



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

CONDITION OF BUREAU OF INDIAN AFFAIRS FACILITIES AT THE PINE HILL BOARDING SCHOOL



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


JAN 11 2016

Memorandum

To: Michael Black
Director, Bureau of Indian Affairs

Charles Roessel
Director, Bureau of Indian Education

Grant Clawson
Acting Superintendent, Pine Hill Boarding School

From: Mary L. Kendall 
Deputy Inspector General

Subject: Inspection Report – Condition of Bureau of Indian Affairs Facilities at the
Pine Hill Boarding School
Report No. C-IS-BIE-0023-2014-A

This memorandum transmits the findings of our inspection of Bureau of Indian Affairs (BIA) facilities at the Pine Hill Boarding School (Pine Hill). Our objective was to determine the condition of school facilities and the efforts being made to maintain the facilities in an environment that is safe for staff and students.

We found that a general condition of mismanagement has resulted in Pine Hill being poorly maintained with several significant safety concerns. Further, inadequate communication and coordination amongst Pine Hill, BIA, and the Bureau of Indian Education has resulted in continued problems with correcting existing facility deficiencies and inefficient ongoing management of the facilities. Our report contains 12 recommendations to address urgent maintenance needs at Pine Hill and help Pine Hill develop promising practices to ensure that its facilities are operated and maintained properly for the students.

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:

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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 this inspection to assess the condition of school facilities funded by the Bureau of Indian Affairs (BIA) at the Pine Hill Boarding School. As part of our work, we reviewed the efforts being taken to maintain the facilities in a manner that is safe for staff and students.

We found that Pine Hill Boarding School is not safe: Facilities are not properly maintained, and known hazards that endanger students, staff and visitors are ignored.

Specifically, we found several major facility deficiencies and health and safety concerns that should be addressed immediately. This includes exposed electrical wires and unprotected outlets in areas accessible to students and near water sources. Mold was found in multiple locations and leaks in several buildings are causing damage to roofs, windows, ceilings, and walls. Corroded and leaking pipes, broken windows, and doors that are not hung properly are some of the other problems we found during our on-site inspection.

In addition to the facility deficiencies, we found that much of this information is not being documented in the facilities management systems. Pine Hill has not taken ownership of its responsibility to document facility needs. The school is relying on BIA to enter this data, so if the school does not provide this information to BIA, then the information used to make funding decisions is not available or complete.

Changes in various school official positions have led to a significant loss in institutional knowledge, which contributes to the poor condition of the facilities. The dormitory space is not used efficiently and major repair and construction projects have been consistently mismanaged. The school is not the only agency that has not performed as it should, however. BIA and the Bureau of Indian Education (BIE) share responsibility for allowing the issues faced by the school to develop, and continue, as they have allowed internal jurisdictional conflicts to govern how they communicate and coordinate with each other and the school regarding the school's maintenance, improvement, and repair projects.

We provided 12 recommendations to address urgent maintenance needs at Pine Hill and help Pine Hill develop promising practices to ensure that its facilities are operated and maintained properly for the students. Further, proper collaboration between the school, BIA, and BIE should help prevent major problems with future facility repair and construction projects.

Introduction

Objective

This inspection focused on the condition of the Pine Hill Boarding School (Pine Hill) facilities and the efforts being made to maintain the facilities in an environment that is safe for staff and students.

Background

The White House, Congress, U.S. Department of Education, U.S. Department of the Interior (DOI), and the Bureau of Indian Education (BIE) have all expressed interest in improving the current state of the Indian school system.

One component of providing a quality education is having school facilities that are safe and conducive to learning. According to the Department of Education, research links the condition of school facilities to students' academic achievement and positive behavior. Decaying environmental conditions such as peeling paint, nonfunctioning toilets, poor lighting, and inoperative heating and cooling systems can affect the learning, health, and morale of staff and students. Several studies have found that students in decaying school environments score several points lower on the academic achievement tests than their peers who attend schools in fair or good condition.¹

School Funding

While BIE is responsible for providing oversight for Indian schools and education, the Bureau of Indian Affairs (BIA) is responsible for funding Indian school facilities and allocates the facility-related funding that goes to each school.

The major funding categories provided by BIA include Operations and Maintenance (O&M), Minor Improvements and Repairs (MI&R), Facilities Improvement and Repairs (FI&R), and funding toward new schools construction or building replacement. Pine Hill has received O&M, MI&R, FI&R, and American Recovery and Reinvestment Act funds in the last 5 years. Major FI&R projects, new school construction, and building replacement, however, have not received discretionary appropriations since 2012.

