DoDEA Regulation 5010.01

DoDEA Inspection Program

Originating Division: Office of the Inspector General

Effective: June 29, 2022

Releasability: Cleared for public release. Available at the DoDEA Policy Webpage.

Approved by: Thomas M. Brady, Director

Purpose: This Issuance establishes policy, assigns responsibility, and implements procedures for the Department of Defense Education Activity (DoDEA) Inspection Program, pursuant to the authority in Department of Defense (DoD) Directive 1342.20 and in accordance with DoD Directive 5106.04. The DoDEA Inspection Program provides an independent, focused, and operational assessment of areas critical to the DoDEA mission and vision.
# TABLE OF CONTENTS

## SECTION 1: GENERAL ISSUANCE INFORMATION

1. Applicability ................................................................. 3  
2. Policy ........................................................................... 3  
3. Information Collection .................................................. 3  

## SECTION 2: RESPONSIBILITIES

1. DoDEA Director .................................................................. 4  
2. DoDEA Chief Academic Officer, Chief Operating Officer, and Chief of Staff ................. 4  
3. DoDEA Inspector General .................................................. 4  
4. DoDEA Office of the General Counsel ................................. 4  
5. Region Directors for Student Excellence, Region and District Chiefs of Staff, and District and Community Superintendents .............................................................. 5  
6. DoDEA Headquarters Division Chiefs .................................... 5  
7. DoDEA Employees ............................................................ 5

## SECTION 3: INSPECTIONS PROGRAM GENERAL ADMINISTRATION

1. Inspections Overview ...................................................... 6  
2. Inspection Processes .......................................................... 6  
   a. Inspection Topic Development .......................................... 6  
   b. Inspection Phases ........................................................... 6  
   c. Inspection Reports .......................................................... 7  
3. Inspection Considerations .................................................. 7  
   a. Consult with OGC on Inspection Findings ......................... 7  
   b. Indication of Misconduct ............................................... 7  
   c. Interviews and Surveys ................................................. 7  
   d. Soliciting SME Assistance ............................................ 7  
4. Independence ..................................................................... 8  
5. File Retention, Documentation, and Releasing Authority .................. 8  
   a. Official Use Requests .................................................. 8  
   b. Requests Processed under Freedom of Information Act or Privacy Act ................. 9

## GLOSSARY

G.1. Acronyms ....................................................................... 10  
G.2. Definitions ...................................................................... 10

## REFERENCES

......................................................................................... 12

## APPENDIX

Appendix 1: Internal Controls Evaluation Checklist .......................... 13
SECTION 1: GENERAL ISSUANCE INFORMATION

1.1. APPLICABILITY.

   a. This Issuance applies to the DoDEA Headquarters Organization, the DoDEA Americas Region, the DoDEA Europe Region, the DoDEA Pacific Region, and to include all schools under the DoDEA authority, and when applicable, volunteers, students, support personnel, student teachers, and contractors.

   b. Does not apply to sponsors, parents, and legal guardians.

1.2. POLICY. It is DoDEA policy that:

   a. DoDEA will inspect and assess its operations to determine the Activity’s capability to accomplish its mission. DoDEA achieves this by analyzing and correlating evaluations of DoDEA functional areas. An inspection function incorporates detection and prevention methodology that identifies areas that have a higher risk for non-compliance, systematic and functional degradation, and are directly related to DoDEA mission accomplishment.

   b. DoDEA Office of the Inspector General (OIG) is the office that oversees and maintains the DoDEA Inspection Program.

1.3. INFORMATION COLLECTION. This Issuance may result in the collection of information due to its policy and procedures. Any collection of information must follow all applicable Federal law and DoD and DoDEA regulations, policies, and guidance.
SECTION 2: RESPONSIBILITIES

2.1. DODEA DIRECTOR. The DoDEA Director will:

   a. Establish the DoDEA Inspection Program in accordance with DoD Directive 5106.04.

   b. Serve as the directing authority for DoDEA OIG inspections.

   c. Ensure the assigned duties of the DoDEA OIG do not interfere (or create a conflict of interest or the appearance of) with the duties, responsibilities, and functions assigned in this Issuance.

