



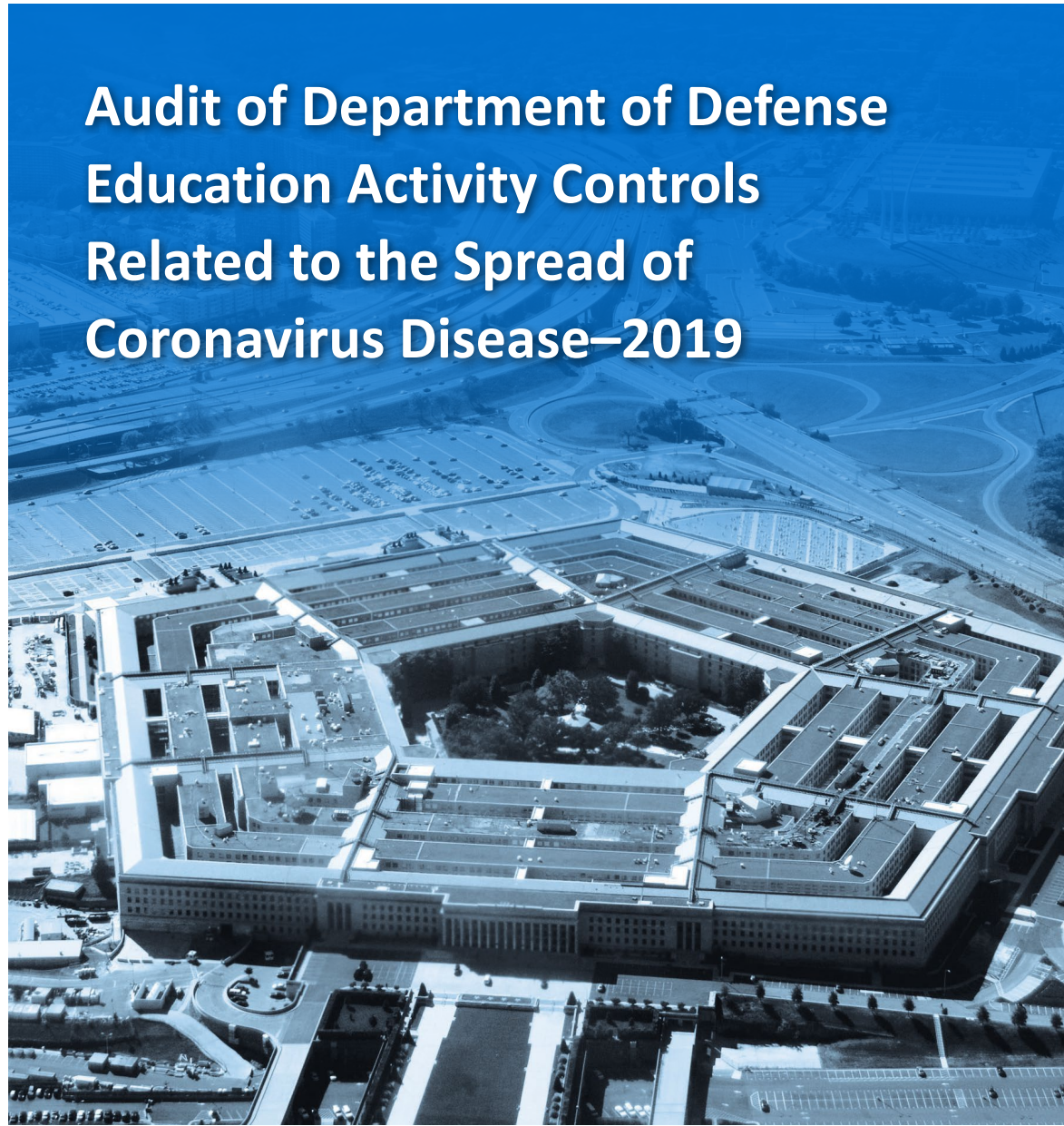
# INSPECTOR GENERAL

*U.S. Department of Defense*

SEPTEMBER 24, 2021



## Audit of Department of Defense Education Activity Controls Related to the Spread of Coronavirus Disease—2019



INTEGRITY ★ INDEPENDENCE ★ EXCELLENCE







# Results in Brief

## *Audit of Department of Defense Education Activity Controls Related to the Spread of Coronavirus Disease–2019*

September 24, 2021

### Objective

The objective of this audit was to determine whether the DoD Education Activity (DoDEA) developed and implemented controls in accordance with the Centers for Disease Control and Prevention (CDC) and DoD guidance related to the spread of coronavirus disease–2019 (COVID-19).

### Background

DoDEA employs over 11,500 full-time employees and serves more than 64,000 children of active duty military and DoD civilian families. DoDEA operates as a field activity of the Office of the Under Secretary of Defense for Personnel and Readiness, through the Assistant Secretary of Defense for Manpower and Reserve Affairs.

DoDEA operates 160 schools in 8 districts that are located in 11 foreign countries, 7 states, Guam, and Puerto Rico. DoDEA schools are separated into three regions: DoDEA Americas, DoDEA Europe, and DoDEA Pacific.

COVID-19 is an infectious disease that can cause a wide spectrum of symptoms. On March 11, 2020, the World Health Organization declared the COVID-19 outbreak a pandemic, and on March 13, 2020, the President declared the COVID-19 pandemic a national emergency. Transmission of the disease can occur when people are in close contact with one another, within 6 feet. Symptoms include fever, chills, cough, sore throat, shortness of breath, and body aches.

The CDC issued COVID-19 guidance in August 2020 to aid school administrators as they determined how to protect the health and safety of students, teachers, other school staff, their families, and communities and prepare for educating students in the fall. COVID-19 protective measures include maintaining a 6-foot distance from others (social distancing), washing

### Background (cont'd)

hands (hand hygiene), training staff, and communicating with students, parents, and caregivers. DoD guidance recommends that DoD Components follow CDC guidance to protect all personnel from disease transmission in DoD workplaces.

We reviewed a sample of 5 elementary schools, middle schools, and high schools from each of the 3 DoDEA regions, totaling 15 schools out of 160 schools.

### Finding

DoDEA developed and implemented controls in accordance with CDC and DoD guidance related to the spread of COVID-19. Specifically, DoDEA issued COVID-19 operational guidelines, and the 15 individual DoDEA schools we reviewed implemented controls for:

- developing multiple COVID-19 mitigation strategies, such as social distancing, masks, and hand hygiene;
- communicating, educating, and reinforcing appropriate hygiene and social distancing practices in ways that were developmentally appropriate for students, teachers, and staff;
- maintaining healthy environments, such as cleaning and disinfecting frequently touched surfaces;
- developing a proactive plan for when a student or staff member tested positive for COVID-19; and
- educating parents and caregivers on the importance of monitoring for and responding to the symptoms of COVID-19 at home.

As a result, the 15 individual DoDEA schools provided staff, students, and parents information and training on effective hygiene, social distancing, cleaning, and identifying the signs of COVID-19 to reduce the risk of COVID-19 spread for students, teachers, and staff members.

### Management Comments

Although not required to comment, the DoDEA Director provided comments to acknowledge the audit. The Director highlighted the efforts taken by DoDEA personnel to prioritize health and safety, provide flexible and creative ways to educate students, and expand the DoDEA Virtual High School to provide educational services for all grade levels.





**INSPECTOR GENERAL  
DEPARTMENT OF DEFENSE  
4800 MARK CENTER DRIVE  
ALEXANDRIA, VIRGINIA 22350-1500**

September 24, 2021

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR PERSONNEL AND READINESS  
DIRECTOR, DEPARTMENT OF DEFENSE EDUCATION ACTIVITY  
AUDITOR GENERAL, DEPARTMENT OF THE NAVY  
AUDITOR GENERAL, DEPARTMENT OF THE ARMY  
AUDITOR GENERAL, DEPARTMENT OF THE AIR FORCE

SUBJECT: Audit of Department of Defense Education Activity Controls Related to the Spread  
of Coronavirus Disease-2019 (Report No. DODIG-2021-128)

This final report provides the results of the DoD Office of Inspector General's audit. We considered management's comments on a discussion draft copy of this report when preparing this final report. We did not make any recommendations; therefore, no management comments are required.

