



# SPECIAL EDUCATION

## Improved Allocation of Resources Could Help DOD Education Activity Better Meet Students' Needs

Report to Congressional Committees

April 2025

GAO-25-107053

United States Government Accountability Office

Accessible Version

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# GAO Highlights

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Highlights of [GAO-25-107053](#), a report to congressional committees

April 2025

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### Improved Allocation of Resources Could Help DOD Education Activity Better Meet Students' Needs

#### Why GAO Did This Study

Meeting the educational needs of children with disabilities attending DODEA schools poses unique challenges. For example, children in military families often relocate frequently, which requires finding appropriate special education and related services each time.

Senate Report 118-58 includes provisions for GAO to examine special education and related services at DODEA schools. GAO examined (1) the extent to which DOD makes these resources available to meet the needs of DODEA students and (2) key obstacles to providing these resources to DODEA students that were reported by DOD staff and families.

GAO analyzed DODEA data on student enrollment, staffing, and service provision. GAO also visited 14 DODEA schools in seven military communities worldwide, selected for variation in number of students with disabilities and location. Across the visits, GAO held 98 group interviews with DODEA teachers, principals, and other stakeholders. GAO also reviewed relevant federal laws and policies and interviewed DOD and DODEA officials.

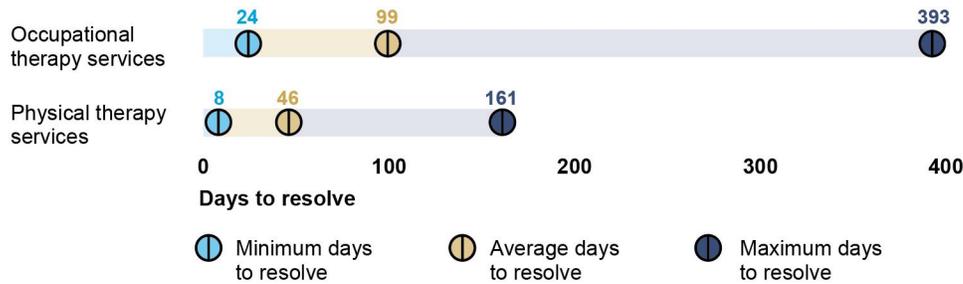
#### What GAO Recommends

GAO is making five recommendations to DOD, including to (1) incorporate students' required service minutes into special education staffing formulas, (2) ensure paraeducators receive required crisis training, and (3) communicate the resources staff should currently use to interpret DOD special education policy. DOD partially agreed with all five recommendations, as discussed in the report.

#### What GAO Found

The Department of Defense Education Activity (DODEA) operates DOD's school system and provides special education and related services for about 15 percent of its students worldwide. However, GAO found that related services provided by the military branches for students in overseas locations—such as physical therapy—were often limited or unavailable, resulting in service delays or disruptions. These services are required by students' individualized education programs—legally binding written plans describing the services students are to receive. GAO found delays in service delivery for students in 44 of DODEA's 114 overseas schools for 2022–2023 (see figure). Further, from school years 2018–2019 through 2022–2023, at least six cases took more than a year to resolve. Service delays and disruptions can negatively affect students' academic progress, according to related service providers and parents GAO interviewed.

**Days Taken to Resolve Services Delays for DODEA Students' Physical and Occupational Services, School Year 2022–2023**



Source: GAO analysis of Department of Defense Education Activity (DODEA) administrative data. | GAO-25-107053

**Accessible Data for Days Taken to Resolve Services Delays for DODEA Students' Physical and Occupational Services, School Year 2022–2023**

Service category	Minimum days to resolve	Average days to resolve	Maximum days to resolve
Behavioral evaluation	27	85	169
Medical evaluation	15	77	232
Occupational therapy services	24	99	393
Physical therapy services	8	46	161

Source: GAO analysis of Department of Defense Education Activity (DODEA) administrative data. | GAO-25-107053

GAO also found that DODEA’s staffing formulas for special education teachers are based on student headcounts and do not consider the required service minutes (i.e., minutes of specialized instruction) specified in students’ individualized education programs. Because required service minutes can vary widely among students, allocating staff without considering them may contribute to staffing shortages and to delays in delivering required services.

DODEA school staff and parents at the schools GAO visited identified several key obstacles to providing special education, including insufficient training and guidance. First, at 12 of 14 schools, paraeducators (staff providing extra help to students) reported receiving little to no onboarding training for special education. For example, paraeducators across all three DODEA regions told GAO they had not received DODEA-required crisis training, despite working with students with behaviors needing crisis response. Further, all regional officials and DODEA staff in 13 of 14 schools described insufficient procedural guidance on how to implement DOD’s special education policies. School staff at seven schools said that without clear guidance, service delivery is inconsistent across schools. DODEA officials said they will update procedural guidance by school year 2025–2026, and staff should refer to DOD policy in the interim. Communicating which resources staff should currently use to interpret DOD policy—consistent with DODEA’s goals for internal communication—would help promote a shared understanding of how to comply with DOD special education policy.

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## Abbreviations

Abbreviation	Word or Phrase
AU	Autism Spectrum Disorder
CI	Communication Impaired
DOD	Department of Defense
DODEA	Department of Defense Education Activity
EDIS	Educational and Developmental Intervention Services
EI	Emotionally Impaired
HI	Hearing Impaired
ID	Intellectual Disability (cognitive delay)
IDEA	Individuals with Disabilities Education Act
IEP	Individualized Education Program
Instructional Specialists	Special Education Instructional System Specialists

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<b>Abbreviation</b>	<b>Word or Phrase</b>
LD	Specific Learning Disability
LIMM	Learning Impaired, Mild to Moderate
LIMS	Learning Impaired, Moderate to Severe
LISP	Learning Impaired, Severe to Profound
PS	Developmental Delay (preschool)
VI	Visually Impaired

April 17, 2025

The Honorable Roger Wicker  
Chairman  
The Honorable Jack Reed  
Ranking Member  
Committee on Armed Services  
United States Senate

The Honorable Mike Rogers  
Chairman  
The Honorable Adam Smith  
Ranking Member  
Committee on Armed Services  
House of Representatives

Research shows that students with disabilities face persistent achievement gaps, pointing to the importance of ensuring they have equitable access to high-quality education and receive the services and supports they need.<sup>1</sup> Further, students in military families—many of whom attend Department of Defense Education Activity (DODEA) schools—face a unique set of challenges because they relocate within the United States and to overseas installations as many as nine times before graduating from high school.<sup>2</sup> For military families, meeting the educational needs of their children with disabilities after each relocation can pose additional challenges. Each move for these families involves finding the appropriate special education services for their children, which may be difficult overseas where schooling options and services can be more limited.

Per DOD policy, DODEA is required to provide a “free appropriate public education” to all eligible children with disabilities attending its schools.<sup>3</sup> As defined by DOD, this includes specially designed instruction and related services that meet the individualized needs of students.<sup>4</sup> Senate Report 118-58 accompanying the National

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<sup>1</sup>U.S. Department of Education, Office for Civil Rights, “U.S. Department of Education’s Office for Civil Rights Releases New Resources on Students with Disabilities,” press release Feb 20, 2024, and *Profile of Students with Disabilities in U.S. Public Schools During the 2020-21 School Year*, February 2024.

<sup>2</sup>GAO, *K-12 Education: U.S. Military Families Generally Have the Same Schooling Options as Other Families and Consider Multiple Factors When Selecting Schools*, [GAO-21-80](#) (Washington, D.C.: Feb. 4, 2021). For the purposes of this report, “overseas” installations refer to military communities located outside of the continental United States.

<sup>3</sup>The Individuals with Disabilities Education Act (IDEA)—the primary federal law governing special education for children and youth with disabilities—guarantees eligible students with disabilities a “free appropriate public education.” DODEA officials stated that DODEA provides special education services to eligible students pursuant to IDEA and as directed by DOD policy, and that IDEA provisions are made applicable to DODEA through separate statutory provisions and DOD implementing regulations that apply uniformly to DOD-operated schools throughout the U.S. and overseas. See, e.g., 10 U.S.C. § 2164(f); 20 U.S.C. §§ 921(b), 927(c); DOD Instruction 1342.12, *Provision of Early Intervention and Special Education Services to Eligible DOD Dependents*; DOD Manual 1342.12, *Implementation of Early Intervention and Special Education Services to Eligible DOD Dependents*, (Washington, D.C.: June 17, 2015, codified at 32 C.F.R. pt. 57); and DOD Directive 1342.20, *Department of Defense Education Activity*. DOD Instruction 1342.12 and DOD Manual 1342.12 establish policy, assign responsibilities, and provide procedures to implement IDEA for eligible DOD dependents.

<sup>4</sup>See DOD Instruction 1342.12. For the purposes of this report, we refer to specially designed instruction and related services as “special education services.”

Defense Authorization Act for Fiscal Year 2024 includes provisions for GAO to examine issues related to special education and related services at DODEA schools.

This report examines: (1) the extent to which DOD makes special education resources available across DODEA locations to meet the needs of students; and (2) the key obstacles to providing special education services to DODEA students that were reported by DOD staff and families.

For both questions, we analyzed data on student enrollment across DODEA schools. This included numbers of students identified by the primary disability qualifying them for special education (e.g., hearing impairment, developmental delay). We used enrollment data for school years 2018–2019 through 2023–2024 and staffing data for school years 2019–2020 through 2022–2023. These were the most recent reliable data available at the time of our review.<sup>5</sup>

To examine the extent to which special education resources were available across DODEA locations, we reviewed DODEA reports for school years 2018–2019 through 2022–2023 (the most recent year available) documenting instances when special education-related services (such as occupational therapy and physical therapy) were not available to DODEA students receiving special education. This included identifying the number of schools impacted when related services were not available, the types of related services that were not available, and the length of time DODEA and the military branches took to resolve these instances.

To examine key obstacles related to providing special education services to DODEA students, we analyzed DODEA hiring data and turnover rates for special education teachers and paraeducators (staff who work alongside licensed teachers to support students) for school years 2019–2020 through 2022–2023, the most recent years available. For the purposes of this review, we measured the time it took DODEA to hire someone as the number of days between when DODEA initiated a personnel action identifying a vacant position to when it extended a firm job offer to applicants. We excluded from our analysis the time between issuing a firm job offer and the employee’s official start date because the start date is typically delayed until the beginning of the school year. To analyze staff turnover rates, we identified the number of staff each school year who either left DODEA entirely or transferred to a new school within DODEA. We also analyzed pay scale data for paraeducators for school years 2019–2020 through 2024–2025, using the gross domestic product price index to adjust for inflation.

Across our analyses, we merged several sets of DODEA data by matching the school names identified in each data set. In instances where school names differed slightly across the data sets, we took steps to appropriately match schools, such as by reviewing web-based sources to confirm school name changes. Additionally, to assess the reliability of all the DODEA data we analyzed, we interviewed agency officials, reviewed documentation, and reviewed the data for obvious errors, outliers, or missing information. We determined that the data were sufficiently reliable to report on our research questions.

We also interviewed DODEA officials in headquarters and conducted site visits to 14 schools in seven military communities across the U.S., Europe, and Asia.<sup>6</sup> We selected these communities to balance variation in

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<sup>5</sup>School year 2019–2020 was the earliest staffing data available following DODEA’s transition to a new human resources servicer in 2018, according to DODEA officials.

<sup>6</sup>The military communities we visited were located in North Carolina, Germany, and Japan.

geographic location, number of students receiving special education, each school's designated capacity to serve students with different disabilities and different levels of need, and service branch.

Across our site visits, we held 98 group interviews and discussion groups. These included (1) 92 group interviews with DODEA regional, district, and school-level staff, including teachers, administrators, paraeducators, other staff who provide specialized support to students (e.g., physical therapists), and military branch staff who help support families with children with disabilities and (2) six discussion groups with parents of students receiving special education services in each community. During these interviews and discussion groups, we discussed the key obstacles to providing special education services to DODEA students, including difficulties with the availability of special education resources, and actions that DODEA schools, districts, regional, and headquarters officials have taken to address these obstacles.<sup>7</sup>

We used NVivo, a qualitative analysis software program, to analyze the 98 group interviews and discussion groups we held across our site visits. We coded content from the interviews and discussion groups into categories. These categories corresponded to our research questions and key terms we identified in our records of the interviews and discussion groups. We then analyzed the coded content to identify common themes across the sites and schools we visited. Information from this analysis is not generalizable across all DODEA schools.

Finally, to inform plans for our site visits, we held group interviews with other stakeholders, including representatives of a military family advocacy group, and representatives from two unions for DODEA teachers in Asia and Europe. We also interviewed officials from DOD's Office of Special Needs about the services they provide for students with special education needs. In addition, we reviewed relevant federal laws, regulations, and DOD policies and procedures.

We conducted this performance audit from November 2023 to April 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### DODEA Schools

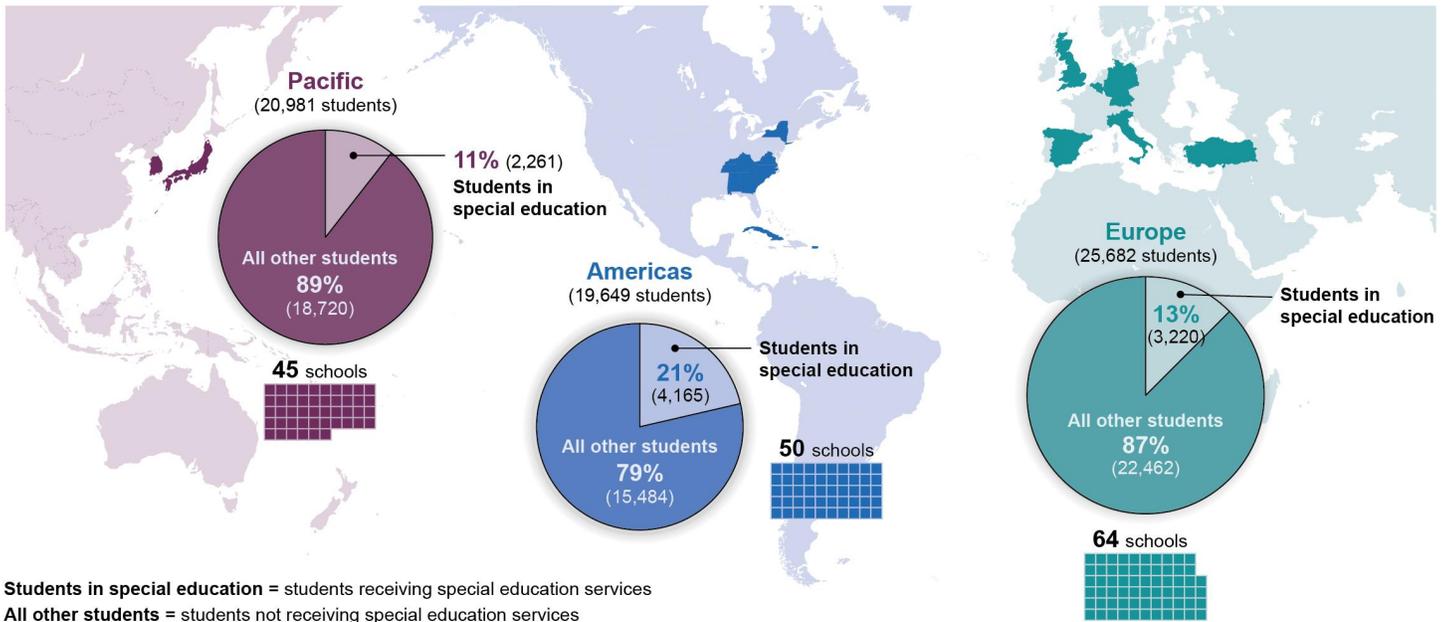
DODEA, a component under DOD's Office of the Under Secretary of Defense for Personnel and Readiness, plans, directs, coordinates, and manages prekindergarten through 12th grade educational programs for DOD. In school year 2023–2024, DODEA educated more than 66,000 children from military families in 160 schools around the world (see fig. 1). About 70 percent of these children attended DODEA schools overseas and the remaining 30 percent attended DODEA schools in North America. Located in nine U.S. states and territories and 11 foreign countries, DODEA schools are organized into three regions: Europe, the Pacific, and the

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<sup>7</sup>For the purposes of this report, findings statements attributed to "school staff" refer to groups we interviewed that can include special education teachers, paraeducators, related service providers (such as physical therapists), and administrators. School administrators include principals and vice principals. We use "officials" to refer to DODEA staff at the headquarters, regional, or district level.

