

DEX 3

## Alexandria Division

**Defendants.**

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## **DECLARATION OF DR. BETH SCHIAVINO-NARVAEZ**

Pursuant to 28 U.S.C. § 1746, I hereby declare, under penalty of perjury as follows:

1. I am the Director of the Department of Defense Education Activity (DoDEA). I make this declaration based on my personal knowledge and information provided to me in my role at DoDEA.

2. I completed my graduate studies at the Harvard University Graduate School of Education where I earned a master's degree in School Leadership, a master's degree in Education Policy and Management, and a doctorate from the Urban Superintendents Program. I earned my Bachelor of Science degree in Elementary Education from Pennsylvania State University. I had 30 years of experience in education prior to assuming the role of Director of DoDEA, which included serving as DoDEA's Chief Academic Officer, Chief of Instructional Leadership Development for DoDEA's Pacific Region, and Superintendent for Hartford, Connecticut Public Schools.

3. DoDEA is a DoD component established as a DoD Field Activity through its chartering Directive, DoD Directive 1342.20, “Department of Defense Education Activity (DoDEA),” July 7, 2020. As its Director I report to the Under Secretary of Defense for Personnel

and Readiness (USD(P&R)) through the Assistant Secretary of the Defense for Manpower and Reserve Affairs (ASD(M&RA)). Mr. Timothy D. Dill is currently Performing the Duties of the ASD(M&RA).

4. DoDEA is one of only two federally operated school systems and, as a DoD component, operates independently of the Department of Education. It is responsible for planning, directing, coordinating, and managing prekindergarten (pre-K) through 12th grade educational programs on behalf of the Department of Defense. DoDEA is globally positioned, operating 161 accredited schools in 9 districts located in 11 foreign countries, 7 states, Guam, and Puerto Rico. DoDEA is committed to ensuring that all eligible school-aged children of military families are provided a world-class education that prepares them for postsecondary education and career success.

5. DoDEA serves several categories of military connected students both inside and outside the continental United States. Full eligibility requirements are detailed in DoDEA Administrative Instruction 1344.01, *Eligibility and Enrollment Requirements for DoDEA Schools*, but briefly summarized, in the continental United States, pre-K-12 grade students are generally eligible to attend tuition free if they are dependent children of active-duty service members living in permanent housing on base or a dependent of federal government civilians living in permanent housing on base. Outside the continental United States, pre-K-12 students may attend tuition free if they are command-sponsored children of active-duty service members or DoD civilians.

6. I understand that the Plaintiffs in the above-captioned lawsuit attend one of the following DoDEA schools: Crossroads Elementary School in Quantico, Virginia; Barsanti Elementary School in Fort Campbell, Kentucky; Aviano Middle High in Aviano, Italy; Sollars Elementary School in Misawa, Japan; and Edgren Middle High in Misawa, Japan.

**A. The President's Executive Orders**

7. The President's Executive Orders, *Ending Radical Indoctrination in K-12 Schooling* (EO 14190), signed on January 29, 2025, and *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (EO 14168), signed January 20, 2025, require the Department of Defense, which includes DoDEA, to ensure that federal resources are not used to support gender ideology and discriminatory equity ideology, as defined in the EOs. As a federal entity, DoDEA adjusts practices to fully meet the Executive Orders, directives, and guidance issued by the President of the United States and leadership of the Department of Defense. DoDEA's enduring commitment to adhere to federal directives ensures that its educational environment aligns with and reflects the nation's core values.

8. In response to direction from the Department's leadership, DoDEA conducted an operational review to ensure alignment with the Executive Orders, Departmental objectives, and the nation's core values. DoDEA's review encompassed both books in school libraries, known within DoDEA as "Information Centers," as well as DoDEA Adopted Instructional Resources.

9. The review of the selected resources is an ongoing process that is focused on the deliberate, careful and thoughtful identification of resources that may conflict with the EOs or Department's educational objectives.

10. I provide interim informational updates regarding this review to leadership within the Office of the ASD(M&RA) as it progresses. Our last update, provided on March 13, 2025, advised that as of that date, the review comprised approximately 427,000 classroom resource components, of which 41, or 0.01%, were identified for a further review and approximately 457,000 library books, of which 555 titles, or 0.1%, were identified for further review.

11. The current stage of the process is to be followed by an even more focused review, as directed by the ASD(M&RA), that will further assess the educational and pedagogical value of each resource prior to making a recommendation to the ASD(M&RA) for the final disposition of the materials subject to this review. The analysis of the educational and pedagogical value of each resource will be included in the recommendation for final disposition to the ASD (M&RA)

12. At this time, no recommendations for the final disposition of the materials subject to this review have been proffered to me or the ASD (M&RA).

**B. Secretary Hegseth's Directives**

13. On January 29, 2025, the Secretary of Defense issued a memorandum, "Restoring America's Fighting Force" to all DoD components. Among other things, this directive prohibits instruction on Critical Race Theory, Gender Ideology and DEI, specifically providing that "No element within DoD will provide instruction on Critical Race Theory (CRT), DEI, or gender ideology as part of a curriculum."

14. On January 31, 2025, the Secretary of Defense issued a directive to all DoD components, including the Military Departments and Defense Agencies and DoD Field Activities such as DoDEA, prohibiting the use of official resources to host celebrations or events related to cultural awareness months.

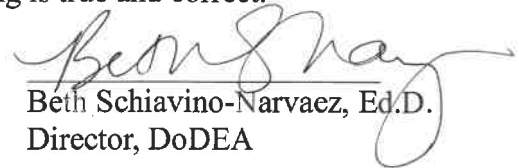
15. Events that directly support Host Nation language and culture classes, international exchanges, or other location-based cultural education efforts continued given their relationship to educating DoDEA students about the country or territory in which they are currently living. Specifically, Host Nation Engagement is intended to provide students with cultural knowledge necessary for situational awareness and safety in their Host Nation and to ensure students feel more comfortable navigating daily life in a foreign country. For example, on May 13, 2025, students at

Vicenza Elementary School visited the *Scuola Primari di Lisiera* to conduct a student exchange with that local elementary school.

16. The adjustments to cultural observances have not altered DoDEA's instruction in any way. Our curriculum and lesson plans are not tied to cultural observances or identity months. DoDEA had included those observances as purely supplemental. DoDEA's core curriculum for history, language arts, and other subjects, continues as before. DoDEA's curriculum includes instruction on a variety of historical figures and events in lessons that are not tied to a particular month or time of year.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 23, 2025

  
Beth Schiavino-Narvaez, Ed.D.  
Director, DoDEA