



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

# **REVIEW OF VIOLENCE PREVENTION AT THE FLANDREAU INDIAN SCHOOL**



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

**MAY 26 2015**

Memorandum

To: Mr. Everall Fox  
Superintendent, Flandreau Indian School

From: Mary L. Kendall *Mary L. Kendall*  
Deputy Inspector General

Subject: Inspection Report – Review of Violence Prevention at the Flandreau Indian School  
Report No. C-IS-BIE-0003-2014

This memorandum transmits the findings of our inspection of violence prevention efforts at the Flandreau Indian School. Our objective was to determine the quality of education facility safety measures in place to prevent violence against students and staff from internal and external threats at schools funded by the Bureau of Indian Education (BIE).

Please provide us with your written response to this report within 30 days. The response should provide information on actions taken or planned to address the recommendations, as well as target dates and title(s) of the official(s) responsible for implementation. Please send your response to:

Kimberly Elmore  
Assistant Inspector General  
Office of Audits, Inspections, and Evaluations  
U.S. Department of the Interior  
Office of Inspector General  
Mail Stop 4428  
1849 C Street, NW.  
Washington, DC 20240

The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit, inspection, and evaluation reports issued; actions taken to implement our recommendations; and recommendations that have not been implemented.

---

# Table of Contents

Results in Brief .....	1
Introduction.....	2
Objective .....	2
Background .....	2
Findings.....	3
Emergency Preparedness/Security Plans .....	3
Training .....	4
Physical Security Features .....	5
Conclusion and Recommendations.....	7
Conclusion.....	7
Recommendations Summary.....	7
Appendix 1: Scope and Methodology.....	8
Scope .....	8
Methodology .....	8
Appendix 2: Schools Visited .....	9
Appendix 3: Prior Coverage .....	10
Appendix 4: Review of Major Components of Emergency Plans .....	12
Appendix 5: Training at Education Facility.....	13
Appendix 6: Matrix of Safety Measures .....	14

---

## Results in Brief

We conducted an inspection of the Flandreau Indian School to determine the quality of safety measures in place to prevent violence against students and staff from internal and external threats. We found Flandreau Indian School's safety measures to be inadequate.

Specifically, Flandreau Indian School's comprehensive emergency plan did not contain a section on how to handle off-campus emergencies. In addition, staff were not trained on conflict resolution and anger management.

Further, of the 18 safety measures we checked for, Flandreau Indian School did not have 10 in place. While no single safety measure is so critical that its absence at an educational facility is cause for immediate concern, we found that the more safety measures not in place, the less prepared the school is to respond to an incident.

This is the fifth in a series of 16 inspections regarding violence prevention at schools funded by the Bureau of Indian Education. We issued reports in 2008 and 2010 on this same topic where we concluded that schools were not prepared to prevent violence and ensure the safety of students and staff. Flandreau Indian School, an off-reservation boarding school located in Flandreau, SD, was not among the schools previously visited.

We provide four recommendations to help Flandreau Indian School improve its safety measures and its violence prevention training.

---

# Introduction

## Objective

Our objective was to determine the quality of safety measures in place to prevent violence against students and staff from internal and external threats at schools funded by the Bureau of Indian Education (BIE). The scope and methodology for this inspection are included in Appendix 1.

## Background

In this current series of inspections, we assessed safety measures and procedures at a non-statistical selection of 16 Indian schools: 7 BIE-operated, 8 grant-operated, and 1 contract-operated (see Appendix 2). We visited 6 of the 16 schools in previous evaluations (see Appendix 3). Specifically, we visited 28 BIE-funded schools in 2 previous evaluations:

- Controls to Prevent Violence at Bureau of Indian Education Operated Education Facilities (Report No. NM-EV-BIE-0001-2008) issued August 2008; and
- School Violence Prevention (Report No. NM-EV-BIE-0003-2008) issued February 2010.

Flandreau Indian School was not among the schools previously visited.