Americas. The regions are further subdivided into nine total districts: four in Europe, three in the Pacific, and two in the Americas.

**Figure 1: Student Enrollment and Number of Schools Across DODEA, School Year 2023–2024**



**Students in special education** = students receiving special education services  
**All other students** = students not receiving special education services

Source: GAO analysis of Department of Defense Education Activity (DODEA) administrative data; Map Resources (base map). | GAO-25-107053

**Accessible Data for Figure 1: Student Enrollment and Number of Schools Across DODEA, School Year 2023–2024**

**Pacific (20,981 students)**

- Students in special education, 11% (2,261)
- All other students, 89% (18,720)
- 45 schools

**Americas (19,649 students)**

- Students in special education, 21% (4,165)
- All other students, 79% (15,484)
- 50 schools

**Europe (25,682 students)**

- Students in special education, 13% (3,220)
- All other students, 87% (22,462)
- 64 schools

Students in special education = students receiving special education services

## All other students = students not receiving special education services

Source: GAO analysis of Department of Defense Education Activity (DODEA) administrative data; Map Resources (base map). | GAO-25-107053

Note: This figure excludes DODEA's virtual school, which enrolled 35 students in school year 2023–24. Student enrollment data presented in this figure reflects the number of active students in DODEA's Student Information System around April 1, 2024.

The majority of DODEA students are children of active-duty servicemembers. However, about one in every five DODEA students is a dependent of civilian employees.

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## Special Education and Related Services in DODEA Schools

### Individualized Education Programs (IEP)

An IEP is a legally binding written plan developed by a team of school staff, parents, and when appropriate, the student receiving special education services. An IEP includes elements such as:

- A statement of the student's present levels of academic achievement and functional performance
- The student's goals and the services the student needs to advance toward attaining those goals.

Because IEPs are tailored to each student's needs, the types of services and number of weekly hours of specialized instruction differs across IEPs.

Source: GAO, *Special Education: Education Needs School- and District-Level Data to Fully Assess Resources Available to Students with Disabilities*, GAO-24-106264 (Washington, D.C.: June 27, 2024). | GAO-25-107053

As in traditional public schools, DODEA is responsible for providing special education and related services to eligible students with disabilities who have a wide range of abilities and needs.<sup>8</sup> Students vary in the type and intensity of services they need to meet their individualized educational needs. Special education and related services (such as speech therapy, psychological services, occupational therapy, and physical therapy) are provided to students as laid out in an individualized education program (IEP) (see sidebar).<sup>9</sup>

DODEA and other entities within DOD have various responsibilities for delivering special education and related services to DODEA students:

- Across DODEA locations worldwide, DODEA delivers specialized instruction to students, maintains records on the special education and related services students receive, and provides transportation services to students, among other duties.
- In military communities in the United States, DODEA staff are responsible for providing eligible DODEA students with occupational therapy, physical therapy, and other related services. Overseas, the military

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<sup>8</sup>For the purposes of this report, we use the phrases “students with disabilities” or “students receiving special education services” interchangeably to refer to K–12 students with individualized education programs receiving special education and related services in DODEA schools. Per DOD policy, DODEA recognizes 14 categories of disabilities in children ages 3 through 21. These include autism spectrum disorder, deafness, deaf-blindness, developmental delay, emotional disturbance, hearing impairment, intellectual disability, orthopedic impairment, other health impairment, specific learning disability, speech or language impairments, traumatic brain injury, visual impairment (including blindness), and multiple disabilities. See DOD Manual 1342.12.

<sup>9</sup>Occupational therapy is designed to help improve an individual's ability to perform tasks for independent functioning, such as walking stairs or grasping utensils.

branches' Educational and Developmental Intervention Services (EDIS) programs are responsible for providing certain related services to DODEA students requiring these services.<sup>10</sup>

DODEA students receiving special education and related services participate in DODEA's general education program, as appropriate. The curriculum for the general education program is based on DODEA's content standards, which are designed to ensure that all students are "college and career ready." Like public schools, DODEA schools offer an alternate curriculum with tailored academic expectations for students with the most significant cognitive disabilities.

Special education and related services staff who provide support to eligible DODEA students with disabilities include:

- **Special education teachers**, who primarily co-teach with general education teachers in general education classrooms and may also teach in separate special education classrooms. They help develop and implement IEPs, track students' progress toward IEP goals, and adapt lesson plans in response to students' needs. They also collaborate with other school staff and students' families.
- **Special education paraeducators**, who assist students with disabilities one-on-one, in small groups, and in larger classroom settings. They assist with physical and self-care tasks, behavioral needs, record-keeping, and tracking students' progress toward IEP goals. They also provide direct instructional support. Paraeducators also support general classroom activities and may help any student needing extra assistance.
- **Related service providers**, who provide specialized support to students, as required by students' IEPs, to help students benefit from the special education they receive. These include school counselors, school nurses, social workers, school psychologists, speech language pathologists, and physical or occupational therapists.
- **Special education and speech language assessors**, who develop assessment plans, administer assessments, and analyze assessment results to determine whether students are eligible for special education, as well as additional assessments should special education needs evolve. These assessors may also participate in developing students IEPs.
- **Special education instructional system specialists (instructional specialists)**, who monitor the quality of special education program services provided to students; provide training to school administrators, teachers, specialists, and other educators on effective instruction and assessment; and provide general oversight and coordinate support of special education and related services across schools.

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## Special Education Services Overseas

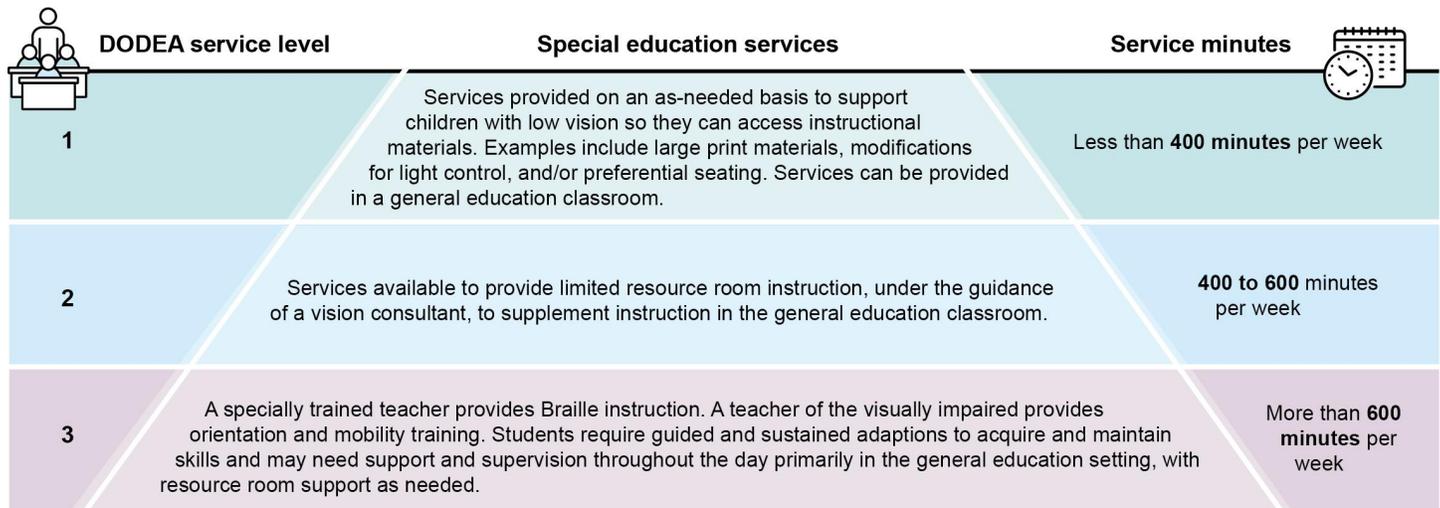
DODEA schools within the U.S. provide special education to students across all disability categories and levels of need. DOD uses three "service levels", grouped by disability category, to distinguish the differences in special education and related services available to students with disabilities in overseas DODEA schools.

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<sup>10</sup>The Army, Air Force, and Navy each operate EDIS programs on military installations where DODEA schools are located. Per DOD policy, EDIS-provided related services include medical services for diagnostic or evaluative purposes; social work; community health nursing; dietary, audiological, optometric, and psychological testing and therapy; occupational therapy; and physical therapy.

DOD publishes a directory listing the service levels available at each overseas location.<sup>11</sup> Each service level corresponds to the amount of instructional time and support the school can provide for students with a particular disability. The lower the service level, the fewer the special education instructional minutes supported at that school for that disability category (see fig. 2 for an example).

**Figure 2: Example of Special Education Service Levels in Overseas DODEA Schools for Services Related to Vision Impairments**



Source: GAO analysis of information from the Department of Defense Directory, *Special Education Services in OCONUS Communities, Department of Defense Education Activity Schools and Educational and Developmental Intervention Services*, July 2021; GAO (icons). | GAO-25-107053

**Accessible Data for Figure 2: Example of Special Education Service Levels in Overseas DODEA Schools for Services Related to Vision Impairments**

DODEA service level	Special education services	Service minutes
1	Services provided on an as-needed basis to support children with low vision so they can access instructional materials. Examples include large print materials, modifications for light control, and/or preferential seating. Services can be provided in a general education classroom.	Less than 400 minutes per week
2	Services available to provide limited resource room instruction, under the guidance of a vision consultant, to supplement instruction in the general education classroom.	400 to 600 minutes per week

<sup>11</sup>See *Department of Defense Directory, Special Education Services in OCONUS Communities, Department of Defense Education Activity Schools and Educational and Developmental Intervention Services*, (July 2021). Disability categories included in the directory are autism spectrum disorder, communication impairment, emotional impairment, hearing impairment, learning disability, intellectual disability, developmental delay, and vision impairment.

DODEA service level	Special education services	Service minutes
3	A specially trained teacher provides Braille instruction. A teacher of the visually impaired provides orientation and mobility training. Students require guided and sustained adaptations to acquire and maintain skills and may need support and supervision throughout the day primarily in the general education setting, with resource room support as needed.	More than 600 minutes per week

Source: GAO analysis of information from the Department of Defense Directory, Special Education Services in OCONUS Communities, Department of Defense Education Activity Schools and Educational and Developmental Intervention Services, July 2021; GAO (icons). | GAO-25-107053

Note: Department of Defense Education Activity (DODEA) “service level” refers to the instructional level and education support that DODEA can provide to students for a particular disability within a school. Service levels can vary within a school for different categories of disabilities. For example, a school may be designated as level 1 for vision impairment and level 3 for autism spectrum disorder. “Service minutes” refers to the number of minutes of specialized instruction and related services required in a student’s individual education program.

One purpose of DOD’s directory is to assist the Exceptional Family Member Program, which makes assignment recommendations for active-duty families with children who have special medical and educational needs, in assessing whether a location has appropriate levels of educational support.<sup>12</sup> As part of the program’s assessment for overseas assignments and travel approval, program staff coordinate educational screening requests to DODEA. DODEA then uses the directory to inform determinations on the availability of educational services at the proposed location and makes a travel recommendation. Travel recommendations based on DODEA’s educational screenings are not binding; military branch command is responsible for all final decisions related to military family member travel. DODEA is typically not informed of a military command’s final decision for permission to travel. In addition, while Exceptional Family Member Program screening is mandatory for service members and their dependents that have qualifying medical conditions or educational needs, civilian employees and their dependents are not required to enroll in the program.<sup>13</sup>

<sup>12</sup>The Exceptional Family Member Program also provides other supports to military families. For example, DOD requires that each military branch’s Exceptional Family Member Program include a family support component, through which it helps families with special needs identify and gain access to services, such as medical case management. For more information, see GAO, *Military Personnel: DOD Should Improve Its Oversight of the Exceptional Family Member Program*, [GAO-18-348](#) (Washington, D.C.: May 8, 2018).

<sup>13</sup>According to DOD policy, once civilians are selected for an overseas position, their DOD civilian human resources representatives are to inquire if the civilian has family members with special needs. If civilian families intend to enroll their children with disabilities in DODEA schools, they must also submit a form to their human resources representative that identifies their children’s special education needs. Their human resources representatives are responsible for providing civilian families with information on the special education services provided by DODEA in their overseas locations. See DOD Instruction 1315.19, *Exceptional Family Member Program* (Washington, D.C.; June 23, 2023).

**Glossary of Terms Used in this Report Related to Special Education in Department of Defense Education Activity (DODEA) Schools**

**Disability category:** The primary disability category for which a student qualifies for special education (such as hearing impairment, specific learning disability, autism spectrum disorder, etc.). To qualify for special education, students need to meet the requirements for at least one disability category. However, students may have disabilities that span multiple categories.

**Evaluation:** The method used by a multidisciplinary team to conduct and review the assessments of a child and other relevant input to determine whether a child has a disability and whether the child has an initial and continuing need to receive early intervention services or special education and related services.

**Free Appropriate Public Education:** Special education and related services provided under the general supervision and direction of DODEA, at no cost to parents of a child with a disability, as designated in a child's individualized education program and in accordance with the requirements of the Individuals with Disabilities Education Act and Department of Defense policy.

**General education curriculum:** The curriculum adopted by DODEA for all children from preschool through grade 12. DODEA officials said that to the extent applicable to an individual child with a disability, the general education curriculum can be used in any educational environment.

**Individualized Education Program (IEP):** A written document developed by a team of school officials, parents, and (when appropriate) the student, that states the student's present level of academic achievement and functional performance, annual goals, and services needed to advance toward attaining those goals.

**Instructional materials:** Materials designed to support and enhance curriculum and support teaching of the curriculum. For example, instructional materials may include units of study, daily lesson plans, and assessments.

