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Inspection



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Memorandum

To: Bryan Newland
Assistant Secretary – Indian Affairs

Tony Dearman
Director, Bureau of Indian Education

From: Nicki Miller *Nicki Miller*
Acting Assistant Inspector General for Audits, Inspections, and Evaluations

Subject: Final Inspection Report – *The Bureau of Indian Education Must Correct Safety and Health Deficiencies and Improve Emergency Preparedness and Security at Havasupai Elementary School*
Report No. 2023-ISP-040

This memorandum transmits our inspection report on health, safety, and security at the Bureau of Indian Education's Havasupai Elementary School.

We will track open recommendations for resolution and implementation. We will notify Congress about our findings, and we will report semiannually, as required by law, on actions you have taken to implement the recommendations and on recommendations that have not been implemented. We will also post a public version of this report on our website.

If you have any questions about this report, please contact me at aie_reports@doioig.gov

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Results in Brief

Objectives

Part of the U.S. Department of the Interior's (DOI's) mission is honoring its trust responsibilities or special commitments to American Indians, including providing quality education opportunities to children. In keeping with these commitments, the Bureau of Indian Education (BIE) is responsible for performing annual safety and health inspections at all Indian schools to identify deficiencies, and each school is required to correct those deficiencies and develop a comprehensive emergency management program to provide a safe school environment for students and staff. In 2023, as part of our oversight planning, we developed an initiative to conduct a series of safety and health inspections at Indian schools. Havasupai Elementary School was the first school chosen for this series.

Our objectives were to determine whether Havasupai Elementary School (1) addressed deficiencies found during required annual safety and health inspections and (2) developed an emergency management program and a security plan in accordance with regulations, policies, and guidelines.

Findings

We found that Havasupai Elementary School did not ensure deficiencies were resolved timely. Specifically, the school had critical and significant deficiencies—including repeat deficiencies—from the last three annual safety and health inspections that remained unaddressed, and of those we reviewed that were corrected, none were completed within the school's established abatement plan timelines. For example, 30 percent of the fiscal year 2023 critical deficiencies remained open and in need of correction, despite the abatement periods having expired. In addition, we identified other safety and health concerns that need attention, such as an unreliable heating, ventilation, and air conditioning system and a roof in poor condition. We also found that the school did not implement a comprehensive emergency management program, did not develop a security plan, did not train staff, and did not conduct all required emergency drills. Further, we found data reliability issues in BIE's facility management system; for example, using statistical sampling, we projected that 48 percent of closed work orders were closed in error. Lastly, the school has experienced severe staffing shortages—approximately 53 percent of Havasupai Elementary School's positions were vacant as of December 2023; these positions need to be filled to contribute to a safer school environment and reestablish the use of unoccupied building space.

Impact

Failure to correct deficiencies found during the annual safety and health inspections exposes students and staff to an unsafe and unhealthy school and work environment. By addressing the deficiencies, the school may be better positioned to retain teachers and ensure a quality education for the children. Without a comprehensive emergency management program, staff and students will be left unprepared if an emergency occurs, which could cause serious harm to staff or students, disrupt school operations, or cause physical or environmental damage to the school. Inaccurate reporting of work orders can create inefficiencies in funding, inadequate monitoring, and the perception of a safe environment when, in fact, risks persist.

Finally, the unique remoteness of Havasupai Elementary School makes some of the ordinary issues we identified in this report more pressing than they would otherwise be, especially regarding the school's ability to communicate externally and the inadequacy of the emergency management program.

Ultimately, we concluded that Havasupai Elementary School faces many difficult challenges in its effort to provide a quality education and a comfortable school environment for the children it serves. Each day that it cannot meet its mission is a lost opportunity to help these children learn and grow.

Recommendations

We make 12 recommendations that, if implemented, will improve the school's overall condition, better prepare the school for emergencies, ensure a secure facility, and help the school recruit and retain staff.

Introduction

Objectives

Our objectives were to determine whether Havasupai Elementary School:

- Addressed deficiencies found during required annual safety and health inspections; and
- Developed an emergency management program and a security plan in accordance with regulations, policies, and guidelines.

See Appendix 1 for our inspection scope and methodology.

Background

The U.S. Department of the Interior's (DOI's) mission includes honoring its trust responsibilities or special commitments to American Indians, which we have consistently identified as a major management challenge for DOI.¹ The Bureau of Indian Affairs (BIA) and Bureau of Indian Education (BIE) report directly to the Assistant Secretary for Indian Affairs (AS-IA), who assists and supports the Secretary of the Interior in fulfilling the United States' trust responsibilities to federally recognized American Indian Tribes.

BIE supports that overall mission by providing "quality education opportunities from early childhood through life in accordance with a tribe's needs for cultural and economic well-being, in keeping with the wide diversity of Indian tribes and Alaska Native villages as distinct cultural and governmental entities."² To fulfill that responsibility, BIE supports and oversees a total of 183 schools—128 schools are tribally controlled under BIE contracts or grants and 55 schools are BIE-operated. BIE's total appropriation for fiscal year (FY) 2023 was \$1.576 billion, of which \$146.4 million was allocated for facility operations and maintenance. BIE has gradually assumed responsibility from BIA for acquisition, safety, and facilities management at Indian schools; this transfer was complete in 2023.

Responsibility for oversight of BIE schools is distributed among 15 education resource centers,³ which are each led by an education program administrator. The Phoenix Education Resource Center is responsible for the oversight of Havasupai Elementary School. Within each education resource center, school safety specialists are assigned to specific schools to serve as the emergency coordinator responsible for providing technical assistance and tracking completion of emergency management and continuity of operations plans.

Havasupai Elementary School

The Havasupai people are an American Indian Tribe who have lived in the Grand Canyon for at least the past 800 years. Supai Village is one of the most remote communities in the United States, as it is accessible only by mule, helicopter, or an eight-mile hike. It is located within Havasu Canyon, a large tributary on the south side of the Colorado River (see Figure 1). Despite its remote location, Supai Village is also a tourist destination, attracting thousands of visitors to its waterfalls and streams annually.

¹ *Inspector General's Statement Summarizing the Major Management and Performance Challenges Facing the U.S. Department of the Interior, Fiscal Year 2023* (Report No. 2023-ER-012), issued November 2023.

² BIE, *Our Mission*, <https://www.bie.edu/topic-page/our-mission>.

³ BIE's education resource centers are responsible for providing both direct oversight of Indian schools and technical assistance for school improvement, needs assessments, and schoolwide budgets. An education program administrator is assigned as the school principal's direct supervisor.

Figure 1: Havasupai Elementary School Campus Located in the Remote Community of Supai Village in the Grand Canyon



Sources:

Earth imagery: Esri, Maxar, Earthstar Geographics, and the GIS User Community.

Supai Village inset image: *U.S. Marine Corps photo by Cpl. Daniel Castillo.*

School campus inset image: *OIG.*

Havasupai Elementary School is a BIE-operated kindergarten through 8th grade school in the Supai Village. The school has approximately 79 students and 9 staff. In FY 2023, the school had expenditures of \$2.46 million, of which \$248,000 was spent on facilities operations and maintenance. The school campus has a cafeteria where all students receive free breakfast and lunch, a kindergarten building with a playground suitable for younger students, a “quad” building with four classrooms, a school office for the principal and a secretary or front desk employee, a special education modular building, two portable buildings, and a recreation area with a basketball court and playground for the grade-level students.

Havasupai Elementary School is included on the 2021 school replacement priority listing.⁴ The Indian schools on the 2021 listing have not yet entered the planning phase, which is the first of five phases: planning, design, design-build, construction, and complete.⁵

⁴ BIA's Division of Facilities Management and Construction is responsible for developing priorities for all Bureau construction projects. This division has responsibility for creating an annual list of schools for the Site Assessment and Capital Investment Program's school replacements. This program uses a comprehensive approach to assess the condition and education capabilities of Bureau-funded schools and prioritize campus improvements.

⁵ Only one school on the 2019 Indian school replacement listing is in the design phase, with an estimated completion date of December 2026; the other 19 schools on the 2019 and 2020 lists are in the planning phase. Based on the estimated completion date for five of the 2019 schools, school replacements are taking approximately seven years.

IA Facilities Oversight

The AS-IA's Office of Facilities, Property, and Safety Management, through the Division of Safety and Risk Management, is responsible for policy, oversight, and technical assistance for facilities management and construction, property and safety management, and real property leasing for BIA and BIE. The responsibility for executing the policy related to school safety and health inspections and correcting deficiencies primarily resides with BIE's Branch of Facility Management and Branch of Safety and Occupational Health.

Division of Safety and Risk Management

According to its website, the Division of Safety and Risk Management "is responsible to assure construction, major repair, alteration, rehabilitation, and remodeling of buildings, physical plants, and facilities that meet IA policy, adopted safety and health codes, and mandated standards for IA controlled facilities."⁶ The Division of Safety and Risk Management established a Safety and Risk Management Program made up of seven components including, among others, the Occupational Safety and Health Program. According to the *Indian Affairs Manual (IAM)*, the goal of the Occupational Safety and Health Program⁷ is to provide a safe and healthful workplace. The program requires each school to appoint a collateral duty safety officer (CDSO), whose responsibilities include advising the principal on the development and implementation of an effective occupational safety and health program within the school, recognizing and evaluating hazards of the working environment, and suggesting general abatement procedures. In 2022, BIE issued a memorandum directing all BIE-operated schools to comply with this requirement and identify a CDSO at each location.⁸

BIE Branch of Facility Management

Under BIE, the Branch of Facility Management provides technical services for all BIE locations, including BIE-operated schools. The services include assisting staff with minor improvements, repairs, and abatement plans and providing support to school facility staff to address maintenance and school facility operations. The BIE facility operations specialists within this branch are responsible for providing these services as needed and work with a Branch of Safety and Occupational Health inspector. One specialist is generally assigned to each school; however, each specialist is assigned to multiple schools.

BIE Branch of Safety and Occupational Health

Under BIE, the Branch of Safety and Occupational Health provides technical services related to safety and health for all BIE locations and conducts safety and health inspections. The functions of this branch include hazard identification, safety training, technical support, and accident and incident prevention. Inspectors function within the Branch of Safety and Occupational Health; once an inspection is completed, the inspector collaborates with the Branch of Facility Management as needed to address deficiencies.

