



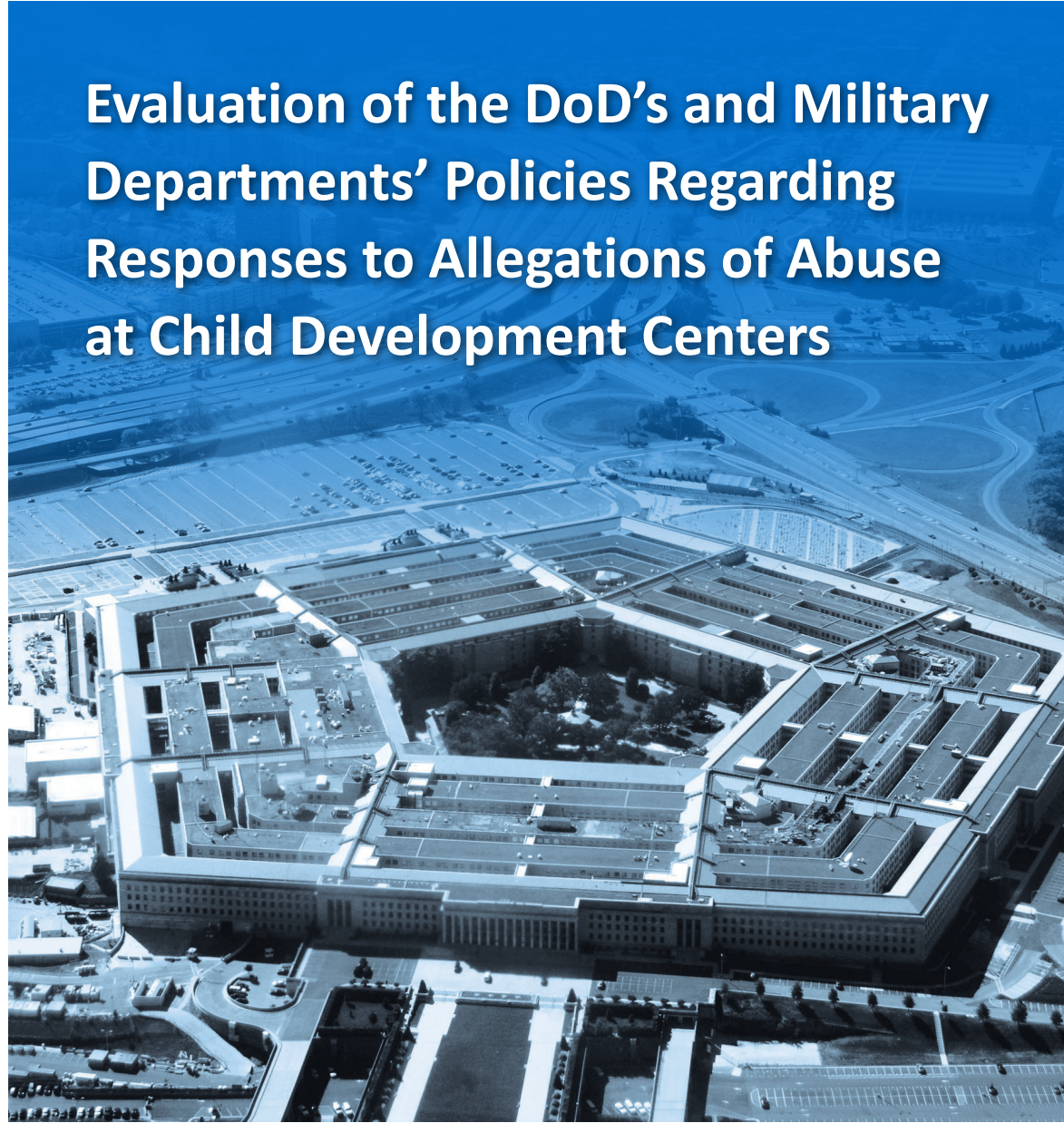
# Inspector General

*U.S. Department of Defense*

MAY 5, 2025



## Evaluation of the DoD's and Military Departments' Policies Regarding Responses to Allegations of Abuse at Child Development Centers



INDEPENDENCE ★ INTEGRITY ★ EXCELLENCE ★ TRANSPARENCY







# Results in Brief

## *Evaluation of the DoD's and Military Departments' Policies Regarding Responses to Allegations of Abuse at Child Development Centers*

May 5, 2025

### Objective

The objective of this evaluation was to assess the effectiveness with which the DoD and Military Departments developed policies and procedures for identifying and reporting allegations of child abuse at military-operated child development centers (CDCs). This is the first of two evaluations on CDCs. A subsequent evaluation will focus on the DoD's and Military Departments' implementation of policies to verify that child abuse allegations were appropriately addressed at select CDCs.

### Background

According to the DoD, its child development programs (CDPs) support the workforce and directly affect military force readiness, efficiency, and retention worldwide. Specifically, the DoD provides care to approximately 200,000 children of uniformed Service members and DoD civilians. To address Federal law related to child abuse prevention, the DoD issued various instructions, directives, and manuals. The DoD also established offices to oversee its CDPs.

The CDCs are a key element of the DoD CDP. Center- and community-based care, such as CDCs, primarily offer care to children from birth to 5 years of age but may also provide school-age care programs.

### Finding

The DoD has policies for CDPs, including CDCs, that address five of the six requirements in 10 U.S.C. § 1794, "Child Abuse Prevention and Safety at Facilities." However, the DoD policies do not require the Military Departments to have uniform processes for notifying parents of child abuse allegations at CDCs, as required by law. During the evaluation, the DoD issued a memorandum to require notification to parents or legal guardians of children allegedly abused or neglected no later than 24 hours after the child and youth program, including the CDC, is made aware of the allegation. However, the memorandum does not address how CDC staff should communicate and follow up with parents or what specific information should be shared. As a result, parents or legal guardians may not be aware of the specifics of the alleged abuse or neglect of their child, thereby limiting the potential actions they can take to address the allegation.

### Recommendations

We recommend that the Under Secretary of Defense for Personnel and Readiness: (1) revise and reissue policy requiring the Military Departments to follow a uniform process for identifying, reporting, and notifying parents of alleged child abuse and neglect across all DoD-sanctioned activities, including CDCs, and (2) maintain all notification documentation.

We also recommend that, when the revised DoD policy is issued, the Military Departments revise and reissue policy to align with the requirements established in the updated DoD policy requiring uniformity for parental or legal guardian notifications.



# Results in Brief

## *Evaluation of the DoD's and Military Departments' Policies Regarding Responses to Allegations of Abuse at Child Development Centers*

### Management Comments and Our Response

The Acting Under Secretary of Defense for Personnel and Readiness, and Army, Navy, and Marine Corps officials agreed with our recommendations; those recommendations are resolved but open. We will close the recommendations when we verify that management officials took the actions required to fully address the recommendations.

The Director of Air Force Policy and Resources did not respond to the recommendation in the report; therefore, the recommendation is unresolved. We request that the Director provide comments within 30 days in response to the final report to address uniformity for parental or legal guardian notifications.

Please see the Recommendations Table on the next page for the status of the recommendations.



## Recommendations Table

Management	Recommendations Unresolved	Recommendations Resolved	Recommendations Closed
Under Secretary of Defense for Personnel and Readiness	None	1.a, 1.b	None
Chief, Army Child and Youth Services	None	2.a	None
Deputy Chief, Naval Operations	None	2.b	None
Director, Air Force Policy and Resources	2.c	None	None
Director, Marine and Family Programs	None	2.d	None

Please provide Management Comments by June 4, 2025.