2.2. DODEA CHIEF ACADEMIC OFFICER, CHIEF OPERATING OFFICER, AND CHIEF OF STAFF. The DoDEA Chief Academic Officer, Chief Operating Officer, and Chief of Staff are responsible for cooperating, assisting, and participating with the DoDEA Inspection Program, as applicable. Examples of this include, but not limited to, recommending assessment areas, providing subject matter experts (SMEs) to assist DoDEA OIG in the performance of inspection duties, ensuring DoDEA employees are available during inspections to provide required data/input, and implementing any approved recommendations resulting from inspection findings.

2.3. DODEA INSPECTOR GENERAL. The DoDEA Inspector General (IG) will:

   a. Serve as principal advisor to the DoDEA Director on all IG matters related to DoDEA.

   b. Oversee execution of DoDEA OIG inspections in accordance with DoD Directive 5106.04.

   c. Recommend functional area and systemic programmatic corrective actions to the DoDEA Director for approval based on inspection findings, observations, and root cause analysis.

   d. Determine and track appropriate inspection-related training requirements for DoDEA OIG and ensure DoDEA OIG staff are knowledgeable about the DoDEA mission and programs and applicable laws, policies, and regulations.

   e. Provide necessary resources to external Federal Agencies in support of their mission to assess DoDEA operations.

2.4. DODEA OFFICE OF THE GENERAL COUNSEL. The DoDEA Office of the General Counsel (OGC) will ensure legal guidance is provided to DoDEA OIG throughout the inspection process.
2.5. **REGION DIRECTORS FOR STUDENT EXCELLENCE, REGION AND DISTRICT CHIEFS OF STAFF, AND DISTRICT AND COMMUNITY SUPERINTENDENTS.** The Region Directors for Student Excellence, Region and District Chiefs of Staff, and District and Community Superintendents are responsible for cooperating, assisting, and participating with the DoDEA Inspection Program, as applicable. Examples of this include, but not limited to, recommending assessment areas, providing SMEs to assist DoDEA OIG in the performance of inspection duties, ensuring DoDEA employees are available during inspections to provide required data/input, and implementing any approved recommendations resulting from inspection findings.

2.6. **DODEA HEADQUARTERS DIVISION CHIEFS.** The DoDEA Headquarters Division Chiefs are responsible for cooperating, assisting, and participating in the DoDEA Inspection Program, as applicable. Examples of this include, but not limited to, recommending assessment areas, providing SMEs to assist DoDEA OIG in the performance of inspection duties, ensuring DoDEA employees are available during inspections to provide required data/input, and implementing any approved recommendations resulting from inspection findings.

2.7. **DODEA EMPLOYEES.** All DoDEA employees will cooperate, assist, and participate in the DoDEA Inspection Program to include, but not limited to, providing DoDEA OIG required inspection data/input and implementing any approved recommendations resulting from inspection findings.
SECTION 3: INSPECTIONS PROGRAM GENERAL ADMINISTRATION

3.1. INSPECTIONS OVERVIEW. The purpose of an inspection is to assess, assist, and enhance the ability of DoDEA to prepare for and perform its assigned mission. DoDEA inspection requirements may change over time.

   a. DoDEA OIG will conduct inspections in accordance with the Council of the Inspectors General on Integrity and Efficiency, “Quality Standards for Inspection and Evaluation” and will refer to Section 6 of DoD Manual 5106.06, when applicable.

   b. Inspections are independent reviews and evaluations that use a compliance-oriented or systemic-oriented approach to assess DoDEA’s implementation of statutory and/or regulatory policies and processes as well as provide functional expertise through teaching and training. Compliance-oriented inspections measure the readiness of DoDEA and its functions against established standards. Systemic-oriented inspections assess the effectiveness and efficiency of systems, functions, and programs within DoDEA.