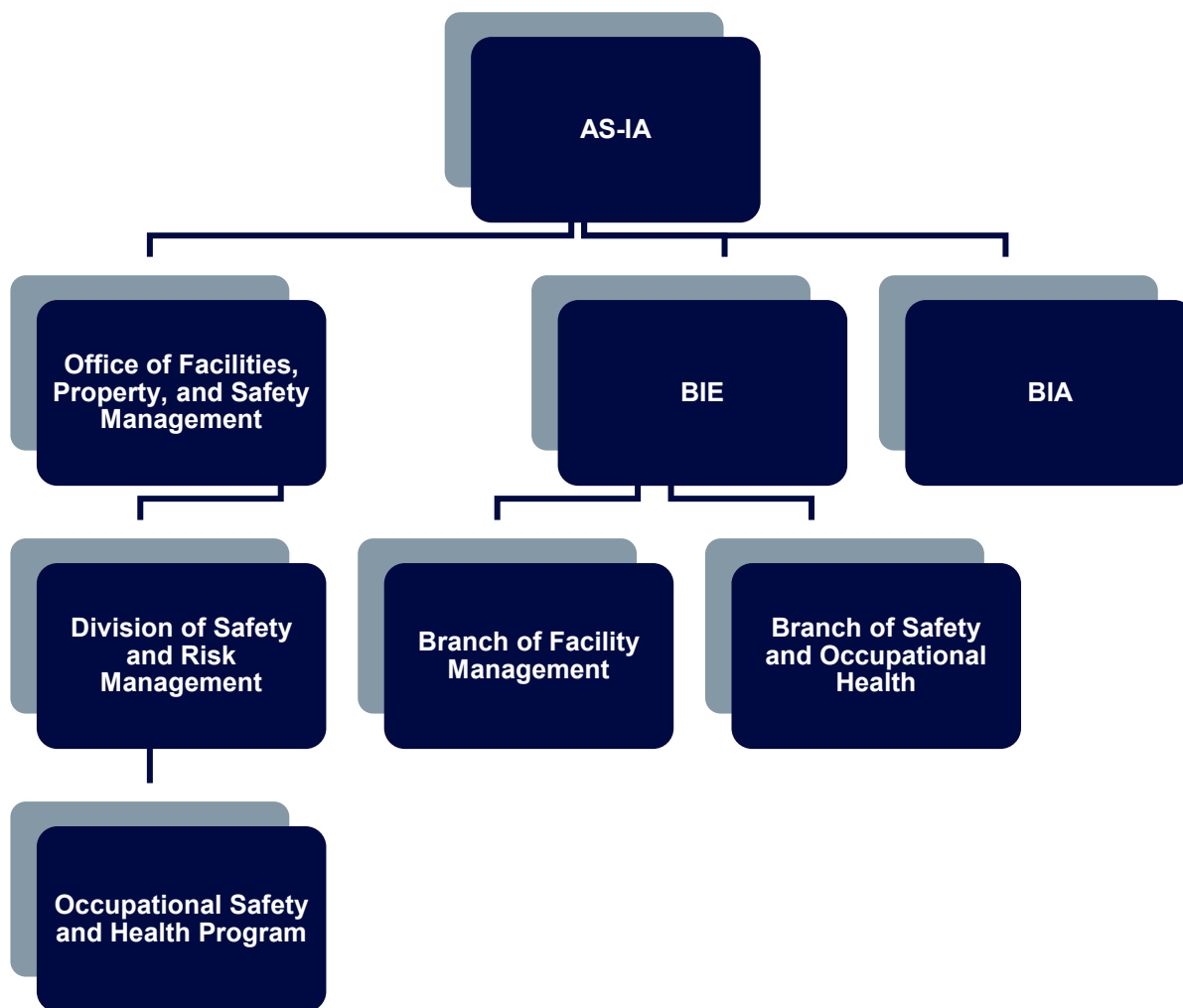
See Figure 2 for an AS-IA facilities management organizational chart.

⁶ Indian Affairs, *Division of Safety and Risk Management (DSRM)*, <https://www.bia.gov/as-ia/ofpsm/dsrm>.

⁷ 25 IAM 3, "Occupational Safety and Health Program," issued August 23, 2023. The IAM contains policies, procedures, and general guidance for IA employees to govern internal IA operations.

⁸ BIE Memorandum, *Collateral Duty Safety Officers (CDSO) and Safety Committees Designation*, issued May 6, 2022.

Figure 2: AS-IA Facilities Oversight Organizational Chart



Annual Safety and Health Inspections

DOI policy found in the *Departmental Manual (DM)*⁹ specifies the minimum safety and occupational health program requirements for conducting occupational safety and health inspections of DOI facilities and the timely abatement of hazards identified during the inspection process. Both Federal regulations¹⁰ and DOI policy require DOI to conduct annual inspections for safety and health compliance at all facilities and other areas under its control. In August 2022, the Division of Safety and Risk Management established IA internal operating procedures¹¹ for meeting Federal and departmental safety, health, and accessibility inspection and evaluation requirements. BIE's Branch of Safety and Occupational Health is responsible for performing the annual safety and health inspection at each Indian school in accordance with established IA procedures. The annual inspection must be conducted by a BIE safety and occupational health specialist who is trained as a hazard recognition and occupational safety and health inspector. The branch also provides technical services related to safety and health (e.g., hazard identification, training, technical support to identify best practices, and

⁹ 485 DM 6, "Inspections and Abatement," issued December 22, 2009.

¹⁰ 29 C.F.R. Part 1960, Subpart D—Inspection and Abatement.

¹¹ *Indian Affairs Code Compliance Guidelines*, Version 1, dated August 2022.

accident and incident prevention) for all tribally controlled schools and BIE-operated schools. This responsibility was transferred from BIA to BIE in 2023.¹²

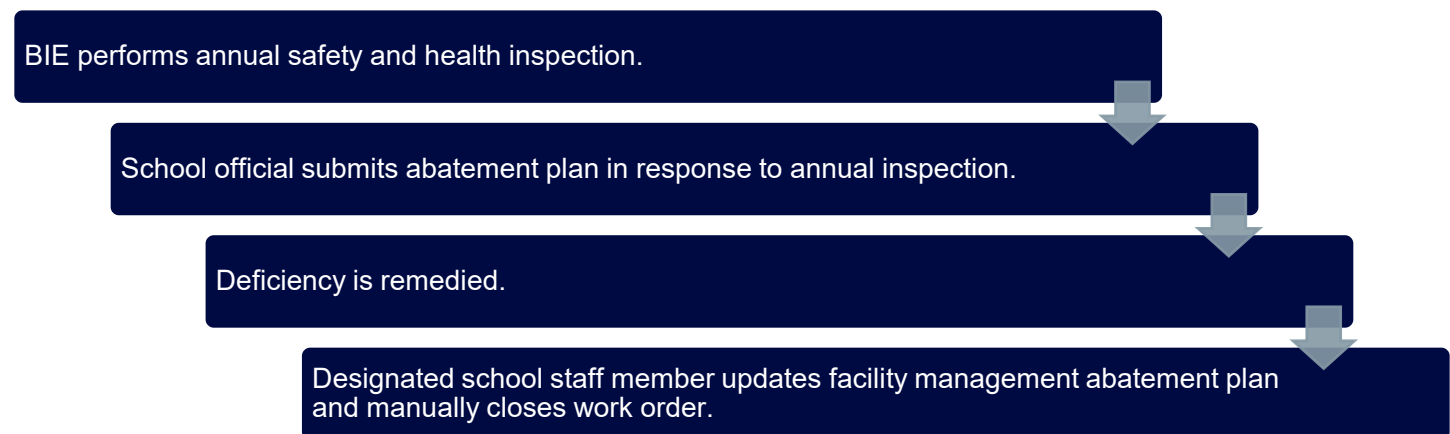
The BIE specialist uses a standardized checklist to complete each school inspection. The checklist includes items related to accessibility requirements, hazardous materials, environmental conditions, fire protection, and electrical and standby power systems. For each deficiency identified, the specialist selects the appropriate category based on the worst credible consequence that can occur as the result of a hazard:

- I. Catastrophic: Imminent and immediate danger of death or permanent disability.
- II. Critical: Permanent partial disability, temporary total disability.
- III. Significant: Hospitalized minor injury, reversible illness.
- IV. Minor: First aid or minor medical treatment.

School officials are required to create an overall abatement plan to document the planned corrective measures and track the status of each deficiency identified during the inspection. The designated school official must enter the abatement plan into BIE’s facility management system to track and document corrections through work order numbers assigned to each deficiency.

Catastrophic deficiencies, such as a gas leak, must be abated within one day. The abatement requirements for critical, significant, and minor deficiencies are specific to the identified type of deficiency. For example, the critical deficiency of “Potential tree danger” (see discussion in the “Other Safety and Health Deficiencies” section below), has an abatement period of 15 days; the significant deficiency of “No fire extinguisher training upon initial employment, and, at least, annually thereafter” has an abatement period of 30 days; and the minor deficiency of “Employees have not received training on bloodborne pathogens plan” has an abatement period of 120 days. Once a deficiency has been corrected, the designated school staff member updates the facility management system and closes out the work order (see Figure 3).

Figure 3: Annual Safety and Health Inspection Process



Emergency Management and Security

To ensure a safe and secure learning and work environment for all students, personnel, and visitors to BIE-operated schools, IA policy¹³ requires each school to implement a comprehensive emergency management program and lists seven program components: (1) an emergency management plan, (2) a continuity of

¹² Our March 2024 report, *Indian Affairs Is Unable To Effectively Manage Deferred Maintenance of School Facilities* (Report No. 2022-CR-036), further explained the transition of Indian school facility management from BIA to BIE.

¹³ 30 IAM 12, “Requiring Emergency Management Programs in Schools,” issued May 17, 2012.

operations plan, (3) training, (4) drills and exercises, (5) a memorandum of understanding (MOU) with local emergency organizations, (6) emergency supplies and equipment, and (7) other safe school measures (as resources permit).¹⁴

In addition, DOI policy¹⁵ requires that each bureau and office develop, implement, and maintain a security plan at each facility.¹⁶ A security plan is a written document describing the practices, procedures, responsibilities, and equipment that provide for the security of facilities.¹⁷ The bureau security managers/officers or designees are responsible for developing, implementing, and maintaining security plans for facilities under their administrative control in coordination with the facility management staff (in this case, school staff). Additionally, the bureau security manager reviews and revises security plans as necessary to ensure they accurately reflect current conditions.

¹⁴ Other safe school measures are not specifically required. The *IAM* states, “As resources permit, the school shall adopt other appropriate Safe School measures addressing physical, technical and operational security.”

¹⁵ 444 *DM* 1.7, “Security Plan,” issued August 13, 2013.

¹⁶ *Id.* at 1.4(D) (defines a facility as “Structures, buildings, dams, grounds, real property, and/or office space occupied by a DOI component whether owned, leased, or controlled by DOI.”).

¹⁷ *Id.* at 1.4(A).

Results of Inspection

We found that BIE needs to take action to improve the health, safety, and security of Havasupai Elementary School and its students and staff. Specifically, we found the following:

- Deficiencies identified during safety and health inspections were not resolved timely. Specifically, the school had critical and significant deficiencies, including repeat deficiencies, that remained unaddressed. For those deficiencies we reviewed that were corrected, none were completed within the established abatement plan timelines, with some taking as long as five years to correct. In addition, we found other safety and health concerns that were not identified on the annual safety and health inspections and need attention.
- There was not a comprehensive emergency management program because the school did not fully implement four of the six required components. Specifically, the school did not train staff, conduct required drills, develop a required MOU, and procure adequate emergency supplies in all cases. In addition, the school did not develop a security plan and implement effective operational security measures.
- BIE's facility management system did not contain reliable data about the maintenance issues at the school. This is the system the school and other BIE offices use to monitor operations and maintenance. We identified a significant number of inaccurate work orders in the system.