In the 2013/2014 school year, BIE funded 185 schools in 23 states, including 119 day schools, 52 boarding schools, and 14 peripheral dormitories. Of these schools, 131 were grant- or contract-operated schools funded through grant agreements or contracts with BIE and operated by the respected tribes. The remaining 54 were operated directly by BIE. The Flandreau Indian School, located in Flandreau, SD, is a BIE-operated off-reservation boarding school for students in ninth through twelfth grade.

---

## Findings

The quality of safety measures in place at Flandreau Indian School was inadequate to prevent violence against both students and staff from internal and external threats. Specifically, we found the school—

- had an inadequate comprehensive emergency plan;
- needed to improve training in basic violence prevention; and
- was missing 10 of the 18 safety measures we inspected (see Appendix 6).

### Emergency Preparedness/Security Plans

In our prior evaluations (see Appendix 3), we reviewed school emergency plans against five key topic areas including bomb threats, shootings, fights, hostage situations, and off-campus emergencies. We chose to evaluate the Flandreau Indian School emergency plan against the same key topic areas (see Appendix 4). We found that the school had an inadequate comprehensive emergency plan.

We found that the emergency plan contained information on, and adequately covered, four of the five topic areas including; bomb threats, shootings, fights, and hostage situations. The emergency plan did not, however, contain information on how to handle off-campus emergencies. Since students were taken off-campus for various reasons such as shopping trips, this information is critical and must be part of comprehensive emergency planning to protect students and staff when away from campus.

In September 2009, BIE’s Division of Performance and Accountability issued “Safe Schools Planning: A Guide for Educators”<sup>1</sup> (Guide) to help schools develop emergency plans. The Guide explained how to create a safe school program, including a comprehensive emergency plan. It also provided emergency preparedness and continuity of operations templates that could be tailored to individual schools.

#### Recommendation

We recommend that Flandreau Indian School should:

- I. Use the BIE Guide to update its emergency plan to include information on off-campus emergencies.

---

<sup>1</sup> The guide can be found at <http://www.bie.edu/Programs/SSS/> under 2009 Safe Schools Planning Guide.

## Training

We found that staff training in basic violence prevention during crisis situations (e.g., to address conflict resolution and anger management) needs improvement (see Appendix 5).

Our prior evaluations identified training topics that, to some degree, should be provided in all BIE-funded educational facilities to help reduce the risk of a violent incident. For staff, the six training topics include crisis/emergency plans, conflict resolution, anger management, suicide prevention, and drugs; for students, the six training topics include gangs, conflict resolution, anger management, bully prevention, and drugs (see Appendix 5). Since this was a follow-up review, we chose to evaluate the training provided at the Flandreau Indian School against these same topics. We found that—

- four of the six training topics had been provided to staff; and
- all six training topics had been provided to students.

Specifically, staff were not trained in conflict resolution or anger management. Such training would be valuable to help prevent violence or defuse conflict among students. For example, the night before our visit, police were called to the dormitory as a result of a fight that escalated in both degree and scope. Had staff received proper training in conflict resolution or anger management, they may have been able to properly defuse the situation before it escalated and the police needed to be called.

In addition, while the school reported running routine evacuation and lock-down drills, we found that the school did not always use the training value of these exercises to develop options for specific situations. For example, during our visit, we noticed that the drill was only conducted in the academic building, with no overall campus lock-down. In addition, hall monitors patrolled the halls but did not check doors to make sure they were locked. We found an unlocked door, with students at their desks inside the room.

Drills and exercises, when properly run and evaluated, can help identify gaps and weaknesses in the emergency plan so that they can be corrected before an actual emergency situation arises. There are different levels of emergency plan exercises that require different amounts of planning, time, and resources to perform, including—

- tabletop exercises involving only a small number of high-level school officials;
- drills and functional exercises; and
- full-scale exercises involving multiple agencies and community resources such as fire response, law enforcement, or emergency medical services.