**Note:** The following categories are used to describe agency management’s comments to individual recommendations.

- **Unresolved** – Management has not agreed to implement the recommendation or has not proposed actions that will address the recommendation.
- **Resolved** – Management agreed to implement the recommendation or has proposed actions that will address the underlying finding that generated the recommendation.
- **Closed** – The DoD OIG verified that the agreed upon corrective actions were implemented.





**OFFICE OF INSPECTOR GENERAL**  
**DEPARTMENT OF DEFENSE**  
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May 5, 2025

**MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR PERSONNEL  
AND READINESS  
CHIEF, NATIONAL GUARD BUREAU  
AUDITOR GENERAL, DEPARTMENT OF THE ARMY  
AUDITOR GENERAL, DEPARTMENT OF THE NAVY  
AUDITOR GENERAL, DEPARTMENT OF THE AIR FORCE**

**SUBJECT:** Evaluation of the DoD's and Military Departments' Policies for Responding to Allegations of Abuse at Child Development Centers  
(Report No. DODIG-2025-094)

This final report provides the results of the DoD Office of Inspector General's evaluation. We previously provided copies of the draft report and requested written comments on the recommendations. We considered management's comments on the draft report when preparing the final report. These comments are included in the report.

The Acting Under Secretary of Defense for Personnel and Readiness; Deputy for Prevention, Resilience, and Readiness, responding for the Chief of Army Child and Youth Services; Chief of Naval Personnel, responding for the Deputy Chief of Naval Operations; and Acting Director for the Marine and Family Programs Division agreed to address the recommendations presented in the report; therefore, we consider the recommendations resolved and open. We will close the recommendations when management officials provide documentation showing that all agreed-on actions to implement the recommendation are complete.

Please provide us within 90 days your response concerning specific actions in process or completed on the resolved recommendations. Send your response to either [REDACTED] if unclassified or [REDACTED] if classified SECRET.

This report also contains a recommendation that is considered unresolved and open because the Director of Air Force Policy and Resources did not provide a response to the report. DoD Instruction 7650.03 requires that recommendations be resolved promptly. Therefore, we request that the Director of Air Force Policy and Resources provide us within 30 days their response concerning specific actions in process or alternative corrective actions proposed on the recommendation. Send your response to either [REDACTED] or [REDACTED] if classified SECRET.

If you have any questions, please contact [REDACTED]

*Bryan Clark*

Bryan T. Clark  
Assistant Inspector General for Evaluations  
Programs, Combatant Commands, and Operations



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# Introduction

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## Objective

The objective of this evaluation was to assess the effectiveness with which the DoD and Military Departments developed policies and procedures for identifying and reporting allegations of child abuse at military-operated child development centers (CDCs).

This is the first of two evaluations on CDCs. A subsequent evaluation will focus on the DoD's and Military Departments' implementation of the policies to verify that child abuse allegations were addressed and appropriately communicated at select CDCs.

## Background

According to the DoD, its child development programs (CDPs), which include on- and off-base childcare for military families, support the workforce and directly affect military force readiness, efficiency, and retention worldwide. As the largest employer-sponsored childcare program in the United States, the DoD provides care to approximately 200,000 children of uniformed Service members and DoD civilians.

DoD CDPs are childcare services for minor children (birth through 12 years of age) of individuals who are eligible for full- and part-day care, available during standard work hours. This report focuses on CDCs, which primarily offer care to children from birth to 5 years of age but may also provide school-age care programs. School-age care is either facility- or home-based care for children attending kindergarten or ages 6 to 12 who require supervision before and after school or during duty hours, school holidays, or school closures.

The DoD requires the Military Departments to ensure that procedures and guidelines for the child and youth programs (CYPs), which include CDCs, are developed and implemented for their respective Components.<sup>1</sup>

## ***DoD Child Development Programs***

DoD Instruction (DoDI) 6060.02, "Child Development Programs (CDPs)," assigns responsibilities and prescribes procedures for providing childcare to minor children of individuals who are eligible for care at DoD-sanctioned CDPs.<sup>2</sup>

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<sup>1</sup> DoDI 6060.02, "Child Development Programs (CDPs)," August 5, 2014, establishes CYPs at locations where military families live on or off an installation.

<sup>2</sup> DoDI 6060.02 defines a CDP as childcare for children of DoD personnel from birth through 12 years of age.

DoDI 6060.02 provides specific policy on the responsibilities and procedures for the DoD Component CDPs, including CDC- and community-based care, family childcare, school-age care, and supplemental childcare facilities.<sup>3</sup>

### ***The DoD Family Advocacy Program***

DoDI 6400.01, “Family Advocacy Program,” establishes the DoD Family Advocacy Program (FAP).<sup>4</sup> The FAP was designed to address prevention, identification, evaluation, treatment, rehabilitation, follow-up, and reporting of child abuse and neglect, domestic abuse, and problematic sexual behavior in children and youth. The FAP is in the Military Community Advocacy Directorate under the Office of the Under Secretary of Defense for Personnel and Readiness (OUSD[P&R]), which provides policy, direction, and oversight to the FAP across the DoD. The Military Community Advocacy Directorate is responsible for collaborating with DoD Component heads to establish programs and guidance to implement the FAP.

### ***The DoD Family Advocacy Command Assistance Team***

DoDI 6400.03, “Family Advocacy Command Assistance Team (FACAT),” establishes the Family Advocacy Command Assistance Team (FACAT) capability to support a DoD Component’s or installation commander’s request to investigate, assess, and manage coordination following the report of a multi-victim allegation of child sexual abuse occurring in a DoD-sanctioned activity.<sup>5</sup> A FACAT is provided when additional personnel or resources are needed and consists of a multidisciplinary team of specially trained and experienced individuals who are responsible for providing advice and assistance on cases of child sexual abuse that involve DoD-sanctioned activities.<sup>6</sup>

An installation commander may request a FACAT when alleged child sexual abuse by a care provider in a DoD-sanctioned activity is reported or when additional personnel are needed to assist in the investigation, provide supportive treatment, or assess the needs of child victims and their families.

### ***Military Department Child Development Programs***

To address DoD requirements, each Military Department issued policy and guidance and established offices to perform duties, actions, and oversight of Service CDPs.

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<sup>3</sup> Family childcare is available to children from infancy through 12 years of age and is provided in government housing or state licensed and regulated homes in the community. School-age care may be offered in CDCs and other installation facilities, such as youth centers and schools.

<sup>4</sup> DoDI 6400.01, “Family Advocacy Program (FAP),” May 1, 2019.

<sup>5</sup> DoDI 6400.03, “Family Advocacy Command Assistance Team (FACAT),” April 25, 2014.

<sup>6</sup> A DoD-sanctioned activity is a governmental or nongovernmental activity authorized by DoD officials to perform childcare or supervisory functions on DoD-controlled property, including CDCs, at DoD dependents’ school youth activities, in school-age and latch key programs, at family day care providers, and at childcare activities.



## ***Department of the Army***

The Army issued policy and guidance that address DoD-required duties, actions, and oversight of CDPs.

### ***Army Family Advocacy Program***

Army Regulation 608-18, “The Army Family Advocacy Program,” establishes policies for handling spouse and child abuse in the Army, including protection, treatment, and trained personnel for intervention.<sup>7</sup> The regulation also assigns the FAP responsibility to administer policy and procedures.