3.2. INSPECTION PROCESSES. The DoDEA Director is the directing authority for all DoDEA OIG inspections.

   a. Inspection Topic Development.

      (1) The DoDEA OIG will develop annual inspection topics for the DoDEA Director’s approval. Although the DoDEA OIG will culminate topics before the beginning of each fiscal year, the DoDEA Director may approve and/or change the inspection topics at any time. The DoDEA OIG will identify inspection topics through (but not limited to) Federal requirements; DoDEA leadership guidance; the DoDEA IG’s annual data call; DoDEA’s Risk Management and Internal Control Program; DoDEA Hotline trend analysis; and DoDEA OIG investigation findings, audit findings, and previous inspection findings. DoDEA OIG will prioritize inspection possibilities based on requirement, need, and expected benefits, as determined by the DoDEA Director and DoDEA IG.

      (2) DoDEA OIG will coordinate with other DoDEA divisions and programs and Federal Agencies, when appropriate, to avoid assessment duplication and provide assistance as necessary (e.g., DoD OIG evaluations).

   b. Inspection Phases. DoDEA OIG will follow three (3) phases when conducting inspections:

      (1) Phase 1: Preparation. Includes (but not limited to) research, developing concepts, obtaining the DoDEA Director’s approval, conducting entrance briefs, detailed planning (e.g., data collection requirements, logistics), pre-inspection visits, and training the inspection team and any applicable SMEs.

      (2) Phase 2: Execution. Includes (but not limited to) visiting functional areas, conducting in-process reviews, collecting data (e.g., interviews/focus groups, surveys, visual
examination, and document reviews), analyzing results, drafting the report, and conducting exit briefs to the applicable DoDEA proponents.

(3) Phase 3: Completion. Includes (but not limited to) finalizing the report’s findings and recommendations, conducting exit briefs to the DoDEA Director and applicable DoDEA Directorate Chief, receiving report approval from the DoDEA Director, tasking appropriate functional areas with approved recommendations, and identifying trends.

c. Inspection Reports. Inspection reports may provide one (1), two (2), or all of three (3) primary results: Findings, observations, and/or best practices.

(1) Findings will always have an associated finding statement, violated standard (e.g., law, policy, regulation), office of primary responsibility (OPR), discussion, root cause, recommended action(s), and management’s response.

(2) Observations will generally include an observation statement, OPR, discussion, and recommended action(s).

(3) Best practices will generally include a statement, OPR, and discussion. When an operation is working well, it is considered a best practice and should be shared with other programs.

3.3. INSPECTION CONSIDERATIONS. Additional situations or issues the DoDEA OIG may need to consider when conducting inspections include:

a. Consult with OGC on Inspection Findings. If an inspection reveals deficiencies involving breaches of integrity, security violations, or criminality, the DoDEA OIG must (upon discovery) consult with DoDEA OGC to determine an appropriate course of action recommendation to DoDEA leadership.

b. Indication of Misconduct. DoDEA OIG staff will identify any indicators of personnel misconduct or allegations of wrongdoing during an inspection. If such matters arise, DoDEA OIG staff will promptly report such information to the DoDEA IG for review and appropriate action (e.g., investigate or refer to the applicable supervisory level within the DoDEA chain of command).

c. Interviews and Surveys. Inspections may include interviews, focus groups, or command climate surveys that involve DoDEA employees who are part of a bargaining unit, DoDEA contractors, or indirect hire foreign national employees. DoDEA OIG staff will coordinate the sessions with the appropriate union, contractor’s office (through the corresponding DoDEA contracting officer or contracting officer’s representative), or the foreign labor office (via the DoDEA Human Resources Division).

d. Soliciting SME Assistance. Inspections may require DoDEA SME expertise and participation in the inspection team. DoDEA OIG staff will coordinate any SME involvement with the respective Division Chief or first-line supervisor to minimize disruption to SME’s regular duties.
3.4. INDEPENDENCE. DoDEA OIG must remain free in both fact and appearance from possible conflicts of interest within DoDEA. Whenever possible, DoDEA OIG duties will not be combined with other duties in DoDEA, and DoDEA OIG staff (to include the DoDEA IG) will not be assigned additional duties that would interfere with their responsibility to remain fair and impartial factfinders.