**Interventions:** Specific programs or strategies that help students who need targeted support on a set of skills or a knowledge area.

**Related services:** Services required to assist a child with a disability to benefit from their special education under the child's IEP. Examples include psychological and counseling services; language, speech, and hearing services; transportation; assistive technology; physical and occupational therapy; and medical services that are required for diagnostic or evaluation purposes.

**Service minutes:** The number of minutes of specialized instruction and related services required in a student's IEP.

**Specially designed instruction:** Adapting, as appropriate to the needs of a child with an IEP, the content, methodology, or delivery of instruction to (1) address the unique needs of the child that result from the child's disability, and (2) to ensure that the child can access the general education curriculum.

Source: Adapted from Department of Defense (DOD) documentation and written statements from DOD officials; GAO, Special Education: Education Needs School- and District-Level Data to Fully Assess Resources Available to Students with Disabilities, [GAO-24-106264](#) (Washington, D.C.: June 27, 2024); Learning List, "Defining Roles: Standards vs. Curriculum vs. Instructional Materials," accessed January 16, 2025 from <https://www.learninglist.com/defining-roles-standards-vs-curricula-vs-instructional-materials/>; Understood, "The difference between interventions and accommodations," accessed February 5, 2025 from <https://www.understood.org/en/articles/the-difference-between-interventions-and-accommodations>; and Matthew M. Chingos and Grover J. "Russ" Whitehurst, "Choosing Blindly: Instructional Materials, Teacher Effectiveness, and the Common Core," (Washington, D.C.: Brown Center on Education Policy at Brookings Institution, April, 2012). | GAO-25-107053

## DOD Updated Its Special Education Services Directory in January 2025 but DODEA's Staff Allocation Methods Do Not Always Align with Student Needs

### DOD Updated its Special Education Services Directory to Include Information About the Availability and Level of Related Services Overseas

**Related Services for Students Receiving Special Education Services**

For many students receiving special education, their individualized education programs (IEPs) may include related services such as occupational and physical therapy that are designed to help students benefit from the special education they receive. These related services help students develop and maintain certain skills necessary for academic success.

For example, occupational therapy helps some students develop hand strength that allows them to hold pencils comfortably, or helps them learn how to maintain good, seated positions at their desks during lessons. Physical therapy may help students improve their balance while walking so they may move around the classroom and school without falling.

Source: Adapted from Department of Defense documentation and California Department of Education, Guidelines for Occupational and Physical Therapy in California Public Schools (Second Edition), (Sacramento, CA: 2012). | GAO-25-107053

DOD’s directory of special education services identifies the service level of special education instruction at DODEA locations overseas. However, until January 2025, the directory did not include comparable information for related services—such as occupational or physical therapy—that are sometimes required in students’ IEPs (see sidebar). For instance, as shown in table 1 below, for schools at the Ansbach, Germany military base, the directory covering July 2021 through December 2024 noted the level of special education instruction DODEA could provide for different disability categories. However, there were no comparable details provided for related services. The directory only stated that related services were available and that the relevant office was located at the Stuttgart, Germany military base.

**Table 1: Sample Information Provided in DOD’s July 2021 Directory of Special Education Services Overseas**

**Department of Defense Education Activity (DODEA) level of service (by disability category)**

Country	Community	School	AU	CI	EI	HI	LD	ID	PS	VI	EDIS military branch	EDIS location
Germany	Ansbach	Ansbach Elementary	2	2	2	1	3	2	2	1	Army	Stuttgart
Germany	Ansbach	Ansbach High School	2	2	2	1	3	2	2	1	Army	Stuttgart

Source: Department of Defense (DOD) Directory, Special Education Services in OCONUS Communities, Department of Defense Education Activity Schools and Educational and Developmental Intervention Services. | GAO-25-107053

Note: This version of the directory was published in July 2021 and remained in place through December 2024. The following disability categories are reflected in the table by acronyms: autism spectrum disorder (AU), communication impaired (CI), emotionally impaired (EI), hearing impaired (HI), specific learning disability (LD), intellectual disability (cognitive delay) (ID), developmental delay (preschool) (PS), visually impaired (VI). DODEA special education service levels are designated on a scale from 1-3. Level 1 services are the least intensive and can accommodate students with up to 400 service time minutes per week. Level 3 services are the most intensive and can accommodate students that need more than 600 service minutes per week. EDIS provides special education-related services at overseas DODEA locations.

**Distribution of Students Receiving Special Education Across DODEA Locations**

Roughly consistent with U.S. public schools, in school year 2023–2024, about 15 percent of DODEA students received special education services.

Across DODEA regions, 57 percent of students receiving special education services attended schools in Europe or the Pacific and about 43 percent attended schools in the Americas.

The most common disability categories for students receiving special education were

1. speech impairments (26 percent of students receiving special education),
2. specific learning disabilities (25 percent),
3. developmental delays (15 percent), and
4. autism spectrum disorder (14 percent).

Source: GAO analysis of Department of Defense Education Activity (DODEA) administrative data. | GAO-25-107053

DOD’s Office of Special Needs publishes the directory.<sup>14</sup> To do so, the Office of Special Needs obtains information from DODEA about the level of special education services available at overseas schools, where the majority of DODEA students receiving special education are enrolled (see sidebar). Officials from the Office of Special Needs told us that one purpose of the directory is to provide transparency about the availability of special education services overseas to help military families facing relocation decisions.

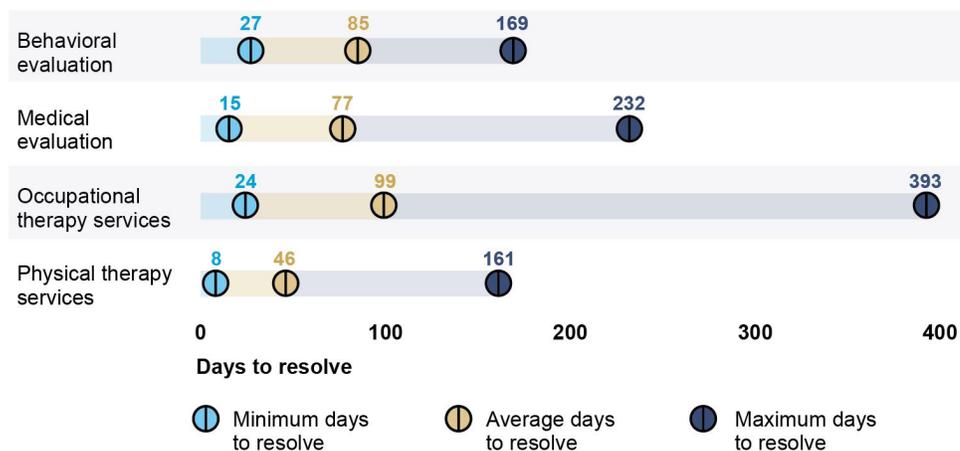
Office of Special Needs officials told us that they had not included more detailed information on EDIS-related services by location in the directory in prior years because they did not have a regularly recurring process to coordinate with the military branches to obtain this information. When we asked officials about whether they planned to include this information in future directories, officials initially told us they would contact the military branches in December 2024 to get more details on related services. Officials said they would include this

<sup>14</sup>The Office of Special Needs is a separate entity from DODEA, within the Office of the Deputy Assistant Secretary of Defense for Military Community and Family Policy, under the Office of the Under Secretary of Defense for Personnel and Readiness. The Office of Special Needs provides support to military families with medical or educational needs, as well as oversight of special education services and the Exceptional Family Member Program.

information in an updated directory.<sup>15</sup> When we followed up with officials about the status of the directory, officials said that they contacted the military branches to obtain this information in January 2025. The office ultimately issued an updated directory in January 2025 that includes information on the level of related services available in overseas locations. Officials said they would continue to publish this information on related services in all future directories.

Including information in the directory on the level of related services EDIS can provide by location is important, as DODEA headquarters officials told us that the availability of related services for students at overseas schools is one of the major challenges they face in serving students with disabilities. Our analysis of DODEA data on interruptions and delays in related services due to high caseloads and staffing shortages for EDIS staff supports this view. For example, we found delays in service delivery for students in 44 of the 114 schools overseas for the 2022–2023 school year. On average, it took between 37 and 99 days to resolve delays for different services (see fig. 3).

**Figure 3: Days Taken to Resolve Special Education Related Services Delays for DODEA Students During 2022–2023 School Year**



Source: GAO analysis of Department of Defense Education Activity (DODEA) administrative data. | GAO-25-107053

**Accessible Data for Figure 3: Days Taken to Resolve Special Education Related Services Delays for DODEA Students During 2022–2023 School Year**

Service category	Minimum days to resolve	Average days to resolve	Maximum days to resolve
Behavioral evaluation	27	85	169
Medical evaluation	15	77	232
Occupational therapy services	24	99	393
Physical therapy services	8	46	161

<sup>15</sup>Officials from the Office of Special Needs also said that they planned to make other changes in the service directory, including providing information on early intervention services for children from birth up to age 3. Per DOD Instruction 1315.19, the military departments are required to notify the Office of Special Needs of substitutions, additions, and deletions to related and early intervention services in overseas locations.

Source: GAO analysis of Department of Defense Education Activity (DODEA) administrative data. | GAO-25-107053

We also found that from school year 2018–2019 through school year 2022–2023, the military branches and DODEA took more than one year to resolve at least six of these cases. DODEA officials stated that they do not have control over staffing overseas for EDIS personnel and noted that the COVID-19 pandemic and difficulties hiring staff during that time may have contributed to these delays. A regional DODEA official also told us that EDIS would not be able to offer occupational therapy or physical therapy services in one country for the first semester of the 2024–2025 school year due to a lack of staff, even though some students' IEPs may require these services. EDIS officials commented that when EDIS services are unavailable, it is due to complex challenges, such as issues with staffing, contract limitations, and available funding.

Students can sometimes struggle to make progress towards their IEP goals when related services are delayed, limited, or unavailable, according to service providers and parents we interviewed. For example, one parent told us that their child did not receive the 1.5 hours per month of occupational therapy that their IEP required. According to this parent, their child “failed three quarters of the [school] year as a result.” Additionally, one EDIS provider told us that because their overseas location only has three physical therapists, students receive their required IEP service minutes in one week rather than spread out over a month, making it more difficult for students to build skills.

Office of Special Needs officials said including more detailed information on related services in the directory may help address challenges connected to the availability of related services. For example, officials said that this information will provide more transparency to military families on the availability of all services their child requires or may require in the future, enabling families to make informed decisions. Officials also said this information will enable all necessary stakeholders, including the Office of Special Needs, DODEA, and the military branches, to maintain awareness of the provision of special education services overseas and to discuss potential needs.

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## DODEA’s School Staffing Formulas Do Not Consider Required Service Minutes, Which Can Vary Widely Among Students with IEPs

DODEA’s formulas for determining the number of special education teachers to assign to a school are based primarily on the total number of students in each special education program within a school. DODEA’s staffing formulas do not consider the number of service minutes in students’ IEPs—minutes of special education services that DODEA is required to provide. Required service minutes can vary widely from student to student even within the same special education program or classroom.

### Special Education Programs Available to DODEA Students

DODEA offers four special education programs to K–12 students (not all programs are offered at every DODEA school). Each of these programs have distinct staff positions associated with them. These programs include

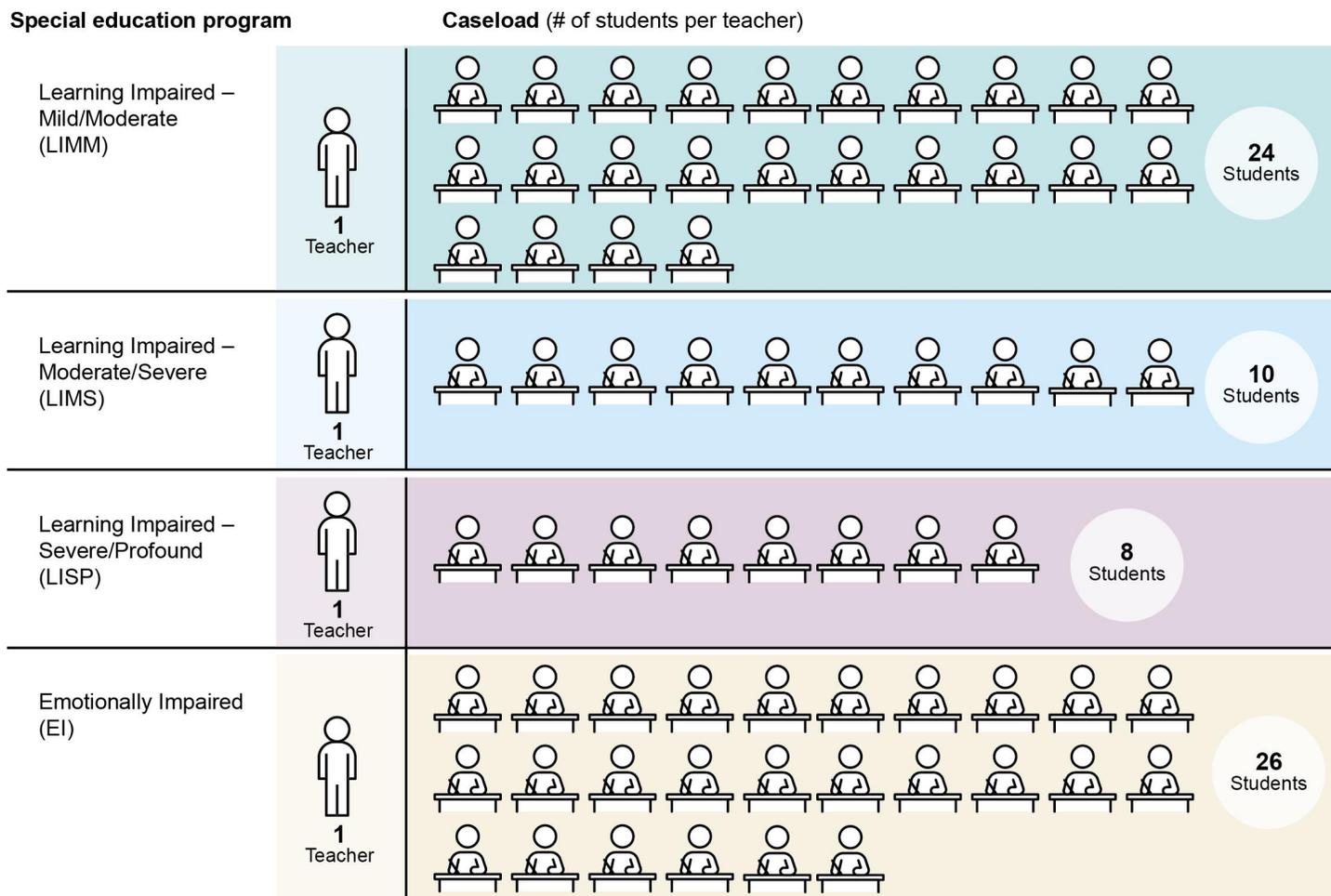
1. a program for students with mild to moderate learning impairments (LIMM),
2. a program for students with moderate to severe learning impairments (LIMS),
3. a program for students with severe to profound learning impairments (LISP), and
4. a program for students with emotional impairments (EI).