Before deciding how many of which types of exercises to implement, a school should consider the costs and benefits of each type. Ideally, schools should use a combination of exercise types since each has advantages and will allow school administrators to identify different plan strengths and weaknesses.

## Recommendations

We recommend that Flandreau Indian School should:

2. Implement training in those areas listed in Appendix 5 where training has not occurred; and
3. Develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type to ensure the greatest training value is obtained from the drills.

## Physical Security Features

In our prior evaluations, we found no guidance for required safety measures for BIE-funded educational facilities. Therefore, we used several public sources to compile a list of 18 safety measures we considered to be critical in areas such as physical access and communication. We found that 10 of the 18 critical safety measures we inspected were absent (see Appendix 6).

When we arrived on campus on January 28, 2014, we stopped at the guard station at the main entrance where school employees signed us in, gave us visitor badges, and notified key officials of our presence on campus. They did not, however, ask us for our identification.



Figure 1: Guard Station at main entrance to Flandreau Indian School. Source: OIG

Once on campus, we found that several exterior doors, including those leading to the dormitories, student life building, and academic building were unlocked. In each case, we were able to enter these buildings without being seen by school officials. While the guard at the main entrance may have identified visitors driving on campus, the absence of fencing around the facility allowed visitors to access the campus from other directions. Therefore, unlocked facility doors presented a significant security risk to both students and staff.

In addition, while the school had numerous cameras that staff could use to monitor activity in real time, approximately 20 percent of the cameras did not work. Further, the superintendent and principal only sporadically viewed the camera feeds during school hours via monitors in their offices.

As we mentioned in our prior report, we recognize that no individual safety measure is so critical that its absence is cause for immediate concern. The fewer safety measures used at an educational facility, however, the less likely a school is prepared to respond adequately to an incident, ensuring the safety of students and staff from internal or external threats.

#### **Recommendation**

We recommend that Flandreau Indian school should:

4. Evaluate the 18 safety measures in Appendix 6 and determine the correct combination of safety measures for the campus necessary to ensure the safety of staff and students from internal and external threats. Once determined, work to put the selected safety measures in place.

---

# Conclusion and Recommendations

## Conclusion

Incomplete training and inadequate implementation of appropriate safety measures resulted in Flandreau Indian School being unprepared to prevent violence or ensure the safety of students and staff.

## Recommendations Summary

We recommend that Flandreau Indian School should:

1. Use the BIE Guide to update its emergency plan to include a section on off-campus emergencies.
2. Implement training in those areas listed in Appendix 5 where training has not occurred.
3. Develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type to ensure the greatest training value is obtained from the drills.
4. Evaluate the 18 safety measures in Appendix 6 and determine the correct combination of safety measures for the campus necessary to ensure the safety of staff and students from internal and external threats. Once determined, work to put the selected safety measures in place.

---

# Appendix I: Scope and Methodology

## Scope

The scope of this inspection was limited to violence prevention programs in place at the Flandreau Indian School, an off-reservation boarding school located in Flandreau, SD. We performed the same inspection at 15 other schools funded by the Bureau of Indian Education (BIE), which are listed in Appendix 2.

We also performed separate reviews at the Flandreau Indian School to evaluate the programs in place at schools funded by BIE to improve academic achievement and the condition of educational facilities. The results of those reviews will be presented in separate reports.

## Methodology

We conducted this review from January 2014 to August 2014 in accordance with the Quality Standards for Inspections and Evaluations as put forth by the Council of the Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our conclusions.

To address our objective, we—

- reviewed the following items—
  - criteria (including laws, regulations, policies, and procedures),
  - studies,
  - prior reports, and
  - school documentation;
- interviewed officials at Flandreau Indian School; and
- visited Flandreau Indian School on January 28, 2014.

We did not extensively review training records and materials, but relied on information provided to us through our interviews with school officials.