3.5. FILE RETENTION, DOCUMENTATION, AND RELEASING AUTHORITY. The DoDEA OIG maintains and retains all approved inspection reports and associated supporting documentation in accordance with Part 102-193, Chapter 201 of Title 41, United States Code, the Office of the Chief Management Officer Administrative Instruction 15, the Office of the Secretary of Defense (OSD) Records Disposition Schedules, DoD Instruction 5015.02, and DoDEA Regulation 5015.01.

   a. Official Use Requests. In accordance with DoD Directive 5106.04, the DoDEA IG maintains DoDEA OIG records and permits release only when authorized by a competent authority. The DoDEA IG is the release authority or initial denial authority for DoDEA OIG records including those related to the DoDEA Inspection Program. Subject to Section 552a of Title 5, United States Code, also known and referred to in this Issuance as “The Privacy Act of 1974, as amended,” DoDEA inspection records are “Controlled Unclassified Information.” Only those individuals with a direct official need-to-know, as determined by the DoDEA IG (per statutory requirements, DoD policy, and/or labor agreements), may have access to or be informed of DoDEA inspection records.

(1) Official use requests must be sent to one of the following:

   (a) The DoDEA Hotline email at OIGHOTLINE@dodea.edu.

   (b) Regular mail at:

   DoDEA Office of the Inspector General
   4800 Mark Center Drive, Suite 04G15-02
   Alexandria, Virginia, 22350

(2) For official use requests, the requestor must identify the specific inspection record(s) requested, the official reason for the request, how the information will be used, the requestor’s name, title, organization, and official contact information.

(3) The DoDEA OIG will only provide copies of reports or documents to satisfy the request. The original inspection file will not be released outside of DoDEA OIG. To protect the confidentiality of all those involved with DoDEA inspections, the DoDEA IG may consult with DoDEA OGC to determine what source-sensitive information, contained within the requested DoDEA OIG records and documents, is required for release by law or regulation.

(4) Any release of DoDEA inspection records, without the approval/acknowledgement of the DoDEA IG, may be considered an unauthorized disclosure.
b. Requests Processed under Freedom of Information Act or Privacy Act. The DoDEA OIG does not respond to requests for information from the public. All requests for DoDEA OIG records made pursuant to Section 552 of Title 5, United States Code, “also known and referred to in this Issuance as “The Freedom of Information Act (FOIA)” and “The Privacy Act of 1974, as amended” are submitted to the DoDEA FOIA Requester Service Center. Interested parties may go to DoDEA’s website at https://www.dodea.edu/Offices/ExecutiveServices/foia.cfm for information on how to submit a FOIA request for DoDEA records.
GLOSSARY

G.1. ACRONYMS.

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<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
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<tbody>
<tr>
<td>FOIA</td>
<td>Freedom of Information Act</td>
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<td>IG</td>
<td>Inspector General</td>
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<td>OGC</td>
<td>Office of the General Counsel</td>
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<td>OIG</td>
<td>Office of the Inspector General</td>
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<td>OPR</td>
<td>Office of primary responsibility</td>
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<td>OSD</td>
<td>Office of the Secretary of Defense</td>
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<tr>
<td>SME</td>
<td>subject matter expert</td>
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G.2. DEFINITIONS. Unless otherwise noted, these terms and their definitions are for the purpose of this Issuance only.

controlled unclassified information. A categorical designation that refers to unclassified information that does not meet the standards for national security classification but requires protection from unauthorized disclosure, special handling safeguards, or prescribed limits on exchange or dissemination pursuant to and consistent with law, regulations, or U.S. Government-wide policy.