Additionally, Havasupai Elementary School has experienced severe staffing shortages—vacancies included the principal,¹⁸ six teachers, a nurse, a librarian, and a maintenance worker, representing approximately 53 percent of Havasupai Elementary School's positions. These shortages contribute to and exacerbate the other issues we identified.

Deficiencies Were Not Resolved Timely

As discussed above, Federal regulations¹⁹ and DOI policy²⁰ require annual safety and health compliance inspections for all facilities and other areas under DOI's control. Each deficiency identified during the inspection is categorized as the worst credible consequence that can occur as the result of a hazard: (I) catastrophic, (II) critical, (III) significant, and (IV) minor. The school official responsible for completing the abatement plan in BIE's facility management system assigns an abatement period, which is the number of days for the school to remedy the deficiency. Although abatement periods are automatically generated in the facility management system, the school is permitted to modify the dates to account for delays posed by external factors. The employees at Havasupai Elementary School do not have access to the facility management system themselves; they instead rely on support from BIE employees for data entry and adjustments.

We reviewed the documentation of the FY 2021, 2022, and 2023 annual safety and health inspections and found that more than 200 deficiencies, including repeat deficiencies, had been reported. Figure 4 shows the total number of deficiencies and repeat deficiencies identified on the annual safety and health inspection reports by severity for FYs 2021 through 2023. No catastrophic deficiencies were reported; however, there was a 13-percent increase in total deficiencies from FY 2021 to FY 2023. We also found the number of repeat deficiencies increased by 12 percent from FY 2021 to FY 2023.

¹⁸ We note that the individual we interviewed throughout our fieldwork and during our site visit in October 2023 resigned in December 2023. For the purposes of this report, we refer to the individual who was in place during our site visit as "the Principal."

¹⁹ 29 C.F.R. Part 1960, Subpart D.

²⁰ 485 DM 6.

Figure 4: FY 2021-2023 Total and Repeat* Deficiencies by Severity

Severity	FY 2021		FY 2022		FY 2023	
	Total	Repeat	Total	Repeat	Total	Repeat
I-Catastrophic	0	0	0	0	0	0
II-Critical	9	9	13	13	23	21
III-Significant	197	191	243	211	208	202
IV-Minor	17	17	15	15	21	21
Totals	223	217	271	239	252	244

* A deficiency is categorized as a “repeat” deficiency if that issue had been identified as a deficiency in any prior inspection. For example, an issue identified as an FY 2022 repeat deficiency was originally identified in FY 2018 but was not included on the FY 2021 annual inspection report.

We found that although Havasupai Elementary School has made progress in correcting identified deficiencies, critical and significant deficiencies were not resolved timely. Specifically, we identified numerous deficiencies that remained uncorrected well beyond the original abatement period. In addition, for those that had been corrected, none were completed within the established abatement periods, with many going as long as five years before being corrected. A BIE facility team visited the school several times in mid-2023 to resolve certain repeat deficiencies such as issues with fire suppression and prevention that had been noted since 2021. However, during our site visit, we found other safety and health concerns that were not included in our sample or in the annual inspection checklist that need attention (discussed in more detail below).

Critical Deficiencies (Category II)

The number of critical deficiencies, those where the worst credible consequence is permanent partial disability or temporary total disability, reported on Havasupai Elementary School safety and health inspections increased from 9 in FY 2021 to 23 in FY 2023. We reviewed the 23 critical deficiencies in the FY 2023 annual safety and health inspection report (21 of which were repeat deficiencies) to verify if the deficiencies were resolved (see Appendix 2 for the complete testing results summary). During our October 2023 site visit, we observed that seven of these deficiencies, or 30 percent, remained uncorrected and had surpassed their original abatement period. For example:

- Fire prevention plans were not in writing, contrary to Federal regulations, which require that “[a] fire prevention plan must be in writing, be kept in the workplace, and be made available to employees for review.”²¹ Having a clear fire prevention plan in place and ensuring that staff are aware of it and their responsibilities helps ensure that they are in the best position to help keep students safe if there is an emergency. This deficiency was identified in September 2019, had an abatement period of 30 days, and as of October 12, 2023, had not been corrected.
- There were no procedures to control flammable and combustible waste, contrary to Federal regulations, which require a fire prevention plan to include “[p]rocedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials.”²² These materials must be handled appropriately to minimize any risk of fire, which can damage school property as well as potentially cause injury to students and staff. This deficiency was

²¹ 29 C.F.R. § 1910.39(b).

²² 29 C.F.R. § 1910.39(c)(3).

identified in March 2023, had an abatement period of 30 days, and as of October 12, 2023, had not been corrected.

- The playground surface did not meet minimum specifications²³ to reduce the risk of head injuries due to falls. Given the remote location of the school and limited medical services, it is particularly important that the school ensure compliance with standards that are intended to minimize students' risk of injury. This deficiency was identified in August 2021, had an abatement period of 180 days, and as of October 12, 2023, continued to be a safety hazard.

After our site visit, Havasupai Elementary School notified us that two of the seven deficiencies—both repeat deficiencies since 2019—had been corrected. Specifically, the school developed a written emergency plan and conducted an annual update of the plan as required. In December 2023, the Principal provided this plan and its update to us, and we confirmed that these documents corrected both deficiencies.

In addition, for the deficiencies we reviewed that had been corrected, none had been addressed within the established abatement periods. For example, of the 16 deficiencies that had been corrected, 10 were initially identified in 2018 with abatement periods between 15 and 45 days—these deficiencies were not corrected until 2023.

Significant Deficiencies (Category III)

We found that 97 percent (202 of 208) of the significant deficiencies, those where the worst credible consequence is hospitalized minor injury or reversible illness, documented in the FY 2023 safety and health inspection report were repeat deficiencies. We judgmentally sampled 31 of the 208 significant deficiencies to verify their status (see Appendix 3 for testing results summary). During our October 2023 site visit, we observed that 10 of these 31 deficiencies, or 32 percent, remained uncorrected and had surpassed their original abatement period. For example:

- The school did not provide new employees with training on fire extinguisher use, nor did it provide annual training thereafter. This is inconsistent with the Federal requirement to “provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage firefighting.”²⁴ If staff do not know how to use fire extinguishers, they cannot efficiently and effectively react if a fire occurs. This deficiency was first identified in May 2022, had an initial abatement period of 30 days, and as of October 12, 2023, had not been corrected.
- Notwithstanding national safety standards, the school did not ensure the kitchen vent hood detection devices were examined and cleaned annually as required, which creates a fire hazard that risks serious harm to school property and to children and staff.²⁵ This deficiency was first identified in May 2022, had an initial abatement period of 30 days, and as of October 12, 2023, continued to be a safety hazard.
- The playground equipment was not compliant with Federal guidelines regarding mitigation of sun exposure.²⁶ The average high temperature for this location in August is 88 degrees Fahrenheit; in such a climate, the metal playground equipment can heat up from the sun and potentially cause a burn upon contact with skin. This deficiency was first identified in August 2021, had an initial abatement period of 180 days, and as of October 12, 2023, continued to be a safety hazard.

In addition, for the deficiencies we reviewed that had been corrected, none had been addressed within the established abatement period. For example, of the 21 that had been corrected, 4 were initially identified in 2018 with abatement periods between 45 and 365 days—these deficiencies were not corrected until 2023.

²³ ASTM International F1292-18e1, *Standard Specification for Impact Attenuation of Surfacing Materials Within the Use Zone of Playground Equipment*.

²⁴ 29 C.F.R. § 1910.157(g)(1), “Training and education.”

²⁵ National Fire Protection Association 96, *Standard for Ventilation Control and Fire Protection of Commercial Cooking Operations* (2024), 11.6.1, “Fire-Extinguishing Equipment for Mobile and Temporary Cooking Operations. Review and Certification.”

²⁶ U.S. Consumer Product Safety Commission, *Public Playground Safety Handbook*, 2.1.1, “Shading considerations.”

Other Safety and Health Deficiencies

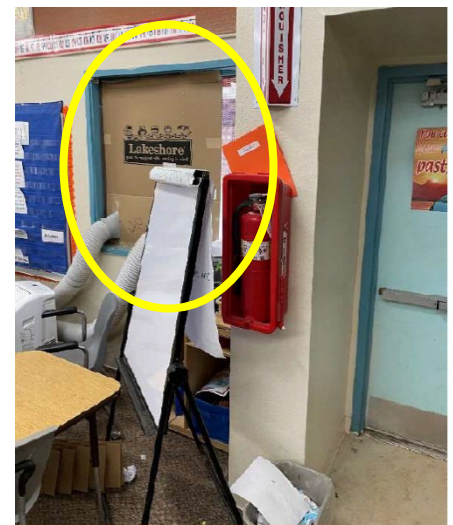
In addition to the deficiencies reported on the annual safety and health inspection reports, we identified other deficiencies that were not specifically listed on the annual inspection checklist or included in our sample. During our site visit, we consulted with a BIE Safety and Occupational Health Specialist and a BIE Facility Operations Specialist to confirm our concerns. Additionally, we discussed the occurrences and potential effects of the deficiencies with school staff members, including the Principal. According to the *IAM*, the school principal is responsible for “identifying and mitigating unsafe conditions.”²⁷

Unreliable Heating, Ventilation, and Air Conditioning

According to the U.S. Environmental Protection Agency (EPA), indoor air quality is an important issue in schools, and a properly designed heating, ventilation, and air conditioning (HVAC) system helps to control temperature and isolate and remove odors and pollutants.²⁸ The EPA recommends that school temperatures should range from 68 to 75 degrees Fahrenheit in winter and 73.5 to 80 degrees Fahrenheit in summer for areas, such as Arizona, with 41 percent relative humidity.²⁹ We toured the school and found that the HVAC system in Building 1023, which contains the majority of the school classrooms, was not functioning properly. According to one staff member, the HVAC system has not been working as intended for at least three years. In one classroom that was in session, we observed portable air conditioning units venting out through cardboard in a framed window in lieu of central air (see Figure 5, cardboard circled in yellow). We also observed box fans with power cables crossing the floor of the classrooms, creating a tripping hazard.

