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HQ, U.S. Army Installation Management Command
Fort Sam Houston, TX
071323Z NOV14

OPERATIONS ORDERS 15-014: Access to Army Installations by Educational Institutions (U)

Refs: (a) (U) AR 621-5, Army Continuing Education System (ACES), dtd 6 Sep 09
(b) (U) Department of Defense Instruction 1322.25, Voluntary Education Programs, Incorporating Change 3, dtd 7 Jul 14
(c) (U) Department of Defense Instruction 1344.07, Personal Commercial Solicitation on DoD Installations, dtd 30 Mar 06
(d) (U) HQ, IMCOM OPORD 12-096: Solicitation by For-Profit Schools Not Under a Garrison Memorandum of Understanding (MOU) Through the Army Continuing Education System (ACES), DTG 221918Z DEC11

(U) Time Zone Used Throughout the Order: Zulu.

1. (U) **SITUATION.** This action rescinds and replaces ref (d). Voluntary Education Programs, ref (b), implements new policy, responsibilities, and procedures for the operation of voluntary education programs within DoD and creates rules to strengthen existing procedures for access to DoD Installations by educational institutions. This OPORD does not apply to overseas locations where educational institutions provide education programs and services under contract.
2. (U) **MISSION.** Upon publication of this order, Garrison Commanders will ensure that educational institutions requesting access to Army Installations for the purposes of marketing programs; providing education, guidance, training opportunities; or to participate in sanctioned education or career fairs be vetted through the Garrison Education Services Officer (ESO) or responsible education advisor to ensure they meet established vetting requirements.
3. (U) **EXECUTION.**
 - 3.A. (U) Commander's Intent. This OPORD supports Installation Readiness Line of Effort (LOE) 2: Effective BASOPS Support Services. My intent is that Garrison Commanders ensure ESOs, or responsible education advisors, vet educational institutions seeking access to and use of our facilities for compliance with the requirements specified in ref (b). I consider this to be an enduring mission.
 - 3.B. (U) Concept of Operations.
 - 3.B.1. (U) Garrison Commanders will refer representatives of educational institutions to the Garrison ESO or responsible education advisor. ESO or responsible education advisor will vet all educational institutions seeking to market their programs; to provide

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education, guidance, training opportunities; or to participate in sanctioned education or career fairs on an Army Installation to ensure: a) educational institutions have a signed DoD Voluntary Education Partnership MOU (as updated in ref (b)); b) educational institutions provide meaningful information to students about the financial cost and enrollment at an institution so students can make informed decisions on where to attend school; c) educational institutions do not use unfair, deceptive, or abusive recruiting practices; and d) educational institutions provide academic and student support services to Service members and their families.

3.B.2. (U) Contacts by an educational institution with a Service member for the purpose of asking or encouraging the members to sign up for one of the institution's programs (assuming the program has a cost) are considered personal commercial solicitation. Commercial Sponsorship/Advertising agreements may be permissible when vetted through the responsible Education Services Officer. These agreements will not conflict with the DoD Voluntary Education Partnership MOU and governing regulations. Specific areas of concern include, but are not limited to, activities of misrepresentation or recruitment by their nature (e.g., setting up a table and handing out sales literature, donations, in exchange for physical presence, advertising ineligible programs, and handing out items having more than a *de minimis* value; obtaining contact information of event participants). Commercial sponsorship also includes providing funding, goods, equipment or services to a Family and Morale, Welfare and Recreation (FMWR) program or event. The ESO will ensure educational institutions comply with ref (c) and all requirements established by the installation commander for solicitation.

3.B.3. (U) Agents representing educational institutions in the performance of contracted services can be permitted installation access only in accordance with the requirements of their contract and/or written agreement and applicable DoD installation policies and regulations. Former military members, representing an educational institution, cannot bypass established installation access procedures based on their government ID card privileges.

3.C. (U) Tasks to Subordinate Units.

3.C.1. (U) IMCOM Region Directors. (AT, CE, PA)

3.C.1.A. (U) Provide assistance as required to respective Garrisons.