Each year, BIA uses a formula to calculate the O&M funds necessary for each of the 183 BIE-funded schools. This formula is based on several components, including the overall condition of the school and the estimated costs to operate and maintain the school for a 50-year building life. The information is based on school-specific data that is input into BIA's facility management system. O&M money is used for maintenance projects under \$2,500 and to cover standard

¹ For more specific information on these and other related findings, see the U.S. Department of Education webpage for "Impact of Inadequate School Facilities on Student Learning" at <http://www2.ed.gov/offices/OESE/archives/inits/construction/impact2.html>.

custodial costs. As a result of decreased funding over the past several years, BIA has only been able to fund O&M costs at approximately 70 percent of the estimated need. This has forced schools to reduce O&M expenditures, which can result in schools not repairing problems when they are initially identified. Avoiding repairs can lead to more significant concerns in the future, because not resolving small problems when first identified often leads to more expensive repairs later and accelerated deterioration of the facility over time. School officials told us that the O&M funding received by Pine Hill has been adequate for the needs of the school, so there should be no reason for the school to defer its basic maintenance.

Funding for BIA Education Facilities

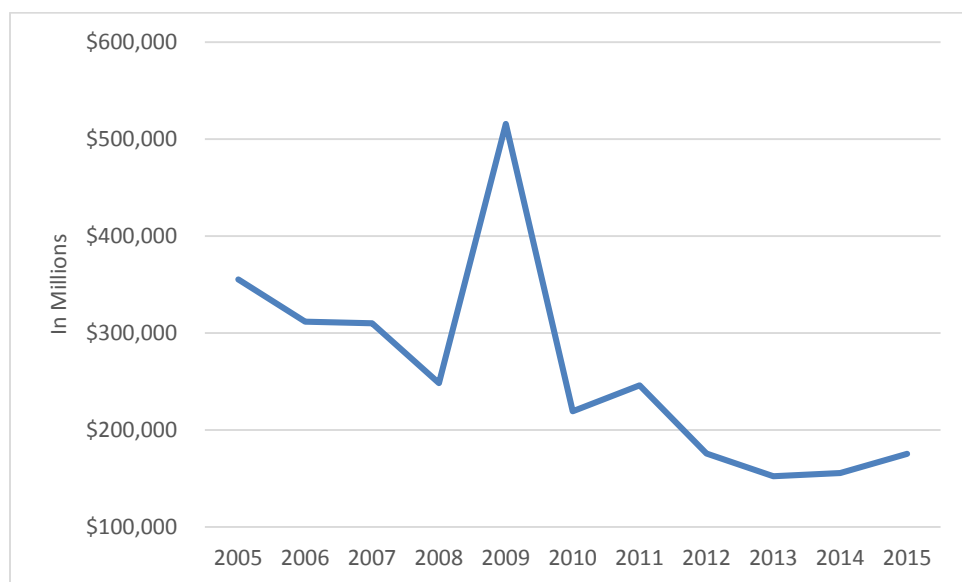


Figure 1. Funding, in millions, for BIA Education Facilities for fiscal years 2005 through 2015.
Source: DOI, Office of Budget

If a school identifies repair needs in excess of \$2,500, then the deficiency is recorded in BIA's facility maintenance system and BIA determines whether it has the funds to address the problem. BIA ranks the projects across all the schools to determine how the funding should be distributed. Fund allocation is directly related to the amount and severity of facility deficiencies recorded in the system. Since these funds have also been affected by severe budget cuts, almost 30 percent from 2011 to 2015 (see Figure 1), schools have been told to prioritize maintenance needs based on health, safety, and "conductive to learning" impacts. It is not unusual for unfunded projects to remain in the system for several years. If the facility's deficiency is deemed critical, however, BIA can provide emergency funding to the affected school. Pine Hill has received over \$7.5 million in FI&R, emergency, and American Recovery and Reinvestment Act funds over the last 5 years. All schools are allocated O&M funds annually based on a formula

generated by BIA and Pine Hill's O&M funding was over \$900,000 for the 2013-2014 funding year alone.

Findings

During our site inspection, we found significant deficiencies including several safety and health concerns. These deficiencies exist despite the fact that Pine Hill has received more than \$7.5 million in facility-related funding over the last 5 years. Further, several of these issues could be classified as routine maintenance activities and likely should have been resolved using the maintenance funds provided to the school for projects with a cost less than \$2,500.

