexity of added space forces in a Space National Guard, the National Guard Bureau and other Space National Guard proponents have argued that a dedicated reserve component reduces risk by providing an alternate lever for recruiting/retention of trained forces, and a relief valve for surge when the active component is over-tasked. History has clearly shown the utility of reserve component forces, particularly access to ‘citizen’ soldiers and Airmen. However, because Space Force is implementing a force structure of full and part-time Guardians, a portion of which who will also be ‘citizen’ Guardians in surge roles, the Space Force does not require a reserve component to perform the same functions that the Army National Guard and ANG perform for the Regular Army and Air Force.

Timeliness: Once law and policy changes are made, the existing NGB-SO HQ element would be redesignated as the Space National Guard headquarters and the Director of the NGB-SO appointed the Director of the Space National Guard. The space units and manpower would be reconstituted in the Space National Guard and decremented from the ANG in a phased process. Because units and manpower would move to a new component but stay within the National Guard structure, COA 3 would likely be timelier than COA 2, and less timely than COA 1.

Cost: COA 3 does not initially increase costs over COA 1, however there is risk of future cost growth. Of the \$83.4M, \$51.3M in military personnel and civilian personnel pay as well as unit operations and maintenance costs would transfer to the Space National Guard;

the rest would be executed by the ANG. COA 3 would marginally increase administrative costs as the Space National Guard stands up new cross-state Deltas. Manpower requirements for 3 cross-state Mission Deltas are estimated at 11 full-time and 13 part-time Guardsmen total, with most of the positions shifted from existing units (i.e., not new requirements). Therefore, cost analysis identified that any incremental or decremental cost change from this COA would be small, within +/- \$5M.

If the Space National Guard grows beyond the initial nine units there could be cost increases. Such growth is only speculation at this time; however, assumptions and models identifying growth to other states drove much of the cost captured in the 2020 Congressional Budget Office assessment, “Costs of Creating a Space National Guard.”²

Recruiting and Retention: Air National Guard space units are manned on average to 85% and are positioned in many cases in recruiting areas attractive to space specialties, particularly the space coast of Florida, and the front range of Colorado. Establishing the space units under a Space National Guard would reinforce the space culture aspects of the units compared to the status quo, which should only increase their effectiveness at recruiting and retaining members from the population at large. Conversely, because Space Force now has part-time service options resident in the active force, it may be more challenging for Space National Guard units to recruit trained members as they have in the past from the regular component.

Additionally, the Space National Guard would offer limited development for members outside of the 11 units and cross-state Deltas. There would be staff positions at Space National Guard headquarters to develop higher-level organizational and planning/programming proficiency, and potentially positions at the Joint Force Headquarters of the seven states with Space National Guard units.

COA 3 Summary: COA 3 is feasible, but not advisable. COA 3 addresses readiness, unity of command, and unity of effort, but it requires the establishment of a new component with an associated headquarters for about 700 people and units. It also simplifies policies, procedures, and resourcing within the ANG by moving mis-aligned space units and specialties out of the service, but it creates the problems associated with establishing all of those things for a new and very small, distributed organization. It reduces concerns related to increased bureaucracy to the Air Force, ANG, and Space Force of having to maintain formal workarounds for policies and procedures to avoid confusion and conflict. It also creates a unique and separate organizational structure separate from the new full and part time seamless Space Force organization. In such a structure, ensuring adequate priorities for the Space Guard is likely to be a significant problem. COA 3 creates a new reserve component which adds command and headquarters. The advantages inherent in a reserve component are not necessary for the Space Force, which has part-time service options within the force under the recently enacted SFPMA. There is no compelling Title 32 requirement for space capabilities. The Space National Guard would be 578 positions (initially), with state Space National Guards ranging in size from 33 (Alaska) to 180 (California) positions.

