



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

JUL - 3 2012

Ms. Carolyn N. Lerner  
The Special Counsel  
U.S. Office of Special Counsel  
Suite 300  
1730 M Street, N.W.  
Washington, DC 20036-4505

Dear Ms. Lerner:

This is in response to your letter dated December 21, 2011, to the Secretary of Defense, referring for investigation OSC File No. DI-12-0081, a whistleblower disclosure made by Mr. Stephen Ford, that employees of the Infrastructure Operations Division, Department of Defense Education Activity (DoDEA), DoD Dependents Schools-Europe, Mainz-Kastel, Germany, may have engaged in gross mismanagement and a gross waste of funds.

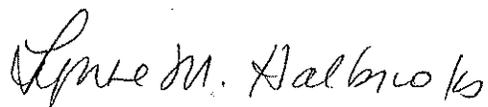
By memorandum from the Secretary of Defense dated February 9, 1998, the DoD Inspector General has been delegated authority to respond to requests for investigations under 5 U.S.C. § 1213. As indicated in our previous correspondence dated March 6, 2012, the Defense Hotline directed DoDEA to conduct an investigation. DoDEA completed their investigation and a copy of their report is enclosed for your use and transmittal to the President and appropriate congressional committees.

We have reviewed the DoDEA report, concur with its conclusions, and believe the enclosed report satisfies the requirement of 5 U.S.C. § 1213. DoDEA determined that the allegations made by the whistleblower, Mr. Ford, were substantiated. Further, consistent with OSC policy to interview a whistleblower who has consented to release of his name, a DoDEA investigator interviewed Mr. Ford on February 7, 2012.

In addition to the unredacted DoDEA report, we have enclosed a redacted copy that may be publicly posted. Because personal information in the unredacted report is exempt from public release under the Freedom of Information Act (FOIA), the report is designated "FOR OFFICIAL USE ONLY." We ask that you coordinate any additional releases of the unredacted report with our FOIA Requester Service Center/Privacy Act Office, Office of the Inspector General of the Department of Defense, 4800 Mark Center Drive, Alexandria, Virginia, 22350-1500.

If you have any questions regarding this matter, please contact me or Mr. John R. Crane, Assistant Inspector General for Communications and Congressional Liaison at (703) 604-8324.

Sincerely,

A handwritten signature in cursive script that reads "Lynne M. Halbrooks".

Lynne M. Halbrooks  
Acting

Enclosures: As stated

cc: Secretary of Defense



DEPARTMENT OF DEFENSE  
EDUCATION ACTIVITY  
4040 NORTH FAIRFAX DRIVE  
ARLINGTON, VA 22203-1635

MAY 16 2012

MEMORANDUM FOR DEFENSE HOTLINE, INSPECTOR GENERAL, DOD

SUBJECT: Defense Hotline Case 122700

Attached is the Department of Defense Education Activity (DoDEA) completion report for the subject referral. The DoDEA Office of General Counsel conducted the examination of the issues.

If you have any questions, please contact Ms. Gloria Rios, Office of Compliance and Assistance at (703) 588-██████

A handwritten signature in black ink, appearing to read "Marilee Fitzgerald", is written over a horizontal line.

Marilee Fitzgerald  
Director

Attachment:  
As stated

Defense Hotline Completion Report  
Hotline Referral Number 122700

1. Name of Official Conducting Inquiry: Mr. Joel K. Hansen
2. Rank and/or Grade of Official: GS-15
3. Duty Position and Telephone Number: Acting Assistant Associate Director for Education
4. Organization: Department of Defense Education Activity (DoDEA)
5. Hotline Control Number: 122700
6. Scope of Inquiry, Findings, Conclusions and Recommendations:

6.1. Scope of Inquiry. The allegations, as framed with assistance of the Office of Special Counsel (OSC) and the DoDEA Office of General Counsel are as follows:

Allegation 1. The following Information Technology (IT) supplies and equipment costing more than \$770,000 have been purchased but are unused:

- Cisco Systems, Inc. router with an original acquisition cost of \$11,025 has been in a warehouse since 2002 and has a Foundry Network Switch purchased in 2004 with an original acquisition value of \$12,035.40.
- Cisco Voice Over IP telephone system purchased for \$667,000.
- Five Smartboards and stands which were purchased for over \$12,000 but were never distributed to any of the schools and have been in a warehouse since 2007.
- One Dell 1950 Tumbleweed Server received in September 2008, housed in the IT lab.
- Two Sidewinder Firewalls, housed in the IT lab.
- Dell R610 NetXServer, housed in the IT lab. The combined value of the three items stored the IT lab exceeds \$70,000.