The existence of some facility deficiencies is not unexpected, as buildings continually deteriorate over time. We also found, however, that many deficiencies and needed repairs are not being documented in the facility management system. BIA and BIE use this system to assess the needs of all bureau-funded schools and to determine funding allocations for projects.

Significant Facility Deficiencies

We found several significant deficiencies, including many that pose an increased risk to the health and safety of staff and students. This report does not contain a comprehensive list of all the problems we identified. It should be used as a guide for conducting a thorough inspection of the school facilities. Additional concerns found during our inspection are listed in Appendix 2.

Inoperable Fire Alarm and Sprinkler Systems

There were no operational fire alarms on the entire campus. A school official told us that the alarm system has not functioned properly since the school was hit by lightning around 2005. We also found that only two school buildings had sprinkler systems installed, but neither of these systems had been tested in years.

In 2010, the school received almost \$100,000 to repair its fire alarm and sprinkler systems. With these funds expended and the fire alarm and sprinkler systems still not operational, BIA told us it was in the process of spending additional funds, totaling \$1.1 million, to ensure that the school is protected. BIA took over the installation and repair of the fire systems, and as of May 2015, told us that the alarms were about 85 percent operational.

Without sprinklers, fire extinguishers are the only protection against fires around the campus. We found many extinguishers that were not inspected as required. In addition, multiple extinguishers had expired inspection tags, including the two extinguishers in the kindergarten classroom.

Without the operational fire alarms, the school is required by BIA to patrol the buildings and grounds every hour, as a fire watch. School officials told us that the security personnel are designated to conduct this fire watch, but we did not see any fire watches being conducted during schools hours over the 2 days we were there.

Exposed Electrical Wiring

Exposed electrical wiring found near water sources presents shock and fire hazards. Wires should be enclosed in the proper electrical box, and outlets near water sources should be ground fault circuit interrupter (GFCI) protected. We found improperly protected wires (see Figure 2) and several outlets that were either not GFCI or not marked properly.



Figure 2. Improperly protected wires under cleaning equipment and near water lines in the kitchen in the cafeteria. Source: OIG

We found electrical outlets in elementary classrooms that were missing cover plates. Further, none of the outdoor outlets had the required covers protecting them.

Extensive Water Damage

Several buildings appeared to have significant roof leaks. This has resulted in extensive water damage in the library, gymnasium, and around the skylight and elevated windows in the instructional buildings (see Figure 3).



Figure 3. Water damage and mold indicated in the ceiling of the gymnasium. Source: OIG

Inadequate Shower Facilities

One water heater in the gymnasium was not functional and the other was leaking (see Figure 4). The shower faucets were corroded, and we are concerned that students do not have adequate showering facilities.



Figure 4. A water heater in the gymnasium was leaking. Source: OIG

Facility Deterioration

Windows that were reportedly installed in the library within the last 2 years were already showing signs of extensive leaking, deterioration, and mold (see Figure 5).



Figure 5. Water damage and mold around a window in the library. Source: OIG

A window in the maintenance building was broken over a year ago, but the broken glass was still exposed to pedestrians outside the building during our site inspection.

Many of the exterior doors around the campus either did not close properly or contained large gaps from improper installation. This can lead to significant energy loss, cause debris to collect in entryways, and allow pests to easily enter the facilities. We noted several instances of wasps inside buildings and we removed a black widow spider from an interior entrance to the library.

We found evidence of corrosion on several pipes in the building and leaks have already developed in various bathrooms and in the kitchen (see Figure 6). Given the inadequate maintenance found at the school, we are concerned that these issues will likely continue uncorrected until more costly repairs are necessary.



Figure 6. Corroded pipes in the gymnasium. Source: OIG

The new building (Building 803) contained a number of deficiencies. While most of these deficiencies did not pose an immediate danger, they will likely lead to accelerated deterioration over time. We also found an exterior door that did not lock; windows that were improperly sealed, leaving daylight visible through the wall; and light switches that did not allow lights to be turned off.

Overall, the kindergarten classroom is in poor condition. It is so cluttered that a fire could swiftly spread throughout the classroom. Further, the walkway leading from the classroom to the play area is directly under an access point to the ventilation unit, and the metal door was left hanging open (see Figure 7). The only thing holding up the metal door was an air filter wedged into one side.



Figure 7. The metal door to the ventilation unit was left hanging open outside the kindergarten classroom. Source: OIG

Unsanitary Conditions

The school is not being adequately cleaned. We found toilet paper stuck to ceilings and walls throughout the school buildings. Walls also had old food residue on them as a result of food being thrown against them. When asked why the school was not being cleaned, we were told the custodians are scared of heights and would not clean above the first floor level.