3.C.1.B. (U) See Coordinating Instructions.

3.C.2. (U) U.S. Army Garrisons. (All less Europe, Japan, Korea)

3.C.2.A. (U) Direct Garrison ESO or responsible educational advisor to vet all educational institutions seeking to market their programs, to provide education,

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guidance, training opportunities, or to participate in sanctioned education or career fairs before granting access to Army installations. Vetting process includes ensuring educational institutions adhere to federal law and comply with applicable DoD Installation policies and regulations.

3.C.2.B. (U) Ensure Garrison ESO or responsible education advisor monitors educational institutions and its agents granted access to an Army installation to ensure they do not:

3.C.2.B.1. (U) Use unfair, deceptive, abusive, or fraudulent devices, schemes, or artifices, including misleading advertising or sales literature.

3.C.2.B.2. (U) Engage in unfair, deceptive, or abusive marketing tactics, such as during unit briefings or assemblies.

3.C.2.B.3. (U) Engage in open recruiting efforts; or distribute marketing materials on the DoD installation at unapproved locations or events.

3.C.2.B.4. (U) Ensure they do not market to, or recruit, newly-assigned military personnel to the installation, unless the Service member has been advised by education services staff regarding voluntary education programs and services IAW with Enclosure 3 of ref (b).

3.C.2.C. (U) Ensure Garrison ESOs/ESSs or responsible education advisor make certain that educational institutions granted access to Army Installations to provide programs, services, or education guidance to their students have met these criteria:

3.C.2.C.1. (U) Have a signed DoD Voluntary Education Partnership MOU.

3.C.2.C.2. (U) Are in compliance with State authorization requirements.

3.C.2.C.3. (U) Are State-approved for the use of veterans' education benefits.

3.C.2.C.4. (U) Are certified to participate in federal student aid programs through the U.S. Department of Education under Title IV of the Higher Education Act of 1965; and

3.C.2.C.5. (U) Are accredited by a national or regional accrediting body recognized by the U.S. Department of Education and conduct programs only from among those offered or authorized.

3.C.2.C.6. (U) Follow applicable DoD installation policies and procedures designated by the Installation Commander.

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3.C.2.D. (U) Ensure Garrison ESOs grant installation access to an institution and/or its representatives/agents solely to provide guidance to their students, in accordance with ref (b) para 4. a-f, when the institution has an installation student population of at least 20 military-connected students, i.e., military tuition assistance (TA) recipients, eligible Title IV and GI Bill recipients (military or Family member). Installation MOUs are not required for this type of access request.

3.C.2.E. (U) Ensure Garrison ESO or responsible education advisor executes consistent access procedures and employs a standardized access form similar to Annex A, Educational Institution Request for Access to Army Installation/Activity. This form will be used also to deny access and provide the reason(s) for doing so.

3.C.2.F. (U) Ensure Garrison ESO or responsible education advisor uses a standardized form similar to Annex B, Education Disclosure/Checklist, to assist in evaluation of an institution's request for access and for educational institutions to provide meaningful information to potential students about the financial cost and enrollment at their institution.

3.D. (U) Coordinating Instructions.

3.D.1. (U) This order is effective upon publication.

3.D.2. (U) Direct Liaison Authorized (DIRLAUTH) is granted to all commands, units, staff, and staff sections to take necessary actions in support of the execution of this order. At the direction of HQ, IMCOM G1, participate in or take action in support of activities, meetings, and/or conferences required to successfully execute this order.

4. (U) SUSTAINMENT. None.

5. (U) COMMAND AND CONTROL.

5.A. (U) Command.

5.A.1. (U) IMCOM G1 is the lead element for this action and all others are in support.

5.B. (U) Control. None.

5.C. (U) Signal.

5.C.1. (U) IMCOM G1, ACES, primary POC is Ms. Janice Beyers, comm: (210) 466-0477; email: janice.m.beyers.civ@mail.mil.