Source: GAO review of Department of Defense Education Activity (DODEA) documentation. | GAO-25-107053

DODEA’s staffing formulas assign a certain number of students to teachers for each of its special education programs (see sidebar). DODEA assigns the highest student-to-teacher ratios for the programs with students with the least intensive needs and the lowest student-to-teacher ratios for programs with students with the

most intensive needs (see fig. 4). For example, for the 2024–2025 school year, DODEA’s staffing formulas indicate that one teacher for the learning impaired mild to moderate program can have up to 24 students on their caseload. For the learning impaired moderate to severe program, DODEA allocates one teacher to every 10 students on their caseload.<sup>16</sup>

**Figure 4: DODEA Staffing Formulas for Special Education**



Source: GAO analysis of Department of Defense Education Activity (DODEA) Special Education staffing standards; GAO (icons). | GAO-25-107053

**Accessible Data for Figure 4: DODEA Staffing Formulas for Special Education**

Special education program	Caseload (# of students per teacher)
Learning Impaired – Mild/Moderate (LIMM)	24
Learning Impaired – Moderate/Severe (LIMS)	10

<sup>16</sup>Staffing standards for each special education program include both a caseload number and a range. The range typically extends two to four students above and below the caseload. For example, the caseload for the learning impaired mild to moderate program is one teacher for 20 students and the range is 16 to 24 students. DODEA’s staffing standards do not explain how DODEA applies these ranges when determining whether schools need additional special education teachers.

Special education program	Caseload (# of students per teacher)
Learning Impaired – Severe/Profound (LISP)	8
Emotionally Impaired (EI)	26

Source: GAO analysis of Department of Defense Education Activity (DODEA) Special Education staffing standards; GAO (icons). | GAO-25-107053

Note: DODEA’s staffing standards for each special education program include both a caseload number and a range. The range typically extends two to four students above and below the caseload number. For example, the caseload for one teacher in the LISP program is 20 students and the range is 16 to 24 students. For the purposes of this report, we use the term “caseload” to refer to the upper limit of the range for each program. DODEA’s staffing standards do not explain how DODEA applies these ranges when determining whether schools need additional special education teachers. DODEA’s staffing standards also include three levels of the EI program: 1) Emotionally Impaired, Mild to Moderate (Self-Contained, meaning a separate and more intensive educational environment for students); 2) Emotionally Impaired, Severe (Self-Contained); and 3) Emotionally Impaired (Itinerant, i.e. teachers who may travel between school sites to provide services to students). The graphic reflects the caseload for a teacher in the Emotionally Impaired (Itinerant) level—the program with the highest student to teacher ratio.

DODEA headquarters officials stated that their staffing formulas should be responsive to emerging needs and the varying intensity of support that students may require over time. Officials also confirmed that their staffing formulas have been in place since at least 2015, and they have not reviewed them since then. Officials told us they did not know whether any previous staffing formulas considered IEP service minutes.

By not including IEP service minutes in their staffing formulas, DODEA is not considering important information about the supports that students need. Further, DODEA school staff and administrators told us that even students within the same special education program can have significant differences in the amount of support they need in the classroom. For example, an administrator at one school we visited told us that “one teacher is supposed to serve [a certain amount] of students, but a certain number of students doesn’t necessarily always equal a certain number of hours.” Additionally, at 13 of the 14 schools we visited, school staff told us that staffing formulas using only student headcounts do not provide enough staff to meet the needs of students as outlined in their IEPs. In overseas schools, this is further exacerbated because some students are enrolled in schools with designated services levels that do not match their needs (see textbox).

**Some Students Receiving Special Education Attend Overseas DODEA Schools Without Available Resources to Support Their Disability**

Our analysis of DODEA data found that in the 2023–2024 school year, 88 students were enrolled at overseas schools that had no available support for their disability category as described in the service directory. For example, more than one-third of these students had an autism diagnosis but were enrolled in schools for which the directory indicated no resources designed to support students with an autism diagnosis.

Various factors can drive instances where students enroll in DODEA schools without service levels that match their diagnosis. For example, travel recommendations based on DODEA’s educational reviews through the Exceptional Family Member Program are not binding, and DODEA and Exceptional Family Member Program staff said that some families may choose to relocate to installations even if they are aware that needed services are unavailable. Additionally, civilian families are not required to enroll in the Exceptional Family Member Program, which would screen and match them to locations with schools offering service levels to meet the needs of their child or children.

DODEA officials told us that schools are required by law to provide a free appropriate public education to students when they arrive at a school, even if they need a higher level of service than the school provides. In these instances, school staff may have to balance an even wider range of student needs in their classrooms than may already exist. Officials also said that DODEA’s mission includes supporting military readiness, and DODEA aims to not be a barrier to a service member serving in the military at any location.

Source: GAO interviews with Department of Defense (DOD) Exceptional Family Member Program staff, Department of Defense Education Activity (DODEA) staff, and GAO review of DOD documentation and DODEA administrative data. | GAO-25-107053

DODEA’s strategic plan directs the agency to develop policies and practices that eliminate barriers and enhance equitable access to resources and support opportunities for all students. DOD policy also states that

personnel requirements should be driven by workload.<sup>17</sup> Additionally, identifying current and future human capital needs, such as specifying the number of employees needed to strategically address gaps in services, is a critical success factor for human capital management.<sup>18</sup> However, DODEA's current special education staffing formulas may make it challenging for all students to have equitable learning opportunities. For example:

- A special education teacher at one school told us that they had to move all their students off their caseload to other teachers in the building so they could provide one-on-one support to one student with a high level of need. The same teacher said they did not “feel equipped” to meet the student’s level of need.
- A special education teacher in another school we visited mentioned that when one or a small handful of students in their classrooms require significantly more attention than others, it limits the amount of support they can provide to students with less profound needs.
- A school administrator told us that because there is not enough time in the school day to provide services with their current staff, special education services are either reduced or offered to students in group settings. The same administrator also explained that when services are offered in a group instead of to students in more individualized one-on-one settings, the personalized attention that was showing so much benefit for the student is lost.

DODEA headquarters officials told us that students with special education needs spend most of their time in general education settings and may receive support from a range of staff beyond their special education teachers. Officials also said there are several mechanisms through which schools can obtain additional staff as needs arise throughout a school year. Officials told us that school administrators and regional DODEA officials have flexibility to move staff between schools if needed. For example, if one DODEA school in a region has special education staff who are underutilized and another school in the region needs additional supports, regional level staff can shift staff from a school where they are underutilized to a school with greater needs. Additionally, DODEA headquarters officials also told us that schools can submit formal requests for additional special education staff if needed, though officials said they do not track how many requests they receive or the number of requests they approve or deny. School staff we spoke with at five schools said that submitting requests for additional staff was a time-intensive process or that their requests for additional paraeducators or student aides were denied.

Revising the staffing formulas to incorporate the IEP service minutes that students are required to receive would provide additional information to consider when determining the intensity of support that students need. Additionally, considering IEP service minutes could help DODEA more effectively allocate staff based on individual student’s needs and address potential gaps in special education services. By allocating staff in a way that considers the instructional time that students are entitled to, DODEA could better ensure that students receive sufficient support to make progress towards their educational goals.

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<sup>17</sup>DOD Directive 1100.4, *Guidance for Manpower Management*, (Feb. 12, 2005).

<sup>18</sup>GAO, *A Model of Strategic Human Capital Management*, [GAO-02-373SP](#) (Washington, D.C.: Mar. 15, 2002).

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## DODEA Staff and Families Identified Staffing Shortages, Insufficient Training, and Unclear Guidance Among Key Obstacles to Providing Special Education Services

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### DODEA School Staff Said Staffing Shortages, High Turnover Rates, and a Lengthy Hiring Process Exacerbate Heavy Workloads and Affect Service Delivery

DODEA staff at the schools we visited identified special education personnel shortages, high turnover rates, and lengthy processes for hiring teachers and staff as key obstacles to educating students with disabilities. These schools are located in the three largest DODEA school districts, which collectively educate nearly 50 percent of all DODEA students. School staff said that these obstacles affect the consistency, timeliness, and overall quality of special education and related services that students receive.

#### Staffing Shortages

At all 14 schools we visited, DODEA school staff cited special education staffing shortages—and resulting heavy workloads—as an obstacle to educating students with disabilities. This is consistent with our 2024 work on special education in public schools, which showed that staffing shortages were the most widely cited obstacle to educating students with disabilities.<sup>19</sup> These staff experiences are also consistent with our 2022 report on teacher shortages, in which we found that special education teachers were among the most commonly reported staffing shortages in K–12 schools.<sup>20</sup>

DODEA school staff told us that staffing shortages impact the quality and frequency of services for students receiving special education. For example:

- School staff in nine of the 14 schools we visited told us that students are not getting the support they need because of staffing challenges. In four schools, staff told us that they were unable to meet the service minutes required in students' IEPs. School staff in three schools told us that students receiving special education are getting required services, but only because staff take on higher workloads to ensure it is possible.
- Related service providers overseas told us that because of their high caseloads, they have difficulty scheduling students for services that are required as part of students' IEPs. Further, one related service provider told us that because there are not enough providers for each school in their community, they often travel to multiple schools throughout the week, which limits the time they can meet with students.

#### Staff Turnover

At 11 of 14 DODEA schools we visited, school staff said that staff turnover is an obstacle to providing special education services to students. At one school, school staff told us they had a new teacher for the Emotionally

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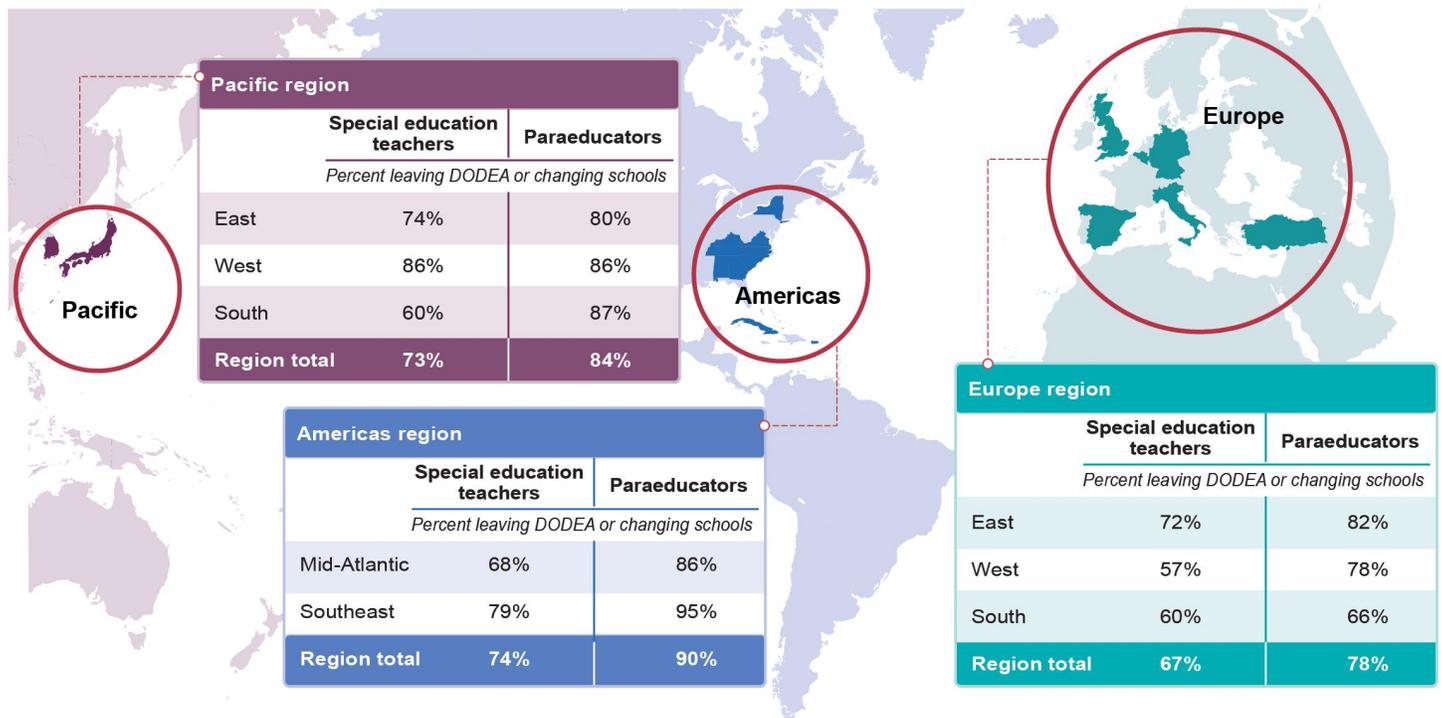
<sup>19</sup>See GAO, *Special Education: Education Needs School- and District-Level Data to Fully Assess Resources Available to Students with Disabilities*, [GAO-24-106264](#) (Washington, D.C.: June 27, 2024).

<sup>20</sup>See GAO, *K-12 Education: Education Should Assess Its Efforts to Address Teacher Shortages*, [GAO-23-105180](#) (Washington, D.C.: Oct. 27, 2022).

Impaired program almost every year for the past few school years because of teacher turnover in that role. At another school, staff said that they have had more than 14 different administrators in the last 4 years.

The annual turnover rates for special education teachers across all regions was over 68 percent for school years 2019–2020 through 2022–2023, according to our analysis of DODEA data.<sup>21</sup> In school year 2022–2023, the average turnover rate for special education teachers was highest in the Americas (see fig. 5). Turnover rates for paraeducators were especially high, with rates 11 to 22 percentage points higher than the average turnover rates for all other special education positions during the same timeframe.<sup>22</sup> Specifically, in school year 2022–2023, turnover rates for paraeducators were 90 percent in the Americas, 84 percent in the Pacific, and 78 percent in Europe (see fig. 5).

**Figure 5: Turnover Rates Among Paraeducators and Special Education Teachers Across DODEA Locations, School Year 2022–2023**



Source: GAO analysis of Department of Defense Education Activity (DODEA) administrative data; Map Resources (base map). | GAO-25-107053

<sup>21</sup>“Turnover rates” are the rates at which employees either transferred from one DODEA school to another, or left DODEA entirely.

<sup>22</sup>Other special education positions include special education teachers, special education assessors, speech language pathologists, and speech language assessors.