Allegation 2. A license for a product called Computer Associates Software Delivery, Version 11.5, was purchased in 2007 but never used.

Allegation 3. The unused equipment in the warehouse or IT lab was purchased without an implementation plan. Other equipment that was purchased pursuant to an implementation plan remains in the warehouse because manpower resources were not properly allocated for the installation and configuration of the equipment.

All above allegations were made referring to employees of the Infrastructure Operations Branch and management within DoDEA, Department of Defense Dependents Schools (DoDDS) Europe IT Division in Mainz-Kastel, Germany.

## Background:

The inquiry was conducted based on the Commander-Driven Investigation (CDI) guide. Ms. Marilee Fitzgerald, Director, DoDEA appointed Mr. Joel Hansen, Acting Assistant Associate Director for Education, DoDEA on January 24, 2012, to conduct the investigation into allegations of gross mismanagement and gross waste of funds by the Infrastructure Operations Branch, Information Technology, Europe. The investigation was conducted from February 8-10, 2012, at Mainz-Kastel, Germany and continued in Arlington, VA via telephone and online to complete interviews and gather evidence. Fourteen interviews were conducted; nine on site and five over the telephone. Procurement documents, inventory records, photographic evidence, pertinent email correspondence, and program planning documents were collected and reviewed as evidence. The whistleblower was interviewed first upon investigator arrival in Mainz-Kastel, Germany on February 7, 2012.

## 6.2. Findings.

Allegation 1. The following Information Technology supplies and equipment costing more than \$770,000 have been purchased but are unused:

- Cisco Systems, Inc. router with an original acquisition cost of \$11,025 has been in a warehouse since 2002 and has a Foundry Network Switch purchased in 2004 with an original acquisition value of \$12,035.40.
- Cisco Voice Over IP telephone system purchased for \$667,000.
- Five Smartboards and stands which were purchased for over \$12,000 but were never distributed to any of the schools and have been in a warehouse since 2007.
- One Dell 1950 Tumbleweed Server received in September 2008, housed in the IT lab.
- Two Sidewinder Firewalls, housed in the IT lab.
- Dell R610 NetXServer, housed in the IT lab. The combined value of the three items stored the IT lab exceeds \$70,000.

Facts. The twelve items in question and identified in TAB G, were documented either through procurement records, inventory documentation, and/or references in email correspondence (TABS F and G).

According to property accountability records, the Cisco router was purchased in 2002 (TAB G(2) a). Due to regulations within the Federal Acquisition Regulation (FAR) subpart 4.8, Section 4.805 that dictates destruction of procurement records after 3 years and 6 months or 5 years depending on the purchase item, it is unclear of the purchase requirement according to Mr. Mark Robbins, Chief, Procurement Division, Europe (Tab F(5)). The original shipment was to Spangdalem Middle School, but was returned in 2008 to the Mainz-Kastel warehouse and there is no record of use since it was returned according to property accountability documents (TAB G(2) c). [REDACTED] IT Division Chief, Europe, reports that, upon investigation, the Cisco router was on warranty through 2009 (TAB G(2) d). [REDACTED] IT Specialist, DoDDS-Europe was the only person who claimed knowledge of the item and that knowledge came only from the property records he obtained (TAB F(1)).

According to property accountability records, the Foundry network was purchased in 2004 (TAB G(3) a). Due to FAR Section 4.805 regulation that requires procurement records over five years old to be destroyed, it is unclear of the purchase requirement according to Mr. Robbins (Tab F(5)). There is no record of the item leaving the warehouse after initial arrival in 2004 (TAB G(3) a). The item appeared to be out of the original box and displayed dust near the fan suggesting use, but no other evidence was available about intended usage or actual implementation (TAB G(3) b). [REDACTED] reports, upon further investigation, the vendor has confirmed that the switch is out of warranty, but no information about when the warranty expired was obtained (Tab G(3) d). [REDACTED] was the only person who claimed knowledge of the item when asked and that knowledge came only from the property records he obtained (TAB F(1)).