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5.C.2. (U) Acknowledge receipt of this order to the IMCOM G1, ACES POC para 5.C.1.

ACKNOWLEDGE:

HALVERSON
LTG
Commanding

OFFICIAL:

Stewart Wyland, DG3 for

SHUCK
COL
G3

ANNEXES:

A – (U) Educational Institution Request for Access to Army Installation/Activity
B – (U) Education Disclosure/Checklist

DISTRIBUTION:

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Fort Sam Houston, TX
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FRAGMENTARY ORDER 01 to OPERATIONS ORDER 15-014: Access to Army Installations by Educational Institutions (U)

- Refs: (a) (U) AR 621-5, Army Continuing Education System (ACES), dtd 6 Sep 09
(b) (U) Department of Defense Instruction 1322.25, Voluntary Education Programs, Incorporating Change 3, dtd 7 Jul 14
(c) (U) Department of Defense Instruction 1344.07, Personal Commercial Solicitation on DoD Installations, dtd 30 Mar 06
(d) (U) HQ, IMCOM OPORD 12-096: Solicitation by For-Profit Schools Not Under a Garrison Memorandum of Understanding (MOU) Through the Army Continuing Education System (ACES), DTG 221918Z DEC11
(e) (U) AR 215-1 Military Morale, Welfare, and Recreation Programs and Non-appropriated Fund Instrumentalities, dtd 24 Sep 10
(f) (U) Department of Defense Instruction 1015.10 Military Morale, Welfare, and Recreation (MWR) Programs, Enclosures 11 and 12, dtd 1 May 11
(g) (U) Army Directive, 2014-05 Policy and Implementation for Common Access for Uncleared Contractors, dtd 7 Mar 14.
(h) (U) Army Regulation, 190-13, The Army Physical Security Program Chapter 8, dtd 25 Feb 11.
(i) (U) OPORD 15-014: Access to Army Installations by Educational Institutions dtg 071323Z NOV14.

(U) Time Zone Used Throughout the Order: Zulu.

1. (U) **SITUATION.** No change. This action rescinds and replaces ref (d). Voluntary Education Programs, ref (b), implements new policy, responsibilities, and procedures for the operation of voluntary education programs within DoD and creates rules to strengthen existing procedures for access to DoD Installations by educational institutions. This OPORD does not apply to overseas locations where educational institutions provide education programs and services under contract.
2. (U) **MISSION.** No change. Upon publication of this order, Garrison Commanders will ensure that educational institutions requesting access to Army Installations for the purposes of marketing programs; providing education, guidance, training opportunities; or to participate in sanctioned education or career fairs be vetted through the Garrison Education Services Officer (ESO) or responsible education advisor to ensure they meet established vetting requirements.

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3. (U) **EXECUTION.**

3.A. (U) Commander's Intent. No change. This OPORD supports Installation Readiness Line of Effort (LOE) 2: Effective BASOPS Support Services. My intent is that Garrison Commanders ensure ESOs, or responsible education advisors, vet educational institutions seeking access to and use of our facilities for compliance with the requirements specified in ref (b). I consider this to be an enduring mission.

3.B. (U) Concept of Operations.

3.B.1. (U) No change. Garrison Commanders will refer representatives of educational institutions to the Garrison ESO or responsible education advisor. ESO or responsible education advisor will vet all educational institutions seeking to market their programs; to provide education, guidance, training opportunities; or to participate in sanctioned education or career fairs on an Army Installation to ensure: a) educational institutions have a signed DoD Voluntary Education Partnership MOU (as updated in ref (b)); b) educational institutions provide meaningful information to students about the financial cost and enrollment at an institution so students can make informed decisions on where to attend school; c) educational institutions do not use unfair, deceptive, or abusive recruiting practices; and d) educational institutions provide academic and student support services to Service members and their families.