² See <https://www.cbo.gov/publication/56374>, “Costs of Creating a Space National Guard,” June 2, 2020

(b)(2) A cost-benefit analysis for each course of action addressed under paragraph (1)

Comparative Cost-Benefit Analysis

Table 11 shows the cost comparison for each of the three COAs, with detailed cost breakout in Table 12 for military personnel costs, civilian personnel costs, and operation and maintenance (O&M) costs of the 11 ANG units considered.

Cost data is based on FY23 ANG cost models and represents the most comparative data between the COAs. Cost analysis did not include any additional costs assessed to add up to a less than \$5M increase or decrease, to avoid debate regarding assumptions which imposed realistic, but not necessarily impactful conditions on one or more COAs. Cost analysis did not include any Facilities Sustainment, Restoration, and Modernization (FSRM) data, for two reasons. One, FSRM is not typically calculated for partial units; i.e., separating out FSRM changes between COAs would result in estimates only and not meaningful data. Second, in all COAs the units and manpower would remain in the same locations, which does not change whether the Space Force, Air Force, ANG, or Space National Guard provides the capability. Additionally, no partial costs were considered for higher headquarters or administrative commands above the considered units. Potential changes to the command structure have already been noted in the individual COA analysis.

	COA 1 Space Functions Remain in ANG	COA 2 ANG Space Functions Transfer to USSF	COA 3 Space National Guard Component (SNG)
Total Cost	\$83.4M	\$83.4M	\$83.4M
Retained ANG Cost	\$83.4M	\$33.3M	\$32.1M
Transferred Cost	\$0	\$50.1M to USSF -\$50.1M from ANG	\$51.3M to SNG -\$51.3M from ANG

Table 11: COA Cost Comparison

Total Cost Breakout:	\$83.4M
MILPERS (Space):	\$50.1M
MILPERS (Support):	\$22.3M
MILPERS Total:	\$72.4M
CIVPAY (Space):	\$6.7M
CIVPAY (Support):	\$1.8M
CIVPAY Total:	\$8.5M
O&M (Space):	\$1.2M
O&M (Support):	\$1.3M
O&M Total:	\$2.5M

Table 12: Cost Breakout

Under COA 2, a cost calculation was made between civilian and military pay, since no civilian technicians would transfer to Space Force in that COA. Civilian technicians are both government civilians and duty-status guardsmen and have two corresponding positions on unit manning documents. Technicians are typically in uniform in both roles. Space Force does not have civilian technicians, thus the full-time military duties of technicians in the ANG units were converted to full time military requirements in COA 2. A corresponding portion of civilian pay was converted to military pay for COA 2 cost calculations. Under that calculation, although there are minor cost differences between a full-time technician and a full-time military member, the differences were below the threshold.

Finally, cost analysis did not incorporate training costs. Training costs are budgeted annually by the ANG but can be funded on an as-needed basis, as recruiting quotas and training allocations shift between units, and specialties. On average, the ANG annually trains approximately 100 members for the 11 ANG units considered, which includes a mix of air and space specialties and costs approximately \$10M per year. Presently, two units in Hawaii are in conversion status and standing up new units, which requires a higher-than-average training pipeline. Because training requirements vary, training costs per specialty vary, and re-training costs associated with COAs 2 and 3 are unknown, it was impossible to accurately capture training costs differences between COAs. Estimates indicate training costs for space specialties at approximately \$100K per military member. If, under any COA, 100 members annually required training, the cost would remain at approximately \$10M. If no members required training because, for example, 100% of existing members transferred to the Space Force (if COA 2 was enacted) or the Space National Guard (if COA 3 was enacted), the annual training costs would be \$0. If no current Guard members transferred to Space Force under COA 2, or to the Space National Guard under COA 3, the cost to re-train all members simultaneously would be approximately \$58.1M. Space Force currently does not have the capacity to re-train 578 new members in one year; thus, a phased approach over several years would spread training costs out over the corresponding years, creating both a limitation and a cost mitigation.