We appreciate the cooperation and assistance received during the audit. If you have any questions, please contact me at [REDACTED]

A handwritten signature in black ink, reading "Richard B. Vasquez", is positioned above the printed name.

Richard B. Vasquez  
Assistant Inspector General for Audit  
Readiness and Global Operations

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# Introduction

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## Objective

The objective of this audit was to determine whether the DoD Education Activity (DoDEA) developed and implemented controls in accordance with the Centers for Disease Control and Prevention (CDC) and DoD guidance related to the spread of coronavirus disease–2019 (COVID-19). See Appendix A for our scope and methodology and prior audit coverage.

## Background

### ***Coronavirus Disease–2019***

COVID-19 is an infectious disease that can cause a wide spectrum of symptoms. On March 11, 2020, the World Health Organization declared the COVID-19 outbreak a pandemic, and on March 13, 2020, the President declared the COVID-19 pandemic a national emergency.<sup>1</sup> Under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) enacted on March 27, 2020, the DoD received \$10.5 billion to prevent, prepare for, and respond to COVID-19, domestically and internationally. According to the CDC, COVID-19 can spread mainly from person to person when an infected person coughs, sneezes, or talks. Transmission can occur when people are in close contact with one another, within 6 feet.

Symptoms of COVID-19 include fever, chills, cough, sore throat, shortness of breath, and body aches. Symptoms may appear in as few as 2 days or as long as 14 days after exposure. Ways to prevent and reduce the spread of COVID-19 include washing hands; avoiding close contact and practicing social distancing of 6 feet; covering the mouth and nose with a cloth face mask in public settings or when social distancing is difficult; covering coughs and sneezes; cleaning and disinfecting surfaces; and monitoring health.<sup>2</sup>

### ***The Department of Defense Education Activity***

DoDEA employs over 11,500 full-time employees and serves more than 64,000 children of active duty military and DoD civilian families. DoDEA operates as a field activity of the Office of the Under Secretary of Defense for Personnel and Readiness, through the Assistant Secretary of Defense for Manpower and Reserve Affairs.

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<sup>1</sup> A pandemic is a global outbreak of a disease that occurs when a new virus emerges to infect people and can spread between people sustainably.

<sup>2</sup> Social distancing is the practice of staying 6 feet apart to prevent and reduce the spread of COVID-19.

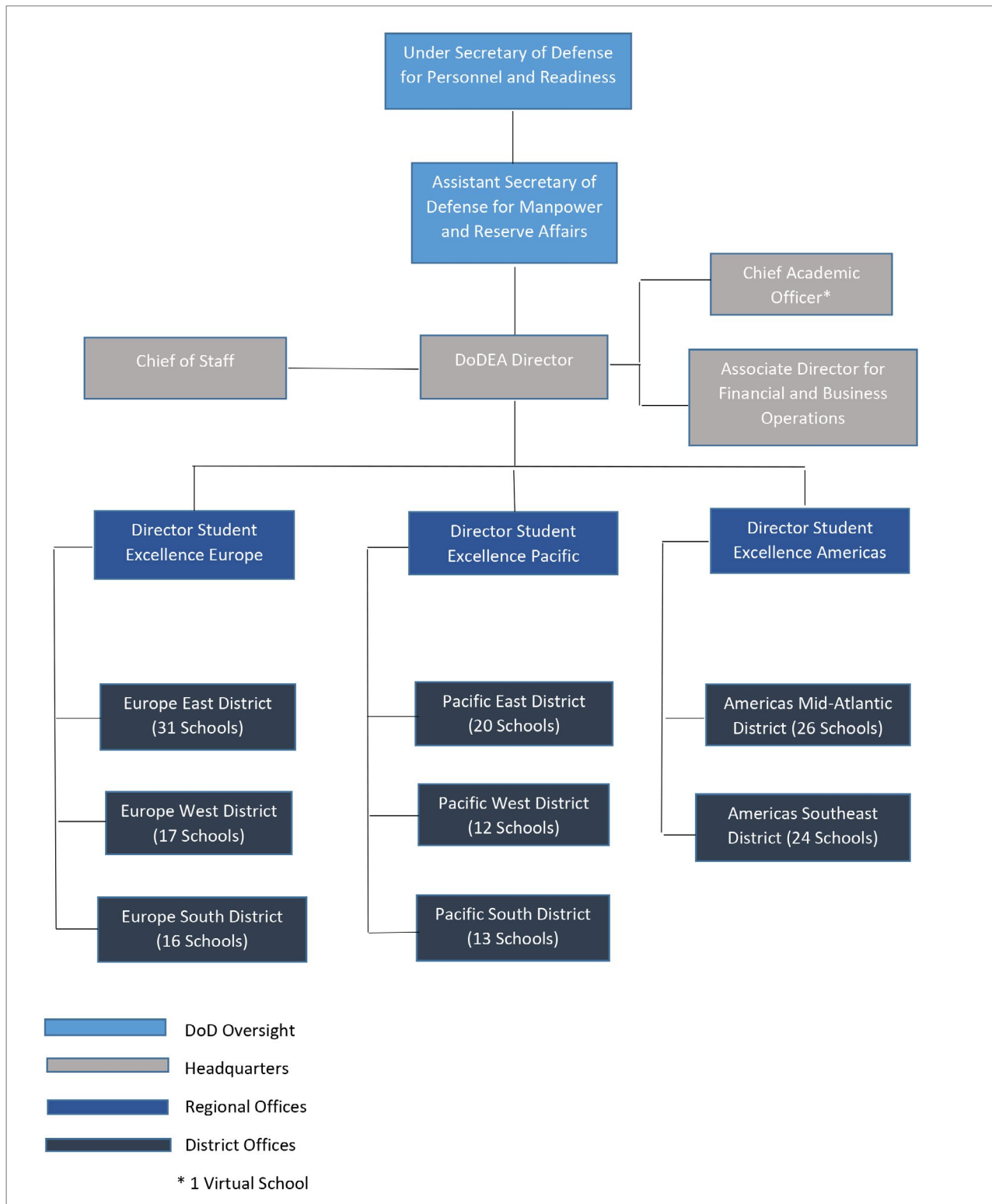
DoDEA operates 160 schools in 8 districts that are located in 11 foreign countries, 7 states, Guam, and Puerto Rico. DoDEA schools are separated into three regions: DoDEA Americas, DoDEA Europe, and DoDEA Pacific.

- **DoDEA Americas:**
  - serves 18,900 children of active duty military and DoD civilian families;
  - employs 4,078 full-time professionals; and
  - geographically organized into two districts (Mid-Atlantic and Southeast), serving U.S. military installations in seven states (Alabama, Georgia, Kentucky, New York, North Carolina, South Carolina, and Virginia), Puerto Rico, and Cuba.
- **DoDEA Europe:**
  - serves 24,658 children of active duty military and DoD civilian families;
  - employs 3,979 full-time professionals; and
  - geographically organized into three districts (Europe East, South, and West), serving U.S. military installations in Bahrain and seven European Nations (Belgium, Germany, Italy, the Netherlands, Spain, the United Kingdom, and Turkey).
- **DoDEA Pacific:**
  - serves 20,917 children of active duty military and DoD civilian families;
  - employs 3,158 full-time professionals; and
  - geographically organized into three districts (Pacific East, South, and West), serving 21 U.S. military installations in the Pacific (Guam, Japan, and South Korea).