### ***Army Child and Youth Services***

Army Installation Management Command (IMCOM) Regulation 608-10-1, “Personnel Affairs, IMCOM, G9, Family Morale, Welfare, and Recreation Child and Youth Services (CYS),” establishes policies, responsibilities, processes, and procedures to prevent risk in child and youth services (CYS) provided by the Army.<sup>8</sup>

## ***Department of the Navy***

The Navy and Marine Corps issued policy and guidance that address DoD-required duties, actions, and oversight of CDPs.

### ***Navy Family Advocacy Program***

Navy Instruction 1752.2C, “Navy Family Advocacy Program,” establishes policies to help prevent domestic and child abuse throughout the Navy, provide support to victims, hold abusers appropriately accountable, and define the FAP.<sup>9</sup>

### ***Navy Child Abuse Prevention, Education, and Reporting Standard***

The Navy’s Child Abuse Prevention, Education, and Reporting (CAPER) standard, issued in July 2024, establishes standard operating procedures for all CAPER-related requirements. The standard also describes the roles, responsibilities, and operational requirements for CAPER and the best practices and strategies that support effective implementation.

### ***Marine Corps Family Advocacy Program***

Marine Corps Order 1754.11A, “Marine Corps Family Advocacy Program,” establishes the commander’s responsibility to prevent and respond to child and domestic abuse and problematic sexual behavior in children and youth.<sup>10</sup>

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<sup>7</sup> Army Regulation 608-18, “The Army Family Advocacy Program,” September 13, 2011.

<sup>8</sup> IMCOM Regulation 608-10-1, “Personnel Affairs, IMCOM, G9, Family Morale, Welfare, and Recreation Child and Youth (CYS),” February 28, 2023.

<sup>9</sup> Navy Instruction 1752.2C, “Navy Family Advocacy Program,” May 20, 2020.

<sup>10</sup> Marine Corps Order 1754.11A, “Marine Corps Family Advocacy Program,” April 8, 2021.

***Marine Corps Child and Youth Programs***

Marine Corps Order 1710.30, “Marine Corps Child and Youth Programs,” establishes policies and procedural guidance for effectively executing the CYPs and standardizes childcare and youth programs across the Marine Corps.<sup>11</sup>

***Department of the Air Force***

The Department of the Air Force issued policy and guidance that address DoD-required duties, actions, and oversight of CDPs.

***Department of the Air Force Family Advocacy Program***

Department of the Air Force Instruction (DAFI) 40-301, “Family Advocacy Program,” establishes reporting procedure requirements for allegations of child abuse or neglect and notification requirements to report all known or suspected incidents of credible maltreatment.<sup>12</sup>

***Department of the Air Force Child and Youth Programs***

DAFI 34-144, “Child & Youth Programs,” establishes requirements for planning and implementing CYPs for all active installations.<sup>13</sup> The policy provides directive guidance, authority, and criteria for establishing Air Force CYPs.

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<sup>11</sup> Marine Corps Order 1710.30, “Marine Corps Child and Youth Programs,” August 5, 2015.

<sup>12</sup> DAFI 40-301, “Family Advocacy Program,” November 13, 2020 (Incorporating Change October 9, 2024).

<sup>13</sup> DAFI 34-144, “Child & Youth Programs,” October 2, 2024.

## Finding

### **The DoD and Military Departments Need Uniform Processes for Identifying and Reporting Child Abuse Allegations at Military Child Development Centers**

The DoD has policies for CDPs, including CDCs, that address five of the six requirements in 10 U.S.C. § 1794, “Child Abuse Prevention and Safety at Facilities.” However, the DoD policies do not require the Military Departments to have uniform processes for notifying parents of child abuse allegations at CDCs, as required by law. During the evaluation, the DoD updated policy to require notification to parents or legal guardians of children allegedly abused or neglected no later than 24 hours after the CYP is made aware of the allegation. However, the updated DoD policy does not address how the CDC staff should communicate and follow up with parents. As a result, parents or legal guardians may not be aware of the specifics of the alleged abuse or neglect of their child, thereby limiting the potential actions they can take to address the allegation.

### **The DoD Developed Policies That Fully Address Five of the Six Requirements for Child Development Programs**

The DoD developed policies that fully address five of the six requirements for CDPs. Representatives from the OUSD(P&R) identified DoD-wide policies that collectively cover five of the six requirements in 10 U.S.C. § 1794.

### ***Federal Law for Preventing, Responding to, and Reporting Child Abuse at Military Childcare Facilities***

Title 10 U.S.C. § 1794 outlines requirements for the DoD to respond to allegations of widespread child abuse at a military installation. Specifically, section 1794 directs the Secretary of Defense to perform the following six actions.

- Maintain a child abuse task force to respond to allegations of widespread child abuse at a military installation. The task force will be composed of personnel from medicine, psychology, and childhood development. In the event of an allegation, the task force will help the installation commander and parents at the installation deal with the allegation.
- Maintain a national telephone hotline to report suspected child abuse or safety violations at a military CDC or family home day care site. The Secretary will ensure that these reports can be made anonymously.



The Secretary will also establish procedures for following up on complaints and information received over the hotline, as well as publicize the telephone number.

- Prescribe regulations requiring that, in a case of allegations of child abuse at a military CDC or family home day care site, the military installation commander or head of the task force seek the assistance of local child protective authorities if available.
- Prescribe regulations on safety and operating procedures at military CDCs. Those regulations will apply uniformly across the Military Departments.
- Require that each military CDC be inspected no less than four times a year. Each inspection will be unannounced. A representative of the installation the center serves will conduct at least one inspection a year, and a representative of the major command under which that installation operates will also conduct one inspection a year.
- With applicable exceptions, immediately remedy any violation of a safety, health, or child welfare law or regulation at a military CDC.

We reviewed DoDI 6060.02; DoDI 6400.01; DoDI 6400.03; DoD Manual 6400.01, Volume 1, “Family Advocacy Program;” and other DoD policies, regulations, and guidance to determine compliance with 10 U.S.C. § 1794 requirements.<sup>14</sup> Table 1 compares the six Federal law requirements and the corresponding DoD policies.

Table 1. Comparison of 10 U.S.C. § 1794 Requirements and DoD Policy

10 U.S.C. § 1794 Requirement	DoD Policy Addressing the Requirement	DoD Policy Guidance
1. Maintain a Child Abuse Task Force	DoDI 6400.03	Deploy the FACAT to assist the Military Departments in addressing allegations of extrafamilial child sexual abuse in DoD-sanctioned activities.
	DoD FACAT Handbook	Provide guidance to individuals involved in the response to extrafamilial child sexual abuse in DoD-sanctioned activities at the Office of the Secretary of Defense, Service headquarters, and military installation levels.
2. Maintain a National Hotline	DoDI 6060.02	Display the DoD Child Abuse and Safety Hotline telephone number in a highly visible area where parents or legal guardians can see it. The telephone number should be published in parent handbooks and other brochures.
	DoDM 6400.01, Volume 1	Provide 24/7 support to families in crisis through hotlines and crisis lines (Program Standard 56: Components of Public Awareness Activities).

<sup>14</sup> DoD Manual 6400.01, Volume 1, “Family Advocacy Program (FAP): FAP Standards,” July 22, 2019. Appendix A lists the other DoD policies, regulations, and guidance.