**Accessible Data for Figure 5: Turnover Rates Among Paraeducators and Special Education Teachers Across DODEA Locations, School Year 2022–2023**

	Special education teachers: Percent leaving DODEA or changing schools	Paraeducators: Percent leaving DODEA or changing schools
Pacific region: East	74%	80%
Pacific region: West	86%	86%
Pacific region: South	60%	87%
Pacific region: Region total	73%	84%
Americas region: Mid-Atlantic	68%	86%
Americas region: Southeast	79%	95%
Americas region: Region total	74%	90%
Europe region: East	72%	82%
Europe region: West	57%	78%
Europe region: South	60%	66%
Europe region: Region total	67%	78%

Source: GAO analysis of Department of Defense Education Activity (DODEA) administrative data; Map Resources (base map). | GAO-25-107053

Pay rates could be one factor affecting staff turnover. Our analysis of DODEA paraeducator pay scales found that, on average, pay has not kept pace with inflation for paraeducators in the Americas. When adjusted for inflation, paraeducators in the Americas saw, on average, a 5 percentage point decrease in their pay from school years 2019–2020 through 2024–2025. Similarly, when adjusted for inflation, paraeducators overseas had, on average, an over 5 percentage point decrease in their pay across school years 2019–2020 to 2022–2023. However, for the last two school years (2023–2024 and 2024–2025), paraeducators overseas received a pay increase. According to DODEA school staff at 10 of 14 schools we visited, paraeducators make less than substitute teachers, or less than they could make working at the commissary on base. DODEA officials also stated that many DODEA paraeducators are military spouses who move locations when their spouses get new assignments, which contribute to higher rates of turnover.

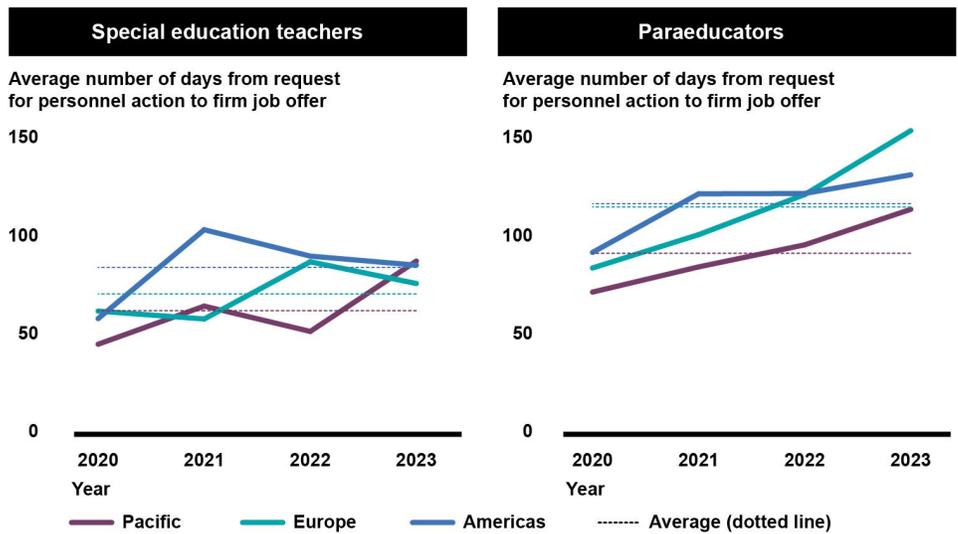
School staff and parents provided several examples illustrating how turnover of teachers, paraeducators, and administrators affects special education services. For instance, teachers and paraeducators at four schools told us that the high turnover rates mean that students receiving special education do not have the consistency or time to build trust with the staff. At one school, teachers said that they had a student who did not receive required special education services for months because the school lost the student’s paperwork during an administrator turnover. DODEA parents at another school told us that it took about 6 months for their child to get an IEP because “things fell through the cracks” when their school rotated through three different administrators.

### Hiring Special Education Staff

Difficulties hiring special education staff also hinder efforts to provide special education services to DODEA students, according to school staff and district officials we interviewed at all 14 schools we visited. For example, school staff at eight schools said the lengthy DODEA hiring process can take over half a school year or more to fill a vacancy. One district official told us that some candidates accept other positions outside of DODEA because the hiring process takes so long and that this further extends the time it takes to fill vacant positions.

The amount of time it takes to hire special education teachers increased from school years 2019–2020 to 2022–2023. For example, in the Pacific, it took on average about 45 days to hire special education teachers in school year 2019–2020 and an average of 87 days by school year 2022–2023. Similarly, hiring timelines for paraeducators increased over time. For example, in Europe, the hiring process for paraeducators took around 83 days on average in school year 2019–2020. In school year 2022–2023, the process increased to 154 days (see fig. 6). DODEA officials stated that hiring was a challenge during these school years in part because hiring timelines were significantly impacted by the COVID-19 pandemic.

**Figure 6: Average Time to Hire DODEA Special Education Teachers and Paraeducators, School Years 2019–2020 to 2022–2023**



Source: GAO analysis of Department of Defense Education Activity (DODEA) administrative data. | GAO-25-107053

**Accessible Data for Figure 6: Average Time to Hire DODEA Special Education Teachers and Paraeducators, School Years 2019–2020 to 2022–2023**

Two line charts

**Special education teachers**

Year	Americas: Average number of days from request for personnel action to firm job offer	Europe: Average number of days from request for personnel action to firm job offer	Pacific: Average number of days from request for personnel action to firm job offer
2020	57.64	61.48	44.58
2021	103	57.47	64.03
2022	89.53	86.63	51.12
2023	84.92	75.55	87
Average (dotted line)	83.77	70.28	61.68

**Paraeducators**

Year	Americas: Average number of days from request for personnel action to firm job offer	Europe: Average number of days from request for personnel action to firm job offer	Pacific: Average number of days from request for personnel action to firm job offer
2020	91.42	83.48	71.19
2021	121.31	100.47	84.03
2022	121.48	120.93	95.28
2023	131.01	153.51	113.38
Average (dotted line)	116.305	114.598	90.97

Source: GAO analysis of Department of Defense Education Activity (DODEA) administrative data. | GAO-25-107053

Note: The request for personnel action to firm job offer means from the date of the request for personnel action identifying the position vacancy to the time of the firm job offer. After the firm job offer, there might be a delay in the official staff start dates due to the school calendar, according to DODEA headquarters officials. Officials stated that hiring timelines during the school years presented above were significantly impacted by the COVID-19 pandemic.

School staff in 10 DODEA schools emphasized that the lengthy hiring process leaves critical staff positions vacant or filled by temporary staff, such as substitutes, for extended periods of time. For example, DODEA staff at one school told us that they did not have a teacher for the moderate to severe learning impaired program for over a year. In the interim, staff said the school relied on long-term substitutes who were not certified in special education to work with students in the program. Research has shown that students’ academic progress can suffer when teachers are absent for extended periods of time.<sup>23</sup> Further, without qualified special education staff in place, students may not be receiving the high-quality instruction they need to make progress on their IEP goals.

DODEA headquarters officials described several ongoing efforts to address staffing shortages and hiring timelines. For example, DODEA headquarters officials told us that in 2023 they began an initiative called the Teacher Hiring Project, which DODEA officials expect will help reduce hiring timelines. Through this initiative, DODEA officials said they proactively identify known and anticipated vacant positions for special education staff and hold biweekly “progress reviews” with hiring managers to monitor the status of classroom teaching vacancies. Headquarters officials also said they created guidance and training for hiring managers to ensure that these managers have tools for filling critical teaching positions. DODEA regional and district officials in one region and school staff in one school told us that hiring timelines have recently improved because of these efforts.

School staff we spoke with also noted helpful aspects of DODEA staffing and provision of other resources. For example:

- Staff in two schools said they were fully staffed in school year 2023–2024. Staff in one of the schools said that this helped improve their workload.
- Staff in one school said that they felt very supported by their school administrators, and that there was a strong sense of mutual respect and a collaborative environment between the general and special education teaching staff.

<sup>23</sup>Charles T. Clotfelter, Helen F. Ladd, and Jacob L. Vigdor, *Are Teacher Absences Worth Worrying About in the United States?* (American Education Finance Association, 2009).

- Staff in two schools also said that beyond having supportive colleagues, DODEA provided other helpful resources, such as assistive technology devices.<sup>24</sup>

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## DODEA Paraeducators Cited a Need for Crisis Training

At most schools we visited (12 of 14), paraeducators told us that when they started at DODEA, they had little or no special education training for their position and they need more. According to officials, DODEA provides agency-wide web-based, self-paced training modules that paraeducators complete annually.<sup>25</sup> They include general education and special education topics and take about 12 hours to complete.<sup>26</sup>

DODEA officials also told us that paraeducators have access to other training opportunities, including training on behavioral strategies. However, paraeducators told us that they are largely dependent on the willingness of special education teachers they work with to train them. For example, one paraeducator told us that paraeducators must “get lucky” that the teachers they work with provide on-the-job training. At another school, paraeducators told us that the special education teacher they worked with has developed their own weekly training for paraeducators in their classroom and helped the paraeducators put the training into practice. Another paraeducator told us that without having had onboarding training they were “thrown into the job to sink or swim.”

### Behavioral Health Resources for DODEA Schools Overseas

During our interviews, DODEA school staff and officials highlighted a lack of availability of behavioral and mental health resources for DODEA schools overseas. These include:

- a lack of mental health services and health care services for DODEA students overseas,
- few behavioral health resources for students overseas,
- no alternative settings (e.g. residential treatment centers) for students overseas whose needs exceed what DODEA can provide, and
- difficult processes for getting families reassigned from an overseas school.

Source: GAO Interviews with Department of Defense Education Activity (DODEA) school staff and regional and district-level DODEA officials. | GAO-25-107053

Paraeducators at five schools across all regions also emphasized that they did not have any training on crisis management. Crisis training teaches staff strategies and techniques to reduce the risk of a crisis, as well as appropriate responses and de-escalation techniques in the classroom. Paraeducators in these schools told us that they often work with students who have behaviors that require crisis management. For example,

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<sup>24</sup>Assistive technology refers to any item, piece of equipment, or product system, that is used to increase, maintain, or improve the functional capabilities of a child with a disability. Examples include modified scissors, audiobooks, and voice recognition software.

<sup>25</sup>DODEA headquarters officials told us that they rely on online training modules because their staff are spread out across time zones, and it can be difficult to find the time to provide in-person trainings. In our 2024 work on special education in public schools, we found that district officials often cited time constraints as a challenge to providing professional development on special education. See GAO, *Special Education: Education Needs School- and District-Level Data to Fully Assess Resources Available to Students with Disabilities*, [GAO-24-106264](#) (Washington, D.C.: June 27, 2024).

<sup>26</sup>We previously reported on professional learning for DODEA teachers and found that teachers generally reported positive views of agency-wide professional learning events, according to GAO’s analysis of closed-ended teacher survey data from summer 2018 through the end of 2021. See GAO, *K-12 Education: Teachers Generally Responded Positively to Professional Learning at DOD Schools*, [GAO-22-105464](#) (Washington, D.C.: July 18, 2022).

paraeducators at one school in Europe described situations in which students were physically aggressive, posing a danger to staff, other students, or themselves. Crisis training is especially important for paraeducators overseas, given the limited mental health and behavioral health resources at overseas locations (see sidebar).

School staff told us that their schools train teachers, administrators, and school counselors in crisis management but do not provide such training for all paraeducators who work directly with students receiving special education. For example, one paraeducator told us, “Only certain people in the schools receive the training. Administrators are trained, but they don’t always show up when they are needed. It is dangerous.” Another paraeducator described an incident in which they were alone with a student and had to keep the student from harming themselves or others until administrators could get to the building. This paraeducator told us that the incident “resulted in me going to the emergency room due to injury...They said there were insufficient funds and limited space for us to go to the training but the people that are with students one-on-one need to go to the training.”

DODEA headquarters officials told us that school administrators have discretion to determine which school building staff should attend crisis training. For example, at one school we visited in the Pacific region, paraeducators told us that they had recently received crisis training because caseloads and behavioral incidents had increased. However, at another school we visited in Europe, school staff told us that administrators wanted paraeducators to take crisis training, but their request was denied by the district.

DODEA headquarters officials also told us that they do not directly oversee special education staff training. Instead, officials said they monitor staff training through feedback from the regional and district instructional specialists. Administrators at one school told us that the administrators monitor training for paraeducators. However, the administrators told us that because of the large number of paraeducators at their school, they are not always able to check that paraeducators have taken the DODEA required trainings.

DODEA Administrative Instruction 2510.01 requires DODEA to ensure that staff employ a full range of effective classroom management and behavior interventions to create a safe learning environment.<sup>27</sup> It also states that school staff should be trained on the appropriate use of effective alternatives to physical restraint and seclusion. Finally, it states that DODEA school administrators provide annually, or as required, DODEA-endorsed crisis intervention training to special education personnel working with students with emotional or behavioral needs.

By ensuring that all special education paraeducators working with students who may need behavioral supports can access the required crisis training, DODEA may be able to provide a safer learning environment for both students and staff. For example, our prior work found that crisis training resulted in decreased use of restraints or seclusion for behavior management in several public-school districts.<sup>28</sup> Taking steps to ensure that paraeducators attend this training could help avoid crises in DODEA schools and promote safe learning environments for students receiving special education.

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<sup>27</sup>DODEA Instruction 2510.01 *Student Behavior Interventions* (July 6, 2015).

<sup>28</sup>See GAO, *K-12 Education: Education Needs to Address Significant Quality Issues with its Restraint and Seclusion Data*, [GAO-20-345](#) (Washington, D.C.: April 2020).

## Special Education Staff Face Challenges Adapting the General Education Curriculum and Obtaining Reading Interventions to Meet Students' Needs

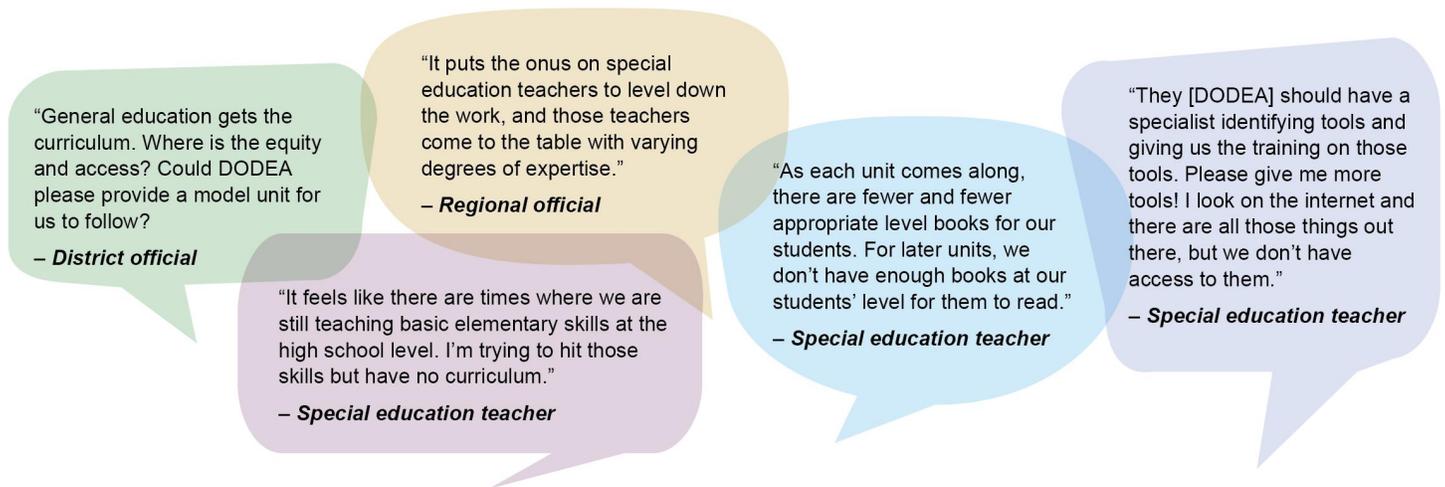
DODEA school staff said they face challenges adapting the general education curriculum and obtaining reading interventions to meet the needs of students receiving special education. School staff and regional and district officials also told us that these challenges limit their ability to provide an equitable learning experience for all students.