Figure 1 illustrates the DoD's oversight of DoDEA, as well as DoDEA's organization.

*Figure 1. DoD's Oversight and DoDEA's Organization*



Source: The DoD OIG.

## ***Operating Status of DoDEA Schools in the COVID-19 Environment***

At the beginning of school year 2020-2021, DoDEA offered in-person learning at 24 of the 50 schools in the Americas region, 58 of the 64 schools in the Europe region, and 10 of the 45 schools in the Pacific region. The 67 schools that did not open for in-person learning provided remote learning.

For students and families with health vulnerabilities related to COVID-19 or who were concerned about returning to an in-person learning setting, DoDEA expanded the virtual high school from grades 9-12 to grades Kindergarten-12 (K-12) to provide a full-time virtual learning option during the 2020 through 2021 school year.<sup>3</sup> The deadline to apply for the virtual option for the first semester was July 30, 2020, and the DoDEA virtual school opened on August 24, 2020. According to DoDEA officials, 7,700 laptops and 250 hotspots were distributed. See Table 1 for the virtual, remote, and in-person learning participation of DoDEA students by semester.

*Table 1. Participation of DoDEA Students by Semester During School Year 2020-2021*

Participation Type	First Semester	Second Semester
Virtual	14.2 percent	7.5 percent
Remote	10.2 percent	4.1 percent
In-person	75.6 percent	88.4 percent

Source: The DoD OIG.

## ***COVID-19 Safety Protocols***

The CDC, DoD, and DoDEA issued guidance and safety protocols related to COVID-19. The COVID-19 guidance covers protocols for operating under three health protection condition (HPCON) levels; the use of personnel protective equipment (PPE), such as masks and gloves; and training staff and students on the COVID-19 health and safety guidelines and protocols.<sup>4</sup>

<sup>3</sup> The DoDEA Virtual School enrolls K-12 students in online classes taught by existing DoDEA teachers.

<sup>4</sup> DoD protocols for public health emergencies include HPCON Alpha, HPCON Bravo, and HPCON Charlie. HPCON Alpha means there is a limited health alert and community transmission is beginning (schools are open for in-person learning). HPCON Bravo means there is a moderate health alert and there is an increase in community transmission (schools are open for in-person learning). HPCON Charlie means there is a substantial health alert and there is sustained community transmission (schools are closed and will transition to remote learning).

### ***CDC Guidance***

On August 26, 2020, the CDC issued COVID-19 guidance, “Preparing K-12 School Administrators for a Safe Return to School in Fall 2020,” to aid school administrators as they determined how to protect the health, safety, and wellbeing of students, teachers, other school staff, their families, and communities and prepared for educating students in the fall.<sup>5</sup> CDC guidance included:

- implementing multiple COVID-19 mitigation strategies, such as social distancing, masks, and hand hygiene;
- communicating, educating, and reinforcing appropriate hygiene and social distancing practices in ways that are developmentally appropriate for students, teachers, and staff;
- maintaining healthy environments, such as cleaning and disinfecting frequently touched surfaces;
- developing a proactive plan for when a student or staff member tests positive for COVID-19; and
- educating parents and caregivers on the importance of monitoring for and responding to the symptoms of COVID-19 at home.

### ***DoD Guidance***

On April 13, 2020, the Office of the Under Secretary of Defense for Personnel and Readiness issued, “Force Health Protection Guidance (Supplement 8),” which states that DoD Components must regularly consult CDC guidance for updated recommendations.

On May 19, 2020, the Secretary of Defense issued, “Guidance for Commanders on Risk-Based Changing of Health Protection Condition Levels During the Coronavirus Disease 2019 Pandemic,” to provide guidance for commanders to consider when making decisions to change HPCON levels as COVID-19 conditions on and adjacent to installations begin to improve.

### ***DoDEA Guidance***

On June 11, 2020, DoDEA issued, “Ensuring a Safe and Healthy Return to School,” to provide social distancing guidelines in a number of areas at HPCON levels Alpha, Bravo, and Charlie and options for implementing those guidelines in accordance with CDC and DoD requirements. The guide provided options for school, district, and region leaders as they developed solutions to appropriately social distance in schools and offices and as they entered school year 2020-2021.

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<sup>5</sup> The CDC guidance states that schools should continue the protocols during the entire 2020 through 2021 school year.

The guide also stated that different circumstances at each school would require innovation and flexibility to develop comprehensive responses at each location. School and district leaders were expected to collaborate and partner with installation commanders as they developed plans for their local communities. Specific options included the following:

- **Classrooms, Labs, and School Offices:**
  - arrange seating and desks at least 6 feet apart where possible;
  - turn desks to face in the same direction (rather than facing each other), or have students sit only on one side of tables, spaced apart where possible;
  - use tape on floors to indicate proper social distancing standards for students when possible;
  - encourage staff and students to use cloth face coverings per HPCON guidance, if feasible;
  - provide staff members with surgical masks if providing any direct assessments/services;
  - remind staff who are monitoring the student or staff member with symptoms to practice social distancing when possible; and
  - advise sick staff members and children not to return until they have met CDC criteria to discontinue home isolation.
- **Corridors and Common Areas:**
  - restrict movement unless it is absolutely necessary; if feasible, consider requiring students to remain in a single classroom during the day and teachers to transition between rooms between periods;
  - designate corridors and stairways for one-way traffic to minimize the chance for close contact;
  - use tape on floors to show the direction students and staff should travel in each corridor to reduce congestion; and
  - remove items from the classroom or hallways that are frequently touched but are not easily cleaned on a daily basis.
- **Cafeterias:**
  - stagger meal times to minimize the number of people dining inside at one time and keep people 6 feet apart;
  - require students to wash hands thoroughly prior to meal times;



- determine if markings for spacing and flow through hallways, cafeterias, and open seating areas are required and, if so, install; and
- consider serving meals outside or in alternative indoor areas to maximize social distancing as weather allows.
- **Playgrounds:**
  - assess the actions needed to limit risk of exposure or direct physical contact in physical education classes, sports or other physical activities, and play in playgrounds, wet areas, and changing rooms; and
  - consider suspending scheduled recess period if playground use cannot be staggered throughout the day or week, or if outside space is limited and would not support social distancing, or staff do not feel confident that social distancing would be maintained during playground use.
- **Large Group Events:**
  - collaborate with local stakeholders to limit gatherings, events, and curricular and extracurricular activities to those that can maintain social distancing and support proper hand hygiene in accordance with local installation guidelines; and
  - provide virtual activities students can participate in at home.

On August 25, 2020, DoDEA issued, “COVID-19 Operational Guidelines and Protocols for Schools – Version III,” and subsequently issued Version IV on December 8, 2020. Both issuances provide DoDEA district and school leaders with general guidelines and protocols for establishing and maintaining safe school environments to reduce the risk of COVID-19 spread. For example, DoDEA schools are high-contact zones like all other schools, and they must change in-school operational and educational practices to reduce student and staff contact and to ensure commonly used areas, equipment, and materials do not spread the COVID-19 virus. School and district leaders are required to work with local installation commanders to implement school-specific plans for reducing health risks that are related to COVID-19.

## What We Reviewed

To determine whether DoDEA developed and implemented controls in accordance with CDC and DoD guidance, we reviewed and compared the DoDEA return-to-school guidance to the CDC return-to-school guidance and DoD guidance. In addition, we used a random number generator to nonstatistically select 5 DoDEA schools from each of the 3 regions, totaling 15 schools out of 160 schools, to determine whether schools implemented controls in accordance with CDC and DoDEA guidance. See Table 2 for the list of DoDEA schools selected for review from each region and district.