## Appendix 2: Schools Visited

Facility Name	Type	Location	Grades	Date Visited
Tonalea Day School	BIE	Tonalea, AZ	K-8	January 14, 2014
Lukachukai Community School	Grant	Lukachukai, AZ	K-8	January 15, 2014
Tuba City Boarding School	BIE	Tuba City, AZ	K-8	January 16, 2014
Moencopi Day School	Grant	Tuba City, AZ	K-6	January 17, 2014
Flandreau Indian School	BIE	Flandreau, SD	9-12	January 28, 2014
Sicangu Owayawa Oti (Rosebud Dorm)	Grant	Mission, SD	1-12	January 29, 2014
Pierre Indian Learning Center	Grant	Pierre, SD	1-8	January 30, 2014
Cherokee Central Schools	Grant	Cherokee, NC	K-12	February 11, 2014
Ahfachkee Indian School	Grant	Clewiston, FL	PreK-12	February 13, 2014
Miccosukee Indian School	Contract	Miami, FL	K-12	February 14, 2014
Chemawa Indian School*	BIE	Salem, OR	9-12	April 28, 2014
Yakama Nation Tribal School*	Grant	Toppenish, WA	9-12	April 30, 2014
Paschal Sherman Indian School*	Grant	Omak, WA	K-9	May 1, 2014
Ojo Encino Day School*	BIE	Cuba, NM	K-8	May 20, 2014
Te Tsu Geh Oweenge Day School*	BIE	Santa Fe, NM	K-6	May 21, 2014
San Ildefonso Day School*	BIE	Santa Fe, NM	K-6	May 22, 2014

\* We revisited these six campuses from our prior reviews (see Appendix 3) to determine whether conditions noted had been corrected.

## Appendix 3: Prior Coverage

### Project NM-EV-BIE-0001-2008

Facility Name	Type	Location	Grades	Date Visited
John F. Kennedy Day School	BIE	White River, AZ	K-8	April 8, 2008
Tohono O'Odham High School^	BIE	Sells, AZ	9-12	April 10, 2008
Santa Rosa Boarding School	BIE	Sells, AZ	K-8	April 11, 2008
Pine Ridge School^	BIE	Pine Ridge, SD	K-12	April 17, 2008
Ojo Encino Day School*	BIE	Cuba, NM	K-8	April 22, 2008
Chemawa Indian School^*	BIE	Salem, OR	9-12	April 22, 2008
Te Tsu Geh Oweenge Day School*	BIE	Santa Fe, NM	K-6	April 23, 2008
Blackfeet Dormitory	BIE	Browning, MT	1-12	April 24, 2008
San Ildefonso Day School*	BIE	Santa Fe, NM	K-6	April 24, 2008

### Project NM-EV-BIE-0003-2008

Facility Name	Type	Location	Grades	Date Visited
Tohono O'Odham High School^	BIE	Sells, AZ	9-12	February 11, 2009
Pine Ridge School^	BIE	Pine Ridge, SD	K-12	February 5, 2009
Chemawa Indian School^#*	BIE	Salem, OR	9-12	February 10, 2009 January 11, 2010
White Shield School	Grant	Roseglen, ND	K-12	September 16, 2008