With those caveats, the table shows that the current cost to the ANG for the 11 units considered is \$83.4M. Under COA 2, \$50.1M of personnel and O&M would transfer to a Space Force appropriation and decrement from the ANG appropriation, leaving \$33.3M remaining to support the space missions. Under COA 3, \$51.3M in personnel and O&M would transfer to a Space National Guard appropriation, with \$32.1M remaining in an ANG appropriation to provide support. While the costs are approximate, there is an outsized impact under COA 3 due to the small footprint of a Space National Guard and risk of future growth associated with establishing a new formal bureaucracy. With the transfer of only nine of the 11 ANG units initially considered, the transfer cost would be reduced compared to the cost identified for all 11 units.

(b)(3) An assessment of any risks or benefits to the mission or readiness of the Space Force, including the ability of the Space Force to meet applicable objectives of the National Defense Strategy that may be presented by transferring or consolidating units of the Air National Guard as described in paragraph (1)

Comparative Risk-Benefit Analysis

The analysis team determined that each of the three COAs was feasible and viable and could be implemented if appropriate legislative and policy changes were enacted. Risks and benefits associated with each COA are listed below.

COA 1 risks: The most impactful risk associated with COA 1 is that a small footprint of space units within the ANG would be mis-aligned and disconnected from Space Force readiness, training, and culture, creating negative impact to the career prospects of the space-

focused professionals in those units. This risk can be partially mitigated by cooperation and coordination between the Air Force and the Space Force.

COA 1 benefits: COA 1 imposes no foreseeable costs or cost risks and would not require complex transition in the short term because it is the closest to the status quo. COA 1 requires no personnel transfers (unlike COAs 2 and 3) and creates no new command or headquarter elements organization (unlike COA 3).

COA 2 risks: COA 2 accepts the risk that some experienced Air National Guard members may not join the Space Force under the SFPMA. Guardsmen in the 578 space positions will have to volunteer to transfer to the Space Force or re-train; they will not be able to stay in the ANG in their current positions. The Space Force, however, has demonstrated that it can manage transition risks. In the past two years, the USSF received Army and Navy military satellite communication missions, as well as the Army's missile warning mission, without assurances that trained manpower would transfer with the units. In each case, despite not getting all the associated personnel, the USSF successfully managed the transition without any loss to the operational mission. Governors of the six states with space units will have a small and marginal reduction in Guard forces available for state activations.

COA 2 benefits: COA 2 creates a single unified Space Force, as envisioned by the SFPMA. Given the already small size of the Space Force and the extremely small size of the ANG space units, this consolidation represents a significant benefit. This COA leverages the existing organizational structure of the Space Force and the authorities of the SFPMA to reconstitute the ANG space units as is, in the same locations, with no increase in administrative overhead. Guardians serving in both full- and part-time billets in the Space Force have access to positions and career development across the entire force, rather than in specific ANG space units. COA 2 preserves the 'Space Force without component' enacted in SFPMA, which created full- and part-time service options in the Space Force in lieu of a reserve component.

COA 3 risks: COA 3 creates a new reserve component of 578 positions, with Space National Guard units in six states. If it remains at that size, development and promotion options for guardsmen would be highly limited compared to their options in the ANG or Space Force. Conversely, if the Space National Guard is increased and expanded, it would create more options for guardsmen but would also drive additional administrative and leadership overhead. Creating a separate Space National Guard defeats the purpose of the SFPMA by introducing an unnecessarily complex model.

COA 3 benefits: A Space National Guard remedies the concerns of leaving space units in the ANG and preserves manpower for state missions such as disaster relief in the Space National Guard.

Summary

In summary, the analysis team examined eight planning factors regarding the feasibility and advisability of three COAs, examining risks, costs, and benefits of each. Each of the three COAs will require legislative and/or policy changes to implement effectively; COA 1 is close to the status quo but has disadvantages for Space Force coherence; COA 2 transfers nine units, missions, and manpower from the ANG to the Space Force consistent with the provisions of the SFPMA and removes a small number of Guardsmen from State resources; COA 3 creates an entirely new and extremely small reserve component and transfers units, missions, and manpower to a newly formed Space National Guard. All three COAs are feasible, but carry costs, risks, and benefits described in the report. In the view of the Secretary of the Air Force and the Chief of Space Operations, only COA 2 is advisable.