We found mold in multiple school buildings, including the gymnasium, elementary classrooms, and the library (see Figure 8). None of these locations are being treated, and the moldy locations are all accessible to students.



Figure 8. Mold found in the restroom of the kindergarten classroom. Source: OIG

Outside some of the academic buildings, we found a commercial-sized trailer overflowing with trash (see Figure 9). This unnecessary health and safety hazard can easily be accessed by students because the fencing is falling down in multiple places.



Figure 9. A commercial-sized trailer overflowing with trash near two academic buildings. Source: OIG

Security Gaps

The school campus does not have complete fencing. This makes other means of security necessary for the dormitory. We found a window into a bedroom wing that was broken and could not be closed, which leaves the boarding students exposed to various threats, including unauthorized persons (see Figure 10).



Figure 10. One window in the dormitory does not close. Source: OIG

Recommendations

We recommend that the Superintendent of Pine Hill Boarding School, the Director of BIA, and the Director of BIE:

1. Take immediate action to correct the health and safety issues or ensure that the students and staff are adequately protected until these problems are resolved; and
2. Take corrective action for the general facility deficiencies noted in this report and Appendix 2 or ensure that these items are entered into Facilities Management Information Systems (FMIS) or Maximo for future funding consideration.

General Mismanagement

In addition to the significant deficiencies and health and safety concerns, we found several instances of general mismanagement at Pine Hill. Some of these concerns have been forwarded to our OIG Office of Investigations for review.

The loss of knowledge held by former school officials involved with managing facility projects, coupled with frequent turnover in leadership positions, may be the cause of what appears to be poor employee morale and a degree of apathy or resignation regarding the condition of the school.

School officials, BIA, and BIE have not worked together effectively to ensure that the school operates in a manner that serves the best interests of the students. While BIA and BIE have not provided effective oversight of the school's major facilities projects, the decision to properly maintain its facilities initially lies with the school. During a local news story, however, school officials repeatedly placed the responsibility for the school's problems with the bureaus and did not acknowledge their own culpability in the issues. BIA and BIE share responsibility for enabling these issues to develop and continue over time, as they have allowed internal jurisdictional conflicts to govern how they communicate and coordinate with each other, and the school, regarding the school's projects. One BIA official told us that the only time he communicates with BIE officials is when something "catches on fire." Further, a school official admitted that a bad relationship with the bureaus and a former school executive created an environment that discouraged cooperation.

Recommendations

We recommend that the Superintendent of Pine Hill Boarding School, the Director of BIA, and the Director of BIE:

3. Develop a document clearly defining the roles and responsibilities of each agency in regards to facilities management; and
4. Work together to ensure that communication efforts are more effective to correct the current conditions and help prevent future problems of this magnitude.

Data Not Entered into FMIS or Maximo

School staff members are not entering and updating data in BIA facilities management systems. BIA is currently transitioning from its old Facilities Management Information Systems (FMIS), to its new system, Maximo. The Bureau uses these systems to track the facility needs of BIE-funded schools across the country. BIA also uses the data in FMIS to determine how much money is needed to maintain and repair these schools. When data is not updated in the system, however, BIA is presented with information that does not accurately represent the true needs of the schools.

At least one staff member at Pine Hill School has been trained on the new Maximo system, but the system is not being used for either of the two operational functions at the time of our inspection. According to school facilities personnel, both of these activities are still being posted to FMIS. Further, FMIS is not being used by the school staff to enter facility deficiencies. The staff stated that they rely on BIA personnel to input all facility needs.

One of the functions of FMIS is to track the estimated cost of operating and maintaining buildings based on the size, material, equipment, and other factors related to each specific building. This “inventory” is part of the information used to fund O&M and should be updated whenever changes are made to a building and its use. This information has not been updated by the school.

We found discrepancies in the school’s facility inventory. Structures that are listed on BIA’s inventory as used by the school are either no longer in use or are being used by other agencies. We found at least three structures totaling used space of almost 3,600 square feet, including two elementary buildings, which are still being funded by BIA for O&M even though they should have been removed from the active inventory.

