



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

# **REVIEW OF VIOLENCE PREVENTION AT THE MOENCOPi DAY SCHOOL**



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

**JAN 28 2015**

Memorandum

To: Rebecca Fred  
Acting Principal, Moencopi Day School

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

Subject: Inspection Report – Review of Violence Prevention at the Moencopi Day School  
Report No. C-IS-BIE-0007-2014

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

We found that the quality of safety measures in place at Moencopi Day School was inadequate. Specifically, the school did not have a comprehensive emergency plan, training in basic violence prevention was either missing or inadequate, and 12 of 18 safety measures we inspected were absent. Our report contains three recommendations that, if implemented, should improve violence prevention activities at the Moencopi Day School.

We welcome your feedback and encourage you to provide us with any comments by February 6, 2015. If you have any questions, please contact Lorelee Bennett at 303-236-9139.

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.

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## Results in Brief

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

Specifically, Moencopi Day School did not have a comprehensive emergency plan. In addition, training in violence prevention and emergency preparedness was inadequate. As a result, the school's response to a gunman on campus in November 2013 was to inadvertently evacuate the students outside rather than locking down the campus. Fortunately, no one was injured during this incident. Despite training on crisis procedures following the incident, the school still could not properly lock down the campus during our visit in January 2014.

Further, of the 18 safety measures we checked for, Moencopi Day School did not have 12 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 first 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. Moencopi Day School was not among the schools previously visited.

We provide three recommendations to help Moencopi Day School improve its safety measures and its violence prevention and emergency preparedness training.

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# 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.

Moencopi Day 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 Moencopi Day School, located on the Hopi Reservation adjacent to Tuba City, AZ, is a grant-operated day school for students in kindergarten through sixth grade. The education facility is made up of one main building, seven modular buildings, and a greenhouse. The main building houses administrative offices, kindergarten and first grade classrooms, and a multi-purpose room that serves as both gym and cafeteria.

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## Findings

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

- did not have a comprehensive emergency plan;
- had inadequate training in basic violence prevention; and
- was missing 12 of the 18 safety measures we inspected (see Appendix 6).

### Emergency Preparedness/Security Plans

We found that the school did not have a comprehensive emergency plan. The school had a basic flip chart book (see Figure 1), which serves as a quick reference guide. A more comprehensive plan, however, is needed to provide those with operational responsibilities detailed instructions on what to do, when to do it, and why to do it; while providing instructions to outside emergency responders on how to provide campus specific support during an emergency.

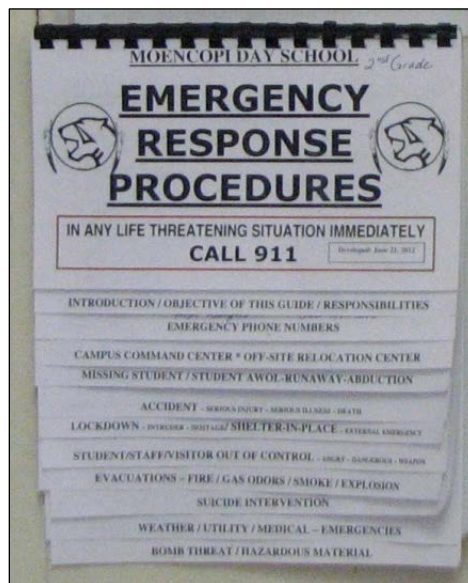


Figure 1: Moencopi Day School Emergency Response Procedures Flip Chart. Source: OIG

In our prior evaluations (see Appendix 3), we reviewed school emergency plans against five key topic areas and determined whether they were adequately covered. We chose to evaluate the Moencopi Day School emergency plan against the same key topic areas (see Appendix 4).

We found that the flip chart contained sections on four of the topic areas including bomb threats, shootings, fights, and hostage situations; however, a closer review of the information in the flip chart revealed that the plans were inadequate in all four topic areas covered (see Appendix 4). For example, the section on bomb

threats in the flip chart simply stated that police instructions take precedence and to visually scan the area for unfamiliar objects before leaving the room. The flip chart did not include instructions on what actions staff should take if they received a bomb threat. This included such actions as—

- information to obtain from the caller;
- electronic equipment to use or not use (i.e., whether to use a cell phone or radio equipment, critical in a school without a central public address system such as Moencopi Day School);
- evacuation procedures (i.e., a specific building or the entire campus);
- appropriate meeting locations (i.e., on campus or off campus); or
- student accountability and release procedures.

Such information and actions are critical and must be part of comprehensive advance emergency planning in order to protect students and staff from dangerous situations.

The school's reaction to a recent incident at Moencopi Day School clearly demonstrates this concept. On November 21, 2013, an individual with a gun jumped the school fence at a point where a mound of dirt left from construction was piled against the fencing (see Figure 2).