Table 1. Comparison of 10 U.S.C. § 1794 Requirements and DoD Policy (cont'd)

10 U.S.C. § 1794 Requirement	DoD Policy Addressing the Requirement	DoD Policy Guidance
3. Prescribe Regulations for Seeking Assistance from Local Authorities	DoDI 6400.03	Deploy a FACAT at the request of the DoD Component head without a request from the installation commander, including when significant issues arise between the Military Departments or DoD and other Federal agencies or civilian authorities when responding to allegations.
	DoDI 6400.01	Develop local memorandums of understanding with civilian agencies and organizations for reporting cases, providing services, and defining responsibilities when responding to child abuse and neglect, domestic abuse, and problematic sexual behavior in children and youth.
	DoDM 6400.01, Volume 1	Develop, sign, and implement formal memorandums of understanding among and between military activities, civilian authorities, and agencies to address child abuse and domestic abuse. The FAP coordinates with the appropriate law enforcement agencies. (Program Standard 3: Monitoring Coordinated Community Response and Risk Management Plan).
	DoDM 6400.01, Volume 4	Develop agreements among military installations of different Military Departments and local government activities.
	FACAT Handbook	Coordinate with military and civilian authorities, such as child protective, Military Department, FBI, local law enforcement, local treatment providers, and host nation authorities and agencies.
4. Prescribe Safety Regulations*	DoDI 6060.02	Implement the minimum safety regulations for installation-based CDCs and school-age care programs, guidance for discipline and touch policy at CDCs, background checks, and child abuse reporting requirements and procedures for CDC staff and providers.
5. Require Inspections	DoDI 6060.02	Apply minimum operational standards for installation-based CDCs and school-age care programs to receive the DoD Certificate to Operate, and require heads of the DoD Components to establish and implement guidance and monitor compliance through regular CDP inspections.
	DoDM 6400.01, Volume 1	Implement procedural quality assurance standard requirements for FAP accreditation, inspections, certification reviews, and any corresponding corrective action plans.
6. Remedy Violations	DoDI 6060.02	Immediately remedy any life-threatening violation discovered at an inspection or otherwise.

\*As discussed in the report, DoDI 6060.02 does not fully address safety regulations because it does not establish a uniform process for parental notification.

#### LEGEND

**DoDM** DoD Manual

Source: The DoD OIG, based on evidence from the OUSD(P&R).

## Existing DoD Policies Do Not Establish a Uniform Process for Parental Notification

Although the DoD developed policies for CDPs that address five of the six requirements in 10 U.S.C. § 1794, the existing DoD policies do not establish a uniform process for notifying parents of child abuse allegations at CDCs. The safety regulation requirement of 10 U.S.C. § 1794 states that the “Secretary of Defense shall prescribe regulations on safety and operating procedures at military child development centers. Those regulations shall apply uniformly among the military departments.”

However, DoDI 6060.02 does not require a uniform process in the policy for parental notification of child abuse allegations. Rather, DoDI 6060.02 states that CDPs must have standard operating procedures for reporting cases of suspected child abuse and neglect. The instruction further requires that parents or legal guardians be informed of the child abuse prevention, identification, and reporting requirements. DoDI 6060.02 also states that incidents, including individual medical problems and accidents, should be recorded and reported to management staff and families, and a written record of the problem or accident will be maintained.

Existing DoD policies do not provide uniform requirements for the Military Departments that include guidance on parental notification timeframes, methods of communication, specific content and information to provide, or the management of parental notification files, as required by the safety regulation requirement of 10 U.S.C. § 1794. Therefore, the DoD cannot track, manage, or determine whether parents or legal guardians receive consistent and timely notifications of child abuse allegations.

### ***The Military Departments Do Not Have Uniform Parental Notification Requirements***

Although the Military Departments are compliant with overarching DoD policy, we found that their policies on how to communicate with parents or legal guardians and the specific content and information to provide to parents regarding alleged and suspected child abuse and neglect are not uniform. Parental notification timeframes are also inconsistent in the policies. For example, the Army, Air Force, and Marine Corps do not have a set timeframe for notifications while the Navy requires a verbal notification within 24 hours. Table 2 illustrates the parental notification requirement by Service.

Table 2. Summary of Parental Notification Timeframe Requirements (by Service)

Service	Parental Notification Requirement	Policy or Guidance
Army <sup>1</sup>	No specific timeframe	Army IMCOM Regulation 608-10-1
Navy	Verbal notification within 24 hours and written notification within 48 hours	Navy CYP Operating Manual
Air Force and Space Force	No specific timeframe	DAFI 40-301
Marine Corps	No specific timeframe	Navy Marine Corps 1710.2 <sup>2</sup>

<sup>1</sup> Army policy also covers Army National Guard CDCs.

<sup>2</sup> Navy Marine Corps 1710.2, "Child and Youth Programs (CYP) Child Abuse Prevention, Education, and Reporting (CAPER) Protocol," December 17, 2024.

Source: The DoD OIG.

### ***Department of the Army Parental Notification Policy***

Army IMCOM Regulation 608-10-1 requires parental notifications for reporting child abuse and problematic sexual behavior at CDCs. According to Army FAP CYS representatives, parents are immediately notified within 24 hours of any alleged or suspected incidents, including child abuse at CDCs, in accordance with Army IMCOM 608-10-1. Army IMCOM Regulation 608-10 states that the center coordinator and director will be "readily available to talk to parents" when an investigation is initiated because of allegations of child abuse. Additionally, the regulation requires CYS management to ensure that parents receive "pertinent and immediate information relating to any incident or condition related to the care of their children or youth."

The regulation further states that all child abuse and neglect allegations involving CYP personnel or volunteers must be reported using the Report of Unusual Incidents form within 1 business day, with weekly follow-up reports submitted through the designated automated tool. The follow-up reports should continue until the Army investigating entity makes a final determination of the incident. However, the regulation does not provide guidance or a requirement that details how often and the methods through which parents or legal guardians are provided updates of the child abuse allegations after the initial notification. This includes maintaining parental notification files.

Army IMCOM 608-10-1 also requires CYS personnel to use “any official means available (such as government phone, SMS text message, flyers, accident or incident reports),” to notify parents of:

- any injury or illness that requires, or appears to require, medical attention, including incidents such as a minor injury, biting, or significant behavior changes involving their child;
- communicable diseases;
- change in personnel or procedures;
- any incident resulting in lost accountability of their child; and
- installation emergencies, such as lockdowns.

According to Army CYS representatives, Army IMCOM 608-10-1 is being revised with updates that include parental notifications with written incident reports for child abuse or neglect allegations. The updates will also be included in a republication of the CYS Standards of Conduct and Accountability Standard Operating Procedures. However, the CYS representatives stated that they do not have an estimated completion date for the regulation update because of the extensive rewrite process.

### ***Department of the Navy Parental Notification Policy***

#### ***Navy***

The Navy’s CYP operating manual, “CAPER Standard,” requires parental notification for child maltreatment, including physical, sexual, psychological, or emotional child abuse. Notification to the parent is required within 24 hours of the incident, either in person or verbally by telephone. Written parental notification is required within 48 hours of the incident. The CYP operating manual includes guidance that parental notification must include:

- the general nature of the allegation,
- assurance of safety,
- the investigation process,
- support and communication, and
- confidentiality.

Although written notification is required, the July 2024 CAPER does not require use of a specific form. The CAPER has examples of written memorandums, but CDCs are not specifically required to use this method. Additionally, the CYP operating manual does not explicitly state if a follow-up with parents or legal guardians should occur or how to maintain documentation of the parental notification.

***Marine Corps***

The CAPER protocol requires CDC staff to notify parents of incidents of alleged child abuse or neglect. CDC staff must also complete a Marine Corps CYP Incident Report, which also has a section to identify the method of communication for parental notification, including what time the notification took place. The incident report also requires documenting if the parent was advised to take the child for medical treatment or if 911 was called.