Facility Name	Type	Location	Grades	Date Visited
Mandaree Day School	Grant	Mandaree, ND	K-12	September 17, 2008
Twin Buttes Day School	Grant	Halliday, ND	K-8	September 18, 2008
Red Water Elementary School	Grant	Carthage, MS	K-8	September 30, 2008
Tucker Elementary School	Grant	Philadelphia, MS	K-8	October 1, 2008
Choctaw Central High School	Grant	Choctaw, MS	9-12	October 2, 2008
Conehatta Elementary School	Grant	Conehatta, MS	K-8	October 3, 2008
Two Eagle River School	Grant	Pablo, MT	K-12	October 7, 2008
Northern Cheyenne Tribal School	Grant	Busby, MT	K-12	October 9, 2008
Chief Leschi School	Grant	Puyallup, WA	K-12	October 20, 2008
Muckleshoot Tribal School#	Grant	Auburn, WA	K-12	October 20, 2008 January 13, 2010
Yakama Nation Tribal School*	Grant	Yakima, WA	9-12	October 21, 2008
Paschal Sherman Indian School*	Grant	Omak, WA	K-9	October 23, 2008
St. Stephens Indian School	Grant	St. Stephens, WY	K-12	October 30, 2008
Dunseith Day School	BIE	Dunseith, ND	K-8	February 18, 2009
Ojibwa Indian School	BIE	Belcourt, ND	K-8	February 19, 2009
Sherman Indian High School#	BIE	Riverside, CA	9-12	February 23, 2009 January 15, 2010
Gila Crossing Day School	Grant	Laveen, AZ	K-8	February 25, 2009
Salt River Elementary School	Grant	Scottsdale, AZ	K-6	February 26, 2009

^ We visited these schools in both Project NM-EV-BIE-0001-2008 and Project NM-EV-BIE-0003-2008.

# We revisited these three campuses during Project NM-EV-BIE-0003-2008 to determine whether conditions noted had been corrected in the time between visits.

\* We revisited these six campuses in our current reviews (see Appendix 2) to determine whether conditions noted had been corrected.

---

## Appendix 4: Review of Major Components of Emergency Plans

Preparedness Plan Components	YES	NO
Adequately Covered Bomb Threats	✓	
Adequately Covered Shootings	✓	
Adequately Covered Fights	✓	
Adequately Covered Hostage Situations	✓	
Adequately Covered Off-Campus Emergencies		X
Plan Less Than A Year Old	✓	

## Appendix 5: Training at Education Facility

Training	YES	NO
<b>STAFF:</b>		
Crisis/emergency plans	✓	
Conflict resolution		X
Anger management		X
Bully prevention	✓	
Suicide prevention	✓	
Drugs	✓	
<b>STUDENTS:</b>		
Gangs	✓	
Conflict resolution	✓	
Anger management	✓	
Bully prevention	✓	
Suicide prevention	✓	
Drugs	✓	

## Appendix 6: Matrix of Safety Measures

Safety Measures (Summary)	YES	NO
Adequate security fencing*		X
Secured exterior doors		X
Designated visitors' entrance		X
Visitors' entrance that prevented unobserved entering		X
Visitors required to sign in or show identification	✓	
Visitors required to wear a visitors' badge	✓	
Security camera(s)	✓	
Metal detector		X
Security guard	✓	
Hall monitors		X
Operable central alarm systems	✓	
Intercom system in classrooms		X
Exits clearly marked	✓	
Evacuation maps clearly displayed	✓	
Graffiti free walls, playground equipment, etc.		X
Student dress code**	✓	
Staff required to wear identification cards		X
Students required to wear identification cards		X

\* We defined "adequate fencing" as security fencing (such as chain link versus boundary fencing, such as split rail), at least 6 feet high, and in good repair.

\*\* Dress codes reduced violence and gang activity in benchmarked mainstream education facilities.

# **Report Fraud, Waste, and Mismanagement**



Fraud, waste, and mismanagement in Government concern everyone: Office of Inspector General staff, departmental employees, and the general public. We actively solicit allegations of any inefficient and wasteful practices, fraud, and mismanagement related to departmental or Insular Area programs and operations. You can report allegations to us in several ways.



---

**By Internet:**      [www.doi.gov/oig/index.cfm](http://www.doi.gov/oig/index.cfm)

**By Phone:**      24-Hour Toll Free:      800-424-5081  
Washington Metro Area:      202-208-5300

**By Fax:**      703-487-5402

**By Mail:**      U.S. Department of the Interior  
Office of Inspector General  
Mail Stop 4428 MIB  
1849 C Street, NW.  
Washington, DC 20240