The students and staff are subject to unreliable conditions that vary based on the weather in the canyon. In Supai, Arizona, the average high temperature in August is 88 degrees Fahrenheit, and the average low temperature in January is 26 degrees Fahrenheit (both of which are months that school is in session). Without functioning air conditioning, ventilation, or heat, the indoor air quality and temperature may affect the health, performance, and comfort of school staff and students; it may also accelerate deterioration and reduce efficiency of school facilities and equipment.³⁰

Figure 5: Interior Venting



No Injury Reports

Federal regulations require employers to “establish a reasonable procedure for employees to report work-related injuries and illnesses promptly and accurately.”³¹ Occupational Safety and Health Administration Form 300A³² is one of BIE’s required safety and occupational health program documents that schools should use to record injuries and should be maintained at the school.³³ We asked staff if the school kept injury reports for accidents on school grounds as required. Several staff members informed us that there are no injury reports currently on file and that injuries on campus are currently not recorded. Notably, the most recent Havasupai Elementary School emergency management plan, dated July 11, 2023, does not include specific injury reporting requirements except where it directs staff to “complete a detailed incident report, file as

²⁷ 25 *IAM* 1, “Overview,” § 1.5(O)(4).

²⁸ EPA, *Indoor Air Quality Backgrounder: The Basics*, <https://www.epa.gov/sites/default/files/2015-09/documents/backgrounder.pdf>.

²⁹ EPA, *Reference Guide for Indoor Air Quality in Schools*, <https://www.epa.gov/iaq-schools/reference-guide-indoor-air-quality-schools>.

³⁰ EPA, *Indoor Air Quality Backgrounder: The Basics*.

³¹ 29 C.F.R. § 1904.35(b)(1)(i).

³² U.S. Department of Labor, Occupational Safety and Health Administration Form 300A, *Summary of Work-Related Injuries and Illnesses*, revised January 2004.

³³ 25 *IAM* 3-H, *Occupational Health Handbook*, Volume 2, § 4.1, “Occupational Injury and Illness Recordkeeping,” issued August 21, 2023.

appropriate.” The plan does not include a sample incident report or specify where the report should be filed. Without completing injury reports as required, there is no official documentation of the cause or extent of the injury or of any remedial action taken.

Roof in Poor Condition

In responses to surveys we sent to staff members, we learned that the school’s roof may be deteriorating (see Figure 6) and that leaks occurred in one of the classrooms. During our visit, we observed that a piece had fallen off the roof and into a common area where students and staff could be present (see Figure 7). A roof in poor condition can leak, cause water damage, and contribute to mold growth, ultimately leading to unsafe conditions such as wet flooring, roof collapse, or health issues.

The BIE Facility Operations Specialist who accompanied us on our site visit reattached some of the roof pieces during our visit. This, however, is not a permanent solution.

Figure 6: Roof in Disrepair

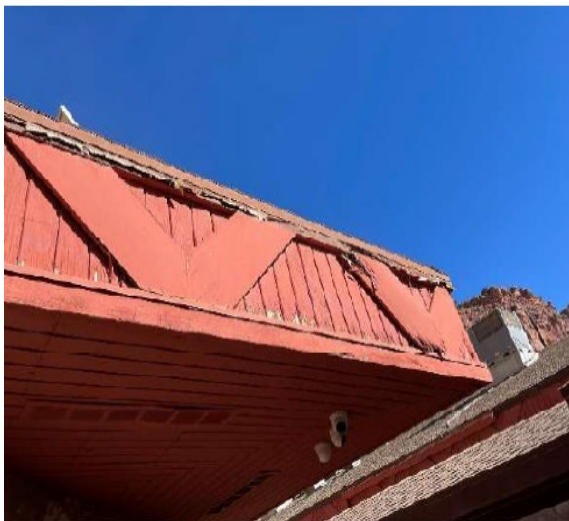


Figure 7: Roof Material on the Ground Near Building



Tree Leaning Toward Kindergarten Building

During our site visit, we learned that a tree located on Tribal land outside of the school boundary was leaning toward the kindergarten building (see Figure 8). As a result of the hazard, the kindergarten building and playground for the younger students had been evacuated and remained out of use for several months. In December 2023, approximately six weeks after our site visit, the Tribe removed the tree (see Figure 9, tree stump circled in yellow).

Figure 8: Leaning Tree That Prompted Closure of Kindergarten Building



Figure 9: Stump of Removed Tree



Source: OIG photo illustration.
Photo: BIE.

Lack of Maintenance Staff, Lack of a Trained CDSO, and Remote Location Pose Challenges

The safety and health issues we identified occurred because the school does not have permanent maintenance staff to monitor and correct deficiencies or a trained CDSO. Moreover, the school's remote location poses additional challenges to addressing these concerns. In response to a lawsuit³⁴ that was settled in May 2023, BIE agreed to fill a maintenance worker position. The school has solicited for the position on the BIE website multiple times but has not been able to fill it, even though the school has offered incentives (as discussed in further detail later in our report). As a result, the school has relied almost solely on the BIE Facility Operations Specialist to maintain the school. Because this particular BIE Facility Operations Specialist oversees 12 to 15 Indian schools at any given time, he is unable to provide continuous service and has visited the school only a few times this past year.

As discussed previously, the IA Occupational Safety and Health Program requires each Indian school to have a CDSO.³⁵ The CDSO is responsible for, among other duties, advising management on the development and implementation of an effective occupational safety and health program within the school, recognizing and evaluating hazards of the working environment, and suggesting general abatement procedures; however, the CDSO is not responsible for performing maintenance.³⁶ While the school listed a CDSO, the designated

³⁴ *Stephen C. v. Bureau of Indian Educ.*, No. CV-17-08004-PCT-SPL (D. Ariz. December 16, 2019).

³⁵ 25 IAM 3.

³⁶ 485 DM 28, "Collateral Duty Safety and Occupational Health Officer Program," issued March 12, 1999.

teacher stated that he was unaware that he had been assigned this duty. The Principal explained that he was required to designate someone for this role and that the training would come later. As of October 12, 2023, no such training had occurred. Without a trained CDSO, the staff and students at the school do not have an onsite expert to help identify occupational safety and health issues and assist supervisors with correcting deficiencies.

Further, the remoteness of the school presents significant staff recruiting and contracting challenges and increases the need for an onsite maintenance worker to address hazards more quickly without relying solely on contractors or outside BIE support.

Failure to correct deficiencies found during the annual safety and health inspections exposes students and staff to an unsafe and unhealthy school and work environment. Due to an absence of a full-time maintenance worker and the remote location, the school often relied on the BIE Facility Operations Specialist for temporary fixes to larger problems. This approach has not satisfactorily resolved school maintenance challenges and continues to pose risks to the safety and health of students and staff.

Recommendations

We recommend that BIE require Havasupai Elementary School to:

1. Develop and implement a plan to monitor the resolution and correction of identified deficiencies in accordance with abatement plan timelines.
2. Until a dedicated maintenance worker is hired, ensure a staff member is designated and trained to address minor deficiencies.
3. Train the school's collateral duty safety officer on the position's roles and responsibilities in advising management on issues related to the development and implementation of a safety and health program in accordance with Indian Affairs policy.
4. Develop and implement a plan to repair the other safety and health concerns identified in this report related to the heating, ventilation, and air conditioning and roof conditions, as well as institute an injury reporting system.

No Comprehensive Emergency Management Program or Security Plan

The *IAM* requires every BIE-operated school to create and implement an emergency management program. This program should consist of (1) an emergency management plan, (2) a continuity of operations plan, (3) training, (4) drills and exercises, (5) an MOU with local emergency organizations, and (6) emergency supplies and equipment, and (7) other safe school measures (as resources permit).³⁷

We found that the school did not implement a comprehensive emergency management program. Specifically, the school did not provide training to school staff, perform all emergency management drills, develop an MOU with local emergency organizations, or procure adequate emergency supplies and equipment (see Figure 10). Lastly, we found that Havasupai Elementary School did not develop a security plan as required by DOI policy and did not implement adequate security measures.

³⁷ 30 *IAM* 12.

Figure 10: Status of Emergency Management Program Requirements at Havasupai Elementary School

Requirement	Status
Emergency Management Plan	Implemented
Continuity of Operations Plan	Implemented
Training	Not Implemented
Drills and Exercises	Not Fully Implemented
Memorandum of Understanding	Not Implemented
Emergency Supplies and Equipment	Not Fully Implemented

Lack of Training

The *IAM* requires that each school train personnel on the contents of its emergency management plan and other components of its program.³⁸ Havasupai Elementary School's most recent emergency management plan contains procedures in the event of specific emergencies, such as fire and explosions; however, the school did not provide any training to staff on the elements of the plan.

Inconsistent Drills and Exercises

The *IAM* also requires that each school conduct tabletop exercises³⁹ of evacuations and lockdown drills at least once a semester.⁴⁰ The school did not conduct any tabletop exercises of evacuations or lockdown drills. The school did, however, conduct two fire drills during the first two months of the 2023 to 2024 school year, which the Principal told us was a new practice as of the current school year. School officials were unable to provide us documentation to support that the school conducted fire drills in previous school years. Without consistent emergency drills, school staff will be unprepared to provide potentially lifesaving guidance to students in the event of an emergency.

No Memorandum of Understanding for Local Emergency Services

The *IAM* requires that each school negotiate with local emergency responders; community support services; and, if applicable, local Tribal authorities to develop an MOU detailing the respective roles and responsibilities of each party before, during, and after an emergency incident.⁴¹ We found that the school did not establish an MOU with any of these parties.

Havasupai Elementary School faces added emergency response challenges because the Tribe does not have a fire department and the police station is not consistently staffed. An MOU would assist the school, Tribe, and emergency responders in addressing the school's unique circumstances with custom solutions agreed upon by all responsible parties should an emergency situation arise.

³⁸ *Id.* at § 1.3(C), "Training."

³⁹ According to Ready, a public service campaign promoting preparedness, "Tabletop exercises are discussion-based sessions where team members meet in an informal, classroom setting to discuss their roles during an emergency and their responses to a particular emergency situation." <https://www.ready.gov/business/training/testing-exercise/exercises>.

⁴⁰ 30 *IAM* 12 § 1.3(D), "Drills and Exercises."

⁴¹ *Id.* at § 1.3(E), "Memorandum of Understanding."

Inadequate or Lacking Emergency Supplies and Equipment

IA policy requires schools to procure emergency supplies and equipment.⁴² During our site visit, we found that the main school office had an inoperable landline phone that was incapable of making outgoing calls because the phone line had been damaged during unrelated maintenance. Since our visit, school officials informed us that the phone line had been fixed as of December 2023 and that the school provided several staff members with new cell phones. We note, however, that cell service in the canyon is unpredictable. The Principal told us that he considered purchasing a satellite phone for the school, which would provide reliable service in this remote area, but he ultimately did not purchase the satellite phone.⁴³ In addition, although we noted improvements to the availability of fire equipment on campus, we observed one fire suppression pull station that had not been serviced as required. As described previously, staff members also stated to us that they had not been trained on the emergency management plan, which includes the use of fire extinguishers. Because emergency situations arise without warning, school staff should have adequate equipment and knowledge of the equipment to act quickly and effectively to minimize dangers to students and school property; this is even more important given that the Tribe does not have a fire department.