However, neither the CAPER nor the Marine Corps incident report form has a specific timeframe requirement for parental notification of child abuse and neglect allegations. According to Marine Corps CYP officials, the Marine Corps updated Navy Marine Corps Order 1710.2 on December 17, 2024, instructing CYPs to notify families within 24 hours. The revised language states, “For alleged or suspected institutional child abuse, the CYP Director completes the following items: Notify parents of an affected child or children as soon as possible and within 24 hours of the Director becoming aware of the suspected incident.”

Although the language was updated to contain a specific timeframe for parental notification, the policy does not provide procedures for notifying parents. Marine Corps CYP officials stated that they do not tell the installations how to provide communication but that it needs to be completed as soon as possible and within 24 hours. The officials further explained that they anticipate that the programs have their own standard operating procedure for providing communication. Marine Corps CYP officials also stated that traditionally, parental notifications start with a phone notification and then follow up with a written notification when they pick up their child from the program.

In addition, the Marine Corps does not provide guidance on how often and by what means parents are provided updates of child abuse allegations after the initial notification. Additionally, the policy does not state how to maintain documentation of parental notification.

***Department of the Air Force Parental Notification Policy***

DAFI 34-144 requires the CDC director to notify parents or legal guardians of any allegations involving a lapse of accountability, inappropriate guidance or touch, problematic sexual behaviors, or suspected child abuse or neglect. However, the instruction does not identify timeframe requirements for parental notification.



DAFI 40-301 specifies notification timeframes for Department of the Air Force leadership, the FAP, FAP Incident Management Teams, and domestic abuse advocates. When FAPs receive notification of an allegation of abuse, the FAP conducts and presents a comprehensive assessment to a Central Registry Board to determine if a maltreatment incident “meets criteria.”

Recent updates to DAFI 40-301 require the FAP to ensure that the unit commander, alleged abuser, and the parent of the victim receive notification of incident status determinations. The FAP is also required to notify DoD Education Activity and CYP leadership when the alleged abuse or neglect occurred at their facility or involved their personnel.

Additionally, we found that neither DAFI 34-144 nor 40-301 explicitly states if a follow-up with parents or legal guardians should occur or how to maintain documentation of the parental notification.

According to Department of the Air Force CYP officials, DAFI 34-144 is under revision to specify that CDC staff must notify parents or guardians within 24 hours after an allegation of child abuse or neglect involving their child. The CDC staff have no estimated date of completion.

### ***DoD Officials Recognized the Need for Updating Parental Notification Policy***

During a meeting with OUSD(P&R) officials on July 31, 2024, and February 24, 2025, the officials stated that they were aware of a gap in policy for parental notification requirements. Specifically, the officials stated that they were aware that current DoD policy does not address a uniform process for identifying, reporting, and notifying parents and legal guardians of child abuse allegations. However, the officials also stated that they were not aware of why specific details for reporting were not originally included in the DoD policy because they were not at the OUSD(P&R) when the policy was created.

### **The DoD’s Lack of a Uniform Process Could Jeopardize Notifications of Child Abuse Allegations to Parents or Legal Guardians**

Without a uniform process in DoD policy that specifically responds to all Federal law requirements, parents or legal guardians may not be aware of the specifics of the alleged abuse or neglect of their child, thereby limiting the potential actions they can take to address the allegation.

## Other Matters of Interest

### ***DoD Actions Taken to Address a Uniform Process for Parental Notification Timeframe***

During the evaluation, we briefed OUSD(P&R) officials on our preliminary conclusions and recommendations so they could take actions to address policies and procedures for child abuse allegations at CDCs. In July 2024, OUSD(P&R) officials stated that they were drafting a memorandum that would require CDP staff to notify the parents or legal guardians of children and youth who are affected by an allegation of child abuse and neglect no later than 24 hours after CDP staff are made aware of the allegation. Subsequently, the Deputy Secretary of Defense issued the memorandum on December 18, 2024, addressing the parental or legal guardian notification timeframe.<sup>15</sup>

However, although the updated policy includes a timeframe of 24 hours for parental notifications, it does not provide the Military Departments with a uniform process to communicate notifications. Specifically, the December 18, 2024 memorandum does not include methods of communication, the type of information to provide to parents, how often to provide updates, or the methods for tracking and managing parental notifications. Because the DoD does not have a requirement for a uniform process to notify parents or legal guardians of child abuse allegations, the Military Departments currently provide parents or legal guardians varying levels of information about the allegations. Although the OUSD(P&R) began to take actions to address our recommendations, the actions are not complete.

### ***The Military Departments Complied with DoD Policy for Child Development Centers***

We also reviewed Department-specific policies and guidance to ensure compliance with DoD policies related to CDCs and found that the Military Departments complied. See Appendix A for a list of the specific policies, regulations, and guidance we reviewed.

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<sup>15</sup> Deputy Secretary of Defense Memorandum, "Allegations of Child Abuse and Neglect in Department Child and Youth Programs," December 18, 2024.

### ***Department of the Army CDC Policy Complies with Applicable DoD Policy***

The Army has policies and guidance that fully address DoD requirements for CDCs.<sup>16</sup> Specifically, the Department of the Army issued the following regulations.

- Army Regulation 608-10—establishes policy and procedures for operating Army CDCs, family child care, and other supplemental programs and services, including FACAT assistance. This regulation requires the Army to conduct an annual internal review and evaluation process at CDCs. This is to ensure compliance with DoD and Army standards and application of regulatory and policy guidance in all child development service delivery systems.
- Army Regulation 608-18—establishes policy on FAP responsibility, as well as the prevention, identification, reporting, investigation, and treatment of child abuse. In accordance with DoDI 6400.03, the Army established a multidisciplinary Family Advocacy Regional Rapid Response Team of specially trained social workers, criminal investigators, and pediatricians who can deploy to installations within 48 hours after notification to assist with child abuse investigations.

### ***Department of the Navy CDC Policy Complies with Applicable DoD Policy***

The Navy and Marine Corps have policies and guidance that fully address DoD requirements for CDCs. Specifically, the Department of the Navy issued the following guidance.

- Chief of Naval Operations Instruction (OPNAVINST) 1700.18—establishes and describes CDPs, inspections, and the FACAT. In accordance with DoDI 6400.01, the Navy instruction includes procedures to assist the Family Advocacy Committee in developing and implementing memorandums of understanding with local community providers.
- Navy CYP Manual, July 2024—establishes and describes the guideline's safety regulations, remedies for violations, and notification responsibility. In accordance with DoDI 6060.02, the CYP Manual outlines safety standards and describes classroom and program observation requirements to provide oversight and ensure child safety.
- Marine Corps Order 1754.11A—establishes FAP roles and responsibilities, FACAT use, and safety resource availability. In accordance with DoDI 6400.03, the order establishes the installation commander, who may request a FACAT in cases of child sexual abuse that involve DoD-sanctioned activities.

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<sup>16</sup> The National Guard CDCs follow Army CDC policies and guidance.

- Marine Corps Order 1710.30—establishes CYP responsibility and outlines policies, procedures, priorities, and management responsibilities. In accordance with DoDI 6060.02, the order establishes the installation commander, who ensures the immediate remedy of any life-threatening violation of this order or other safety, health, and child welfare laws or regulations at a DoD CDP site.

### ***Department of the Air Force CDC Policy Complies with Applicable DoD Policy***

The Department of the Air Force has policies and guidance that fully address DoD requirements for CDCs. Specifically, the Department of the Air Force issued the following guidance.