Recommendations

We recommend that the Director of BIA:

5. Train staff on entering data into FMIS and Maximo;

We recommend that the Superintendent of Pine Hill Boarding School and the Director of BIA:

6. Review the existing inventory for the school and make any necessary corrections so the inventory and additional needs of the school are accurately reflected for funding considerations; and

We recommend that the Superintendent of Pine Hill Boarding School:

7. Conduct routine inspections of the school and enter deficiency data into FMIS and Maximo promptly.

Turnover and Absence of Knowledgeable Personnel

A school official told us that routine maintenance checklists did not exist or are no longer being used. Frequent turnover in key maintenance personnel has left the school without continuity in facility management. This has likely contributed to a breakdown in routine maintenance activities, including the monthly checks of fire extinguishers and other safety equipment.

Without the necessary institutional facilities management knowledge, school officials expressed little confidence concerning how to identify or estimate repair costs. Further, without someone who has sufficient experience in managing facilities, the school has been susceptible to incomplete bids and contractors who perform substandard work.

For example, in 2006 BIA provided the school with almost \$300,000 in supplemental funding to upgrade a water treatment facility so the water could pass treatment tests. Because actual costs of this repair were underestimated, the school was unable to complete the project and over \$44,000 is still sitting in school accounts. In addition, the school appears to be improperly using some of these idle funds for routine maintenance costs.

Further, the school began construction on a new elementary school building in 2010. Since then, this building has been continually faced with problems. Specifically, contractors have performed inferior quality work, leaving the school with a building that was unable to pass inspection until recently, and construction that had still not been completed at the time of our inspection. This included doors that did not latch properly, walls with cracks, lights that could not be turned off,

floors that were not even, poorly installed cabinets and plumbing fixtures, and concrete work that was already cracking and breaking (see Figure 11).



Figure 11. A retaining wall installed in the new building is already structurally compromised.
Source: OIG

As a result of this knowledge gap, school officials indicated an over-reliance on bureau personnel to estimate and input facility needs into FMIS, and have now turned multiple large projects over to the bureaus to monitor and manage. This leaves Pine Hill increasingly dependent on others to prioritize the interests and needs of this school.

Recommendations

We recommend that the Superintendent of Pine Hill Boarding School:

8. Create routine custodial and maintenance checklists to help determine what needs to be cleaned and checked, who is responsible for it, and how often it should be done; and
9. Create a plan to help ensure continuity of facility management and related financial management, even if staff changes occur with key personnel.

We recommend that the Director of BIA and the Director of BIE:

10. Assess the status of previously funded projects that were not completed and determine whether to finish the projects or have the funds returned.

Poor Overall Maintenance

In addition to the significant deficiencies and health concerns mentioned earlier, the whole school campus is poorly maintained. Overgrowth makes the school look semi-abandoned and basic preventative maintenance activities do not appear to be performed consistently (see Figure 12). The overgrowth not only presents a fire hazard, but it also leads to accelerated deterioration of school facilities.



Figure 12. Overgrowth on and around the main basketball court on campus. Source: OIG

BIA built a dormitory for the school in 2007 (see Figure 13), to replace a building in poor condition. This new dormitory is only housing about 25 students in over 25,000 square feet of space, although the dormitory is designed to accommodate up to 100 students. A dormitory of this size is not needed, given that this is the only student boarding facility on campus and most of it is empty. In addition, the building is not being maintained properly. Some of the maintenance problems include broken door handles, fraying carpet, overgrown play areas, moisture damage in some bathrooms, non-functioning hallway lights, damaged gutters, and garbage scattered in several sleeping spaces. Further, one wing of the dormitory had the heater set to the mid-80s, while doors to other parts of the building were left open. BIA told us that the computer-automated heating system is no longer working, and parts may have been improperly removed from the site. BIA has still worked to secure even more funding to have this system replaced.



Figure 13. The new dormitory, which was built in 2007, has been poorly maintained. Source: OIG

Recommendations

We recommend that the Superintendent of Pine Hill Boarding School:

11. Clean up the campus landscaping, walkways, recreation areas, and fencing, and make sure that fire hazards are properly maintained.

We recommend that the Superintendent of Pine Hill Boarding School, the Director of BIA, and the Director of BIE:

12. Re-assess the needs of the students boarded on-site and identify a more efficient way to house them in the dormitory.

Conclusion and Recommendations

Conclusion

Pine Hill School is not being maintained properly, despite receiving more than \$7.5 million for facility repair projects within the last 5 years. School officials, BIA, and BIE have not worked together effectively to ensure that Pine Hill operates in a manner that serves the best interests of the students. Significant deficiencies exist at Pine Hill facilities, including health and safety concerns.

