

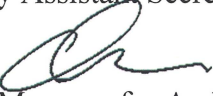


**OFFICE OF  
INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

SEP 04 2015

Memorandum

To: Kristen J. Sarri  
Principal Deputy Assistant Secretary for Policy, Management and Budget

From: Charles Haman   
Central Region Manager for Audits, Inspections, and Evaluations

Subject: Verification Review – Recommendations for the Report, “Bureau of Indian Education: School Violence Prevention” (NM-EV-BIE-0003-2008)  
Report No. 2015-CR-060

The Office of Inspector General (OIG) has completed a verification review of the four recommendations presented in the subject report. Our objective was to determine whether the Bureau of Indian Education (BIE) implemented the recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. PFM reported to OIG that it has closed the recommendations. We do not concur that all recommendations have been resolved and implemented.

**Background**

Our report, “Bureau of Indian Education: School Violence Prevention,” dated February 3, 2010, made four recommendations designed to improve safety measures in place at the BIE-funded schools

The Chief of Staff to the Assistant Secretary – Indian Affairs concurred with the report’s recommendations in a memorandum dated March 24, 2010, and detailed the Bureau’s plans to implement the four recommendations. In an April 6, 2010 memorandum, we considered these four recommendations resolved but not implemented and referred the recommendations to the Assistant Secretary for Policy, Management and Budget to track their implementation

**Scope and Methodology**

The scope of this review was limited to determining whether BIE implemented the recommendations we reported. To accomplish our objective, we reviewed the supporting documentation that BIE officials provided to us and to PFM. We did not perform internal control testing, site visits, or conduct fieldwork to determine whether the underlying deficiencies that were initially identified have been corrected. As a result, this review was not conducted in accordance with Generally Accepted Government Auditing Standards, issued by the Comptroller General of the United States, or Quality Standards for Inspection and Evaluation issued by the Council of the Inspectors General on Integrity and Efficiency.

## Results of Review

We found that BIE implemented and resolved three of the four recommendations.

**Recommendation 1:** Indian Affairs should develop safety policies that establish minimum safeguards that must be in place at all Indian education facilities to protect students and staff from internal and external threats.

**Action Taken:** On April 18, 2011, BIE issued a national policy memorandum addressing Emergency Management Programs in Schools. The policy requires all BIE-operated schools to have a Continuity of Operations Plan and an Emergency Management Plan. In addition, the policy requires evacuations and lockdown drills once a semester. On May 17, 2012, this national policy memorandum became a permanent policy procedure for BIE staff within the Indian Affairs Manual (Part 30, Chapter 12).

**Recommendation 2:** Once safety policies are developed, Indian Affairs should immediately prepare and implement a plan of action to evaluate the safety and security of each education facility against the safety policy. After this evaluation is completed:

- (a) At the BIE-operated education facilities, immediately correct identified weaknesses.
- (b) At the grant-operated education facilities, determine whether identified weaknesses involve the violation of the right, or endangerment of the health, safety, or welfare of any persons. If Indian Affairs determines that there is “an immediate threat of imminent harm to the safety of any person” and that this threat “arises from the failure of the grantor to fulfill requirements of the grant” the Secretary should immediately rescind the grant and resume control of the facility and immediately correct identified weaknesses

**Action Taken:** In May 2012, BIE completed a review of every BIE-operated school as part of the Safe School Audit in order to evaluate the safety and security of each education facility. BIE provided the Safe School Audit Reports for the Alamo Navajo School and Riverside Indian School. In addition, we requested and received the Safe School Audit Reports for Paschal Sherman Indian School, Pierre Indian Learning Center, Moencopi Day School, and Ojo Encino Day School.

We determined that BIE created a safety policy and evaluated the safety and security of each education facility against the safety policy. BIE, however, did not provide evidence that it corrected identified weaknesses highlighted in the Safe School Audits. Therefore, we consider this recommendation resolved but not implemented.

**Recommendation 3:** Indian Affairs should prepare and implement a plan of action to evaluate grant agreements. Grant agreements should be updated to require the establishment of, and adherence to, all BIE safety policies

**Action Taken:** On March 6 and March 7, 2012, BIE created a focus group to draft an assurance statement addressing safety compliance from Tribally Controlled Grant Schools (TCGSs) to all BIE safety policies. These assurance statements were then distributed to all TCGSs. Of the 125 TCGSs, all but 3 grantees signed the assurance statement.

**Recommendation 4:** Indian Affairs should develop and implement a plan to ensure all teachers in schools receiving BIE funding are trained, at least annually, in gang indicators, school specific emergency plans and procedures, conflict resolution, anger management, bully prevention, suicide prevention, and drug abuse resistance.

**Action Taken:** We requested evidence of annual training for fiscal year (FY) 2013 in addition to the FY 2012 evidence already delivered. BIE provided evidence showing annual training for FY 2012 and FY 2013 in gang indicators, school specific emergency plans and procedures, conflict resolution, anger management, bully prevention, suicide prevention, and drug abuse resistance

## **Conclusion**

Based on a review of the evidence provided, we consider recommendations 1, 3, and 4 resolved and implemented. Recommendation 2 is considered resolved but not implemented. We informed BIE officials of the results of this review on July 15, 2015.

cc: Olivia Ferriter, Deputy Assistant Secretary for Policy, Management and Budget  
Douglas A. Glenn, Director, Office of Financial Management  
Allen Lawrence, Division Chief, Internal Control and Audit Follow-up, Office of Financial Management  
Kevin Washburn, Assistant Secretary, Bureau of Indian Affairs  
Michael Oliva, Audit Liaison Officer, Bureau of Indian Affairs  
Alexandra Lampros, Audit Liaison Officer, Office of Financial Management