Lack of Security Plan and Inadequate Security Measures

DOI policy requires each DOI facility to develop, implement, and maintain a security plan that deters threats, mitigates vulnerabilities, and minimizes consequences associated with an attack or other incident, including hardening facilities, building resiliency and redundancy, incorporating hazard resistance into initial facility design, initiating active or passive countermeasures, installing security systems, promoting workforce security, and implementing cybersecurity measures, among various others.⁴⁴

We requested the security plan, and the Principal informed us that the school did not have one. BIE has a security manager role at each regional office and this person is expected to work with the school to make sure the school has security measures in place; however, because the school has difficulty retaining leadership and staff, it is difficult to establish priorities for action, including security plans. Although it did not have a security plan, the school did implement some security measures. Despite this, we found two security measures the school had put into place that did not effectively mitigate risk as intended.⁴⁵

We found that the fence surrounding the school was not secure. A key concept in physical security is to create a series of obstacles, such as fences, gates, and locked doors, between the facility's perimeter and the building's interior to stop intruders. The fence surrounding the school was in poor condition; it had missing fence pickets, and one section was replaced with chain link fencing that was easily scalable (see Figure 11).

At the time of our visit, both the campus fencing and the classroom doors were not secure. Because the school did not have a security plan, the standard operating procedures for securing the campus were not documented. Additionally, the school gate, which provides the only entry point, was unlocked during school hours. The school is adjacent to a popular hiking trail leading to the waterfalls that, according to the National Park Service,⁴⁶ attract thousands of visitors each year (see Figure 12); therefore, students and staff may be exposed to transient visitors that could pose potential security threats.

Figure 11: Easily Breached Fencing



⁴² *Id.* at § 1.3(F), "Emergency Supplies and Equipment."

⁴³ The Principal did not explain why he did not make the purchase.

⁴⁴ 444 DM 1.4(H), "Physical Security."

⁴⁵ Our inspection objective did not include identifying and verifying the adequacy of security measures; however, we observed issues during our site visit that may indicate additional deficiencies we did not detect at the time.

⁴⁶ National Park Service, Grand Canyon National Park, *Havasupai Indian Reservation*, <https://www.nps.gov/grca/planyourvisit/havasupai.htm>.

Figure 12: Havasupai Elementary School Location Adjacent to a Popular Hiking Trail



Sources:

Earth imagery: Esri, Maxar, Earthstar Geographics, and the GIS User Community.

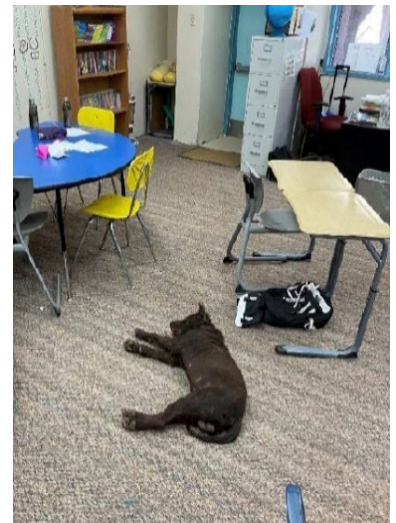
Open school gate inset image: OIG.

Hiking trail inset image: Photosphere by Scott Kennedy. Google Maps.

In addition, dogs were able to access the school, as we witnessed on the campus and within a classroom (see Figure 13). The presence of dogs in classrooms could potentially pose the risk of a dog biting students or staff as well as the risk of transmitting potential illnesses within the school. BIE confirmed that there are no guidelines regarding dogs on school campuses. In June 2024, a BIE official told us that the school is now making efforts to block the dogs from getting on campus.

We also found that the closed-circuit television cameras did not function. A key concept in physical security is having a security system in place to deter intruders and monitor activity. BIE developed a safe schools planning guide to help keep children, employees, visitors, and school property safe and secure from a variety of hazards; the guide includes surveillance cameras as an example of a technical security measure.⁴⁷ The Havasupai Elementary School campus has several closed-circuit television cameras on one of the buildings near the entrance. However, while testing the system during our site visit, we learned the cameras were inoperable. According to one staff member, the cameras have not been operational in approximately four years. The Principal informed us that the cameras had been fixed and were working properly as of December 2023. Functioning surveillance cameras help mitigate the potential vulnerabilities posed by the poor fencing we identified above.

Figure 13: Dog Sleeping in a Classroom



⁴⁷ BIE, *Safe Schools Planning: A Guide for Educators*, dated September 2009, <https://www.bie.edu/sites/default/files/documents/idc010036.pdf>.

Some of these security deficiencies may have gone uncorrected because the checklist BIE inspectors used to conduct annual safety and health inspections did not include any security measures, such as verifying that existing security cameras are functional. Including security measures on the checklist would ensure that the school is aware of any deficiencies and is working on an abatement plan to address them.

Staff Turnover and Remote Location Pose Safety Challenges

In addition, staff turnover at the school and its remote location contributed to the emergency management program and security plan issues discussed above. Specifically, the high turnover at Havasupai Elementary School resulted in a loss of institutional knowledge—the lack of personnel and absence of experienced, long-term staff has made it difficult to train new staff on required school operations. Furthermore, the logistical challenges associated with addressing deficiencies, purchasing adequate equipment, and securing contractor labor are significantly more complicated due to the remoteness of the school.

Without a comprehensive emergency management program and security plan, staff and students will be left unprepared if an emergency occurs, which could threaten or cause death or significant injuries to staff or students, disrupt school operations, or cause physical damage to the school.

Recommendations

We recommend that BIE require Havasupai Elementary School to:

5. Implement staff training on the emergency management program as required by Indian Affairs policy.
6. Complete a memorandum of understanding with local emergency organizations as required by Indian Affairs policy.
7. Implement fire safety procedures, track all required fire equipment maintenance, and train all staff on the use of fire extinguishers and other related fire safety equipment as required by the National Fire Protection Association and Federal regulations.
8. Develop and implement a security plan as required by DOI policy.

We recommend that BIE:

9. Expand its annual safety and health inspection guidance to include security requirements and measures

BIE's Facility Management System Did Not Have Reliable Information Regarding Havasupai Elementary School

The U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government* (the "Green Book") identify quality information as information that is current, complete, accurate, and timely. Quality information is necessary to make informed decisions and evaluate performance in achieving objectives and addressing risks.⁴⁸ The school uses BIE's facility management system to monitor operations and maintenance; the system, in turn, contains the deficiency information BIE uses for planning and operational processes, including safety and health abatement plans and corresponding work orders.⁴⁹ Work orders are generated in response to inspections, facility condition assessments, and onsite detection from school staff when

⁴⁸ Green Book, Principle 13.05, "Data Processed into Quality Information."

⁴⁹ Report No. 2022-CR-036 included recommendations related to the facility management system.

deficiencies are identified. Like other Indian schools, Havasupai Elementary School is responsible for updating the facility management system with new work orders, monitoring open work orders, updating the status of work orders, and closing work orders when completed.

We found that the facility management system information specific to Havasupai Elementary School was not reliable. We judgmentally sampled 26 of the 171 open work orders and found that 17 of the 26, or 65 percent of the sample, should have been closed. Fifteen of the 17 were transferred from the previous facility management system in 2013 and had not been properly monitored and closed out by prior school maintenance staff.

In addition, of the total of 468 closed work orders in the facility management system as of September 12, 2023, we statistically sampled 60 and found that 29 of the 60 were closed inappropriately. For example, one deficiency requiring staff to be trained on bloodborne pathogens was closed; however, the Principal acknowledged that this training had not been completed and was scheduled for January 2024. Many of the work orders that were closed in error were related to fire safety maintenance, such as the fact that portable fire extinguishers did not receive a monthly visual inspection and no annual test of fire alarm smoke detectors had been conducted. Based on our statistical sample, we were able to project across the population that 226 of the 468 closed work orders, or 48 percent, were closed in error.

The inaccuracies in the facility management system data occurred in part because none of the current employees at Havasupai Elementary School have access to the facility management system. Access requires approval from the principal, or the principal's immediate supervisor, and a four-day virtual training. The Principal's December 2023 resignation further complicated any potential facility management access approvals; it may take some time for a new principal to come onboard and provide the required approval. Also, because the school has not had a dedicated maintenance worker or anyone trained on the facility management system in years, no one at the school has updated the system recently. Instead, the school relies on BIE to update the facility management system; however, there is a risk of data errors based on the infrequency of BIE visits and the BIE Facility Operations Specialist's high workload. Further, even though we could not determine for certain, the closure of uncompleted work orders could be attributed to a batch closing of more than 14,000 work orders in the entire facility management system in September 2023.⁵⁰

Failure to accurately report the status of work orders may create inefficiencies in funding, result in inadequate monitoring, contribute to a perception of a safe environment when risks persist, and potentially expose students and staff to adverse conditions.

Recommendations

We recommend that BIE:

10. Assist Havasupai Elementary School with reviewing and analyzing all work orders in the facility management system related to the school and update work order status as needed to ensure an accurate facility management database.

We recommend that BIE require Havasupai Elementary School to:

11. Until a dedicated maintenance worker is hired, ensure designated staff are trained to update the work orders.

⁵⁰ A BIA official told us that because only about 10 percent of work orders that are opened are ever completed, BIA decided to "batch close" work orders that were generated by an annual inspection, were more than three years old, and had generated no activity. We do not know how batch closing work orders will factor into future repeat deficiencies or affect the accuracy of the facility management system.

Havasupai Elementary School Is Experiencing Severe Staff Shortages

In addition to not having a dedicated maintenance worker, we found that Havasupai Elementary School is experiencing severe staff shortages. According to the Principal, as of October 2023, the school had nine employees and at least nine vacant positions: six teachers, a nurse, a librarian, and a dedicated maintenance worker. In October 2023, the Principal told us the school had employment offers out for three teachers and one guidance counselor. According to the Principal, as of December 2023, the guidance counselor was onboarded at the school; however, the teachers had not yet cleared the required background check. With the resignation of the Principal in December 2023, there are 10 vacant positions, representing approximately 53 percent of the Havasupai Elementary School positions. The Principal had been with the school for approximately 1½ years, which was the longest tenure for this position in recent years; the two previous principals stayed at the school for only one year each.

Staff members reported several reasons for the high turnover at the school. For example, staff said that the living conditions for the employees were not ideal (some employees were required to share two-bedroom apartments), and there are no leisure activities on the reservation other than hiking. In addition, because of the remoteness of the area, cell phone reception is not reliable; therefore, staff members are often unable to call their families. Finally, one staff member told us about an occurrence of vandalism in the staff living quarters, suggesting that there might be concerns about crime in the village.

To account for these challenges, the school has offered a 25-percent recruitment differential added to each biweekly paycheck for the first four years and a 25-percent retention incentive at the end of each school year for the first four years. In addition, the school provides all teachers, counselors, and administrators with a \$5,000 stipend and, at the end of each semester, an additional \$2,500 stipend for those who agree to share double-occupancy housing. Despite offering these additional benefits, the school's conventional recruiting efforts have not been successful. The school should consider using nonconventional recruiting efforts such as working with nongovernmental organizations that specialize in this hiring field to widen the potential pool of applicants.