Recommendation

The Department of the Air Force, in consultation with the National Guard Bureau and the Office of the Under Secretary of Defense for Personnel and Readiness, recommends the transfer of covered space functions from the ANG to the Space Force (COA 2).

Under the SFPMA, the Space Force is integrating the Reserves and has authority for flexible service options of a combined full- and part-time force. Extending this model to include the National Guard space functions fully integrates the Reserve component into a single streamlined Service, preserves current mission capability without adding command and headquarter elements structure, and provides future flexibility. Given its small size and the lean philosophy the Space Force has taken in its organizational approach, the burden of a separate Reserve or Guard component—in any form—would detract from the ability of the Space Force to execute its critical mission. Congress recognized this when it passed the SFPMA, breaking new ground by providing the Space Force with more personnel management flexibility than any other Service. Either retaining Space Force units in the ANG or creating a new Space National Guard would be directly counter to this purpose.

The National Guard Bureau is capable of continuing missions with minimal disruption regardless of the COA selected. However, they have consistently stated and remain of the opinion that the transfer of covered space functions from the ANG into a new Space National Guard component (COA 3) provides the best option for Airmen performing space missions in the ANG today. The Department of the Air Force, the Department of Defense, and the Administration disagree with this position.³

³ See <https://www.whitehouse.gov/wp-content/uploads/2022/10/S4543-NDAA-SAP.pdf>, “Statement of Administrative Policy S. 4543 – James M. Inhofe National Defense Authorization Act for Fiscal Year 2023,” October 18, 2022 & <https://www.whitehouse.gov/wp-content/uploads/2021/09/SAP-HR-4350.pdf>, “Statement of Administrative Policy H.R. 4350 – National Defense Authorization Act for Fiscal Year 2022,” September 21, 2021

Appendices

Appendix A: Interim Brief (as previously provided to the Committees on Armed Services)

Appendix B: Memorandum from the Chief of Space Operations to the Secretary of the Air Force, “Covered Space Functions Under Section 924 of the Fiscal Year 2024 National Defense Authorization Act,” 27 MAR 2024

Distribution

The Honorable Jack Reed
Chairman
Committee on Armed Services
United States Senate
Washington, DC 20510

The Honorable Roger Wicker
Ranking Member
Committee on Armed Services
United States Senate
Washington, DC 20510

The Honorable Mike Rogers
Chairman
Committee on Armed Services
U.S. House of Representatives
Washington, DC 20515

The Honorable Adam Smith
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Department of the Air Force

Integrity - Service - Excellence

2024 NDAA Section 924 - FEASIBILITY STUDY ON THE CONSOLIDATION OR TRANSFER OF SPACE FUNCTIONS OF THE NATIONAL GUARD TO THE SPACE FORCE