*Table 2. DoDEA Schools Selected for Review by Region and District*

Regions	Districts	Schools	Location
Americas	Mid-Atlantic	Irwin Intermediate School	Fort Bragg, North Carolina
		Quantico Middle/High School	Quantico, Virginia
	Southeast	Barkley Elementary School	Fort Campbell, Kentucky
		Marshall Elementary School	Fort Campbell, Kentucky
		Diamond Elementary School	Fort Stewart, Georgia
Europe	East	Kaiserslautern Elementary School	Kapaun Air Station, Germany
		Ramstein Intermediate School	Ramstein Air Base, Germany
		Patch Middle School	U.S. Army Garrison Stuttgart, Germany
		Wiesbaden High School	U.S. Army Garrison Wiesbaden, Germany
	South	Vicenza High School	U.S. Army Garrison Vicenza, Italy
Pacific	East	Kinnick High School	Commander Fleet Activities Yokosuka, Japan
		Mendel Elementary School	Yokota Air Base, Japan
		Yokota Middle School	Yokota Air Base, Japan
	West	Humphreys West Elementary School	U.S. Army Garrison Humphreys, Korea
		Humphreys Middle School	U.S. Army Garrison Humphreys, Korea

Source: The DoD OIG.

To determine whether schools implemented controls in accordance with CDC and DoDEA guidance we submitted questionnaires, requested documentation, and interviewed school administrators from each region, district, and school, addressing:

- district, region, and school plans;
- teacher, staff, student, and parent training;
- health and safety protocols;
- PPE availability;
- social distancing requirements; and
- contact tracing procedures.

## Review of Internal Controls

DoD Instruction 5010.40 requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls.<sup>6</sup>

The DoDEA internal controls that we reviewed to ensure DoDEA schools implemented CDC and DoD guidance related to the spread of COVID-19 were effective; we identified no internal control weaknesses.

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<sup>6</sup> DoD Instruction 5010.40, "Managers' Internal Control Program Procedures," May 30, 2013.

## Finding

### **The DoD Education Activity Developed Guidance and Implemented Controls in Accordance With CDC and DoD Guidance in Response to the Coronavirus Disease–2019 Pandemic**

DoDEA developed and implemented controls in accordance with CDC and DoD guidance related to the spread of COVID-19. Specifically, DoDEA issued COVID-19 operational guidelines and the 15 individual DoDEA schools we reviewed implemented controls for:

- developing multiple COVID-19 mitigation strategies, such as social distancing, masks, and hand hygiene;
- communicating, educating, and reinforcing appropriate hygiene and social distancing practices (protective measures) in ways that are developmentally appropriate for students, teachers, and staff;
- maintaining healthy environments, such as cleaning and disinfecting frequently touched surfaces;
- developing a proactive plan for when a student or staff member tests positive for COVID-19; and
- educating parents and caregivers on the importance of monitoring for and responding to the symptoms of COVID-19 at home.

As a result, the 15 individual DoDEA schools provided staff, students, and parents information and training on effective hygiene, social distancing, cleaning, and identifying the signs of COVID-19 to reduce the risk of COVID-19 spread for students, teachers, and staff members.

### **DoD Education Activity Developed Return-to-School Guidelines in Accordance With CDC and DoD Guidance and Schools Implemented Controls**

DoDEA developed COVID-19 Operational Guidelines and Protocols for Schools based on CDC and DoD guidance. Using the COVID-19 Operational Guidelines and Protocols for Schools, the 15 individual DoDEA schools we reviewed implemented controls for:

- developing multiple mitigation strategies;
- communicating, educating, and reinforcing appropriate hygiene and social distancing practices (protective measures) in ways that were developmentally appropriate for students, teachers, and staff;



- maintaining healthy environments;
- developing a proactive plan for when a student or staff member tested positive for COVID-19; and
- educating parents and caregivers on the importance of monitoring for and responding to the symptoms of COVID-19 at home.

### ***DoDEA Implemented Multiple COVID-19 Mitigation Strategies***

DoDEA COVID-19 Operational Guidelines and Protocols for Schools contains the CDC and DoD guidance for implementing multiple COVID-19 mitigation strategies. Specifically, CDC guidance states that it is critical that school administrators implement multiple mitigation strategies, such as social distancing, hand hygiene, and cloth face coverings. DoD guidance states that individuals in the workplace will minimize close contact by maintaining 6 feet of separation and will mandate the use of cloth face coverings in situations where social distancing is difficult to maintain.

In accordance with CDC and DoD guidance, DoDEA COVID-19 Operational Guidelines and Protocols for Schools states that it is critical that administrators implement and enforce multiple mitigation strategies. Specifically, the Guidelines and Protocols require that social distancing of 6 feet or more will be maintained in DoDEA facilities to the greatest extent possible and that desks should be placed at least 6 feet apart and faced in the same direction, where feasible. The Guidelines and Protocols also state that DoDEA school staff members, contractors, and students will wear face coverings in all areas of a school campus. Appropriate and consistent use of cloth face coverings is most important when students, teachers, and staff are indoors and when social distancing of at least 6 feet is difficult to implement or maintain. These difficult areas include DoDEA school buses, at bus stops, or during off-campus school-sponsored activities, or when desk and office furniture cannot be spaced at least 6 feet apart. The Guidelines and Protocols require that DoDEA schools also provide handwashing, hand sanitizing, and disinfectant supplies and materials in sufficient quantities to meet school sanitization and disinfectant requirements.

The 15 DoDEA schools we reviewed implemented mitigation strategies that were aligned with CDC and DoD guidelines. Specifically, school officials implemented various mitigation strategies throughout the schools, such as rearranging classrooms and cafeterias to implement social distancing, providing hand-sanitizing stations throughout the schools, adjusting arrival and dismissal procedures, and adjusting traffic patterns in hallways and other common areas. In addition, all

15 schools we reviewed provided guidance on processing reasonable accommodation requests. Figure 2 demonstrates the multiple mitigation strategies implemented at DoDEA schools.



Figure 2. Implemented Mitigations at DoDEA Schools (Top Left: Socially Distanced Classroom at Irwin Intermediate School, Fort Bragg, North Carolina; Top Right: Hand Sanitizing Station at Humphreys Middle School, U.S. Army Garrison, Humphreys, Korea; and Bottom: Socially Distanced Hallway Traffic Pattern and Mask Reminder at Wiesbaden High School, U.S. Army Garrison, Wiesbaden, Germany) Source: DoDEA.

## ***Protective Measures Based on Federal Guidance Were Provided***

DoDEA COVID-19 Operational Guidelines and Protocols for Schools incorporated the CDC and DoD guidance to communicate, educate, and reinforce appropriate hygiene and social distancing practices. Specifically, CDC guidance states that regular communication with families, staff, and other partners should include an explanation of what parents, students, teachers, and staff can expect when returning to school and actions taken to prevent virus transmission in buses, school buildings, and facilities. DoD guidance states that DoD components must communicate to the workforce good health and hygiene habits in the workplace.

DoDEA COVID-19 Operational Guidelines and Protocols for Schools requires DoDEA schools to provide COVID-19 Health and Safety Guidelines and Protocols Orientation Training for all faculty, staff, substitutes, and students at the start of the school year and that the information is communicated to sponsors. The Guidelines and Protocols also state that schools should educate students on viruses, mode of transmission, signs of illness, protective measures, how to wear face coverings, and appropriate social skills encouraging minimal physical contact. School nurses and teachers should partner to develop and deliver this learning as a part of the standard start of school practice.

Additionally, DoDEA Headquarters developed a presentation for school officials to communicate COVID-19 protocols to students and staff. The presentation contained the following 12 topics and, when necessary, schools adjusted the slides to outline how specific COVID-19 protocols would be implemented at their school.