Recommendations Summary

We provided 12 recommendations to address urgent maintenance needs at Pine Hill and help Pine Hill develop promising practices to ensure that its facilities are operated and maintained properly for the students. These recommendations should be coordinated between the school, BIA, and BIE to help prevent major problems with future facility repair and construction projects.

We recommend that the Superintendent of Pine Hill Boarding School, the Director of BIA, and the Director of BIE:

1. Take immediate action to correct the health and safety issues or ensure that the students and staff are adequately protected until these problems are resolved;
2. Take corrective action for the general facility deficiencies noted in this report and Appendix 2 or ensure that these items are entered into FMIS or Maximo for future funding consideration;
3. Develop a document clearly defining the roles and responsibilities of each agency in regards to facilities management;
4. Work together to ensure that communication efforts are more effective to help correct the current conditions and prevent future problems of this magnitude; and
5. Re-assess the needs of the students boarded on-site and identify a more efficient way to house them in the dormitory.

We recommend that the Director of BIA:

1. Train staff on entering data into FMIS and Maximo.

We recommend that the Director of BIA and the Director of BIE:

1. Assess the status of previously funded projects that were not completed and determine whether to finish the projects or have the funds returned.

We recommend that the Superintendent of Pine Hill Boarding School and the Director of BIA:

1. Review the existing inventory for the school and make any necessary corrections so the inventory and additional needs of the school are accurately reflected for funding considerations.

We recommend that the Superintendent of Pine Hill Boarding School:

1. Conduct routine inspections of the school and enter deficiency data into FMIS and Maximo promptly;
2. Create routine custodial and maintenance checklists to help determine what needs to be cleaned and checked, who is responsible for it, and how often it should be done;
3. Create a plan to help ensure continuity of facility management and related financial management, even if staff changes occur with key personnel; and
4. Clean up the campus landscaping, walkways, recreation areas, and fencing, and make sure that fire hazards are properly maintained.

Appendix I: Scope and Methodology

Scope

We inspected the condition of school facilities funded by the Bureau of Indian Affairs (BIA) at the Pine Hill Boarding School in October 2014, focusing on the efforts being taken to maintain the facilities in a manner that is safe for staff and students.

We conducted our inspection in accordance with the Quality Standards for Inspection and Evaluation as put forth by the Council of the Inspectors General on Integrity and Efficiency Quality Standards for Inspections. We believe that the work performed provides a reasonable basis for our conclusions and recommendations.

Methodology

We conducted an on-site inspection of the facilities in October 2014. Further, we obtained and reviewed budget and facility system data for the school, although we focused on the condition of the facilities in this report. We interviewed Pine Hill Boarding School administrative and facility personnel at the school and BIA facilities personnel in Albuquerque, New Mexico. We reviewed applicable Federal laws, hearings, press statements, and key reports.

Appendix 2: Detailed Facility Deficiencies

During our visit to the school, we identified many concerns that we believe are also important enough to warrant highlighting in this report. While not all of these concerns pose current significant issues, if not addressed, they can become critical deficiencies in the future. Additional photos are being provided to the school in an electronic format.

Ventilation Concerns

Substantial amounts of dirt around the vents indicate a poorly maintained air distribution system and may be reducing the operational efficiency of the system.



Drainage Concerns and Water Damage

Water saturation at the base of buildings is eroding walls and may be impairing the structural integrity of building foundations.



Gutters are broken or improperly hung on some portables. Several gutters on the administration buildings drain straight down to the building foundation (not

drained away from the building). Further, gutters on some academic buildings and the dormitory are damaged and not properly protecting the buildings from water damage.



Indications of poor drainage and subsequent water damage can be seen on deteriorating eaves and overhangs.



Drainage areas are poorly maintained around the campus, which has resulted in cracked areas and trip hazards. Clogged drains also lead to additional problems when water backs up above ground onto walkways and towards the foundations of nearby buildings.



Campus Grounds and Walkways

The grounds and student walkways are extremely deteriorated with debris, cracks, and loose particulates that pose a safety concern for students and staff, especially when weather affects walking visibility.



Barbed wire and other fencing materials are accessible to students directly across from the dormitory. This is dangerous to students playing in the area or walking between the dormitory and classrooms.



The backyard and patio of the dormitory is not a safe place for boarding students to play or relax.



Other Facility and Structural Issues

An unfinished beam in classroom space leaves unsafe and rough edges accessible to students and staff.



Improperly installed equipment is putting undue pressure on the ceiling and breaking tiles, including those surrounding lighting fixtures.



Missing panels and bent frames in student restroom stalls is a privacy issue. The cause of this damage is unknown.



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