### Supplementary Instructional Materials to Adapt the General Education Curriculum

At 12 of the 14 DODEA schools we visited staff told us that DODEA does not provide instructional materials needed to help students receiving special education learn the general education curriculum. For example, special education staff in seven schools told us that not having these instructional materials may impact the quality of special education instruction. School staff in six of the schools said that to meet their students' needs, they must find or create their own instructional materials to supplement the general education curriculum—for example, by downloading materials from websites or borrowing materials from other teachers.

DODEA regional, district, and school-level staff expressed several concerns about the lack of agency-wide instructional materials for providing special education to students. One teacher emphasized that they are “not a curriculum developer.” Another teacher told us that they feel like they are constantly reinventing the wheel to adapt the general education curriculum for their students (see fig. 7 for additional examples).

**Figure 7: Voices from the Field: Concerns Around Instructional Materials to Adapt the General Education Curriculum**



Source: GAO analysis of interviews with Department of Defense Education Activity (DODEA) special education staff. | GAO-25-107053

**Accessible Data for Figure 7: Voices from the Field: Concerns Around Instructional Materials to Adapt the General Education Curriculum**

“General education gets the curriculum. Where is the equity and access? Could DODEA please provide a model unit for us to follow?” – District official

“It puts the onus on special education teachers to level down the work, and those teachers come to the table with varying degrees of expertise.” – Regional official

“It feels like there are times where we are still teaching basic elementary skills at the high school level. I’m trying to hit those skills but have no curriculum.” – Special education teacher

“As each unit comes along, there are fewer and fewer appropriate level books for our students. For later units, we don’t have enough books at our students’ level for them to read.” – Special education teacher

“They [DODEA] should have a specialist identifying tools and giving us the training on those tools. Please give me more tools! I look on the internet and there are all those things out there, but we don’t have access to them.” – Special education teacher

Source: GAO analysis of interviews with Department of Defense Education Activity (DODEA) special education staff. | GAO-25-107053

Note: The selected comments reflect themes discussed by DODEA staff in GAO interviews and are not generalizable.

One regional official told us that DODEA did not purchase the special education instructional materials designed to accompany the general education curriculum, and that doing so would provide a consistent and high-quality curriculum for students. Two district officials also told us that DODEA does not consider special education when purchasing curriculum. When we asked DODEA headquarters officials whether special education stakeholders were consulted during the process of purchasing curriculum, officials said that DODEA’s Curriculum and Instruction Division determines which stakeholders within the agency to consult when purchasing general education curriculum and were unable to confirm whether that division consulted any special education stakeholders.

DODEA headquarters officials told us that DODEA’s primary goal is for all students to learn using the core general education curriculum.<sup>29</sup> Officials also said the general education curriculum includes supplemental resources for reading, writing, and math. Further, officials said they plan to procure supplemental resources for special education in fiscal year 2025.

Additionally, officials told us that to help students with special education needs access the general education curriculum, staff can provide specially designed instruction. Officials said that specially designed instruction consists of a variety of strategies and supports specific to individual students’ needs. Further, officials said that DODEA school staff should determine the types of specially designed instruction or supplemental materials they use to teach students on a case-by-case basis. Officials stated that making these determinations at the regional, district, and school levels allows DODEA staff to be more agile and responsive in meeting students’ evolving needs. However, special education teachers at 10 of the 14 schools we visited told us that the curriculum materials they have do not meet their students’ needs.

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<sup>29</sup>Headquarters officials told us that DODEA also has a unique learning system track for a subset of students receiving special education with the highest needs.

DODEA stated that special education is intended to support students in successfully developing to their fullest potential. DODEA's strategic plan also states that DODEA will provide an equitable learning experience for all students and will implement programs and supports to address achievement gaps, including gaps due to student ability. Additionally, the strategic plan directs DODEA to develop policies, practices, and learning opportunities to eliminate barriers as well as enhance and maximize equitable access to resources and support opportunities for all students.

Providing supplemental instructional materials would assist special education teachers in tailoring the general education curriculum to the individualized needs of their students. By doing so, DODEA would help support equitable access to the general education curriculum for students throughout DODEA. Additionally, it could allow teachers more time to teach curriculum rather than create it and may improve the quality of the special education services students receive.

### Special Education Reading Interventions

DODEA district and regional officials overseas told us that it is difficult to obtain needed reading interventions for students receiving special education. Interventions are specific programs or strategies that help students who need more support strengthen a set of skills or a knowledge area. Three of our six parent discussion groups as well as school staff at four of the 12 overseas schools we visited expressed concerns about the lack of access to reading interventions specifically for students with dyslexia or other reading-related disabilities. For example, one parent told us that special educators are not given access to appropriate resources to help students learn how to read.

DODEA headquarters officials also told us that in 2018 and 2022 they procured and provided all schools with a reading program for all students who need it, including students with disabilities. DODEA officials told us that these programs are effective at addressing the needs of students with dyslexia. However, one regional official, one parent group, and school staff at three schools overseas told us that the reading program DODEA provides does not always meet the needs of students with dyslexia or other reading-related disabilities. DODEA headquarters officials told us that when students are not making adequate progress with DODEA's reading program, schools and districts can choose to purchase additional resources to meet a student's individualized needs. They also said that some schools have purchased specialized resources to help students with more significant dyslexia-related needs.

According to DODEA data, students with specific learning disabilities—including students with dyslexia and other reading-related disabilities—attend DODEA schools in every DODEA region. For example, in school year 2023–2024, about 37 percent of DODEA students with specific learning disabilities were located in Europe, about 26 percent were in the Pacific, and about 37 percent were in the Americas region. However, we found that students' access to reading interventions for dyslexia may depend on where they are located. Regional and district officials overseas told us that it can be difficult to obtain specific reading interventions for dyslexia and that some schools and districts have access to these interventions while others do not. These officials represent regions and districts that support nearly 65 percent of DODEA students with specific learning disabilities, such as dyslexia. Additionally, one district official in the Pacific told us about a literacy intervention program that a district in their region could access for "emergency use" while another district was not permitted to use it.

Regional and district officials overseas told us that they are not able to purchase reading interventions for dyslexia for a larger number of students. One regional official overseas explained that this is because these

purchases compete with DODEA's contract for its current reading program. In contrast, a regional official in the Americas told us that they purchase a specialized reading intervention program for dyslexia every year and try to make the program available for everyone. They ask schools to submit yearly requests to replenish certain materials for the program, such as workbooks or new units.

DODEA headquarters officials told us that they monitor school and district-level requests for interventions to determine whether DODEA needs an agency-wide purchase for interventions. They also told us that they seek feedback from regional officials and other special education stakeholders in the agency to identify trends in unmet student needs. Headquarters officials did not identify any plans to obtain an agency-wide intervention for students with more significant dyslexia or reading related disabilities.

Equitable access to reading interventions would help ensure that across all DODEA regions students with reading-related disabilities, including dyslexia, receive the same opportunities to learn to read. Providing an equitable learning experience would help these students make progress on their education goals, as directed in DODEA's strategic plan.

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### DODEA School Staff Said They Have Insufficient Guidance to Implement DOD's Special Education Policies, Resulting in Inconsistent Practices Across Schools

In nearly all (13 of 14) schools we visited, DODEA school staff said that they need more clarity and detail on how to implement DOD's special education policies. In addition, regional officials we spoke with told us that DODEA does not have procedural guidance for special education. DOD policy assigns roles and responsibilities for the provision of special education services in DODEA schools.<sup>30</sup> However, school staff told us that DOD policy is not clear or detailed enough to help them implement the policy, so they often rely on district staff and various other sources for direction, which results in inconsistent application of policy.

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<sup>30</sup>DOD Instruction 1342.12, *Provision of Early Intervention and Special Education Services to Eligible DoD Dependents* (June 17, 2015) and DOD Manual 1342.12, *Implementation of Early Intervention and Special Education Services to Eligible DoD Dependents* (June 17, 2015).

### Roles and Responsibilities for DODEA's Special Education Instructional System Specialists

According to DODEA officials we spoke with, regional and district-level Special Education Instructional System Specialists (instructional specialists) have various responsibilities related to supporting DODEA's efforts to provide special education services to students. These include:

- providing training to school staff on special education services;
- observing classes and providing feedback to teachers and staff on ways to improve instruction; and
- helping schools and districts manage staffing needs, as well as purchasing classroom equipment and interventions for students.

Regional instructional specialists also participate in DODEA's Special Education Collaborative, which was established in the 2022–2023 school year, in part to help identify and share information on the unique special education needs of each region.

DODEA officials also noted that the regional instructional specialist roles were recently established in 2022 to generally provide oversight and support for special education services in their respective regions.

Source: GAO interviews with Department of Defense Education Activity (DODEA) instructional specialists | GAO-25-107053.

Specifically, district officials we spoke with described how instructional specialists give direction on how to provide special education services (see sidebar). Some school staff we spoke with also shared examples of the support they receive from instructional specialists. For example, staff at one school said the instructional specialists will visit the school and provide recommendations to help implement students' IEPs. However, school staff in five schools told us that the direction they receive from special education instructional specialists is often not specific enough. Further, in two schools, administrators told us that instructional specialists have such large workloads that their responses are not timely.

In addition to relying on direction from the instructional specialists, special education staff in half the schools we visited told us that they often refer to an unofficial guide that DODEA issued in 2017 on special education. This unofficial guide, referred to by school staff as the "companion guide," was written as an easy reference guide for special education services to accompany DOD policy. One regional official told us that the DOD policy "tells us what we must do" while the companion guide "tells us how to do it."

DODEA headquarters officials told us that the companion guide is outdated and should no longer be used. However, we found that the companion guide was publicly available on DODEA's website as of April 2025.<sup>31</sup> Two regional officials we interviewed told us that the companion guide has been "phased out," but DODEA headquarters has not formally communicated with school staff about this change. During our review, staff at seven schools we visited said they use the companion guide; staff at three of those schools acknowledged that the companion guide was outdated.

DODEA headquarters officials told us that they are in the process of updating the companion guide to provide new procedural guidance for special education to supplement DOD policy. According to officials, this procedural guidance will not be published until the 2025–2026 school year. Officials also said they plan to provide concrete examples for school staff in the new guidance, and that official release of the guidance will

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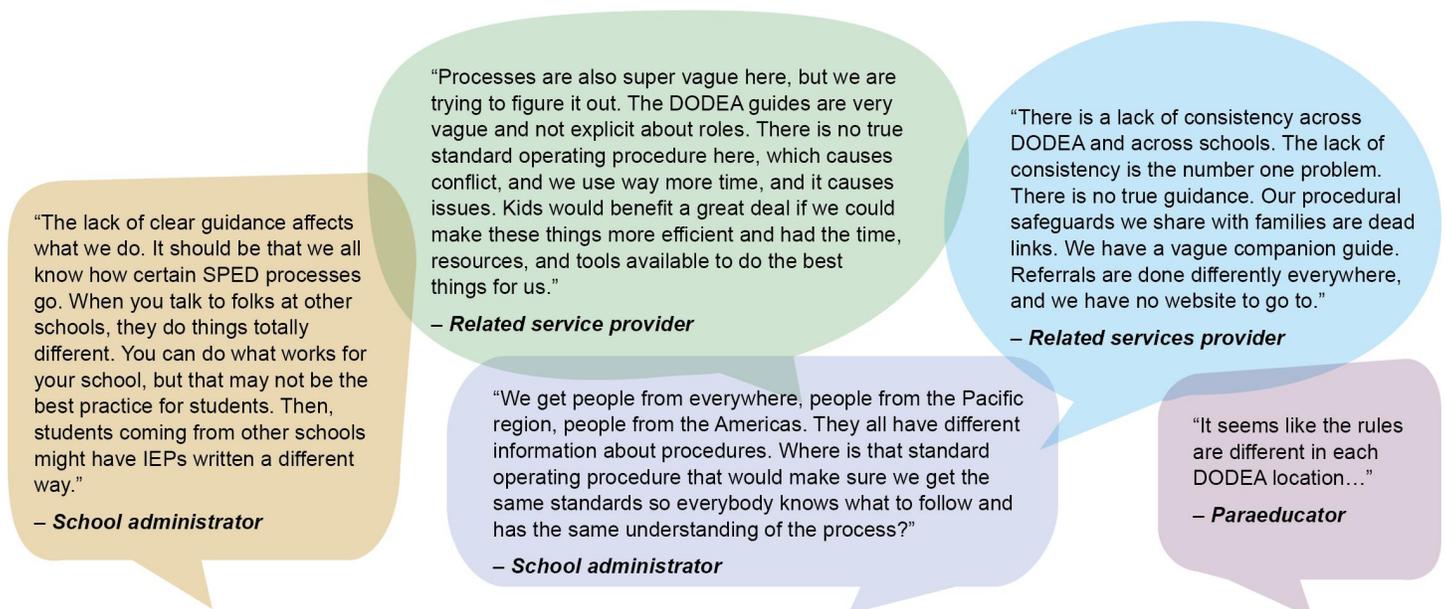
<sup>31</sup>See the companion guide posted on DODEA's website at the following link: [https://content.dodea.edu/teach\\_learn/student\\_services/sped/companion\\_07122017/files/assets/common/downloads/publication.pdf](https://content.dodea.edu/teach_learn/student_services/sped/companion_07122017/files/assets/common/downloads/publication.pdf).

include an announcement to phase out prior guidance. DODEA headquarters officials told us that, in the meantime, staff should follow DOD policy.

In addition to the companion guide, regional officials in the Americas and the Pacific told us that they have developed their own guidance for staff in their regions. One regional official shared “reference guides” they developed for special education staff in their region because they felt the companion guide “is not always complete or correct.” For example, one of these reference guides provides step-by-step instructions on how to request a paraeducator who works individually with a student receiving special education. Another regional official shared a checklist they developed for special education staff at the beginning of the 2024–2025 school year. The checklist covers topics such as ensuring that general education teachers have access to their students’ IEPs and that they secure the IEPs in a confidential location. Additionally, the checklist includes verifying that each special education teacher has a copy of the companion guide, although DODEA headquarters officials told us that the companion guide is obsolete.

At the school level, staff at seven schools we visited told us that the delivery of special education is inconsistent across schools because of the lack of clear guidance from DODEA. For example, one school administrator told us that “When you talk to folks at other schools, they do things different. You can do what works for your school, but that may not be the best practice for students.” At four schools we visited, related service providers told us that the referral process for special education is different from school to school. One related service provider told us that at DODEA schools, “There is no conformity. The two schools I work at are night and day” (see fig. 8 for additional examples).