- Online Course Materials
- Cleaning and Personal Hygiene Supplies
- Custodial Cleaning
- Prescreening
- Face Coverings
- Personal Hygiene and Habits
- Classrooms and Related Areas
- Large Group Events
- Sending Students and Staff to Nurse
- School Medical Surveillance Protocols
- Returning After COVID-19 Illness
- Students transitioning to DoDEA Virtual School

To determine whether DoDEA trained and educated faculty, staff, and students in proper hygiene and social distancing practices, we submitted questionnaires and conducted interviews with the principals of the 15 schools in our sample.<sup>7</sup> The principals provided copies of training videos or presentations used to train administrators, faculty, staff, and students on appropriate COVID-19 protocols. For example, Marshall Elementary School used DoDEA Headquarters' training presentation to train personnel on COVID-19 procedures.

Based on our review, the 15 DoDEA schools in our sample communicated, educated, and reinforced appropriate hygiene and social distancing practices. Specifically, the schools provided training to administrators, faculty, staff, and students on COVID-19 operational guidelines and protocols, such as the proper use of PPE, hand washing and sanitizing procedures, and maintaining social distances throughout the school.

### ***Healthy Environments Were Maintained in the Schools***

DoDEA COVID-19 Operational Guidelines and Protocols for Schools contained the CDC and DoD guidance to provide DoDEA district and school leaders with guidelines and protocols for establishing and maintaining safe school environments that reduce the risk of COVID-19 spread. Specifically, CDC guidance states that it is critical that school administrators maintain healthy environments, such as cleaning and disinfecting frequently touched surfaces. DoD guidance states that workforce best practices include cleaning and disinfecting frequently touched surfaces and objects using regular household spray or wipes. DoD guidance also states that it is important to frequently clean and disinfect common touch points, including keyboards, laptops, and door handles.

In accordance with CDC and DoD guidance, DoDEA COVID-19 Operational Guidelines and Protocols for Schools states that the custodial staff will provide routine environmental cleaning of surfaces, such as floors, counters, desks, walls, and windows. Custodians should also disinfect frequently touched surfaces and objects. In addition, custodians will promptly clean and disinfect surfaces and objects that are visibly soiled with bodily fluids. The Guidelines and Protocols also state that occupants of the school should ensure the cleaning and disinfecting of commonly touched surfaces and objects between each use. This includes laptops, keyboards, lab equipment, and sports equipment. While custodians will disinfect desks daily outside of school hours, students should also disinfect their desks and other surfaces or objects after they use them. Teachers, staff, and aides are to ensure classroom surfaces and objects are disinfected throughout the day.

The 15 DoDEA schools we reviewed implemented controls to maintain healthy school environments. Specifically, schools obtained PPE, hand sanitizer and cleaning supplies, and placed hand-sanitizing stations throughout the schools.

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<sup>7</sup> See Appendix B for the questionnaire that was used.



For example, Humphreys West Elementary School officials stated that at the start of the school year each staff member was given a set number of consumable supplies (hand sanitizer, disinfectant wipes, sanitizing spray, and masks) and non-consumable supplies (floor mats, barriers, and posters).

In addition, school officials stated that they used an inventory spreadsheet to track supplies. The principals at the 15 DoDEA schools stated that their schools maintained sufficient quantities of PPE, hand sanitizer, and cleaning supplies. School officials stated that they reported their PPE inventory to their District who used the spreadsheets to track PPE inventory. We reviewed DoDEA's PPE inventory spreadsheet and determined that each school reported PPE, including hand sanitizer, wipes, gloves, gowns and masks on hand. Figure 3 shows the individual PPE and supply kits provided to staff members and hand sanitizing stations placed throughout the schools.



Figure 3. Cleaning Supplies and Sanitizing Stations (Top Left: PPE Caddies at Barkley Elementary School, Fort Campbell, Kentucky; Top Right: Sanitizing Wipe Station in a Classroom at Vicenza High School, U.S. Army Garrison, Vicenza, Italy; and Bottom: Hand Sanitizing Station at Yokota Middle School, Yokota Air Base, Japan)  
Source: DoDEA.

***Proactive Plans Were Developed for Students or Staff Members Who Tested Positive for COVID-19***

DoDEA COVID-19 Operational Guidelines and Protocols for Schools contained the CDC guidance on developing a proactive plan for when students or staff members test positive for COVID-19. Specifically, CDC guidance states that schools should be prepared for COVID-19 cases to occur in their facilities. Collaborating with local health officials will continue to be important once students return to school, as they can help support and maintain the health and wellbeing of students, teachers, and staff. In addition, CDC guidance states that having a plan in place for maintaining academic instruction is critical.

DoDEA COVID-19 Operational Guidelines and Protocols for Schools states that it is critical that all administrators coordinate with district, installation, and local health officials to develop a proactive plan for when a student or staff member tests positive for COVID-19. The Guidelines and Protocols provide specific steps for when there is a school positive COVID-19 case, regardless of the established HPCON level.

The principals at each school stated that they followed their school specific protocols for when an individual tested positive or was exposed to someone with COVID-19. For example, the Wiesbaden High school principal stated that she received a call at 0800 hours from the installation's Public Health office about a student who tested positive for COVID-19, and the office needed help with contact tracing. The school principal:

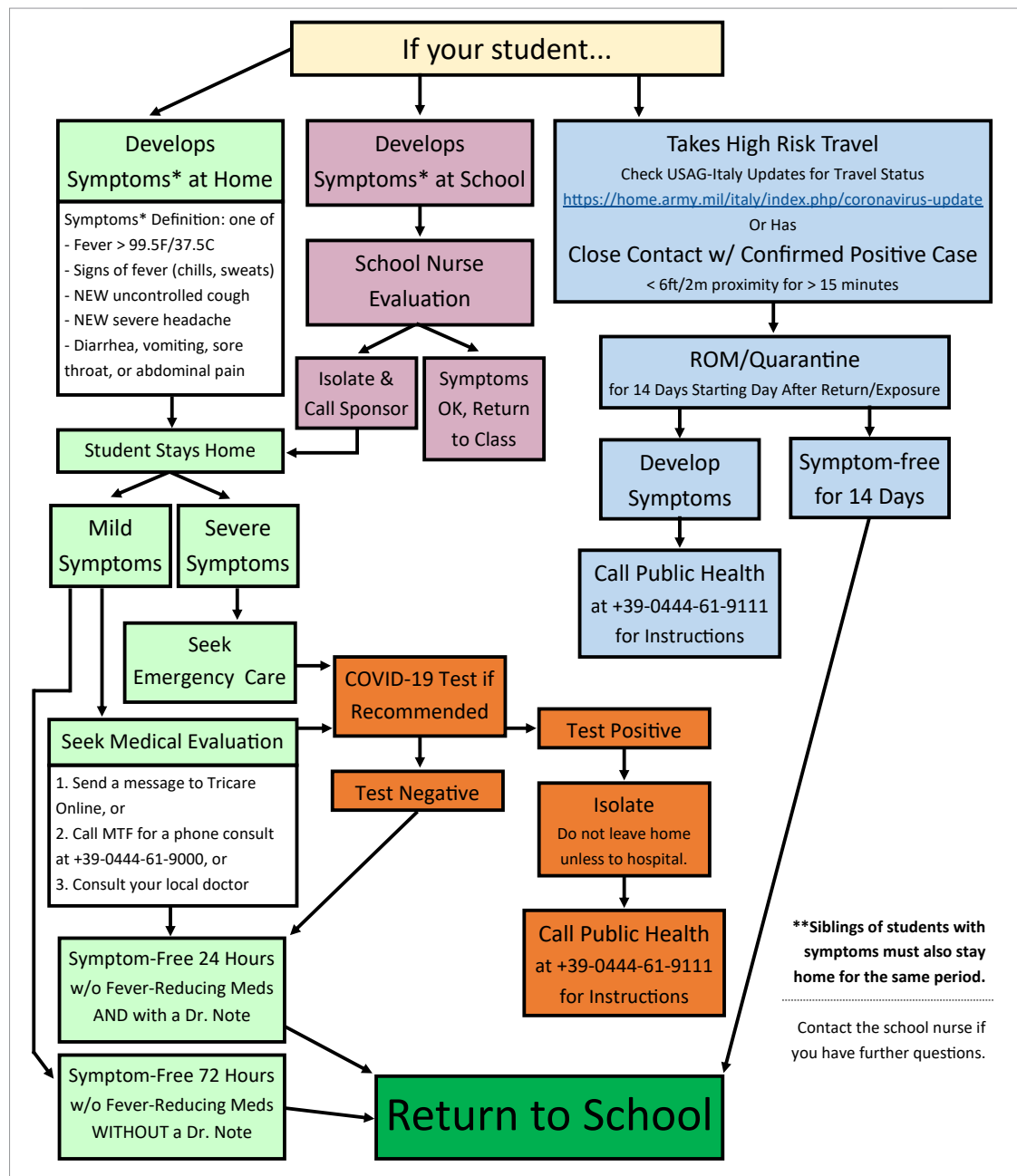
- requested all seating charts maintained by the school nurse,
- retrieved the student's schedule and attendance dates to determine potential exposure data,
- cross-referenced attendance records to seating charts for buses,
- isolated the COVID-19 positive student,
- notified the contact tracing team,
- notified parents of the process for contact tracing,
- provided exposure data to the contact tracing team, and
- quarantined the class and teachers for 14 days.