The Cisco VOIP telephone system was purchased on September 26, 2008, with end-of-year funding (TAB G(4)b). The amount of the contract provided for the Naples High School was \$644,964.74. According to procurement documentation for the "Justification for Other than Full and Open Competition," this purchase was made as part of a project to provide support for the voice over internet protocol (VOIP), personnel emergency alert system (PEAS), wireless, local area network (LAN) and wide area network (WAN) requirements. Similar purchases were made for Spangdalem (TAB G(4) b). Since there is only one Contract Line Item Number (CLIN) for all of these projects, it is not clear how much the VOIP equipment cost (TAB G(4) b). [REDACTED] indicates that the equipment was planned for the Kaiserslautern District Superintendent's office, Illisheim, Spangdalem, and Naples. According to [REDACTED] while the LAN equipment was installed, the VOIP equipment was not installed and was eventually returned to Mainz-Kastel (TAB G(4) e). Cost estimates provided by [REDACTED] Network Administrator, IT Division, indicate that VOIP equipment returned from Naples, Spangdalem, and Illisheim is valued at \$667,940.73 (TAB G(4) c). While [REDACTED] submits meeting notes citing communication between the military commands and DoDDS-Europe IT beginning in the fall of 2008 (TAB G(4)e), and some planning documents are included, planning was not completed for each site (TAB G(4)e). The main reason that the VOIP equipment was not implemented, according to [REDACTED] was the inability to gain cooperation from Signal Battalions and Commands, difficulty with approval processes for connection, necessity for the system to interface with school emergency alarm system, and consumption of resources beyond what DoDDS-Europe IT could provide (TAB G(4) e). There is no record of the DoDDS-Europe Area informing others of those concerns. A test site for the VOIP deployment, Kaiserslautern District Office, had the equipment installed in 2009. Records do indicate that [REDACTED] School Support Assistant at Spangdalem Middle School on November 9, 2009, alerted IT and Mr. Charles Toth, former Associate Director for Education that VOIP equipment was sitting at his school unused and he was being directed to return it to DoDDS-Europe IT because IT was "getting out of the telephone business." While it was assigned through Mr. Toth to Mr. Jeffrey Friedler, Chief Information Officer, DoDEA HQ IT and [REDACTED] Chief, Information Assurance Branch, DoDEA IT, to [REDACTED] email was not returned until March 18, 2010 (TAB G(4) d). [REDACTED] indicated this was due to a miscommunication about follow up with Headquarters IT (TAB G(4) d). [REDACTED] statement indicates that upon arriving to Mainz-Kastel in August 2010, he tried to convince [REDACTED] to use the VOIP equipment for facilities currently using expensive Siemens equipment and created a cost estimate and plans for reuse, but was not permitted to implement that plan. He was told that they were moving voice out of IT and into facilities (TAB F(4)). In May of 2010, [REDACTED] Customer Support Specialist, DoDDS-Europe IT assisted then Infrastructure Operations Branch

Chief, [REDACTED] in bringing the equipment from Illesheim, Naples and Spangdalem back to the IT warehouse in Mainz-Kastel. In December 2011, [REDACTED] was asked to transfer the VOIP equipment to the logistics warehouse (TAB F(2)). Although the IT Division assumed lead control over the VOIP system by making the purchase in 2008, it has recently been decided that the Logistics Division would take the lead on implementation of the remaining VOIP equipment at sites to be determined (TAB G(4) e). According to [REDACTED] statement the conversation about moving VOIP to facilities seems to have been solidified at an IT chief's meeting in the summer of 2010 (TAB F(8)), but Mr. Friedler's statement indicates that voice was considered, at that time, a shared responsibility (TAB F(9)). To date, the equipment, priced at approximately \$667,940.73 still remains in the facilities warehouse at Mainz-Kastel (TAB G(4) c).

Five Smartboards were located on the shelves in the IT warehouse along with the stands that accompany them (TAB G(5) a). One hundred seventy eight (178) like items were purchased in 2007 as a part of an order on a Blanket Purchase Agreement (BPA), but none of them were scheduled for delivery at Mainz-Kastel (TAB G(5)b). [REDACTED] statement indicates that five Smartboards were purchased for Mainz-Kastel under the DoDDS-E BPA during the end of the fiscal year by [REDACTED] IT Division Government Purchase Card holder. He was unaware of where they were stored or installed (TAB F(14)). [REDACTED] maintains that these were held for unforeseen needs or replacement/replenishment (TAB F(8)); however, these five Smartboards remain in the warehouse and are rapidly approaching the end of their warranty lifecycle (TAB G(5) b). [REDACTED] statement indicates that at least on one occasion, he received an email from a district in need of Smartboard stands and he was not permitted to release them (TAB F(2)). When asked to produce the above referenced email, while a request was made from [REDACTED] to [REDACTED] in it, no denial of the material is evident (TAB F(2)).