3.B.2. (U) No change. Contacts by an educational institution with a Service member for the purpose of asking or encouraging the members to sign up for one of the institution's programs (assuming the program has a cost) are considered personal commercial solicitation. Commercial Sponsorship/Advertising agreements may be permissible when vetted through the responsible Education Services Officer. These agreements will not conflict with the DoD Voluntary Education Partnership MOU and governing regulations. Specific areas of concern include, but are not limited to, activities of misrepresentation or recruitment by their nature (e.g., setting up a table and handing out sales literature, donations, in exchange for physical presence, advertising ineligible programs, and handing out items having more than a *de minimis* value; obtaining contact information of event participants). Commercial sponsorship also includes providing funding, goods, equipment or services to a Family and Morale, Welfare and Recreation (FMWR) program or event. The ESO will ensure educational institutions comply with ref (c) and all requirements established by the installation commander for solicitation.

3.B.2.A. (U) [Add] New Annex C (Processing Commercial Sponsorship and Advertising Agreements with Educational Institutions) to OPORD 15-014: Access to Army Installations by Educational Institutions (U). Annex C describes the process for approval for commercial sponsorship solicitation from educational institutions for national sponsorship and advertising promotions initiated at

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IMCOM G9. The purpose is to expedite the process for obtaining approval of educational institutions as DFMWR commercial sponsors.

3.B.3. (U) **[Change]** All educational institution representatives must meet requirements outlined in references h and I to gain unescorted access onto the installation. These individuals will be vetted through the National Crime Information Center (NCIC) Interstate Identification Index (III) Database. This data base runs a full criminal background check. Army policy has established 11 categories of criminal offenses that automatically deny the individual access to the installation. Agents representing educational institutions in the performance of contracted services can be permitted installation access only in accordance with the requirements of their contract and/or written agreement and applicable DoD installation policies and regulations. Former military members, representing an educational institution cannot bypass established installation access procedures based on their government ID card privileges.

3.B.3.A. (U) [Add] Those individuals not granted access to the installation due to National Crime Information Center Interstate Identification Index database checks may request and submit an installation access denial packet.

3.C. (U) Tasks to Subordinate Units.

3.C.1. (U) IMCOM Region Directors. (AT, CE, PA)

3.C.1.A. (U) No change. Provide assistance as required to respective Garrisons.

3.C.1.B. (U) No change. See Coordinating Instructions.

3.C.2. (U) U.S. Army Garrisons. (All less Europe, Japan, Korea)

3.C.2.A. (U) No change. Direct Garrison ESO or responsible educational advisor to vet all educational institutions seeking to market their programs, to provide education, guidance, training opportunities, or to participate in sanctioned education or career fairs before granting access to Army installations. Vetting process includes ensuring educational institutions adhere to federal law and comply with applicable DoD Installation policies and regulations.

3.C.2.B. (U) No change. Ensure Garrison ESO or responsible education advisor monitors educational institutions and its agents granted access to an Army installation to ensure they do not:

3.C.2.B.1. (U) No change. Use unfair, deceptive, abusive, or fraudulent devices, schemes, or artifices, including misleading advertising or sales literature.

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3.C.2.B.2. (U) No change. Engage in unfair, deceptive, or abusive marketing tactics, such as during unit briefings or assemblies.

3.C.2.B.3. (U) No change. Engage in open recruiting efforts; or distribute marketing materials on the DoD installation at unapproved locations or events.

3.C.2.B.4. (U) No change. Ensure they do not market to, or recruit, newly-assigned military personnel to the installation, unless the Service member has been advised by education services staff regarding voluntary education programs and services IAW with Enclosure 3 of ref (b).

3.C.2.C. (U) No change. Ensure Garrison ESOs/ESSs or responsible education advisor make certain that educational institutions granted access to Army Installations to provide programs, services, or education guidance to their students have met these criteria:

3.C.2.C.1. (U) No change. Have a signed DoD Voluntary Education Partnership MOU.

3.C.2.C.2. (U) No change. Are in compliance with State authorization requirements.

3.C.2.C.3. (U) No change. Are State-approved for the use of veterans' education benefits.