finding. A functional area non-compliant with a standard or failure to adequately provide information relative to the respective assessed area. Findings will have recommendations for corrective action.

indirect hire foreign national. A non-U.S. citizen who performs work for the U.S. Government outside of the U.S., its territories, and possessions. The host government serves as the legal employer of the foreign national. The host government grants operational control to the U.S. Government for the day-to-day management of the foreign national employees.

inspection. A process that evaluates, reviews, studies, and analyzes DoDEA programs and activities for the purpose of providing information to managers for decision-making; making recommendations for improvement to programs, policies, or procedures; and identifying where administrative action may be necessary.

need-to-know. The determination made by an authorized holder of information that a prospective recipient requires access to specific information to perform or assist in a lawful and authorized governmental function (i.e., access is required for the performance of official duties).

observation. An opinion in which a standard may not have been violated or may not exist, but where economy, efficiency, or effectiveness may be improved by recommended corrective actions.
**proponent.** The DoDEA employee or functional area identified in the recommendation paragraphs of an inspection report who is responsible for addressing the identified problem.
REFERENCES

DoD Instruction 5015.02, “Department of Defense Records Management Program,” February 24, 2015, as amended
DoD Manual 5106.06, “Joint Inspectors General Manual,” May 7, 2018
DoDEA Regulation 5015.01, “Records Management Program,” December 19, 2017
OSD Records Disposition Schedules, current edition
United States Code, Title 5, Section 552 (also known as “The Freedom of Information Act”)
United States Code, Title 5, Section 552a (also known as “The Privacy Act of 1974, as amended”)
United States Code, Title 41, Part 102-193 (also known as “Creation, Maintenance, and Use of Records”)

APPENDIX

APPENDIX 1: INTERNAL CONTROLS EVALUATION CHECKLIST

The purpose of this Internals Control Evaluation Checklist is to assist users managing the DoDEA Inspection Program in assessing key internal controls and risk. It is not intended to represent all internal controls. Internal controls may not be mandated by policy but act as preventive measures to ensure the effectiveness and efficiency of a program and/or its operations. The following should be evaluated annually:

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<tr>
<th>CHECKLIST ITEM</th>
<th>YES/NO</th>
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<tr>
<td>Does the DoDEA OIG oversee, operate, and maintain the DoDEA Inspection Program?</td>
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<td>Was the DoDEA Director the directing authority for all completed DoDEA OIG inspections?</td>
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<td>Did the DoDEA OIG coordinate with other DoDEA divisions, programs, or other Federal entities on inspection topics to avoid duplication of effort?</td>
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<tr>
<td>Are DoDEA OIG inspections conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency, “Quality Standards for Inspection and Evaluation”?</td>
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<td>Was the DoDEA OGC consulted if any inspection revealed deficiencies involving breaches of integrity, security violations, or criminality?</td>
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<tr>
<td>Was the DoDEA IG consulted if any inspection revealed possible personnel misconduct or allegations of wrongdoing during an inspection?</td>
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<tr>
<td>Are the DoDEA Director-approved recommendations being tasked to the appropriate employee or functional area?</td>
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<tr>
<td>Are DoDEA OIG staff conducting timely follow-up reviews on the DoDEA Director-approved recommendations?</td>
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<tr>
<td>Is the DoDEA OIG maintaining and retaining all DoDEA OIG inspection reports and associated documentation in accordance with DoD Directive 5106.04?</td>
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<tr>
<td>Are DoDEA OIG Inspection Program records being requested and released in accordance with Section 3.5. of this Issuance?</td>
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<td>Is the DoDEA IG ensuring DoDEA OIG staff are trained and knowledgeable about the DoDEA mission and programs as well as applicable laws, policies, and regulations?</td>
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<tr>
<td>Do any of the DoDEA OIG assigned duties interfere or create a conflict (or appearance of) with the duties, responsibilities, and functions assigned in this Issuance?</td>
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