The Dell 1950 Tumbleweed server was purchased on September 28, 2008, for \$10,251.18 purchased with Funds Available Distribution (FAD) from DoDEA headquarters. The reason for the purchase was to assist with the Public Keys Infrastructure (PKI) project put in place to help alleviate bandwidth issues arriving from certificate searches. This purchase also included licenses (TAB G(6) b). At the time of the investigation, the server was not plugged in, but "in the rack" in the IT Lab (TAB G(6) a). According to the statement of [REDACTED] the project manager, the purchase was made in 2008, the active client was implemented in 2009, and the software deployed in 2010 (TAB F(11)). According to statement from [REDACTED] Lead Systems Administrator, there was a project team for the PKI project, but union issues were involved and the servers were never implemented (TAB F(12)). [REDACTED] statement also states there were union issues centered around whether teachers would be required to use Common Access Cards (CAC) and indicates the server is not online. He also maintains that in the period of time that this was to be implemented there were several projects that needed manpower and he had recently lost 20 positions (TAB F(8)). Additionally, Mr. Friedler informed the DoDDS-Europe IT Chief to stop implementation in October 2009 due to incomplete negotiations with the teacher union (TAB G (6) c).

Sidewinder Firewalls were purchased on September 30, 2008. The contract included the hardware, one year of support, security reporter, and a training class as well as shipping. The

contract totaled \$151,305.42 (TAB G(7) b). At the time of the investigation, the firewall appliances were 'in the racks' in the IT lab, but not in use (TAB G(7) a). According to [REDACTED] statement, this system was requested by DoDDS Europe IT employees and was given support by Mr. Friedler (TAB F(8)). The "Justification for Other than Full and Open Competition" document indicates the Sidewinder is the only DoD and Federal Government firewall that met the requirements (TAB G(7) b). Statements conflict as to whether these were ever implemented. [REDACTED] indicates that they have never been used (TAB F(1), but statement from [REDACTED] and [REDACTED] indicate that they were eventually used for a short time (TAB F(12), F(8)). [REDACTED] admits that due to staff unfamiliarity, it took a long time to "get them up and running" (TAB F(8)). Email correspondence from [REDACTED] after statement suggests that the delay was also due to delays in circuit upgrades required for implementation (TAB G(7) d). Since that time, pending larger system-wide upgrades will increase bandwidth speeds beyond the capabilities of these sidewinders and Cisco Adaptive Security Appliances (ASA) have been purchased to replace the sidewinders (TAB G(7) d). Training on the firewall was provided the week of July 20-24, 2009, and attended by approximately five DoDDS-Europe IT personnel as part of the contract (TAB G(7) c).

Dell R610 NetXServer was part of the Altiris service consultation contract purchased July 21, 2010, (TAB G(8) b). The NetXServer was purchased as part of the Altiris project and is on the rack, but not operational (TAB G(8) a, b). Very few of those interviewed, however, had any idea what this server was for. Statement from [REDACTED] and [REDACTED] indicates that it has never been turned on (TAB F(12, 1)). There was no separate purchase price for this server (TAB G(8) b).

Allegation 2. A license for a product called Computer Associates Software Delivery, Version 11.5, was purchased in 2007 but never used.

Facts. Procurement documents for the original Computer Associates (CA) are attached and show it as a "Solutions for Enterprise-Wide Procurement" (SEWP) contract awarded on September 22, 2008, (TAB G(9) a). Based on statement and documents provided by [REDACTED] the maintenance contract for the CA Software Delivery allowed for the automatic upgrade to a new version when it became available (TAB F(8)). The release of the new version in August 2009 (TAB G(9) b) coincided with the discussion to switch to Altiris helpdesk management and software delivery for continuity with the rest of the DoDEA enterprise, so while the license keys were available, the system was never upgraded (TAB G(9) c). [REDACTED] submitted documents resembling meeting minutes allegedly from March 30, 2009, that showed communication surrounding the decision not to make the move to the newest version of CA since the new product was being considered (TAB G(9) c). The procurement documents related to the Altiris system (TAB G(8) b) indicate that purchase was made in an expedited fashion in July of 2010. The DoDEA enterprise, due to efficiencies, is making a move to Microsoft System Center currently (TAB F(9)). Nonetheless, as of February 20, 2012, the switch to the new system for software delivery has not occurred in DoDDS-Europe.