As a result of the staff shortages, the school may not be able to provide quality educational services. Specifically, the staff shortage has contributed to a wide range of challenges facing the school, including a reduction in necessary special education services for the students, medical services for sick and injured students, critical reading and media services, and student and staff pride in having a safe and well-maintained school campus.

The lack of qualified staff to provide critical teaching and support services could also lead to a lack of institutional knowledge of required school operations. For example, the shortage has resulted in underused buildings, such as the library, which is closed to students because the school does not have a dedicated librarian to inventory the books and provide the services required of this position. The school recently purchased new furniture for the library space, which sits unused. Further, as described above, a tree that leaned toward the kindergarten facility was seen as endangering students and staff nearby, which caused the school to avoid using the building. Although the tree was removed and no longer poses a hazard, the building remains vacant due to the school's staffing shortage, limiting the space available to the youngest children on campus for age-appropriate play and outdoor recreation.

Recommendation
<p>We recommend that BIE:</p> <ol style="list-style-type: none">12. Assist Havasupai Elementary School with developing and implementing a staffing plan that considers alternative options to fill vacancies (e.g., interfacing with nongovernmental organizations to broaden the pool of available applicants).

Conclusion and Recommendations

Conclusion

BIE is responsible for performing annual safety and health inspections at all Indian schools to identify deficiencies. Further, each BIE school is required to ensure the deficiencies are corrected and to develop a comprehensive emergency management program to provide a safe school environment for students and staff. BIE and Havasupai Elementary School need to correct safety and health deficiencies in a timely manner, implement a comprehensive emergency management program, and develop a security plan to ensure staff and students have a safe and healthy environment in which to teach and learn. In addition, the facility management system should be reviewed and updated to provide an accurate database of work orders for more efficient and effective oversight. Finally, it is critical that the school develop a plan to recruit qualified staff members to support students' educational requirements. Each day that passes without quality educational staff and a comfortable school environment is a lost opportunity to help these children learn and grow.

The deficiencies we found occurred because the school (1) does not have a dedicated maintenance worker to maintain the school; (2) does not have a CDSO to assist in identifying deficiencies and corrective actions; (3) is in a remote location that is not easily accessible, which has created challenges in obtaining supplies and services as well as recruiting and retaining school staff; (4) does not have a staff member with access to the facility management system to timely update and monitor work orders; and (5) has experienced consistent staff turnover, which has resulted in the loss of institutional knowledge and limited the school's ability to meet applicable safety requirements.

We make 12 recommendations that, if implemented, will improve the school's overall condition, better prepare the school for emergencies, ensure a secure school facility, and help the school recruit and retain staff.

We note that although our inspection involved a sample of Havasupai Elementary School facility management work orders, our finding related to the inaccurate facility management system highlights an issue that may be applicable across BIE Indian schools.

Recommendations Summary

We provided a draft of this report to BIE for review. BIE concurred with all 12 of our recommendations. We consider Recommendations 1 and 4 through 12 resolved and Recommendations 2 and 3 implemented. We determined that Recommendations 1, 4, 8, and 9 are significant and will be reported as such in our semiannual report to Congress in accordance with the Inspector General Act.⁵¹ Below we summarize BIE's response to our recommendations, as well as our comments on its response. See Appendix 4 for the full text of BIE's response; Appendix 5 lists the status of each recommendation.

We recommend that BIE require Havasupai Elementary School to:

1. Develop and implement a plan to monitor the resolution and correction of identified deficiencies in accordance with abatement plan timelines.

BIE Response: BIE concurred with this recommendation and stated that its Branch of Facilities Management and Branch of Safety Management "will monitor the resolution and correct the deficiencies in accordance with abatement plan timelines." BIE also stated it has implemented a plan to review the deficiencies with Havasupai Elementary School's personnel and will provide technical assistance in developing appropriate abatement plans.

⁵¹ The Inspector General Act of 1978, 5 U.S.C. § 405(b), requires inspectors general to prepare semiannual reports summarizing OIG activities during the immediately preceding six-month periods ending March 31 and September 30. It also states that these semiannual reports should include an identification of each "significant recommendation" described in previous semiannual reports on which corrective action has not been completed.

In addition, BIE stated that its Branch of Facilities Management “takes the resolution and correction of deficiencies at [Havasupai Elementary School] seriously,” and since 2022, the branch has made 16 onsite visits to correct outstanding deficiencies.

BIE provided a November 30, 2024 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider this recommendation implemented when BIE provides documentation demonstrating that deficiencies identified in the report are being monitored and have been corrected in accordance with abatement plan timelines.

2. Until a dedicated maintenance worker is hired, ensure a staff member is designated and trained to address minor deficiencies.

BIE Response: BIE concurred with this recommendation and stated a facility manager was hired at Havasupai Elementary School in March 2024 and has been trained to address minor deficiencies. Outside of its official response, a BIE official provided documentation clarifying that the position filled was for a maintenance worker and stated that BIE’s Branch of Facilities Management personnel would oversee their work and update work orders.

OIG Comment: Although BIE provided an implementation date of January 31, 2025, based on our review of the supporting documentation received outside of the official response, we consider this recommendation implemented.

3. Train the school’s collateral duty safety officer on the position’s roles and responsibilities in advising management on issues related to the development and implementation of a safety and health program in accordance with Indian Affairs policy.

BIE Response: BIE concurred with this recommendation and stated that its Branch of Safety Management “scheduled safety trainings that will include collateral duty safety officer position’s roles and responsibilities during the week of August 12, 2024.” Outside of its official response, a BIE official provided documentation identifying the collateral duty safety officer and the applicable training certificate.

OIG Comment: Although BIE provided an implementation date of January 31, 2025, based on our review of the supporting documentation received outside of the official response, we consider this recommendation implemented.

4. Develop and implement a plan to repair the other safety and health concerns identified in this report related to the heating, ventilation, and air conditioning and roof conditions, as well as institute an injury reporting system.

BIE Response: BIE concurred with this recommendation and stated that its Branch of Facilities Management and Branch of Safety Management will work with Havasupai Elementary School “to develop a plan to repair safety and health concerns identified in this report.” BIE also stated that Branch of Safety Management staff have worked with the school to submit a work order to replace the HVAC system and are working on a permanent solution for the school roof. Additionally, BIE stated the injury reporting system is currently available to all supervisors and managers to report all on the job injuries, and the Branch of Safety Management is providing training to Havasupai Elementary School leaders to ensure proper reporting of injuries.

BIE provided a May 31, 2025 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider this recommendation implemented when BIE provides documentation demonstrating that it

has developed and implemented a plan to address the HVAC and roof conditions and instituted an injury reporting system.

5. Implement staff training on the emergency management program as required by Indian Affairs policy.

BIE Response: BIE concurred with this recommendation and stated training will occur during fall 2024 for the remaining five emergency management program requirements. BIE also stated the school phone line only receives calls, and staff “have been instructed to use cell phones until the phone line is repaired.”

BIE provided a January 31, 2025 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider this recommendation implemented when BIE provides documentation demonstrating Havasupai Elementary School staff have been fully trained on the emergency management program and the phone line has been fully repaired.

6. Complete a memorandum of understanding with local emergency organizations as required by Indian Affairs policy.

BIE Response: BIE concurred with this recommendation and stated that its Branch of Safety Management will work with Havasupai Elementary School leaders “to execute a memorandum of understanding with local emergency organizations.”

BIE provided a January 31, 2025 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider this recommendation implemented when BIE provides the MOU(s) with local emergency organizations.

7. Implement fire safety procedures, track all required fire equipment maintenance, and train all staff on the use of fire extinguishers and other related fire safety equipment as required by the National Fire Protection Association and Federal regulations.

BIE Response: BIE concurred with this recommendation and stated that its Branch of Safety Management “will implement fire safety procedures, track all required fire equipment maintenance and train staff on fire related safety procedures.” BIE also stated it is working on an emergency action plan that includes tabletop exercises.

BIE provided a January 31, 2025 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider this recommendation implemented when BIE provides documentation demonstrating fire safety procedures have been implemented, fire equipment maintenance is being tracked, and staff have been trained on the use of fire extinguishers and other related fire safety equipment.

8. Develop and implement a security plan as required by DOI policy.

BIE Response: BIE concurred with this recommendation and stated that, in partnership with Havasupai Elementary School leaders, BIE’s Branch of Safety “will develop and implement a security plan.” BIE also stated that its Branch of Safety Management conducted a security and threat assessment in August 2024.

BIE provided a January 31, 2025 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider this recommendation implemented when BIE provides documentation demonstrating that a security plan has been developed and implemented as required by DOI policy.

We recommend that BIE:

9. Expand its annual safety and health inspection guidance to include security requirements and measures.

BIE Response: BIE concurred with this recommendation and stated that it “will develop a plan to incorporate security requirements and measures annually.”

BIE provided a May 31, 2025 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider this recommendation implemented when BIE provides documentation demonstrating it expanded its annual safety and health inspection guidance to include security requirements and measures.

10. Assist Havasupai Elementary School with reviewing and analyzing all work orders in the facility management system related to the school and update work order status as needed to ensure an accurate facility management database.

BIE Response: BIE concurred with this recommendation and stated that its “Branch of Facilities Management has implemented a process to review the deficiencies with school personnel and provide technical assistance to develop a plan to resolve and correct deficiencies.” BIE further stated, “To ensure an accurate facility management database, BIE hired a contractor that evaluated and cleaned up Deferred Maintenance Work Orders,” and as of July 2024, the contractor removed 40 work orders.

BIE provided a December 31, 2024 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider this recommendation implemented when BIE provides documentation demonstrating all work orders in the facility management system related to Havasupai Elementary School have been reviewed, analyzed, and updated as needed to ensure an accurate facility management database.

We recommend that BIE require Havasupai Elementary School to:

11. Until a dedicated maintenance worker is hired, ensure designated staff are trained to update the work orders.

BIE Response: BIE concurred with this recommendation and stated that it hired a facility manager for Havasupai Elementary School in March 2024 and will work to ensure the employee has appropriate access to the facility management system. Outside of its official response, a BIE official provided documentation clarifying that the position filled was for a maintenance worker and stated that BIE’s Branch of Facilities Management personnel would oversee their work and update work orders.

BIE provided a January 31, 2025 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider this recommendation implemented when BIE provides documentation demonstrating designated staff are trained to update the work orders, including the four-day facility management system training required to access the system.

We recommend that BIE:

12. Assist Havasupai Elementary School with developing and implementing a staffing plan that considers alternative options to fill vacancies (e.g., interfacing with nongovernmental organizations to broaden the pool of available applicants).