Figure 2: The dirt mound along the perimeter fence, left after construction. Source: OIG

As a result, local law enforcement told the school to lock down. School officials, however, confused the codes and inadvertently evacuated the students outside where the armed individual was located. In reaction to this incident, the tribal school board looked for money to have the dirt removed to improve the safety of the school. Just a few yards down the fence line, however, was an opening with no gate or other closure (see Figure 3).





Figure 3: One of many fence openings along the campus perimeter. Source: OIG

In September 2009, BIE’s Division of Performance and Accountability issued “Safe Schools Planning: A Guide for Educators”<sup>1</sup> 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

- I. Moencopi Day School should use the BIE guide to develop a comprehensive emergency plan, and then update the classroom quick reference guide for use during an emergency.

### Training

We found that training in basic violence prevention during crisis situations (e.g., to address anger management and bullying, and to increase awareness of gang activity) was inadequate (see Appendix 5).

In our prior evaluations, we identified training topics that should be provided, to some degree, in all BIE-funded educational facilities to help reduce the risk of a violent incident, six topics for staff members and six for students (see Appendix 5). Since this was a follow-up review, we chose to evaluate the training provided at the Moencopi Day School against these same topics. We found that—

- two of the six training topics had not been provided to staff; and

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



- four of the six training topics had not been provided to students.

In addition, we found that the training that was provided did not necessarily prepare staff for emergency situations. For example, regarding the situation with the armed individual on campus, school officials informed us that the inadvertent evacuation resulted from inadequate training and drilling on the emergency plans. School officials stated that following the November 2013 incident, staff were trained on the emergency plans, including how to safely lockdown the school. When we asked school officials to perform a lock down drill during our visit on January 17, 2014, however, school officials were unsure how to lock down the school. Further, after school officials reported that the school was in lock down, we found numerous unlocked exterior doors with direct access to classrooms containing staff and students, staff in unsecured locations, open fence gates with individuals walking on and off campus unaware of the lock down, and a class in the greenhouse also unaware of the lock down.

Without adequate training, staff and students will remain unprepared to act in the event of a crisis situation, such as a gunman on campus. When an emergency plan is developed, students and staff should be trained on how to execute the plan. With regular practice and drills, the school will be able to execute the plan reliably in an actual emergency.

Drills and exercises can also 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 making a decision about 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 have advantages and will allow school administrators to identify different plan strengths and weaknesses.

## Recommendation

2. Moencopi Day School should:
  - a. implement training in those areas listed in Appendix 5 where training has not occurred; and
  - b. develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type.

## Physical Security Features

We found that 12 of the 18 critical safety measures we inspected were absent (see Appendix 6). In our prior evaluations, we found no guidance for required safety measures for BIE-funded education 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.

When we arrived on campus on January 17, 2014, we bypassed the main building and entered the campus through one of the many open fence gates along the perimeter of the campus. Once on campus, we went to some of the modular buildings and were able to enter classrooms through unlocked exterior doors. While walking around campus, we passed several staff members but were not challenged or directed to the office despite not having visitor badges displayed. Eventually, we went to the main office and we were not required to sign in or show identification. In addition, we were not given visitor badges to wear while on campus.



Figure 4: Open fence gate where we entered campus. Source: OIG

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**

3. Moencopi Day school should :
  - a. control campus access to ensure the safety of staff and students;
  - b. train staff to question all individuals on campus not clearly displaying an appropriate identification card or visitors' badge, directing them to report to the main office; and
  - c. 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.

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# Conclusion and Recommendations

## Conclusion

Inadequate emergency planning, training, and implementation of appropriate safety measures resulted in Moencopi Day School being unprepared to prevent violence or ensure the safety of students and staff.

## Recommendations Summary

We recommend that:

1. Moencopi Day School should use the BIE guide to develop a comprehensive emergency plan, and then update the classroom quick reference guide for use during an emergency.
2. Moencopi Day School should:
  - a. implement training in those areas listed in Appendix 5 where training has not occurred; and
  - b. develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type.
3. Moencopi Day School should:
  - a. control campus access to ensure the safety of staff and students;
  - b. train staff to question all individuals on campus not wearing a clearly displayed staff identification card or visitors' badge, directing them to report to the main office; and
  - c. 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.

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# Appendix I: Scope and Methodology

## Scope

The scope of this inspection was limited to violence prevention programs in place at the Moencopi Day School, located on the Hopi Reservation adjacent to Tuba City, AZ. 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 Moencopi Day 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 Moencopi Day School; and
- visited Moencopi Day School on January 17, 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.

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

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

## 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		X
Conflict resolution		X
Anger management		X
Bully prevention	✓	
Suicide prevention		X
Drugs	✓	

## Appendix 6: Matrix of Safety Measures

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

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