In addition, Quantico Middle and High School officials stated that a staff member came in contact with a suspected or confirmed case of COVID-19 and as a result, the school transitioned to a 2-week period of remote learning. Also, there were two faculty and six students that were symptomatic for COVID-19; therefore, they were required to quarantine for 14 days. School officials used their seating charts to conduct contact tracing to determine whether other faculty or students may have been exposed to COVID-19.

Based on our review, the 15 DoDEA schools in our sample established a course of action for when students or staff members test positive. Specifically, all 15 schools implemented steps including contact tracing, sanitizing contaminated spaces, and requiring negative COVID-19 tests before returning to school.

Figure 4 illustrates the protocols, of one of the DoDEA Europe schools, parents follow if a student develops COVID-19 symptoms at home, school, or from travel before being allowed to return to school.

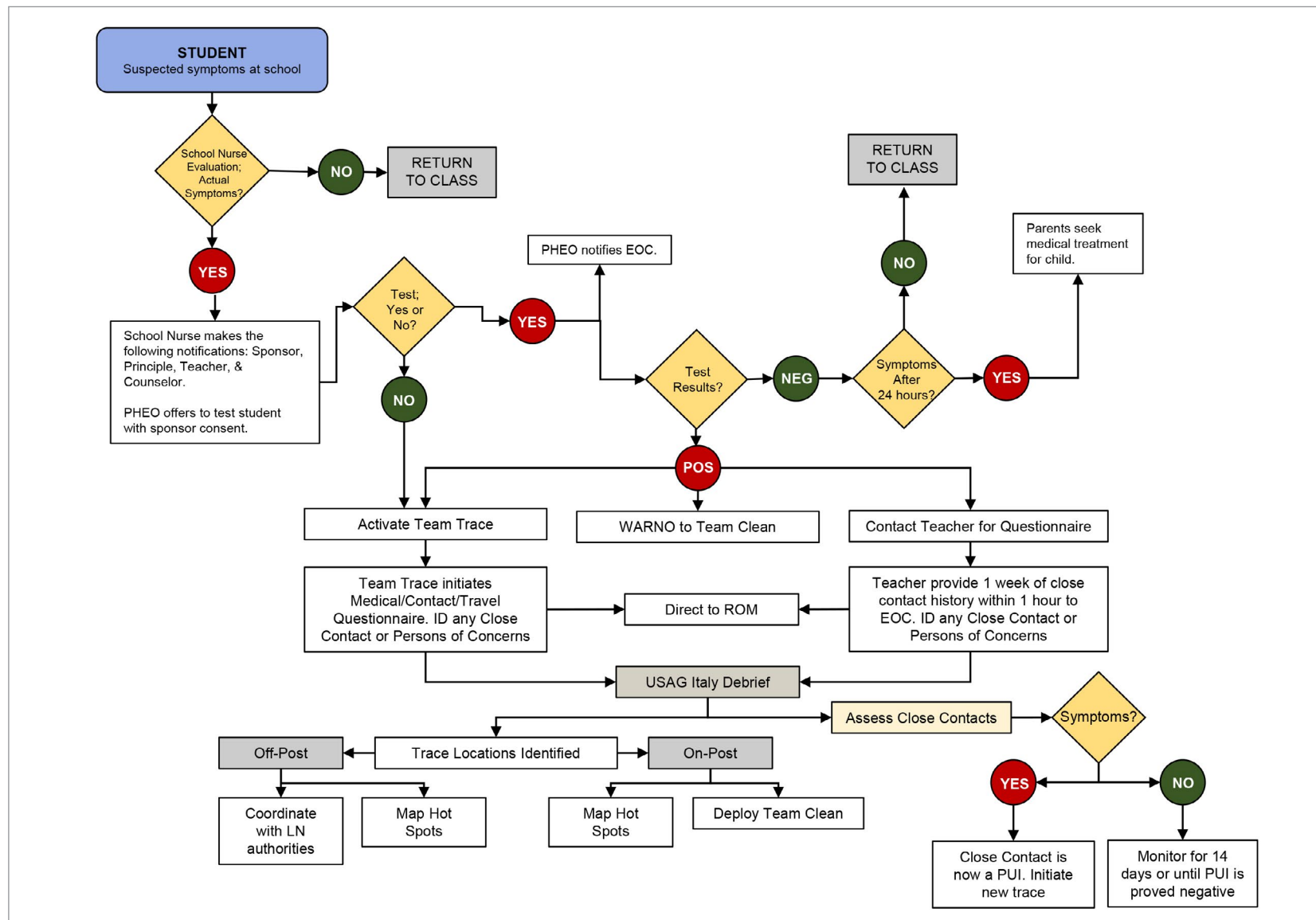
*Figure 4. COVID-19 Return-to-School Flowchart for Parents of Students at Vicenza High School, Italy*



Source: Vicenza High School.

In addition, Figure 5 illustrates a contact tracing “battle drill” (actions) for a COVID-19 positive DoDEA student that was conducted with the U.S. Army Garrison, Italy.

Figure 5. U.S. Army Garrison Italy's Contact Tracing Battle Drill for DoDEA Students



Source: Vicenza High School.

## ***Parents and Caregivers Were Educated on the Importance of Monitoring For and Responding to the Symptoms of COVID-19 at Home***

DoDEA COVID-19 Operational Guidelines and Protocols for Schools contains the CDC and DoD guidance on educating parents and caregivers on the importance of monitoring for and responding to symptoms of COVID-19 at home. Specifically, CDC guidance states that regular communication with families, staff should include actions that families and households can take to help prevent the spread of COVID-19. The CDC's screening methods include:

- taking the child's temperature prior to arriving at the facility;
- confirming that the child does not have shortness of breath or cough; and
- making a visual inspection of the child for signs of illness (flushed cheeks, rapid or difficulty breathing, fatigue, or extreme fussiness [lack of alertness]).

DoD guidance states that personnel exhibiting symptoms, such as fever, cough, or shortness of breath, should notify their supervisor and stay at home.

DoDEA COVID-19 Operational Guidelines and Protocols for Schools required employees and sponsors of enrolled students to perform prescreening protocols at home before departing for school or a school-sponsored activity. Home-based symptom screenings rely on individuals or sponsors and caregivers to initially identify when an individual may have signs and symptoms of illness and to take action, such as staying home or seeking an evaluation from a healthcare provider.