BIE Response: BIE concurred with this recommendation and stated that it “has taken several measures to ensure a broader applicant pool and to retain staff. By resolution of the Havasupai Tribe,

the BIE has waived the Indian Preference policy . . . to ensure consideration for both Indian and non-Indian applicants.” BIE also stated it has conducted outreach to outside organizations “to explore avenues to work collaboratively to recruit, orient, and retain staff.”

BIE provided a January 31, 2025 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider this recommendation implemented when BIE provides documentation demonstrating the development and implementation of a staffing plan that considers alternative options to fill vacancies.

Appendix 1: Scope and Methodology

Scope

Our inspection focused on Havasupai Elementary School's fiscal year (FY) 2021 through 2023 annual safety and health inspection reports prepared by the Bureau of Indian Education (BIE) Branch of Safety Management; the work orders in the facility management system as of September 12, 2023; and the school's emergency management program and security plan.

Methodology

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. We believe that the work performed provides a reasonable basis for our conclusions and recommendations.

Our tests and procedures included:

- Obtaining and reviewing relevant Federal laws and regulations and U.S. Department of the Interior (DOI), Bureau of Indian Affairs (BIA), BIE, and Havasupai Elementary School policies, procedures, and guidance.
- Interviewing (both in person and virtually) officials from the BIE Office of the Director; BIE School Operations, Safety Division; BIA Division of Facilities Management and Construction; and Havasupai Elementary School.
- Surveying all school staff members using an emailed survey and an additional email questionnaire to all administrative school staff.
- Conducting a site visit in October 2023.
- Reviewing and analyzing all the deficiencies reported on the FY 2023 annual safety and health inspection and organizing the deficiencies by severity: catastrophic, critical, significant, and minor. There were no catastrophic deficiencies.
- Testing 100 percent of the FY 2023 critical deficiencies and judgmentally sampling the significant deficiencies. Testing included visually observing the deficiency, with the assistance of the Safety and Health Inspector and the BIE Facility Operations Specialist, to determine if the deficiency had been resolved.
- Reviewing and analyzing the FY 2021 and 2022 annual safety and health inspection reports to compare with the FY 2023 data to determine the previous total deficiencies and repeat deficiencies identified.
- Testing whether facility management system work orders were properly closed. We statistically sampled 60 closed work orders from the population of 468 to obtain a 90-percent level of confidence using a standard sampling formula. In addition, we physically inspected each of the deficiencies associated with the 60 work orders, with the assistance of the Safety and Health Inspector and the BIE Facility Operations Specialist, to determine whether the work orders were in the appropriate status. We acknowledge a limitation to testing closed work orders because a work order could have been closed out and an identical deficiency could have subsequently occurred.
- Judgmentally selecting 15 percent of the open work orders to verify if the work orders were in the correct status. We did not produce estimates based on the judgmentally selected work orders or commingle them with the statistical sample.

Appendix 2: Critical Deficiencies Testing Summary

Deficiency	Repeat Deficiency on FY 2023 Inspection Report?	Initial Date Identified	Initial Abatement Period	Corrected in Original Period?	Corrected?
Improper storage of chemicals (Structure 1022)	Yes	06/06/2018	15 days	No	Yes
Exposed live parts – light fixtures (Structure 1022)	Yes	06/06/2018	15 days	No	Yes
Exposed live parts – light fixtures (Structure 1022)	Yes	06/06/2018	15 days	No	Yes
Playground surface insufficient to prevent injuries (Structure 1022)	Yes	08/25/2021	180 days	No	No
Portable fire extinguishers discharged or missing (Structure 1023)	Yes	07/31/2017	15 days	No	Yes
Electric receptacle does not have cover exposing live wires (Structure 1023)	Yes	06/06/2018	15 days	No	Yes
Emergency lighting not operable (Structure 1023)	Yes	06/06/2018	45 days	No	Yes
Fire prevention plan not in writing (Structure 1023)	Yes	05/06/2022	30 days	No	Yes
Fire prevention plan not in writing (Structure 1024)	Yes	09/18/2019	30 days	No	No
No written emergency action plan (Structure 1024)	Yes	09/18/2019	30 days	No	Yes*
Storage obstructs access to electric control panel (Structure 1025)	Yes	06/06/2018	15 days	No	Yes
Potential tree danger (Structure 1025)	Yes	06/06/2018	15 days	No	Yes
Fire prevention plan not in writing (Structure 1025)	Yes	09/18/2019	30 days	No	No
No annual emergency action plan update (Structure 1025)	Yes	09/18/2019	30 days	No	Yes*
Emergency lighting not operable (Structure 1034-Building)	Yes	06/06/2018	45 days	No	Yes
Emergency lighting not operable (Structure 1034-Classroom)	Yes	05/06/2022	45 days	No	Yes
Electric receptacle does not have cover exposing live wires (Structure T31)	Yes	06/06/2018	15 days	No	Yes

Deficiency	Repeat Deficiency on FY 2023 Inspection Report?	Initial Date Identified	Initial Abatement Period	Corrected in Original Period?	Corrected?
Exit signs and emergency lighting not operable (Structure T31)	Yes	06/06/2018	365 days	No	Yes
Exits, means of egress not free of obstructions (Structure T31)	Yes	06/06/2018	15 days	No	Yes
No procedures to control flammable and combustible waste (Structure T31)	No	03/17/2023	30 days	No	No
Stairs not equipped with handrails on both sides (Structure T31)	Yes	05/06/2022	15 days	No	Yes
Stairs not equipped with handrails on both sides (Structure T32)	Yes	05/06/2022	15 days	No	Yes
No procedures to control flammable and combustible waste (Structure T32)	No	03/17/2023	30 days	No	No

* Deficiency corrected after our site visit.

Appendix 3: Significant Deficiencies Testing Summary

Deficiency	Repeat Deficiency on FY 2023 Inspection Report?	Initial Date Identified	Initial Abatement Period	Corrected in Original Period?	Corrected?
Sun exposure to playground equipment poses potential for skin burns (Structure 1022)	Yes	08/25/2021	180 days	No	No
Fire alarm detectors not tested every 5 years (Structure 1022)	Yes	05/06/2022	30 days	No	Yes
No annual test of digital fire detection alarm system communicator transmission (Structure 1022)	Yes	05/06/2022	30 days	No	Yes
Restrooms not accessible (Structure 1022)	Yes	08/25/2021	45 days	No	Yes
Fire door parts missing or broken (Structure 1023)	Yes	05/06/2022	30 days	No	Yes
At least 60 percent of public entrances not accessible (Structure 1023)	Yes	05/06/2022	45 days	No	Yes
No annual test of fire alarm system initiating circuit, notification circuit, and signaling line circuit (Structure 1023)	Yes	05/06/2022	30 days	No	Yes
Different fire alarm detectors not tested each year (Structure 1023)	Yes	05/06/2022	30 days	No	Yes
No record of emergency lighting test monthly (Structure 1023)	Yes	05/06/2022	30 days	No	No
Water supply and drain pipes under lavatories not protected (Structure 1023)	Yes	05/06/2022	45 days	No	No
Portable fire extinguishers are installed outside the allowable dimensions (Structure 1023)	No	03/17/2023	30 days	No	No
Operable door handle parts not accessible (Structure 1023)	Yes	06/06/2018	45 days	No	Yes
Firewall penetrations are not properly sealed (Structure 1023)	Yes	08/25/2021	45 days	No	Yes
No annual test of all fire detection alarm system equipment (Structure 1024)	Yes	05/06/2022	30 days	No	Yes
No fire extinguisher training upon initial employment or annually thereafter (Structure 1024)	Yes	05/06/2022	30 days	No	No

Deficiency	Repeat Deficiency on FY 2023 Inspection Report?	Initial Date Identified	Initial Abatement Period	Corrected in Original Period?	Corrected?
No annual test of manual fire alarm system boxes (Structure 1024)	Yes	05/06/2022	30 days	No	Yes
No annual test of fire alarm smoke detectors (Structure 1024)	Yes	05/06/2022	30 days	No	Yes
No written confined space entry program in place (Structure 1024)	Yes	08/25/2021	60 days	No	No
Restroom not accessible (Structure 1024)	Yes	05/06/2022	45 days	No	Yes
Site lighting does not illuminate the exterior exit (Structure 1025)	Yes	05/06/2022	45 days	No	Yes
Kitchen hood actuation and control components not tested for proper operation (Structure 1025)	Yes	05/06/2022	30 days	No	No
Kitchen hood detection devices not examined and cleaned annually (Structure 1025)	Yes	05/06/2022	30 days	No	No
No annual test of fire alarm system initiating circuit, notification circuit, and signaling circuit (Structure 1025)	Yes	05/06/2022	30 days	No	Yes
Required accessible signage for room not provided (Structure 1025)	Yes	05/06/2022	45 days	No	Yes
Assembly equipment subject to explosion not separated by 1-hour resistance fire barriers (Structure 1025)	Yes	05/06/2022	90 days	No	Yes
Emergency lighting (Structure 1034)	Yes	06/06/2018	365 days	No	Yes
Second means of egress not provided (Structure 1034)	Yes	08/25/2021	45 days	No	No
No annual test of all fire detection alarm system equipment, functions, power supplies, signals (Structure 1034)	Yes	05/06/2022	30 days	No	Yes
Automatic sprinkler system not provided (Structure 1034)	Yes	06/06/2018	90 days	No	No
Portable fire extinguishers are discharged or missing from designated places (Structure T31)	Yes	06/06/2018	365 days	No	Yes
Doorways or means of egress are blocked (Structure T32)	Yes	06/06/2018	365 days	No	Yes

Appendix 4: Responses to Draft Report

The Bureau of Indian Education's response to our draft report follows on page 34.



UNITED STATES DEPARTMENT OF THE INTERIOR

Bureau of Indian Education
1849 C Street NW, MIB-3610
Washington, DC 20240

September 5, 2024

Memorandum

To: Kathleen Sedney
Assistant Inspector General for Audits, Inspections and Evaluations

From: Tony L. Dearman *Tony L. Dearman*
Director, Bureau of Indian Education

Subject: Management Response to Recommendations 1 through 12 in Draft Inspection Report (No. 2023-ISP-040) – *The Bureau of Indian Education Must Correct Safety and Health Deficiencies and Improve Emergency Preparedness and Security at Havasupai Elementary School*

The Bureau of Indian Education (BIE) appreciates the opportunity to comment on the U.S. Department of the Interior Office of Inspector General (OIG) Draft Inspection Report (No. 2023-ISP-040) – *The Bureau of Indian Education Must Correct Safety and Health Deficiencies and Improve Emergency Preparedness and Security at Havasupai Elementary School*. This memorandum provides BIE's response to each of the audit recommendations. The BIE concurs with all recommendations identified in the draft audit report. The BIE's plans for corrective actions and actions taken are detailed below:

Recommendation 1: Develop and implement a plan to monitor the resolution and correction of identified deficiencies in accordance with abatement plan timelines.