**Figure 8: Voices from the Field: Concerns Around Guidance for Special Education**



Source: GAO analysis of interviews with Department of Defense Education Activity (DODEA) special education staff. | GAO-25-107053

**Accessible Data for Figure 8: Voices from the Field: Concerns Around Guidance for Special Education**

“The lack of clear guidance affects what we do. It should be that we all know how certain SPED processes go. When you talk to folks at other schools, they do things totally different. You can do what works for your school, but that may not be the best practice for students. Then, students coming from other schools might have IEPs written a different way.” – School administrator

“Processes are also super vague here, but we are trying to figure it out. The DODEA guides are very vague and not explicit about roles. There is no true standard operating procedure here, which causes conflict, and we use way more time, and it causes issues. Kids would benefit a great deal if we could make these things more efficient and had the time, resources, and tools available to do the best things for us.” – Related service provider

“We get people from everywhere, people from the Pacific region, people from the Americas. They all have different information about procedures. Where is that standard operating procedure that would make sure we get the same standards so everybody knows what to follow and has the same understanding of the process?” – School administrator

“There is a lack of consistency across DODEA and across schools. The lack of consistency is the number one problem. There is no true guidance. Our procedural safeguards we share with families are dead links. We have a vague companion guide. Referrals are done differently everywhere, and we have no website to go to.” – Related services provider

“It seems like the rules are different in each DODEA location...” – Paraeducator

Source: GAO analysis of interviews with Department of Defense Education Activity (DODEA) special education staff. | GAO-25-107053

Note: The selected comments reflect themes discussed by DODEA staff in GAO interviews and are not generalizable. Statements about “IEPs” refer to students’ individualized education programs.

School staff from more than half the schools we visited (eight of 14) also expressed concern that they may be out of compliance with IDEA or DOD policy. DODEA stated that it has conducted onsite monitoring of special education services across DODEA locations. Onsite monitoring helped identify areas where regions may not be compliant with DOD special education policy, according to a regional official we spoke to. The official noted that some of the difficulties that schools have with compliance stem from the lack of procedural guidance on special education. The official said that procedural guidance would help build a unified understanding across DODEA of what it means to comply with various aspects of special education services.

DOD Directive 1342.20 states that DODEA is responsible for developing and providing guidance as necessary for the delivery of services for children with disabilities and for the protection of procedural rights, in accordance with IDEA and DOD policy. Further, DODEA’s strategic plan states that DODEA must provide consistent, meaningful, and timely two-way internal communication. Absent clear procedural guidance and communication to staff about the appropriate guidance to use, especially since the companion guide is still publicly available online, DODEA risks staff following practices that may not comply with DOD policy.

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## Conclusions

DODEA's special education programming is intended to enable students to successfully develop to their fullest potential, and to provide equitable learning experiences for all DODEA students. However, it faces unique challenges serving its students, including highly mobile families who frequently move in and out of DODEA schools and varying capacity of overseas schools to provide some of the services that children are required to receive. While DOD has recently taken steps to better identify and communicate which special education resources are available at each overseas location, DODEA could revise its staffing formulas for special education to incorporate the time required to support students, as documented in students' IEPs. DODEA also has an opportunity to better support special education staff and help students meet their full potential. Specifically, ensuring that paraeducators who work with students who may need behavioral supports receive crisis training would help keep students and staff safe. Further, ensuring that all special education staff receive (1) supplementary instructional materials to help them tailor the general education curriculum to their students' needs and (2) more specialized reading interventions for students with specific learning disabilities, including dyslexia, would help provide an equitable learning experience for all students regardless of where they are located, a key goal in DODEA's strategic plan. Lastly, communicating which resources staff should use to interpret DOD policy would help staff consistently implement special education. This is especially important given the high turnover rates that we found among DODEA's special education staff and would ultimately support the well-being of military families with children receiving special education services.

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## Recommendations for Executive Action

We are making the following five recommendations to DOD:

The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness directs the DODEA Director to revise its special education staffing formulas to incorporate students' service minute requirements specified in IEPs among the factors it considers. (Recommendation 1)

The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness directs the DODEA Director to ensure that any special education paraeducators who work with students who may need behavioral supports receive crisis training. (Recommendation 2)

The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness directs the DODEA Director to provide supplemental instructional materials to special education teachers agencywide to help them adapt the general education curriculum for students with IEPs. (Recommendation 3)

The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness directs the DODEA Director to make more specialized reading interventions accessible across all DODEA locations to students with specific learning disabilities, including dyslexia, that impact their ability to read. (Recommendation 4)

The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness directs the DODEA Director to communicate its timeframes for its new procedural guidance on special education and what resources staff should use to interpret the DOD policy while that guidance is being developed. (Recommendation 5)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DOD for review and comment. DOD provided technical comments, which we incorporated as appropriate. In its formal comments, reproduced in appendix I, DOD partially concurred with all five of our recommendations.

For our first recommendation on revising staffing formulas to incorporate students' service minute requirements specified in IEPs, DOD acknowledged the importance of aligning staffing practices with the diverse needs of students with IEPs, and that service minutes can provide valuable insights into students' needs. DOD also stated that it will reassess its staffing formulas and employ a data-informed approach in doing so. However, DOD said that aligning staffing to service minutes may lead to various challenges—including overstaffing—as service minutes may not always accurately reflect the actual needs of students and may fail to account for the individualized nature of each student's educational requirements. We agree that staffing practices should take students' needs into account. Further, the purpose of an IEP is to lay out the special education and related services tailored to an individual student's needs and the anticipated frequency, location, and duration of those services. We continue to believe that required service minutes are one of the factors the agency should consider in its staffing formulas. Further, considering this information would support DOD's efforts to use a data-informed approach in its staffing practices.

For our second recommendation about ensuring that paraeducators receive crisis training, DOD discussed ongoing efforts to expand its crisis training contract. DOD also stated that crisis training is not applicable to every paraeducator role within DOD schools; it also acknowledged the necessity of providing access to crisis training to paraeducators and other key personnel serving students with significant behavioral challenges. As stated in the report, some paraeducators we spoke with who work with students needing behavioral supports told us that they did not have access to crisis training. We agree that crisis training should be targeted to those who need it and revised our recommendation accordingly.

For our third recommendation about providing supplemental instructional materials to special education teachers, DOD stated that it prioritizes providing students with individualized, targeted support. DOD also stated that relying solely on supplemental instructional materials would not fully ensure that it exposes students to core standards alongside their nondisabled peers, adequately prepares students for general education assessments, or meets the individualized needs of students. We agree that teachers should not solely rely on supplemental materials, and our recommendation does not state that teachers should do so. We also acknowledge that DOD faces unique requirements regarding the procurement of educational resources and agree that it needs a strategic approach to ensure that it acquires resources that effectively address students' needs moving forward. As such, we continue to believe that agencywide access to supplemental instructional materials would expand the resources available to DODEA teachers to support their students and would continue to allow teachers to tailor instructional materials based on students' unique needs.

In response to our fourth recommendation, DOD said that the agency already systemically provides students with reading interventions. While DODEA provides some reading interventions that all schools can access, DODEA district and regional officials told us that it is difficult to obtain more specialized reading interventions for students receiving special education overseas, and that some schools and districts have access to more specialized interventions while others do not. These officials represent regions and districts that support nearly 65 percent of DODEA students with specific learning disabilities, such as dyslexia. We therefore continue to

believe that implementing this recommendation would help ensure that students receiving special education and related services develop to their fullest potential, regardless of their location.

For our fifth recommendation on communicating timeframes for new procedural guidance on special education and the resources staff should use to interpret DOD policy in the interim, DOD agreed with the substance of our recommendation and stated that it is committed to issuing updated guidance beginning in the 2025–2026 school year. DOD said it will take a phased approach to update and implement the guidance, including communicating with staff about prior guidance that should not be used. DOD also said that existing agency policy provides guidance on special education. However, as discussed in this report, almost all school staff we spoke with said that DOD policy is not clear or detailed enough to help them implement it without guidance. We agree with DOD’s plan to phase in new guidance, and we maintain that it is important for DOD to communicate which resources staff should use to interpret DOD policy in the interim.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Defense, and other interested parties. In addition, the report will be available at no charge on GAO’s website at <http://www.gao.gov>.

If you or your staff should have any questions about this report, please contact me at [EWISinquiry@gao.gov](mailto:EWISinquiry@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

**//SIGNED//**

Jacqueline M. Nowicki,  
Director, Education, Workforce, and Income Security Issues

# Appendix I: Comments from the Department of Defense



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

MAR 25 2025

Ms. Jacqueline M. Nowicki  
Director, Education, Workforce, and Income Security  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Nowicki,

This transmits the Department of Defense (DoD) response to the Government Accountability Office (GAO) draft report GAO-25-107053, "Improved Allocation of Resources Could Help DOD Education Activity Better Meet Students' Needs," dated February 28, 2025 (GAO Code 107053).

Attached is DoD's response to the subject report. The point of contact regarding this matter is Ms. Jasmine McLeod at email address: [Jasmine.Mcleod@dodea.edu](mailto:Jasmine.Mcleod@dodea.edu), or office phone: (571) 571-6010.

Sincerely,

A handwritten signature in black ink, appearing to read "Beth Schiavino-Narvaez", is positioned above the typed name.

Beth Schiavino-Narvaez, Ed.D.  
Director

GAO DRAFT REPORT DATED FEBRUARY 28, 2025  
GAO-25-107053 (GAO CODE 107053)

“SPECIAL EDUCATION: IMPROVED ALLOCATION OF RESOURCES COULD  
HELP DOD EDUCATION ACTIVITY BETTER MEET STUDENTS’ NEEDS”

DEPARTMENT OF DEFENSE COMMENTS  
TO THE GAO RECOMMENDATION

**RECOMMENDATION 1:** The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness directs the DODEA Director to revise its special education staffing formulas to incorporate students' service minute requirements specified in IEPs among the factors it considers.

**DoD RESPONSE: Partially Concur:** DoDEA partially concurs with the recommendation to revise its staffing formulas. We acknowledge the importance of aligning staffing practices with the diverse needs of our students with IEPs, particularly given the high mobility rates of our student population and the complexities of the global educational environment.

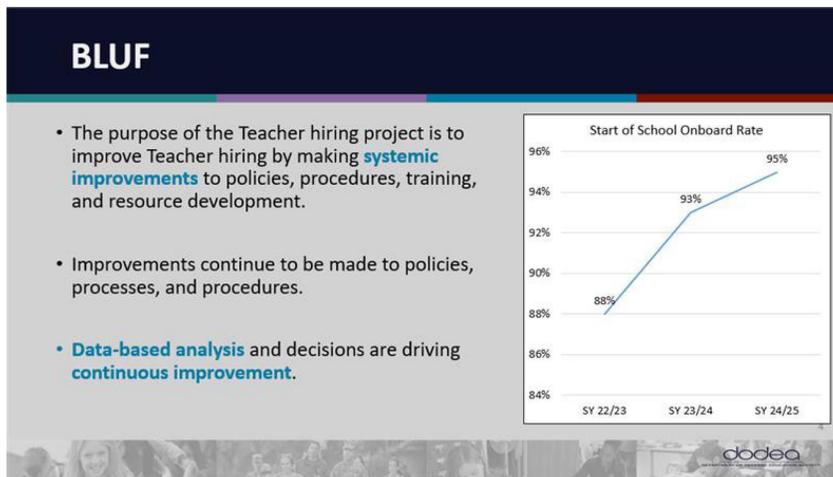
While recognizing the potential benefits of including service minutes in our staffing considerations, we understand that this approach may not be the most advisable way forward. While service minutes provide valuable insights into the needs of students, they can lead to overstaffing as they do not always accurately reflect the actual needs of students and fail to account for the individualized nature of each student's educational requirements. This approach could also oversimplify the complexities of delivering effective individualized instruction and may inadvertently create additional administrative burdens.

In our global school system, the time it takes to hire and onboard new teachers is a persistent challenge. Due to the lengthy hiring process and the transient nature of our student population, it is not always possible to align staffing to service minutes for students. To enhance our staffing processes, we are committed to conducting a thorough reassessment of our formulas, focusing on high-impact factors that reflect the needs of our military connected students and families. This reassessment will involve targeted components within our Teacher Hiring Initiative, including optimizing hiring pathways, enhancing onboarding processes, and refining new employee orientation programming. We will employ a data-informed approach to ensure that these initiatives are effective and aligned with our organizational objectives.

Furthermore, we recognize the unique needs of our military-connected student population and will prioritize ongoing professional development for our educators. DoDEA's commitment to building capacity further reinforces the spirit of Individuals with Disabilities Education Act (IDEA) and our Department of Defense Instruction and Department of Defense Manual (DoDI/DODM) 1342.12 which recognizes that all students are general education students first. Most students with Individualized Education Programs (IEPs) access the general education curriculum. They spend the majority of their school day in the general education setting, with appropriate supports, services, and accommodations, to ensure they have opportunities to

succeed. By equipping our staff with the necessary skills and knowledge, we aim to ensure they can effectively support the diverse needs of students with IEPs, fostering an inclusive and responsive educational environment.

At the beginning of school year 2022/23, only 88% of authorized teaching positions were filled with a certified teacher. The Teacher Hiring Project was initiated mid school year 22/23 and resulted in an improvement to 93% of teaching positions filled at the beginning of SY 23/24. Additional efforts through the second year of the project gained another 2% so that SY 24/25 started with 95% of teaching positions filled with certified teachers onboard and in classrooms.



DoDEA remains committed to providing a high-quality educational experience for all students, including students with IEPs. Our staffing strategies will continue to be dynamic and adaptable, ensuring we can effectively meet the evolving needs of our students and families in fiscally responsible ways. Through a focus on quality, collaboration, and professional development, we are dedicated to empowering all students to thrive academically alongside their peers.

**RECOMMENDATION 2:** The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness directs the DODEA Director to ensure that special education paraeducators receive crisis training.

**DoD RESPONSE: Partially Concur:** DoDEA partially concurs with the recommendation to provide crisis management training to paraeducators working with students with IEPs. While all paraeducators serving students with IEPs do not require this level of training, we agree with the necessity for those serving students with significant behavioral challenges to have access to such training.

Paraeducators play a vital role in enhancing classroom environments by offering assistance in classrooms, with small groups, and to individual students. While some paraeducators are assigned to provide individualized support to students with IEPs, the nature of that support may vary, encompassing both academic and behavioral aspects. It is important to highlight that the responsibility for managing student behaviors does not rest solely or primarily with paraeducators. Nor does behavior management start with response. Effective behavior management begins with classroom management and encompasses a broad system of support, including cross-training at every level within the continuum of behavioral support. This collaborative approach allows for a comprehensive understanding of behavior management among all staff that promotes a school environment conducive to learning. Most paraeducators that support students do not necessitate the intensity of knowledge and skills associated with Safe Crisis Management training, as their roles and responsibilities vary. DoDEA AI 2510.01, requires the following staff to be provided annually (at minimum, or as needed) DoDEA-endorsed crisis intervention training:

- Support services personnel (school psychologists, counselors, and nurses);
- Special Education personnel (teachers and paraprofessionals working with emotionally impaired (EI) and learning impaired moderate-severe or learning impaired severe-profound students);
- Administrators, at least one per building;
- Other identified staff members who work closely with students with emotional and/or behavioral needs (e.g., SPED instructional systems specialist, behavioral specialist).