- DAFI 40-301—establishes and describes FAP incident response and operational support to CYPs and inspections, as well as FACAT use and safety resources. In accordance with DoDI 6400.03, the Air Force instruction requires collaboration with the Child Sexual Maltreatment Response Team and FACAT in cases involving allegations of child sexual maltreatment in DoD-sanctioned activities.
- DAFI 34-144—establishes CYP policy, CDC-specific procedures, and CYP management responsibilities. In accordance with DoDI 6060.02, the Air Force instruction outlines operational guidance, CDC personnel training and reporting requirements, and procedure instructions for 24-hour accident and injury reporting of alleged or suspected child abuse to the Department of the Air Force FAP and other appropriate agencies.

## **Recommendations, Management Comments, and Our Response**

### ***Recommendation 1***

**We recommend that the Under Secretary of Defense for Personnel and Readiness revise and reissue policy requiring the Military Departments to follow a uniform process to:**

- Identify, notify, and report child abuse allegations to parents or legal guardians across all DoD-sanctioned activities, including child development centers.**
- Maintain parental or legal guardian notification documentation for child abuse allegations across all DoD-sanctioned activities, including child development centers.**

### ***Under Secretary of Defense for Personnel and Readiness Comments***

The Acting Under Secretary of Defense for Personnel and Readiness agreed and stated that the CYP abuse and neglect policy will be revised and reissued, requiring the Military Departments to follow a uniform process to identify, notify, and report child abuse allegations to parents or legal guardians. The policy will include requirements for maintaining parent or legal guardian notification documentation. The Acting Under Secretary of Defense for Personnel and Readiness stated that the updated policy will be issued by September 30, 2025.

### ***Our Response***

The response addressed the specifics of the recommendation; therefore, the recommendation is resolved but will remain open. We will close the recommendation when we verify that the policy is revised to fully address the specifics of the recommendation.

### ***Department of the Army Comments***

Although not required to comment, the Army's Deputy for Prevention, Resilience, and Readiness agreed with the recommendation.

### ***Our Response***

We acknowledge receipt of the comments from the Army's Deputy for Personnel, Readiness, and Readiness.

### ***Department of the Navy Comments***

Although not required to comment, the Chief of Naval Personnel provided comments on the recommendation. The Chief of Naval Personnel agreed with the recommendation and stated that the Navy will take steps to revise and reissue Service-level policies by incorporating detailed guidance for notifying parents and guardians.

### ***Our Response***

We acknowledge receipt of the Chief of Naval Personnel's comments.

## ***Recommendation 2***

We recommend that, when the revised DoD policy is issued, the following officials revise and reissue policy to align with the requirements established in the updated DoD policy in Recommendation 1 requiring uniform parental or legal guardian notifications of child abuse allegations.

- a. Chief, Army Child and Youth Services
- b. Deputy Chief of Naval Operations
- c. Director, Marine and Family Programs
- d. Director, Air Force Policy and Resources

### ***Department of the Army Comments***

The Deputy for Prevention, Resilience, and Readiness, responding for the Chief of Army Child and Youth Services, agreed and stated that, upon the reissuance of the OUSD(P&R) policy, the Army will revise and reissue policy aligning to the requirements established in the DoD policy.

### ***Our Response***

Comments from the Deputy addressed the specifics of the recommendation; therefore, the recommendation is resolved but will remain open. We will close the recommendation when we verify that the policy is revised to fully address the specifics of the recommendation.

### ***Department of Navy Comments***

The Chief of Naval Personnel, responding for the Deputy Chief of Naval Operations, agreed and stated that the Navy will update OPNAVINST 1752.2C to fully comply with DoD policies and ensure consistent implementation of the procedures. The target completion date for Recommendation 2.b is April 30, 2026.

### ***Our Response***

Comments from the Chief of Naval Personnel addressed the specifics of the recommendation; therefore, the recommendation is resolved but will remain open. We will close the recommendation when we verify that the updated OPNAVINST 1752.2C aligns with DoD policy and fully addresses the specifics of the recommendation.



### ***U.S. Marine Corps Comments***

The Acting Director for the Marine and Family Programs Division agreed and stated that once the OUSD(P&R) issues policy requiring uniform parental or legal guardian notifications of child abuse allegation, the Marine Corps will revise and reissue policy to align with DoD requirements. The target completion date for implementing Recommendation 2.c is April 1, 2026.

### ***Our Response***

Comments from the Acting Director addressed the specifics of the recommendation; therefore, the recommendation is resolved but will remain open. We will close the recommendation when we verify that the policy is revised to fully address the specifics of the recommendation.

### **Management Comments Required**

The Director of Air Force Policy and Resources did not respond to the recommendation 2.d in the report; therefore, the recommendation is unresolved. We request that the Director provide comments on the final report.

## Appendix

### Scope and Methodology

We conducted this evaluation from May 2024 through March 2025 in accordance with the “Quality Standards for Inspection and Evaluation,” published in December 2020 by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we adequately plan the evaluation to ensure that objectives are met and that we perform the evaluation to obtain sufficient, competent, and relevant evidence to support the findings, conclusions, and recommendations. We believe that the evidence obtained was sufficient, competent, and relevant to lead a reasonable person to sustain the findings, conclusions, and recommendations.

We identified, obtained, and reviewed the following laws and policies during this evaluation.

- 10 U.S.C. § 1794, “Child Abuse Prevention and Safety at Facilities”
- 10 U.S.C. § 1787, “Reporting of Child Abuse”
- DoDI 6060.02, “Child Development Programs (CDPs),” August 5, 2014
- DoDI 6400.03, “Family Advocacy Command Assistance Team (FACAT),” April 25, 2014 (Incorporating Change 1, April 3, 2017)
- DoDI 6400.06, “DoD Coordinated Community Response to Domestic Abuse Involving DoD Military and Certain Affiliated Personnel,” May 16, 2023

We obtained the following supporting documentation from OUSD(P&R), FAP, and FACAT representatives.

- DoD Manual 6400.01, Volume 1, “Family Advocacy Program (FAP): FAP Standards,” July 22, 2019
- DoD Manual 6400.01, Volume 4, “Family Advocacy Program (FAP): Guidelines for Clinical Intervention for Persons Reported as Domestic Abusers,” March 2, 2015
- DoD Family Advocacy Program Military Community and Family Policy, “Department of Defense Family Advocacy Command Assistance Team (FACAT) Handbook,” updated April 2024
- U.S. Senator letter to the Secretary of Defense and OUSD(P&R), April 18, 2024
- OUSD(P&R) response to the April 2024 U.S. Senators letter, May 7, 2024

We conducted interviews with DoD officials to understand current policy, guidance, and procedures related to child abuse at CDCs. Specifically, we interviewed personnel from the OUSD(P&R) and offices of the Secretaries of the Army, Navy, and Air Force and National Guard Bureau for various Components, including:

- military family readiness,
- CYPs,
- military community advocacy, and
- family advocacy.

These Components also provided us with Service-specific policies, guidance, and procedures related to child abuse and neglect at CDCs. We reviewed the policies, guidance, and procedures to determine compliance with DoD policy, including the following guidance.

- Army Regulation 608-10, “Child Development Services,” May 11, 2017
- Army Regulation 608-18, “The Army Family Advocacy Program,” October 30, 2007 (Rapid Action Revision September 13, 2011)
- Army Installation Management Command (IMCOM) Regulation 608-10-1, “Child and Youth Services,” Feb 28, 2023
- Marine Corps Order 1754.11a, “Marine Corps Family Advocacy Program,” April 8, 2021
- Marine Corps Order 1710.30, “Marine Corps Child and Youth Programs,” August 5, 2015
- Marine Corps Child Development Center and Child Youth Programs Oversight and Inspection Protocols, January 2022
- OPNAVINST 1700.9E, “Child and Youth Program,” September 24, 2012
- OPNAVINST 1752.2C, “Navy Family Advocacy Program,” May 20, 2020
- OPNAVINST 1700.18, “Navy Coordinated Community Response to Problematic Sexual Behavior in Children and Youth,” March 15, 2024
- DAFI 40-301, “Family Advocacy Program,” November 2020 (Incorporating Change October 9, 2024)
- DAFI 40-301\_DAFM 2024-02, “Department of the Air Force Family Advocacy Program Guidance Memorandum to DAFI 40-301, Family Advocacy Program,” October 9, 2024
- DAFI 34-144, “Child & Youth Programs,” October 2, 2024

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

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

## **Prior Coverage**

No prior coverage has been conducted on CDCs during the last 5 years.