**SAF/MR
7 Mar 2024**



NDAA SEC. 924 Language

- (a) **STUDY REQUIRED.**—The Secretary of Defense shall conduct a study to assess the feasibility and advisability of transferring all covered space functions of the National Guard to the Space Force.
 - (b) **ELEMENTS.**—The study under subsection (a) shall include the following:
 - (1) An analysis and recommendations addressing, at a minimum, each of the following courses of action with respect to the covered space functions of the National Guard:
 - (A) Maintaining the current model under which the Air National Guard has units and personnel performing such functions.
 - (B) Transferring such functions, including units and personnel, to the Space Force.
 - (C) The establishment of a new National Guard component of the Space Force to perform such functions.
 - (2) A cost-benefit analysis for each course of action addressed under paragraph (1).
 - (3) An assessment any risks or benefits to the mission or readiness of the Space Force, including the ability of the Space Force to meet applicable objectives of the National Defense Strategy, that may be presented by transferring or consolidating units of the Air National Guard as described in paragraph (1).
 - (c) **INTERIM BRIEFING.**—Not later than February 1, 2024, the Secretary of Defense shall provide to the Committees on Armed Services of the Senate and House of Representatives an interim briefing on the preliminary results of the study conducted under subsection (a).
 - (d) **FINAL REPORT.**—
 - (1) **IN GENERAL.**—Not later than March 1, 2024, the Secretary of Defense shall submit to the Committees on Armed Services of the Senate and House of Representatives a report on the final results of the study conducted under subsection (a), including the results of the study with respect to each element specified in subsection (b).
 - (2) **FORM OF REPORT.**—The report required under paragraph (1) shall be submitted in unclassified form, but may include a classified annex.
 - (e) **COVERED SPACE FUNCTIONS OF THE NATIONAL GUARD DEFINED.**—In this section, the term “covered space functions of the National Guard” means all units, personnel billets, equipment, and resources of the Air National Guard associated with the performance of a space related function that is (as determined by the Secretary of the Air Force, in consultation with the Chief of Space Operations)— (1) a core space-related function of the Space Force; or (2) otherwise integral to the mission of the Space Force.
-



Briefing Overview

- **Study Approach**
 - **Planning Factors**
 - **Current ANG Space Units**
 - **COA Analysis**
 - **Cost Factors**
 - **Interim Key Findings**
 - **Interim Recommendation**
-



Study Approach

- **Study Team: 30 action officers from the National Guard Bureau, Air National Guard, U.S. Space Force, U.S. Air Force, and Department of the Air Force Secretariat with executive-level oversight**
 - **Leveraged existing USSF and ANG data – swifter response than an outside agency starting from scratch**
 - **Fact-based approach – data drives analysis, rather than assumptions**
 - **Briefing contains interim findings/recommendations – the final report presents a comprehensive analysis of the planning factors (next chart)**
 - **Timeline:**
 - **Interim brief due 1 February**
 - **Report due 1 March**
-



Planning Factors

- **Readiness**: Maintains, improves or degrades readiness related to NDS objectives
- **Unity of Command**: Commander directs all forces in pursuit of common purpose
- **Unity of Effort**: Achieves effectiveness and efficiency in organizational efforts
- **Feasibility**: Implementation is viable long term
- **Simplicity**: Simple enough as to not create unnecessary risk to mission
- **Timeliness**: May be implemented in a deliberate manner without delay
- **Cost**: Estimated resourcing based on FY23 dollars
- **Recruiting and Retention**: Impact on recruiting and retention of space professionals

Derived from Joint Planning Process – Operational Assessment Criteria



ANG Covered Space Functions



Unit and Manpower Summary:
 702 space operations billets in 11 space operations units + 1 HQ element that would transfer in COAs 2 & 3
 124 embedded air (admin, etc.) billets in these units that remain in the ANG regardless of COA
 305 support billets in 4 supporting units (AK, CO, not shown on map) that remain in the ANG regardless of COA

Fill rates current as of 1 Jan 24
Overall manning: 85%



COA 1 – Space Functions Remain in ANG

ANG continues executing space missions and augmenting USSF assigned missions

- **No legal provision for Guardsmen in one component to serve in a different service – legislative changes may be required to address**
 - **Revision/update to 32 USC Section 104(b) – composition of the ANG**
 - **May require legislative changes for end strength reporting, promotion processes, etc. – currently set in law separately for each service**
 - **Changes to service appropriations – currently specific to service requirements**
 - **Creates administrative burden for Space Force, Air Force, and ANG:**
 - **Requires new policies to align recruiting, retention, training, assignments career development, promotions, unit structures, and command relationships**
 - **DAF and ANG would need to separate space functions into a de facto SNG under the ANG; ANG would develop and manage Airmen and Guardians separately**
 - **Option preserves existing Guard manpower -- no personnel transfers (702 ops positions stay in ANG and are available for state missions)**
-



COA 2 – ANG Space Functions Transfer to USSF

USSF absorbs ANG space missions, use SFPMA authorities for full-time/part-time Guardians