DoDEA recently restructured and recompeted our Safe Crisis Management training contract, expanding it to address the continuum of behavioral prevention, interventions, and responses required to support all students and educators, including paraeducators. The new contract includes the provision of asynchronous webinars and/or digital modules for school-level administrators and staff on behavior theory, expectations, and strategies with the goal of creating school cultures that support positive behavioral outcomes and prevent behavioral incidents. This adjustment reflects DoDEA's commitment to providing continuous support and interventions to meet the diverse needs of all students. It also aligns our training resources to support the facilitation of safe and effective educational environments conducive to learning. The most intensive portion of Safe Crisis Management training includes safe hands-on restraint training. While we recognize the necessity of training for paraeducators who work with students requiring intensive behavioral support, most students, including students with IEPs, do not require such support, and therefore the training is not applicable to every paraeducator role within our educational framework.

Additionally, the Safe Crisis Management training contract is designed to be implemented within a train-the-trainer model, which enables DoDEA to maintain readily available training and access to certified Instructional System Specialists in Safe Crisis Management methods. This approach allows for responsive, on-demand training that is responsive to the evolving needs of schools and educators throughout the school year. However, it should be noted that paraeducators have access to a variety of behavioral training resources that they engage with at least quarterly, focusing on applied behavior analysis strategies, alongside job-embedded coaching provided by district instructional specialists and board-certified behavior analysts. District-level staff members are often trained in Safe Crisis Management and offer ongoing technical support, which can be requested by school administrators as needed.

DoDEA is committed to ensuring that all staff, including paraeducators, are equipped with the appropriate levels of knowledge and understanding to be responsive to student needs at every level. As a part of our plan to initiate the new Safe Crisis Management contract, we will initiate train-the-trainer sessions in the spring of 2025, in preparation for a rollout of the new training school year 2025-26. This training model will focus on building proactive skills that can be implemented at the lowest level, supporting the continuum of behavioral supports for all students, including those with IEPs. Paraeducators supporting students with behavioral goals necessitating the level of intensity associated with safe crisis management will have access to specialized training in this area.

DoDEA remains committed to fostering a safe and supportive educational environment for all students, ensuring that our staff is well-prepared to address the diverse needs of our student population.

**RECOMMENDATION 3:** The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness directs the DODEA Director to provide supplemental instructional materials to special education teachers agency-wide to help them adapt the general education curriculum for students with IEPs.

**DoD RESPONSE: Partially Concur:** DoDEA partially concurs with the recommendation to provide supplemental instructional materials to special education teachers for the adaptation of the general education curriculum. However, it is important to consider several essential factors to ensure our practices remain compliant with the IDEA, the DoDI/DoDM 1342.12, and the Federal Acquisition Regulation (FAR) requirements.

As one of only two federal school systems serving a global military-connected student population, DoDEA faces unique requirements regarding the procurement of educational resources. The FAR requirements impose specific guidelines that govern the procurement process, which can influence our ability to identify and secure resources aimed at effectively addressing the individualized needs of students with IEPs at a systematic level. This necessitates a strategic approach to ensure that the resources acquired align with the diverse and unique educational needs of students.

IDEA mandates that students with disabilities be educated in the least restrictive environment (LRE), ensuring maximum access to the general education curriculum and participation in general education setting to the fullest extent possible. While the recommendation suggests that adapting the general education curriculum solely through supplemental instructional materials will sufficiently meet the needs of students with disabilities, it is important to consider that specially designed instruction (SDI) encompasses a broader range of strategies aimed at addressing the unique needs of individual students with IEPs. This includes the provision of continuous services and supports that are tailored to their specific educational requirements.

SDI incorporates differentiated instruction, accommodations, modifications, and high-leveraged practices designed to engage students at their individual levels of learning while also ensuring access to grade-level standards. It is important to clarify that SDI is not synonymous with supplementary curriculum and may not guarantee that students will attain the required levels of proficiency within the general curriculum framework.

Relying solely on supplemental materials may not fully ensure that students with disabilities are integrated into the general education environment, sufficiently exposed to the core standards, and adequately prepared for the general education assessments. Therefore, we advocate for a focus on individualized, targeted support that aligns with specific goals outlined in each student's IEP, as this approach is fundamental for providing meaningful access to the curriculum and achieving educational equity.

Moreover, while supplemental materials are valuable components of our instructional strategy, we must also enhance educators' capacity to implement effective instructional strategies and structures that facilitate student access and proficiency in the general education curriculum. By prioritizing professional development, fostering collaborative practices, and employing co-teaching models, we can create more effective and sustainable outcomes for our students. These collaborative frameworks will also ensure the IEP goals are systematically addressed within the context of the general education curriculum, ultimately enriching the overall academic experience for students with disabilities.

DoDEA prioritizes a more integrative approach that emphasizes the development and implementation of comprehensive instructional strategies and collaborative practices. This holistic perspective aligns with the legal mandates of IDEA and DoDI 1342.12, ensuring that our students continue to receive the high-quality educational support and structures they deserve.

**RECOMMENDATION 4:** The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness directs the DODEA Director to make more specialized reading interventions accessible across all DODEA locations to students with specific learning disabilities, including dyslexia, that impact their ability to read.

**DoD RESPONSE: Partially Concur:** DoDEA partially concurs with the need to address specific learning disabilities and more specifically specific learning disabilities through reading interventions and supports, particularly the emphasis on enhancing support for students with

specific learning disabilities. Please note that Dyslexia is not an identified IDEA or DoDI/DoDM 1342.12 disability category. Additionally, DoDEA does not diagnose dyslexia as this is a medical diagnosis. However, through the evaluation process, DoDEA evaluates students for the presence of an educational disability and looks at their academic achievement testing, cognitive testing, and other sources of data such as classroom performance and teacher/parent input to identify whether the child meets the criteria for a student with a specific learning disability. Through this process, the team explores and documents all relevant information brought to the table including any outside medical diagnoses that would educationally impact the student.

However, DoDEA does not agree with the assertion that the agency is not providing reading interventions systemically at this time. All Special Education teachers received intervention kits for each grade in the 2018 Benchmark Advance curriculum purchase which provided direct resources for reading. These intervention kits were included in the original buy. DoDEA also procured an additional resource for intervention to address phonics instruction, entitled "Benchmark Advanced Intervention, Phonics and Word Recognition" (colloquially known as the Phonics kits). Special Education teachers have digital access to the Phonics kit. Special Education teachers have access to the Benchmark core curriculum, core curriculum intervention kit, and the phonics intervention kit. Subsequent to the original purchase, DoDEA procured additional intervention materials, utilized for Strategic Literacy Intervention, which include Read 180 (grades 6-12), Steps to Advance (grades 2-6), and Spring Forward (grades K-2). The Steps to Advance targets reading comprehension and Spring Forward intervention provides targeted intervention on close reading and text evidence skills. Read 180 is proven to be effective at increasing reading proficiency for students with dyslexia. Additionally, intensive phonics instruction is embedded within the Benchmark Phonics core curriculum and Phonics Intervention Kit. Both provide explicit, systematic, multi-modal instruction which research has indicated has a high level of efficacy with addressing the needs of students with dyslexia.

In addition, DoDEA utilizes tiered intervention to support students who are not demonstrating adequate progress or who are behind in reading or math. Currently, DoDEA employs approximately three hundred strategic intervention educators in schools to provide literacy and math supports. At each school, the SST monitors, supports, and helps determine appropriate leveled interventions for students prior to referral for special education services. If the SST suspects the presence of a disability (e.g. the student continues to demonstrate limited growth despite tiered intervention implemented with fidelity), then they would refer the student to the CSC team to begin the evaluation/eligibility process. DoDEA considers students for referral to Strategic Literacy or Math instruction who are: at least 6 months below grade level expectations as evidenced by proficiency level benchmarks and 2) receiving several weeks of daily core differentiation/core intervention, supported by multiple data sources, has not resulted in steady or appropriate mathematics growth. Students are enrolled in Strategic Literacy or Math, grade-level specific courses based on the recommendations of a designated school-based team (e.g. SST) who meets regularly to review multiple sources of student data, to problem-solve and identify targeted, classroom-based strategies for students who are not making expected progress, and to make collective decisions about placement for students needing strategic instruction.

When core and intervention materials are used with fidelity, but the student is not making adequate progress, schools and districts have the autonomy to procure additional resources and/or materials to meet a student's individualized specialized instructional needs. For example, some schools have procured more specialized resources (e.g. Barton and Spire) to address students with more significant dyslexia-related needs. DoDEA contends that a "one-size fits all" approach to purchasing a singular reading resource to address dyslexia and provide specially designed instruction is not adequate in meeting the individualized needs of students. Rather, retaining autonomy at the school and district level to purchase more specialized instructional materials better positions the agency to meet the specific, unique instructional needs of students requiring more specialized support and ensures the provision of a free and appropriate public education (FAPE).

**RECOMMENDATION 5:** The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness directs the DODEA Director to communicate its timeframes for its new procedural guidance and what resources staff should use to interpret the DOD policy while that guidance is being developed.

**DoD RESPONSE: Partially Concur:** DoDEA partially concurs with this recommendation recognizing the necessity for updated guidance and affirming our ongoing efforts in this area. While we continue to work on the development of this updated guidance, it is important to note that DoDI 1342.12 outlines our requirements, and DoDM 1342.12 provides implementation guidance that remains applicable as we move forward. We have initiated the planning process and have drafted a list of prioritized topics for updated guidance, which are informed by data collected during special education compliance and monitoring visits. This data-driven approach ensures that guidance will be targeted, prioritized, and aligned with the specific needs identified in our schools.

To facilitate effective implementation, DoDEA is taking a phased approach, recognizing that updating guidance goes hand in hand with capacity building and the professional development of educators. This phased approach will allow us to support the integration of updated practices while also allowing educators time to adapt and incorporate these changes into their routines.

DoDEA is committed to issuing updated guidance beginning in the 2025-26 school year. As part of the initial phase, we will also communicate that the previous "Companion" guidance is no longer to be used, ensuring consistency and clarity for all stakeholders. This process reflects DoDEA's commitment to continuous improvement, ensuring that our educators are supported and our schools are equipped to provide the highest quality education to all students, in alignment with the requirements of DoDI/DoDM 1342.12.

This process reflects our commitment to continuous improvement, ensuring that our educators and schools are equipped to provide the highest quality education for all students. Our alignment with the requirements of the DoDI/DoDM 1342.12 underscores that we do, in fact, have existing guidance that is applicable to our schools.

# Accessible Text for Appendix I: Comments from the Department of Defense

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

MAR 25 2025

Ms. Jacqueline M. Nowicki  
Director, Education, Workforce, and Income Security  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Nowicki,

This transmits the Department of Defense (DoD) response to the Government Accountability Office (GAO) draft report GAO-25-107053, "Improved Allocation of Resources Could Help DOD Education Activity Better Meet Students' Needs," dated February 28, 2025 (GAO Code 107053).

Attached is DoD's response to the subject report. The point of contact regarding this matter is Ms. Jasmine McLeod at email address: [Jasmine.Mcleod@dodea.edu](mailto:Jasmine.Mcleod@dodea.edu), or office phone: (571) 571-6010.

Sincerely,

Beth Schiavino-Narvaez, Ed.D.  
Director

**GAO DRAFT REPORT DATED FEBRUARY 28, 2025 GAO-25-107053 (GAO CODE 107053)**

**“SPECIAL EDUCATION: IMPROVED ALLOCATION OF RESOURCES COULD HELP DOD EDUCATION ACTIVITY BETTER MEET STUDENTS’ NEEDS”**

## **DEPARTMENT OF DEFENSE COMMENTS TO THE GAO RECOMMENDATION**

RECOMMENDATION 1: The Secretary of Defense should ensure that the Under Secretary of Defense for Personnel and Readiness directs the DODEA Director to revise its special education staffing formulas to incorporate students' service minute requirements specified in IEPs among the factors it considers.

DoD RESPONSE: Partially Concur: DoDEA partially concurs with the recommendation to revise its staffing formulas. We acknowledge the importance of aligning staffing practices with the diverse needs of our students with IEPs, particularly given the high mobility rates of our student population and the complexities of the global educational environment.

While recognizing the potential benefits of including service minutes in our staffing considerations, we understand that this approach may not be the most advisable way forward. While service minutes provide valuable insights into the needs of students, they can lead to overstaffing as they do not always accurately reflect the actual needs of students and fail to account for the individualized nature of each student's educational requirements. This approach could also oversimplify the complexities of delivering effective individualized instruction and may inadvertently create additional administrative burdens.

In our global school system, the time it takes to hire and onboard new teachers is a persistent challenge. Due to the lengthy hiring process and the transient nature of our student population, it is not always possible to align staffing to service minutes for students. To enhance our staffing processes, we are committed to conducting a thorough reassessment of our formulas, focusing on high-impact factors that reflect the needs of our military connected students and families. This reassessment will involve targeted components within our Teacher Hiring Initiative, including optimizing hiring pathways, enhancing onboarding processes, and refining new employee orientation programming. We will employ a data-informed approach to ensure that these initiatives are effective and aligned with our organizational objectives.

Furthermore, we recognize the unique needs of our military-connected student population and will prioritize ongoing professional development for our educators. DoDEA's commitment to building capacity further reinforces the spirit of Individuals with Disabilities Education Act (IDEA) and our Department of Defense Instruction and Department of Defense Manual (DoDI/DODM) 1342.12 which recognizes that all students are general education students first. Most students with Individualized Education Programs (IEPs) access the general education curriculum. They spend the majority of their school day in the general education setting, with appropriate supports, services, and accommodations, to ensure they have opportunities to succeed. By equipping our staff with the necessary skills and knowledge, we aim to ensure they can effectively support the diverse needs of students with IEPs, fostering an inclusive and responsive educational environment.

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DoDEA remains committed to providing a high-quality educational experience for all students, including students with IEPs. Our staffing strategies will continue to be dynamic and adaptable, ensuring we can effectively meet the evolving needs of our students and families in fiscally responsible ways. Through a focus on quality, collaboration, and professional development, we are dedicated to empowering all students to thrive academically alongside their peers.

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improvement, ensuring that our educators are supported and our schools are equipped to provide the highest quality education to all students, in alignment with the requirements of DoDI/DoDM 1342.12.

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# Appendix II: GAO Contact and Staff Acknowledgements

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## GAO contact

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## Staff Acknowledgements

In addition to the contact named above, the following staff members made key contributions to this report: Jennifer Gregory (Assistant Director), Aimée Elivert (Analyst-in-Charge), Erin Barry, and Maggie Baucom. Also contributing to this report were Maria Gadel, Monika Gomez, Lara Laufer, Amy MacDonald, John Mingus, Michael Naretta, James Rebbe, David Reed, Karissa Robie, Rebecca Sero, Meg Sommerfeld, Alexandra Squitieri, and Curtia Taylor.

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