The principals at each of the 15 schools stated that staff and parents completed the DoDEA prescreening acknowledgment forms before the start of in-school learning.<sup>8</sup> We also identified other actions taken by school officials to conduct outreach with parents, students, and staff. For example, in August 2020, Ramstein Intermediate School conducted a virtual town hall to communicate COVID-19 return-to-school procedures to students and parents. The virtual town hall video was maintained on the school's social media page allowing students and parents to review the information.

Based on our review, the 15 DoDEA schools in our sample required staff and parents to complete prescreening acknowledgment forms before the start of school year 2020-2021, agreeing to conduct a pre-check each morning before entering the school. Prescreening acknowledgment forms include sections for identifying symptoms such as temperature, sore throat, cough, difficulty breathing, headache, and exposure to COVID-19.

<sup>8</sup> See Appendix C for the DoDEA prescreening acknowledgment form.

## Conclusion

DoDEA developed and implemented controls in accordance with the CDC and DoD guidance related to the spread of COVID-19. Specifically, DoDEA developed guidance in accordance with CDC and DoD protocols and the 15 individual DoDEA schools we reviewed implemented controls to reduce the spread of COVID-19.

## Management Comments

Although not required to comment, the DoDEA Director provided comments to acknowledge the audit. The Director highlighted the efforts taken by DoDEA personnel to prioritize health and safety, provide flexible and creative ways to educate students, and expand the DoDEA Virtual High School to provide educational services for all grade levels. For the full text of the Director's comments, see the Management Comments section of this report.



## Appendix A

### Scope and Methodology

We conducted this performance audit from October 2020 through September 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

To determine whether DoDEA schools developed and implemented controls in accordance with CDC and DoD guidelines, we conducted a nonstatistical sample of the 160 DoDEA schools. We used a random number generator to select a sample of DoDEA schools by region: DoDEA Americas, Europe and Pacific and by school type: elementary (primary), middle (intermediate), and high (secondary) schools.

We nonstatistically sampled the following 15 schools out of 160 schools from all three regions.

#### DoDEA Americas

- Irwin Intermediate School, Fort Bragg, North Carolina
- Barkley Elementary School, Fort Campbell, Kentucky
- Diamond Elementary School, Fort Stewart, Georgia
- Quantico Middle/High School, Quantico, Virginia
- Marshall Elementary School, Fort Campbell, Kentucky

#### DoDEA Europe

- Ramstein Intermediate School, Ramstein Air Base, Germany
- Wiesbaden High School, U.S. Army Garrison, Wiesbaden, Germany
- Kaiserslautern Elementary School, Kapaun Air Station, Germany
- Vicenza High School, U.S. Army Garrison, Vicenza, Italy
- Patch Middle School, U.S. Army Garrison, Stuttgart, Germany

#### DoDEA Pacific

- Nile C. Kinnick High School, Commander Fleet Activities, Yokosuka, Japan
- Humphreys Middle School, U.S. Army Garrison, Humphreys, Korea
- Humphreys West Elementary School, U.S. Army Garrison, Humphreys, Korea
- Joan K. Mendel Elementary School, Yokota Air Base, Japan
- Yokota Middle School, Yokota Air Base, Japan

## **Documentation Reviewed**

We provided DoDEA Headquarters with questionnaires and requested documentation from the Regions, Districts, and the 15 schools selected for review to determine whether DoDEA developed and implemented controls in accordance with CDC and DoD guidance. We obtained and reviewed the following documentation.

- CDC return-to-school guidance
- DoDEA Headquarters' return-to-school guidelines and protocols
- DoDEA Region, District, and school-specific return-to-school plans
- DoDEA COVID-19 School Readiness Reports/Assessments
- faculty, staff, student, and sponsor return-to-school training videos and briefing slides
- personal protective equipment and supply trackers
- reasonable accommodation form for employees
- signed prescreening acknowledgment forms for staff and students
- photographs of social distancing measures

We conducted telephone conferences with the following DoDEA organizations that have roles and responsibilities in developing and implementing controls in accordance with CDC and DoD guidance related to the spread of COVID-19.

- DoDEA Headquarters
- DoDEA Americas Regional/District Offices
- DoDEA Europe Regional/District Offices
- DoDEA Pacific Regional/District Offices

## **Internal Control Assessment and Compliance**

We assessed internal controls and compliance with laws and regulations necessary to satisfy the audit object. In particular, we assessed the control activities within DoDEA to determine whether DoDEA developed its guidance in accordance with CDC and DoD guidance. Control activities are actions that management establish through policies and procedures to achieve objectives. We found that DoDEA provided continuity of education for DoDEA students and for the operation of DoDEA schools through the guidance it developed in accordance with CDC and DoD guidance.

Additionally, we assessed the information and communications within DoDEA through its use of information to provide faculty, staff, substitutes, and students with COVID-19 training. Information and communication are actions management and personnel take to provide quality information. We found that DoDEA used relevant data from reliable sources and developed training that educated and informed the DoDEA community on COVID-19 operational guidelines and protocols. However, because our review was limited to these internal control components and underlying principles, our review may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

## **Use of Computer-Processed Data**

We did not use computer-processed data to perform this audit.

## **Use of Technical Assistance**

We received assistance from the Quantitative Methods Division to select a nonstatistical sample of DoDEA Schools.

## **Prior Coverage**

During the last 5 years, the DoD Office of Inspector General (DoD OIG) issued one report discussing Disinfection of DoD Facilities in response to COVID-19.

Report No. DODIG-2021-036, “Audit of Disinfection of Department of Defense Facilities in Response to the Coronavirus Disease–2019,” December 18, 2020

The DoD OIG determined that DoD and DoD contractor personnel disinfected, in accordance with CDC guidance, the areas that were previously occupied by individuals who tested positive for COVID-19.

## Appendix B

### Questionnaire to DoDEA Regions, Districts, and Selected DoDEA Schools

#### Request For Information to DoDEA Regions, Districts, and Selected DoDEA Schools

DoD Office of Inspector General  
Audit of the DoD Education Activity Controls Related to the Spread of Coronavirus Disease-2019  
Project No. D2021-D000RM-0021

For each of the following questions, we ask that you provide the name, position title, and office of the individual responding to each question. In addition, please provide documentation supporting your response.

#### DoDEA Regions/Districts

1. What are the roles and responsibilities of DoDEA Regions/Districts in regards to implementing COVID-19 guidelines and protocols across the regions/districts?
2. Have the regions/districts developed region/district-specific COVID-19 guidelines and protocols? If so, please provide documentation.
3. How do the regions/districts monitor the implementation of COVID-19 guidelines and protocols for individual schools?
4. What was the process for conducting readiness assessments related to COVID-19 prior to the start of school year 2020/21? For each school in our sample, please provide the results from the readiness assessments.
  - a. If there are any shortfalls identified within the readiness assessments, how were they addressed?
5. Please explain the tabletop exercises that were conducted prior to the start of school year 2020/21 related to COVID-19. For each school in our sample, please provide after action reports from each exercise.

#### DoDEA Schools Selected for Review

##### Return to School Plans

1. How were school-specific return to school plans developed in response to COVID-19 for school year 2020/21? For each school in our sample, please provide each return to school plan.
2. How do the schools ensure or monitor the implementation of DoDEA headquarters' guidelines and protocols?

##### Training

3. Please explain the COVID-19-related training provided to faculty, staff, substitutes, and students at the start of the school year. For each school in our sample, please provide copies of the training presentations/packets that were provided to faculty/staff/students.
  - a. How does the school document and track the training? For each school in our sample, please provide training records.

##### Health and Safety Protocols

4. How do the schools ensure sufficient quantities of essential supplies/materials (face coverings, hand sanitizer, disinfectant wipes, nurse PPE) are available?
5. How are social distancing measures implemented and monitored throughout the school? If available, please provide photographs demonstrating the implemented social distancing measures.

##### Facilities

6. How were the cleaning protocols at each school adjusted to address COVID-19 concerns? For each school in our sample, please provide the new protocols that were implemented to address COVID-19 concerns.
  - a. Who is responsible for monitoring cleaning protocols?