Response and Actions Planned: The BIE concurs with the recommendation. The BIE Branch of Facilities Management (BFM) and Branch of Safety Management (BSM) will monitor the resolution and correct the deficiencies in accordance with abatement plan timelines. More specifically, BIE has implemented a plan to review the deficiencies with Havasupai Elementary School's (HES) personnel and will provide technical assistance in developing appropriate abatement plans. In addition to this process, abatement plans are tracked by the assigned BFM Facility Operations Specialist point-of-contact (POC) to ensure implementation.

BIE BFM takes the resolution and correction of deficiencies at HES seriously and has made 16 on-site visits, since 2022, to correct outstanding deficiencies. During the visits, the BFM Facility Operations Specialist POC tracks the Abatement Correction Report. Specific work items are identified, and tasks are assigned during the site visits for immediate resolution. BIE BFM will continue to monitor work orders to further correct outstanding deficiencies.

Responsible Official: BIE Facility Operations Specialist and Supervisory General Engineer.

Target Date: November 30, 2024

Recommendation 2. Until a dedicated maintenance worker is hired, ensure a staff member is designated and trained to address minor deficiencies.

Response and Actions Planned: The BIE concurs with this recommendation. On March 27, 2024, a Facility Manager was hired at Havasupai Elementary School (HES) and trained to address minor deficiencies. BSM Safety and Occupational Health Specialist and BFM Facility Operations Specialist have reviewed the safety deficiencies with the new facility manager and provided an abatement plan and technical assistance.

Responsible Official: BIE Facility Operations Specialist POC and BIE Safety Program Manager
Target Date: January 31, 2025

Recommendation 3. Train the school's collateral duty safety officer on the position's roles and responsibilities in advising management on issues related to the development and implementation of a safety and health program in accordance with Indian Affairs policy.

Response and Actions Planned. The BIE concurs with the recommendation. In accordance with IA policy, BSM Staff has scheduled safety trainings that will include collateral duty safety officer position's roles and responsibilities during the week of August 12, 2024.

Responsible Official: BIE BSM Safety and Occupational Health Specialist
Target Date: January 31, 2025

Recommendation 4. Develop and implement a plan to repair the other safety and health concerns identified in this report related to the heating, ventilation, and air conditioning and roof conditions, as well as institute an injury reporting system.

Response and Actions Planned: The BIE concurs with the recommendation. BIE BFM and BSM will work with HES to develop a plan to repair safety and health concerns identified in this report. BSM Staff have worked with HES to submit Work Order AB747414 in Maximo for the HVAC Replacement at HES. BIE has completed temporary repairs to the roof and will plan a permanent solution for HES. Regarding the injury reporting system, the Safety Management Information System (SMIS) is currently available for all supervisors and managers to report all on the job injuries. BSM is providing training to HES school leaders to ensure proper reporting of injuries.

Responsible Official: BIE Branch of Safety Management
Target Date: May 31, 2025

Recommendation 5. Implement staff training on the emergency management program as required by Indian Affairs policy.

Response and Actions Planned: The BIE concurs with the recommendation. Per the OIG Report Figure 10, BIE has provided training on Emergency Management and Continuity of Operations plans. Training on the other five topics will occur during fall 2024. Regarding the

emergency supplies and equipment, the school phone line only receives calls and Staff have been instructed to use cell phones until the phone line is repaired.

Responsible Official: BIE Branch of Safety Management

Target Date: January 31, 2025

Recommendation 6. Complete a memorandum of understanding with local emergency organizations as required by Indian Affairs policy.

Response and Actions Planned: The BIE concurs with the recommendation. The BIE Branch of Safety will work with HES school leaders to execute a memorandum of understanding with local emergency organizations as required by IA policy. More specifically, BSM staff will review the local emergency organizations during their visits to HES in fall 2024.

Responsible Official: BIE Branch of Safety Management

Target Date: January 31, 2025

Recommendation 7. Implement fire safety procedures, track all required fire equipment maintenance, and train all staff on the use of fire extinguishers and other related fire safety equipment as required by the National Fire Protection Association and Federal regulations.

Response and Actions Planned. The BIE concurs with the recommendation. BIE BSM will implement fire safety procedures, track all required fire equipment maintenance and train staff on fire related safety procedures in accordance with the National Fire Protection Association. For the month of August 2024, BSM Staff is providing a comprehensive safety training that will include fire safety training. In addition, the BIE is working on Emergency Action Plan to include tabletop exercises.

Responsible Official: BIE Branch of Safety Management

Target Date: January 31, 2025

Recommendation 8. Develop and implement a security plan as required by DOI policy.

Response and Actions Planned: The BIE concurs with the recommendation. In partnership with HES school leaders, the Branch of Safety will develop and implement a security plan as required by policy. As part of developing the security plan, BSM has conducted a Security and Threat Assessment on August 4, 2024. BSM Manager is currently reviewing the assessment and plans to finalize the Security and Threat Plan and work with HES staff to implement the recommendation.

Responsible Official: BIE Branch of Safety Management

Target Date: January 31, 2025

Recommendation 9. Expand its annual safety and health inspection guidance to include security requirements and measures.

Response and Actions Planned: The BIE concurs with the recommendation. BIE BSM's Annual Safety Inspections does not include security requirements and measures. BIE will develop a plan to incorporate security requirements and measures annually as part of the current work of Indian Education's draft of a National Policy Memorandum on School Security Enhancement Plan.

Responsible Official: BIE Branch of Safety Management

Target Date: May 31, 2025

Recommendation 10. Assist Havasupai Elementary School with reviewing and analyzing all work orders in the facility management system related to the school and update work order status as needed to ensure an accurate facility management database.

Response and Actions Planned: The BIE concurs with the recommendation. The BIE Branch of Facilities Management has implemented a process to review the deficiencies with School personnel and provide technical assistance to develop a plan to resolve and correct deficiencies. Currently, abatement plans are tracked by the assigned point-of-contact to monitor progress of work on deficiencies. To ensure an accurate facility management database, BIE hired a contractor that evaluated and cleaned up Deferred Maintenance Work Orders (DMWO). As of July 2024, the contractor removed 40 work orders. BFM Staff are currently reviewing the remaining work orders.

Responsible Official: BIE Branch of Facilities Management

Target Date: December 31, 2024

Recommendation 11. Until a dedicated maintenance worker is hired, ensure designated staff are trained to update the work orders.

Response and Actions Planned: The BIE concurs with the recommendation. As of March 27, 2024, the BIE hired a Facility Manager for HES. BFM will work to ensure employee has appropriate access to the Maximo system. BFM will continue to provide technical assistance on entering and accessing work orders within the Maximo system.

Responsible Official: BIE Branch of Facilities Management

Target Date: January 31, 2025

Recommendation 12. Assist Havasupai Elementary School with developing and implementing a staffing plan that considers alternative options to fill vacancies (e.g., interfacing with nongovernmental organizations to broaden the pool of available applicants).

Response and Actions Planned: The BIE concurs with the recommendation. The BIE recognizes the challenges in filling vacancies at Havasupai Elementary School and has taken several measures to ensure a broader applicant pool and to retain staff. By resolution of the Havasupai Tribe, the BIE has waived the Indian Preference policy otherwise in place for BIE vacancies to ensure consideration for both Indian and non-Indian applicants. Additionally, BIE has conducted outreach to nongovernmental organizations Teach for America (TFA) and AmeriCorps to explore avenues to work collaboratively to recruit, orient, and retain staff. BIE will continue to coordinate with HES to develop and implement staffing plans to fill vacancies at HES.

Responsible Official: BIE Division of Human Resources and Bureau Operated Schools

Target Date: January 31, 2025

BIE will ensure Havasupai Elementary School receives the support and technical assistance needed to improve the management of deficiencies and emergency preparedness and security. Thank you for the opportunity to review and provide a response on behalf of the Bureau of Indian Education to the U.S. Department of the Interior Office of Inspector General (OIG) Draft Inspection Report – (No. 2023-ISP-040) *The Bureau of Indian Education Must Correct Safety and Health Deficiencies and Improve Emergency Preparedness and Security at Havasupai Elementary School*.

If you have any questions, or need additional information, please contact Ventura Lovato at ventura.lovato@bie.edu.

Sincerely,

A handwritten signature in black ink that reads "Tony L. Dearman". The signature is written in a cursive, flowing style.

Tony L. Dearman
Director

Appendix 5: Status of Recommendations

Recommendation	Status	Action Required
2023-ISP-040-01 We recommend that the Bureau of Indian Education (BIE) require Havasupai Elementary School to develop and implement a plan to monitor the resolution and correction of identified deficiencies in accordance with abatement plan timelines.	Resolved	We will track implementation.
2023-ISP-040-02 We recommend BIE require Havasupai Elementary School to, until a dedicated maintenance worker is hired, ensure a staff member is designated and trained to address minor deficiencies.		
2023-ISP-040-03 We recommend that BIE require Havasupai Elementary School to train the school's collateral duty safety officer on the position's roles and responsibilities in advising management on issues related to the development and implementation of a safety and health program in accordance with Indian Affairs policy.	Implemented	No action is required.
2023-ISP-040-04 We recommend BIE require Havasupai Elementary School to develop and implement a plan to repair the other safety and health concerns identified in this report related to the heating, ventilation, and air conditioning and roof conditions, as well as institute an injury reporting system.		
2023-ISP-040-05 We recommend that BIE require Havasupai Elementary School to implement staff training on the emergency management program as required by Indian Affairs policy.		
2023-ISP-040-06 We recommend that BIE require Havasupai Elementary School to complete a memorandum of understanding with local emergency organizations as required by Indian Affairs policy.	Resolved	We will track implementation.
2023-ISP-040-07 We recommend that BIE require Havasupai Elementary School to implement fire safety procedures, track all required fire equipment maintenance, and train all staff on the use of fire extinguishers and other related fire safety equipment as required by the National Fire Protection Association and Federal regulations.		

Recommendation	Status	Action Required
<p>2023-ISP-040-08 We recommend that BIE require Havasupai Elementary School to develop and implement a security plan as required by DOI policy.</p>		
<p>2023-ISP-040-09 We recommend that BIE expand its annual safety and health inspection guidance to include security requirements and measures.</p>		
<p>2023-ISP-040-10 We recommend BIE assist Havasupai Elementary School with reviewing and analyzing all work orders in the facility management system related to the school and update work order status as needed to ensure an accurate facility management database.</p>	Resolved	We will track implementation.
<p>2023-ISP-040-11 We recommend that BIE require Havasupai Elementary School to, until a dedicated maintenance worker is hired, ensure designated staff are trained to update the work orders.</p>		
<p>2023-ISP-040-12 We recommend BIE assist Havasupai Elementary School with developing and implementing a staffing plan that considers alternative options to fill vacancies (e.g., interfacing with nongovernmental organizations to broaden the pool of available applicants).</p>		



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U.S. DEPARTMENT OF THE INTERIOR

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