Allegation 3. The unused equipment in the warehouse or IT lab was purchased without an implementation plan. Other equipment that was purchased pursuant to an implementation plan remains in the warehouse because manpower resources were not properly allocated for the installation and configuration of the equipment.

Facts. [REDACTED] Chief, Infrastructure Operations Branch, DoDDS-Europe IT, [REDACTED] all mentioned implementation plans, project charters, and other planning documents required to be in place prior to a project's implementation (TAB F(8), (6), (7), (11), (12)) and [REDACTED] provided project charter and implementation planning documents (TAB G(10)). [REDACTED] testified that the branch chiefs are responsible for those documents (TAB F(8)). [REDACTED] however, mentions that many projects were led by "ideas, (but) no project plans" (TAB F(1)). [REDACTED] stated that for his current wireless project, he was asked to create implementation plans after the purchase of equipment (TAB F(4)). [REDACTED] statement corroborates that situation as she stated, "implementation plans in nearly all cases are created after purchase. This is the first organization I have been involved in where that is the case." [REDACTED] also indicated that the delay in project implementation can make planning documents obsolete by the time they are underway (TAB F(12)). [REDACTED] himself stated, on the topic of the purchase of the Tumbleweed servers that, "there wasn't a lot of planning to be honest" (TAB F(8)). [REDACTED] also points out a significant loss of manpower sometime after DoDEA realigned the IT structure under headquarters which according to a statement by Mr. Friedler occurred in the 3<sup>rd</sup> quarter of fiscal year 2009 (TAB F(10)).

### 6.3. Conclusions and Recommendations.

Allegation 1. Information Technology supplies and equipment costing more than \$770,000 have been purchased but are unused.

Analysis. All twelve items alleged to be in the warehouse and IT Lab in Mainz-Kastel were located and photographed. At the time of the investigation, none of the materials were in use (TAB G(2) b, G(3) b, G(4) a, G(5) a, G(6) a, G(7) a, G(8) a). Only the Cisco router (TAB G(2)) and though the statement is not clear, perhaps the Sidewinder Firewalls ((TAB F(1), F(12), F(8) were ever in use. The VOIP equipment was moved to the Facilities warehouse in December (TAB F(2)), but was easily located and clearly not installed.

In the case of the Cisco router, it is unclear why the item was returned from Spangdalem Middle School, nor is it clear why the item was stored for so long in the warehouse. Most of those interviewed had no knowledge of the item in the warehouse (TAB F). The case was the same for the Foundry switch in that no one seemed to know why the item was not in the original box or why it appeared to be used, but there was no record of it leaving the warehouse (TAB G(3) c). It is worth noting that many interviews included a comment about the tight controls on the warehouse (TAB F(1), (2), (4), (12), (13), (14)). The only personnel with keys to the warehouse are [REDACTED] and [REDACTED] (TAB F(1), (2), (4), (8)). [REDACTED] indicated that there is no procedure to go through the warehouse with the staff to identify items that should be implemented or sent to Defense Reutilization and Marketing Office (DRMO) (TAB F(8)). [REDACTED] indicated that there were times when items that were in the warehouse were actually purchased again because they were unable to locate the items or weren't allowed to get it out of the warehouse (TAB F(4)). [REDACTED] indicated that items that were purchased and not implemented in addition to the alleged items and more that were sent to DRMO without ever being implemented (TAB F(2)). Each of the procurement documents indicated a year-end purchase nearly all of them executed in the last week of the fiscal year (TAB G(4) b, G(5) b,

G(6) b, G(7) b, G(8) b). This fact was not lost on those interviewed; as [REDACTED] put it, "100% of hardware when I was there was made at the end of the fiscal year." [REDACTED] did make points about losing 20 positions around the time of many of these initiatives (TAB F(8)), and it is clear that a number of initiatives have been added to the DoDDS Europe IT workload. During this investigation, DoDDS IT was working many hours a day preparing laptops for schools that were purchased by DoDEA headquarters at the end of the fiscal year. With that said, there was no clear reason given for the sheer volume of inventory in the warehouse that was nearing or past its warranty date without being used in the system.

Conclusion. The preponderance of the evidence shows that significant amounts of IT equipment were procured and kept in a warehouse or lab unused. I conclude this allegation is SUBSTANTIATED.