- **SFPMA enacted to give USSF flexibility of full-time/part-time service options, instead of maintaining a separate reserve component**
 - **Prioritized recruitment/retention across all USSF mission areas, adds service options for 702 space ops personnel**
 - **Missions, units, and personnel that transfer to USSF can stay in-state at the same location**
 - **Leverages existing USSF mission Delta structure – no added overhead/bureaucracy**
 - **Because this option decrements ANG end strength and transfers missions, units, and manpower to USSF it requires governor consent or congressional override of that consent**
 - **ANG decrement of 702 positions, \$51.3M in annual personnel/operation costs**
 - **Support personnel do not transfer; remain in ANG**
 - **Guardsmen must volunteer for USSF or re-train to other specialties; approx. \$100K per person to replace / re-train space operators; may exceed annual ~\$10M training budget**
-



COA 3 – Space National Guard

Establishes Space National Guard (SNG) and transfers current ANG units conducting space missions to Space National Guard

- **Creates a new reserve component in law to USSF for 702 positions, and transfers end strength and \$51.3M personnel/operating costs to a SNG**
 - **Requires legislative change to SFPMA to remedy ‘no component’ structure**
 - **All positions remain National Guard and are available for state missions**
 - **However, ANG Guardsmen must still volunteer for SNG or re-train as with COA 2**
 - **Because the ANG already stood up a NGB-SO headquarters element it requires little admin growth to initially establish SNG**
 - **Re-organizes units into cross-state Mission Deltas**
 - **No new ATAG positions required—states with space missions would leverage senior space officer in liaison role to state JFHQ**
 - **ANG would provide support functions to SNG, similar to USSF-USAF arrangement**
-



Cost Factors

	COA 1 Space Functions Remain in ANG	COA 2 ANG Space Functions Transfer to USSF	COA 3 Space Force National Guard Component (SNG)
TOTAL COST:	\$83.4M	\$83.4M	\$83.4M
<i>Retained ANG Cost:</i>	\$83.4M	\$32.1M	\$32.1M
<i>Transferred Cost:</i>	\$0	\$51.3M to USSF -\$51.3M decrement from ANG	\$51.3M to SNG -\$51.3M decrement from ANG
<u>Total Cost Breakout:</u>	\$83.4M	<p>Notes:</p> <ul style="list-style-type: none"> - Costs based on ANG FY23 cost models - Negligible admin cost differences between COAs (+/- \$5M) - O&M includes unit operating funds only (FSRM not included) - No CIVPAY transfer in COA2 (MILPERS offset in lieu of ANG Technicians) - Current and potential training costs not included in analysis (est. \$10M annually, but highly variable depending on new accessions, re-missioning) 	
<i>MILPERS (Space):</i>	\$50.1M		
<i>MILPERS (Support):</i>	\$22.3M		
MILPERS Total:	\$72.4M		
<i>CIVPAY (Space):</i>	\$6.7M		
<i>CIVPAY (Support):</i>	\$1.8M		
CIVPAY Total:	\$8.5M		
<i>O&M (Space):</i>	\$1.2M		
<i>O&M (Support):</i>	\$1.3M		
O&M Total:	\$2.5M		



Interim Key Findings

COA 1: Space functions remain in the Air National Guard (current model, but not the status quo)

COA 2: Air National Guard space functions transfer to the U.S. Space Force

COA 3: Creation of a Space National Guard

- **COA 1 creates the least structural change, but it perpetuates retention of Space Force missions in an Air Force component**
- **COA 2 integrates space missions into the Space Force – new SFPMA authorities enable part-time service without a separate reserve component – but marginally reduces (-3%) the number of Air National Guardsmen available for state missions in 7 states**
- **COA 3 aligns ANG space missions to USSF and preserves state manpower but creates a new organization and uncertainty for cost increases**
- **Cost is approximately neutral for all options (+/- \$5M) although hidden costs may arise if planning assumptions are not met**
- **The DAF could execute any of the COAs if required**