## Management Comments

### Office of the Under Secretary of Defense for Personnel and Readiness



PERSONNEL AND  
READINESS

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

APR - 1 2025

MEMORANDUM FOR INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE

- SUBJECT: Response to Department of Defense Inspector General Draft Report, "Evaluation of the DoD and Military Departments' Policies on Response to Allegations of Abuse at Child Development Centers" (Project No. D2024-DEV0PJ-0122.001)

I have reviewed the DoD Inspector General Draft Report, "Evaluation of the DoD and Military Departments' Policies on Response to Allegations of Abuse at Child Development Centers" (Project No. D2024-DEV0PJ-0122.001) and provide the following response for the recommendation within my purview.

**Recommendation 1:**

"We recommend that the Under Secretary of Defense for Personnel and Readiness revise and reissue policy requiring the Military Departments to follow a uniform process to:

- a) Identify, notify, and report child abuse allegations to parents or legal guardians across all DoD-sanctioned activities, including Child Development Centers.
- b) Maintain parental or legal guardian notification documentation for child abuse allegations across all DoD-sanctioned activities, including Child Development Centers."

**Response:** Agree with the recommendation. Child and Youth Programs abuse and neglect policy will be revised and reissued requiring the Military Departments to follow a uniform process to identify, notify, and report child abuse allegations to parents or legal guardians. The policy will include requirements for maintaining parent or legal guardian notification documentation.

- This recommendation will be accomplished by September 30, 2025.

My point of contact for this matter is [REDACTED] at [REDACTED] or [REDACTED]

Jules W. Hurst III  
Performing the Duties of the Under Secretary of  
Defense for Personnel and Readiness

## Department of the Army



**DEPARTMENT OF THE ARMY  
DEPUTY CHIEF OF STAFF, G-9  
600 ARMY PENTAGON  
WASHINGTON, DC 20310-0600**

DAIN-PRY

MEMORANDUM FOR the Office of the DoD Inspector General, 4800 Mark Center Drive, Alexandria, VA, 22350-1500.

SUBJECT: Project No. D2024-DEV0PJ-0122.001, "Evaluation of the DoD and Military Departments' Policies on Response to Allegations of Abuse at Child Development Centers."

1) References:

a) Draft Report, Project No. D2024-DEV0PJ-0122.001, "Evaluation of the DoD and Military Departments' Policies on Response to Allegations of Abuse at Child Development Centers."

b) DoDI 6060.02, Child Development Programs, August 5, 2014

c) Army Regulation 608-10, Child Development Programs, May 11, 2017

d) IMCOM Regulation 608-10-1, Child and Youth Services, February 28, 2023

- 2) The Department of the Army reviewed the draft report in ref a. and acknowledges the finding that the DoD has policies to address child abuse and neglect (CAN) allegations for five of the six requirements in 10 U.S.C § 1794, "Child abuse prevention and safety at facilities." DoD policies do not require the Military Departments to have a uniform process for notifying parents of CAN allegations as required by law; potentially creating a lack of awareness for parents/guardians on potential actions they can take.
- 3) Reference a. provides two recommendations to the finding noted above in paragraph 2. The Department of the Army concurs without comment for the recommendation for USD P&R to revise and reissue policy requiring the Military Departments to follow a uniform process for the notification of parents/guardians in CAN incidents, as well as to the maintenance of parental/guardian notification documentation across all DoD-sanctioned activities, to include child development centers.
- 4) The Department of the Army concurs without comment to the recommendation that upon the reissuance of USD P&R's policy, the Army will revise and reissue policy aligning to the requirements established in the DoD policy.



## Department of the Army (cont'd)

DAIN-PRY

SUBJECT: Project No. D2024-DEV0PJ-0122.001, "Evaluation of the DoD and Military Departments' Policies on Response to Allegations of Abuse at Child Development Centers."

- 5) The point of contact for this memorandum is Ms. [REDACTED] at [REDACTED] or [REDACTED]



E. BLAKE WITHERELL  
COL, IN  
Deputy PRR for Readiness  
HQDA, DCS, G-9

## Office of the Assistant Secretary of the Navy

April 9, 2025

From: Branch Head, Sailor and Family Readiness Branch (OPNAV N171)  
To: Assistant Secretary of the Navy (M&RA)  
Via: Chief of Naval Personnel (BUPERS 00IG)

Subj: MANAGEMENT RESPONSE TO DRAFT AUDIT REPORT 2021-010

Ref: (a) DoD IG Draft Audit Report Project No. D2024-DEV0PJ-0122.001

Encl: (1) OPNAV N171 Management Response to Draft Audit Project  
No. D2024-DEV0PJ-0122.001

1. Per reference (a), enclosure (1) is provided.
2. There is not Controlled Unclassified Information contained within my response.
3. My point of contact is [REDACTED] at [REDACTED] email:  
[REDACTED]

YAVORSKI.THOMAS  
AS.PAUL [REDACTED]  
[REDACTED]  
Digitally signed by  
YAVORSKI.THOMAS.PAUL [REDACTED]  
DN: cn=AS.PAUL, o=OPNAV, ou=OPNAV, email=AS.PAUL@OPNAV.NAVY.MIL, c=US  
Date: 2025.04.10 15:15:21 -04'00'

T. P. YAVORSKI

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### FIRST ENDORSEMENT

From: Chief of Naval Personnel  
To: Assistant Secretary of the Navy (M&RA)

1. Enclosure (1) is forwarded approved.

CROLEY.STEPHEN.WAYNE  
AYNE [REDACTED]  
[REDACTED]  
Digitally signed by  
CROLEY.STEPHEN.WAYNE [REDACTED]  
Date: 2025.04.11 13:53:44 -04'00'

STEPHEN W CROLEY  
By direction

## Office of the Assistant Secretary of the Navy (cont'd)

**DODIG DRAFT REPORT DATED MARCH 13, 2025  
DODIG (Project No. D2024-0122)**

**“EVALUATION OF THE DOD AND MILITARY DEPARTMENTS’ POLICIES ON  
RESPONSE TO ALLEGATIONS OF ABUSE AT CHILD DEVELOPMENT CENTERS”**

**DEPUTY, CHIEF OF NAVAL OPERATIONS (N1) / CHIEF OF NAVAL PERSONNEL  
COMMENTS**

**RECOMMENDATION 1:** We recommend that the Under Secretary of Defense for Personnel and Readiness revise and reissue policy requiring the Military Departments to follow a uniform process to:

- a) Identify, notify, and report child abuse allegations to parents or legal guardians across all DoD-sanctioned activities, including Child Development Centers.
- b) Maintain parental or legal guardian notification documentation for child abuse allegations across all DoD-sanctioned activities, including Child Development Centers.

**NAVY RESPONSE:**

**- Concur.**

**Comments:** OPNAV N171B FAP: POLICY

In the absence of Department of Defense (DoD) policy, the Navy will take proactive steps to revise and reissue service-level policies, incorporating detailed guidance for notifying parents and legal guardians.