Recommendations. Procedures for warehouse management need to be tightened. At the present time there are no procedures for regular inspection and deployment or disposal of warehouse equipment in DoDDS Europe. Additionally, complete project charters and planning documents should be submitted for any project over a certain threshold. This should prevent the situation, like the VOIP installation, where the planning is insufficient to implement the purchased equipment. Determinations of equipment disposal should be made based on a policy and amount of time after purchase or warranty expiration.

Allegation 2. A license for a product called Computer Associates (CA) Software Delivery, Version 11.5, was purchased in 2007 but never used.

Analysis. DoDDS Europe IT had a contract with CA to provide a suite of products. That suite included both helpdesk management and software deployment modules among other products. DoDDS Europe IT was paying maintenance on the CA contract for licenses. That maintenance covered any upgrades while the contract was in place. Most recently, in 2009, DoDDS IT downloaded the software keys they had the right to, but never implemented the newest version of the software (TAB G(9) b). It is worth pointing out that this does not mean the DoDDS Europe made a separate purchase for the software as is alleged. Those license keys were simply available through the life of the contract. With the Altiris in place in both DoDDS Pacific and in Domestic Dependant Elementary and Secondary Schools (DDESS), the decision was made to move DoDDS Europe to Altiris as well instead of making the upgrade to the CA system (TAB G(9) c). DoDDS Europe chose to upgrade the helpdesk system first and moved to a newer version than the rest of the enterprise, but had some difficulty with that process and were unable to complete Altiris software deployment module in place (TAB F(8)). Statements conflict as to whether the upgrade to CA could have been made with the existing manpower as DoDDS Europe began planning for further transition to Altiris (TAB F(8) F(14)). Still, there are inconsistencies with the documents provided by [REDACTED] a week after the interview (TAB G(9) b) and the procurement documents that related to the Altiris project (TAB G(8) b), which indicates on July 21, 2010, that there was a rush for this product, one that needed to be in place by August 15, 2010. If the documents [REDACTED] provided (TAB G(9) b), are to be believed and a decision was made in March of 2009, it is hard to understand why a rushed procurement would need to be in place in July of 2010.

Conclusion. The preponderance of evidence shows that while there was no additional procurement of the upgraded license, the system upgrades that were to take place with Altiris, removing the need for the CA upgrade, were not complete. I conclude that this allegation is **PARTIALLY SUBSTANTIATED.**

Recommendation. Project charters and planning documents should include clear approaches to maintenance, support, and upgrade milestones. Organizational plans to upgrade software or platforms should be accompanied by plans to maintain and support them with a consideration for staff time in a more formal way.

Allegation 3. The unused equipment in the warehouse or IT lab was purchased without an implementation plan. Other equipment that was purchased pursuant to an implementation plan remains in the warehouse because manpower resources were not properly allocated for the installation and configuration of the equipment.

Analysis. DoDDS Europe IT does have charters and project planning documents in place (TAB G(10)), but multiple interview statements seem to suggest that these processes are not followed previous to procurement in the budget planning phase. The only completed project planning document that was submitted for the PKI project is dated October 22, 2009, for items that were procured in September of 2008 (TAB G(6) b). Even the copious information provided about the VOIP implementation attempt was not complete and it is unclear that proper planning was completed prior to purchase (TAB G(4) e). There seems to be pressure to make end of year purchases and proper planning is not complete as illustrated in the facts section.

Conclusion. The preponderance of the evidence shows that a substantial amount of unused equipment in the warehouse or IT lab was purchased without an implementation plan. In some cases, those plans were written after the purchase was made. It is unclear specifically how manpower resources affected specific installation and configuration of the equipment. **SUBSTANTIATED.**

Recommendation. Project charters and planning documents should include clear approaches to maintenance, support, and upgrade milestones. This should prevent the situation, like the VOIP installation, where the planning is insufficient to implement the purchased equipment. Plans to adopt, implement, and maintain any project should make consideration for staff time in a more formal way.

7. Cite Criminal or Regulatory Violations Substantiated: None

8. Disposition. Implement recommendations DoDEA-wide. Establish procedures to ensure project charters and planning documents are in place prior to procurement actions. Establish procedures for warehouse management and inventory control. Establish and refine Internal Management Controls for these indentified weaknesses.

9. Specify Security Classification of Information: Unclassified

10. Indicate the Location of Field Working Papers and Files:

Associate Director for Education

4040 North Fairfax Drive

Arlington, VA 22203

703-588-[REDACTED]