Interim Recommendation

- **COA 2 “ANG Space Functions Transfer to USSF” is recommended:**
 - *USSF provides unity of command and unity of effort for space missions, enabling most efficient utilization of a small number of forces*
 - *USSF can operate existing units in place without moving mission or manpower, and with no added bureaucracy*
 - *Cost does not significantly change for the DAF*
 - *Space professionals recruited, developed, and managed by a single service*
 - *Extends the benefits of SFPMA to current Guardsmen performing space missions*



DISCUSSION



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES SPACE FORCE

MAR 27 2024

MEMORANDUM FOR SECRETARY OF THE AIR FORCE

FROM: USSF/CSO

SUBJECT: Covered Space Functions Under Section 924 of the Fiscal Year 2024 National Defense Authorization Act

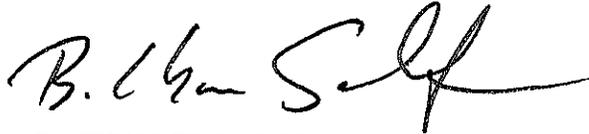
1. As you review the draft Congressionally-mandated "Report on the Feasibility of the Consolidation or Transfer of Space Functions of the National Guard to the Space Force," this memorandum provides my advice on which units of the Air National Guard (ANG) should be designated as conducting "covered space functions" and therefore should be transferred to the Space Force if the Department of the Air Force receives the authority to do so.
2. Section 924 of the Fiscal Year 2024 National Defense Authorization Act (NDAA) provided the following definition of covered space functions:

COVERED SPACE FUNCTIONS OF THE NATIONAL GUARD DEFINED.—In this section, the term "covered space functions of the National Guard" means all units, personnel billets, equipment, and resources of the Air National Guard associated with the performance of a space related function that is (as determined by the Secretary of the Air Force, in consultation with the Chief of Space Operations)— (1) a core space-related function of the Space Force; or (2) otherwise integral to the mission of the Space Force.

Based on this definition, it is my recommendation that of the 11 ANG units analyzed, two of the units do not perform "a core space-related function of the Space Force" and are not "integral to the mission of the Space Force." The 234 Intelligence Squadron Operating Location-A in Los Alamitos, California, has supported the Air Force's Distributed Common Ground Station (DCGS) and does not have a Space Force assigned mission. It has no current operational relationship with Space Operations Command or any other Space Force organization. The 222 Command and Control Squadron in Rome, New York, augments the National Reconnaissance Office (NRO), performing a non-Space Force mission from home station and mission partner locations. The Space Force has no command and control squadrons and does not execute command and control functions for the NRO.

3. The nine other ANG units considered in the section 924 study do meet the NDAA criteria. The 213 Space Warning Squadron (SWS) in Alaska is co-located with the 13 SWS, a Space Force unit which maintains operational control of the early warning radar at Clear Space Force Station in support of Space Force Delta 4. Similarly, the 148 Space Operations Squadron in California provides mission manpower for an employed-in-place satellite communications mission on Vandenberg Space Force Base in support of Delta 8. Five electromagnetic warfare squadrons (EWS) located in California (216 EWS), Colorado (138 EWS), Florida (114 EWS),

and Hawaii (109 EWS and 150 EWS) provide manpower and operate mission systems to conduct electromagnetic warfare missions in support of Delta 3. The 126 Intelligence Squadron has an assigned Space Force intelligence mission, supporting institutional space intelligence missions that have recently re-aligned under two Space Force Deltas. The 137 SWS, which operates from Greeley Air National Guard Station (ANGS) in Colorado, performs the nation's only survivable and endurable missile warning mission, deploying from garrison in higher states of readiness in support of Delta 4. All of these units' current missions encompass "a core space-related function of the Space Force" and/or are "integral to the mission of the Space Force."



B. CHANCE SALTZMAN
General, USSF
Chief of Space Operations

Attachment:
Section 924 Report