Following an incident of child abuse at a child development center, the Family Advocacy Program (FAP) typically does not notify parents about the initial allegation of abuse. However, FAP becomes actively involved once the case is officially initiated, providing ongoing support and intervention. FAP's primary focus is to ensure the child's safety and well-being while offering parents and legal guardians the necessary resources, counseling, and continuous support.

The revision of OPNAVINST 1752.2C will specifically define the Navy's response to child abuse incidents within DoD-sanctioned activities, such as child development centers, ensuring a coordinated and comprehensive approach.

**Date of completion:** 30 APRIL 2026

**RECOMMENDATION 2.b:** We recommend that, when the revised DoD policy is issued, the following officials revise and reissue policy to align with the requirements established in the updated DoD policy in Recommendation 1 requiring uniform parental or legal guardian notifications of child abuse allegations.

- a) Chief of Army Child and Youth Services
- b) Deputy Chief of Naval Operations for Personnel, Manpower, and Training.

Enclosure (1)

## Office of the Assistant Secretary of the Navy (cont'd)

- c) Director of Marine and Family Programs Division
- d) Director of Air Force Policy and Resources

### NAVY RESPONSE

#### - Concur with comment and recommended technical correction

**Comments:** OPNAV N171B FAP POLICY:

Recommend that this be edited to read:

“(b) Deputy Chief of Naval Operations for Personnel, Manpower, and Training; Deputy Chief of Naval Operations for Installations and Logistics”

Rationale: Deputy Chief of Naval Operations for Personnel, Manpower and Training is responsible for Family Advocacy Program policy, while Deputy Chief of Naval Operations for Installations and Logistics is responsible for Child and Youth Program (CYP) policy.

The Navy will align its policies to fully comply with codified DoD policies and ensure the consistent implementation of standardized procedures.

OPNAVINST 1752.2C mandates that in any case of alleged child abuse, the safety of the victim must be the primary concern and must be assessed immediately by the Family Advocacy Representative (FAR), command personnel, and law enforcement. In incidents involving CYP/DoDEA personnel, the Navy FAP Manager will promptly inform law enforcement and CYP/DoDEA leadership, recommending appropriate actions as necessary. Effective collaboration among FAP, parents, CYP/DoDEA leadership, commanders, law enforcement, and legal entities is crucial to ensure comprehensive safety measures and mitigate potential risks.

**Date of completion:** 30 APRIL 2026

# Marine Corps Headquarters



DEPARTMENT OF THE NAVY  
HEADQUARTERS, UNITED STATES MARINE CORPS  
3000 MARINE CORPS PENTAGON  
WASHINGTON, DC 20350-3000

IN REPLY REFER TO:  
1 Apr 2025

MEMORANDUM FOR DEPARTMENT OF DEFENSE OFFICE OF INSPECTOR GENERAL

SUBJECT: DODIG Draft Evaluation Report No. D2024-DEV0PJ-0122-001, Evaluation of the DoD and Military Departments’ Policies on Response to Allegations of Abuse at Child Development Centers

Pursuant to your March 13, 2025 report, the attachments provide Marine Corps senior leadership comments to the report and its recommendation no. 2.c. The Marine Corps estimated completion date for implementing recommendation no. 2.c is 1 April 2026.

The attachments were reviewed and approved by [REDACTED] Acting Director, Marine and Family Programs Division, Manpower and Reserve Affairs Department, Headquarters, U.S. Marine Corps.

For questions regarding this response, you may contact me at [REDACTED] or email [REDACTED].

Charles K. Dove  
Head, Audit Coordination and Response  
Office of the Director, Marine Corps Staff

Attachments:  
As stated

## Acronyms and Abbreviations

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<b>CAPER</b>	Child Abuse, Prevention, Education, and Reporting
<b>CDC</b>	Child Development Center
<b>CDP</b>	Child Development Program
<b>CYP</b>	Child and Youth Program
<b>CYS</b>	Child and Youth Services
<b>DAFI</b>	Department of the Air Force Instruction
<b>DoDI</b>	DoD Instruction
<b>FAP</b>	Family Advocacy Program
<b>FACAT</b>	Family Advocacy Command Assistance Team
<b>IMCOM</b>	Installation Management Command
<b>OUSDP(P&amp;R)</b>	Office of the Under Secretary of Defense for Personnel and Readiness



## Glossary

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**Child.** According to 32 C.F.R. § 60.3:

An unmarried person under 18 years of age for whom a parent, guardian, foster parent, caregiver, employee of a residential facility, or any staff person providing out-of-home care is legally responsible. The term “child” means a biological child, adopted child, stepchild, foster child, or ward. The term also includes a sponsor’s family member (except the sponsor’s spouse) of any age who is incapable of self-support because of a mental or physical incapacity, and for whom treatment in a DoD medical treatment program is authorized.

**Child Abuse.** According to 32 C.F.R. § 60.3:

The physical or sexual abuse, emotional abuse, or neglect of a child by a parent, guardian, foster parent, or by a caregiver, whether the caregiver is intrafamilial or extrafamilial, under circumstances indicating the child’s welfare is harmed or threatened. Such acts by a sibling, other family member, or other person shall be deemed to be child abuse only when the individual is providing care under express or implied agreement with the parent, guardian, or foster parent.

**Child Sexual Abuse.** According to 32 C.F.R. § 60.3:

The employment, use, persuasion, inducement, enticement, or coercion of any child to engage in, or assist any other person to engage in, any sexually explicit conduct or simulation of such conduct for producing a visual depiction of such conduct; or the rape, and in cases of caretaker or inter-familial relationships, statutory rape, molestation, prostitution, or other form of sexual exploitation of children, or incest with children.

**DoD-Sanctioned Activity.** According to DoDI 6400.01:

A U.S. Government activity or a nongovernmental activity authorized by appropriate DoD officials to perform supervisory functions over programs that provide care and supervision of children or youth on DoD controlled property. The care and supervision of children and youth may be either its primary function or incidental in carrying out another mission (e.g., medical care). Examples include child development centers, DoD dependents schools, or youth activities, school age, family day care providers, and childcare services.

**FACAT.** According to DoDI 6400.01, “A multidisciplinary team composed of specially trained and experienced individuals who are on-call to provide advice and assistance on cases of child sexual abuse that involve DoD-sanctioned activities.”

**FAP.** According to DoDI 6400.01:

A program designed to address prevention, identification, evaluation, treatment, rehabilitation, follow-up, and reporting of child abuse and neglect, domestic abuse, and problematic sexual behavior in children and youth. FAPs consist of coordinated efforts designed to prevent and intervene in cases that impact military family readiness by promoting healthy relationships and families.

**FAP Manager.** According to DoDI 6400.01, “An individual designated by a Secretary of a Military Department or the head of another DoD Component to manage, monitor, and coordinate the FAP at the headquarters level.”



# **Whistleblower Protection**

## **U.S. Department of Defense**

*Whistleblower Protection safeguards DoD employees against retaliation for protected disclosures that expose possible fraud, waste, and abuse in Government programs. For more information, please visit the Whistleblower webpage at [www.dodig.mil/Components/Administrative-Investigations/Whistleblower-Reprisal-Investigations/Whistleblower-Reprisal/](http://www.dodig.mil/Components/Administrative-Investigations/Whistleblower-Reprisal-Investigations/Whistleblower-Reprisal/) or contact the Whistleblower Protection Coordinator at [Whistleblowerprotectioncoordinator@dodig.mil](mailto:Whistleblowerprotectioncoordinator@dodig.mil)*

**For more information about DoD OIG  
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