3.C.2.C.4. (U) No change. Are certified to participate in federal student aid programs through the U.S. Department of Education under Title IV of the Higher Education Act of 1965; and

3.C.2.C.5. (U) No change. Are accredited by a national or regional accrediting body recognized by the U.S. Department of Education and conduct programs only from among those offered or authorized.

3.C.2.C.6. (U) No change. Follow applicable DoD installation policies and procedures designated by the Installation Commander.

3.C.2.D. (U) No change. Ensure Garrison ESOs grant installation access to an institution and/or its representatives/agents solely to provide guidance to their students, in accordance with ref (b) para 4. a-f, when the institution has an installation student population of at least 20 military-connected students, i.e., military tuition assistance (TA) recipients, eligible Title IV and GI Bill recipients (military or Family member). Installation MOUs are not required for this type of access request.

3.C.2.E. (U) No change. Ensure Garrison ESO or responsible education advisor executes consistent access procedures and employs a standardized access form

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similar to Annex A, Educational Institution Request for Access to Army Installation/Activity. This form will be used also to deny access and provide the reason(s) for doing so.

3.C.2.F. (U) No change. Ensure Garrison ESO or responsible education advisor uses a standardized form similar to Annex B, Education Disclosure/Checklist, to assist in evaluation of an institution's request for access and for educational institutions to provide meaningful information to potential students about the financial cost and enrollment at their institution.

3.C.2.G (U) [Add] Garrison ESOs and ESSs will coordinate with the local Director of Emergency Services to obtain guidance and full understanding on the requirements needed for the educational representatives to gain access to the installation.

3.C.2.G.1 (U) [Add] Garrison ESO or ESSs will ensure that all educational institution representatives understand the requirements to gain access to the installation prior to performing services.

3.C.2.G.2. (U) [Add] Garrison ESO or ESSs will be the sponsor for all educational associated access and access denial packets submitted for approval.

3.D. (U) Coordinating Instructions.

3.D.1. (U) No change. This order is effective upon publication.

3.D.2. (U) No change. Direct Liaison Authorized (DIRLAUTH) is granted to all commands, units, staff, and staff sections to take necessary actions in support of the execution of this order. At the direction of HQ, IMCOM G1, participate in or take action in support of activities, meetings, and/or conferences required to successfully execute this order.

4. (U) **SUSTAINMENT**. None.

5. (U) **COMMAND AND CONTROL**.

5.A. (U) Command.

5.A.1. (U) No change. IMCOM G1 is the lead element for this action and all others are in support.

5.B. (U) Control. None.

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5.C. (U) Signal.

5.C.1. (U) No change. IMCOM G1, ACES, primary POC is Ms. Janice Beyers, comm: (210) 466-0477; email: janice.m.beyers.civ@mail.mil

5.C.1.A. (U) [Add] IMCOM G9, Marketing & Interactive Solutions primary POC is Ms. Gabriele Drechsel, Senior Program Analyst, IMCOM G9 Marketing, e-mail: gabriele.k.drechsel.naf@mail.mil; phone: 210-466-1860.

5.C.1.B. (U) [Add] IMCOM G9, Marketing & Interactive Solutions secondary POC is Ms. Carly Michael; Commercial Sponsorship and Advertising Program Coordinator; e-mail: carly.n.michael2.naf@mail.mil; phone: 210-466-1855.

5.C.2. (U) **[Change]** Acknowledge receipt of this order to the IMCOM G1, ACES POC para 5.C.1. **and the IMCOM G9 Marketing & Interactive Solutions POC para 5.C.1.A. and 5.C.1.B.**

ACKNOWLEDGE:

HALVERSON
LTG
Commanding

OFFICIAL:

SHUCK
COL
G3

ANNEXES:

A – (U) No change. Educational Institution Request for Access to Army Installation/Activity

B – (U) No change. Education Disclosure/Checklist

C – (U) [Add] Corporate Sponsorship Standard Operating Procedures (SOP) for Educational Institutions

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