##### Staff and Students

7. What is the process for identifying and accommodating high risk staff and students?

Source: The DoD OIG.

## Appendix C

### DoDEA Home-based Screening Acknowledgment

#### Department of Defense Education Activity Home-based Screening Acknowledgment

**Sponsors and Caregivers:** Please complete this short check of your student each morning before they leave for school.

**Staff:** Please complete this short check of yourself each morning before you leave for work.

#### Section 1: Symptoms

If the individual has any of the following symptoms, they might have an illness they can spread to others (for those with chronic conditions, check a symptom only if it has changed from usual or baseline health):

- ☐ Temperature 100.4 degrees Fahrenheit or higher (or in accordance with host nation policy)
- ☐ Sore throat
- ☐ Cough (for those with chronic cough due to allergies or asthma, a change in their cough from baseline)
- ☐ Difficulty breathing (for those with asthma, a change from their baseline breathing)
- ☐ Diarrhea or vomiting
- ☐ New onset of severe headache, especially with a fever

#### Section 2: Exposure

A. Has the individual had close contact with someone with COVID-19 (within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period, regardless of whether the contact was wearing a mask)?

- ☐ Yes
- ☐ No

B. Has the individual traveled or arrived from an area where the local, territorial, or state health department is reporting large numbers of COVID-19 cases as described in the Community Mitigation Framework or in HPCON C or D?

- ☐ Yes
- ☐ No

→ If YES response to any part of Section 1 and NO to both parts of Section 2:

- The individual should stay home until his or her symptoms have improved, at least 24 hours after they no longer have a fever (temperature of 100.4 or higher or in accordance with host nation policy) or signs of a fever (chills, feeling very warm, flushed appearance, or sweating) without the use of fever-reducing medicine (e.g., acetaminophen or ibuprofen).

→ If YES response to any part of Section 1 and YES to any part of Section 2:

- Consult with healthcare provider.
- Consult with local public health officials for potential testing and evaluation as a possible close contact.
- Follow applicable public health or local installation quarantine, isolation, and Restriction of Movement (ROM) requirements.

→ If NO response to Section 1 and YES to any part of Section 2:

- Consult with local public health officials for potential testing and evaluation as a possible close contact.
- Follow applicable public health or local installation quarantine, isolation, and Restriction of Movement (ROM) requirements.

I have reviewed the DoDEA Home-based Screening Protocol and agree to conduct the prescreening daily prior to entering a DoDEA facility.

Student or Staff Name: \_\_\_\_\_

School Name or Office Location: \_\_\_\_\_

Student Sponsor or Staff Signature: \_\_\_\_\_

Date: \_\_\_\_\_

12.02.20

Source: DoDEA.

# Management Comments

## Department of Defense Education Activity



**DEPARTMENT OF DEFENSE EDUCATION ACTIVITY**  
**HEADQUARTERS**  
 4800 MARK CENTER DRIVE  
 ALEXANDRIA, VA 22350-1400

AUG 24 2021

MEMORANDUM FOR DEPARTMENT OF DEFENSE INSPECTOR GENERAL

SUBJECT: DoDEA Management Comments for DoD IG Draft Report, "Audit of Department of Defense Education Activity Controls Related to the Spread of Coronavirus Disease-2019" (Project No. D2021-D000RM-0021.000).

The Department of Defense Education Activity (DoDEA) submits the following response to the subject draft report. DoDEA has a 75-year tradition of achieving its mission despite extraordinary circumstances. The ongoing COVID-19 pandemic highlighted the remarkable dedication and resilience of DoDEA students, families, teachers, and administrators. By working together, believing in excellence, and always putting safety first, the activity provided continuity of education for over 65,000 students and 15,000 full and part-time employees in 11 host nations, seven states, Guam, and Puerto Rico during School Year (SY) 2020/21. In particular, DoDEA displayed excellence in providing and adhering to guidance, conducting virtual education, and responding to Health Protection Conditions (HPCONs).

To support schools as they prioritize the health and safety of their communities during SY 2020/21, DoDEA Headquarters published Ensuring a Safe and Healthy Return to School and versions one through five of the DoDEA COVID-19 Operational Guidelines and Protocols for Schools. The guidance contained in these documents directly aligned with the latest guidance and best practice from the Centers for Disease Control and Prevention (CDC), the Department of Defense (DoD), professional organizations, and other government agencies. The documents detailed guidance ranging from when to transition from in-person to remote learning and safety protocols for the prevention of disease spread to international travel guidance. DoDEA schools went above and beyond to adhere to the guidance and find creative ways to safely educate students within their own building, installation, and host-nation contexts. As a result, the DoDEA COVID-19 Cross Functional Team responsible for creating DoDEA's guidance won the prestigious Gears of Government Award for contributing to improved readiness and continuity of education for military families and communities.

During SY 2020/21, many students and staff had COVID-19 related health concerns. To address the concerns of students and families with health vulnerabilities, DoDEA expanded its existing virtual school from grades 9-12 to grades K-12. The DoDEA Virtual High School was originally designed to supplement the options provided at DoDEA brick and mortar high schools but was expanded to provide K-12 educational services as a temporary, emergency response to COVID-19. This type of expansion typically takes well over a year, but due to the extraordinary circumstances, DoDEA successfully launched a full K-12 school in just a few short months. To address the needs of those teachers with health vulnerabilities and experience in virtual learning, positions were offered within the virtual school as a reasonable accommodation. As a testament to the quality of this work and her leadership, the DoDEA Virtual School Principal, [REDACTED] was honored with the Spirit of Service Award recognizing the virtues of public service across the Department of Defense.

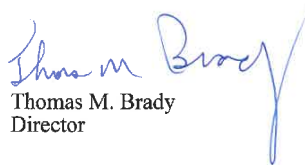


## Department of Defense Education Activity (cont'd)

DoDEA successfully navigated a wide variety of local contexts with different levels of community spread and host nation requirements. For SY 2020/21, school opening status was connected to the HPCONs assigned to each installation. As installations shifted between HPCON Bravo+ and Charlie, schools pivoted seamlessly between in-person and remote learning. DoDEA distributed 7,700 laptops and 250 hotspots to support remote learning in HPCON Charlie, and teachers established the routines necessary to prepare students for rapid changes. Teachers learned and taught students at all grade levels to use the learning management system and the new curricular software necessary to successfully conduct remote instruction. DoDEA also considered students' needs outside of the classroom and provided over 2,000,000 free lunches to students through its school meal program in partnership with the Department of Agriculture.

Due to the activity's hard work and mission focus, over 87% of DoDEA schools offered in-person instruction during the first semester of SY 2020/21 when only 24% of the 100 largest school districts in the United States made full in-person instruction available at the start of the year. By March of SY 2020/21, 99% of DoDEA schools offered in-person instruction. Further, the COVID-19 safety protocols instituted across the activity resulted in low levels of viral transmission in schools. The low infection rates coupled with DoDEA's ability to provide uninterrupted instruction serve as evidence of the efficacy of this plan and of DoDEA's unwavering commitment to the total force and the warfighter's mission readiness.

As a DoD activity, DoDEA provided excellent continuity of education and care for its communities during SY 2020/21. DoDEA appreciates the validation of its extraordinary effort and mission focus by the Inspector General team.

  
Thomas M. Brady  
Director

## Acronyms and Abbreviations

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<b>CARES</b>	Coronavirus Aid, Relief, and Economic Security
<b>CDC</b>	Centers for Disease Control and Prevention
<b>COVID-19</b>	Coronavirus Disease-2019
<b>DoDEA</b>	Department of Defense Education Activity
<b>HPCON</b>	Health Protection Condition
<b>K-12</b>	Kindergarten-12
<b>PPE</b>	Personnel Protective Equipment

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