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Inspection



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Memorandum

To: Scott J. Davis
Senior Advisor to the Secretary of the Interior
Exercising the Delegated Authority of the Assistant Secretary - Indian Affairs

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Director, Bureau of Indian Education

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Subject: Final Inspection Report – *The Bureau of Indian Education Must Correct Safety and Health Deficiencies and Improve Emergency Preparedness, Security, and Facility Management System Accuracy at Riverside Indian School*
Report No. 2024-ISP-040

This memorandum transmits our inspection report on safety and health at Riverside Indian 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. 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, we developed an initiative to conduct a series of reviews to determine if deficiencies identified during safety and health inspections at Indian schools were adequately resolved. We selected BIE's Riverside Indian School because its fiscal year (FY) 2024 safety and health inspection included a catastrophic deficiency, and the school had a high increase in the number of reported deficiencies from a total of 89 in FY 2022 to 208 in FY 2024. Moreover, it is a residential boarding school, which poses additional and unique risks associated with students living in dorms on campus.

Our objectives were to determine whether (1) BIE addressed deficiencies found during required annual safety and health inspections, (2) Riverside Indian School developed a security plan and emergency management program, and (3) BIE completed and documented background checks for school staff in accordance with regulations, policies, and guidelines.

Findings

We found that BIE did not always ensure safety and health deficiencies were addressed or resolved timely. Specifically, a catastrophic deficiency identified in January 2024 related to an inoperative fire detection alarm system had not been corrected as of February 2025, and no mitigating measure had been put into place. We also found that critical and significant deficiencies at the school—including repeat deficiencies—remained unaddressed. We found that 57 percent (25 of 44) of the FY 2024 deficiencies we reviewed remained unresolved and in need of correction, even though the BIE-established abatement timelines in the facility management system had passed. For those deficiencies that had been corrected, none were completed within the established abatement periods. We also identified data reliability issues in BIE's facility management system. We sampled 56 from a total of 417 critical and significant deficiencies BIE reported as corrected and closed. We found that 27 of 56, or 48 percent, had not been corrected, and the associated work orders were incorrectly closed—meaning that the associated deficiencies still exist. Many of these closed work order errors were related to safety and fire maintenance issues. In addition, although the school did have the basic components of the emergency management program, it only partially met and, in some instances, failed to meet, all the specified requirements of the program and did not have a security plan.

In addition, we did not identify concerns related to BIE's suitability for employment determinations. We confirmed that BIE completed required suitability for employment determinations to ensure school employees met the minimum standards of character based on background checks.

Impact

Failure to correct deficiencies found during the annual safety and health inspections exposes students and staff to a potentially unsafe and unhealthy school and work environment. By addressing the deficiencies, the school may be better positioned to ensure a quality educational environment for the children. Without a comprehensive emergency management program, staff and students may 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. As we have discussed in other recent reports,¹ inaccurate reporting of work orders may create inefficiencies in funding, result in inadequate monitoring, and create an inaccurate perception of a safe environment when risks persist.

Recommendations

We make 10 recommendations that, if implemented, will improve the school's overall facility condition by reducing the number of safety and health deficiencies, increasing staff's ability to respond to maintenance requirements, and improving the school's security and emergency preparedness.

¹ See, e.g., *Indian Affairs Is Unable To Effectively Manage Deferred Maintenance of School Facilities* (Report No. 2022-CR-036), issued March 2024, https://www.doiioig.gov/sites/default/files/2021-migration/FinalEvaluationReport_BIEDeferredMaintenance_Public.pdf; *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), issued October 2024, https://www.doiioig.gov/sites/default/files/2021-migration/Final%20Inspection%20Report_%20Havasupai%20School%20Inspection.pdf; *The Bureau of Indian Education Must Correct Safety and Health Deficiencies and Improve Facility Management System Accuracy at Tate Topa Tribal School* (Report No. 2024-ISP-014), issued December 2024, https://www.doiioig.gov/sites/default/files/2021-migration/FinalInspectionReport_TateTopaTribalSchoolInspection_0.pdf.

Introduction

Objectives

Our objectives were to determine whether:

- The Bureau of Indian Education (BIE) addressed deficiencies found during required annual safety and health inspections.
- Riverside Indian School developed a security plan and emergency management program.
- BIE completed and documented background checks for school staff in accordance with regulations, policies, and guidelines.

See Appendix 1 for our audit 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.² The Bureau of Indian Affairs (BIA) and BIE report directly to the Assistant Secretary for Indian Affairs (AS-IA), who assists and supports the Secretary of the Interior in fulfilling DOI's mission.

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 vast diversity of Indian tribes and Alaska Native villages as distinct cultural and governmental entities.”³ 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 FY 2025 was \$1.5 billion, of which \$162.6 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 completed in 2023.

Responsibility for oversight of BIE schools is distributed among 15 education resource centers (ERCs),⁴ which are each led by an education program administrator. The Albuquerque ERC is responsible for the oversight of Riverside Indian School. Within each ERC, 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.

² *Inspector General's Statement Summarizing the Major Management and Performance Challenges Facing the U.S. Department of the Interior, Fiscal Year 2024* (Report No. 2024-ER-013), issued October 2024, https://www.doiig.gov/sites/default/files/2021-migration/Inspector%20General%27s%20Statement_Major%20Management%20Challenges_FY%202024.pdf.

³ BIE, *Mission*, <https://www.bie.edu/topic-page/bureau-indian-education>.

⁴ BIE's ERCs are responsible for providing both direct oversight of Indian schools and technical assistance for school improvement, needs assessments, and schoolwide budgets.

Riverside Indian School

Riverside Indian School is a BIE-operated residential school located north of Anadarko, Oklahoma (see Figure 1). This 4th through 12th grade school has approximately 423 students representing more than 75 Tribes and 144 staff, which includes the school's onsite superintendent, assistant principals, teachers, and counselors, as well as dormitory, kitchen, facility, security, and administrative staff. The school operates nine months out of the year and is one of four BIE off-reservation residential schools. The majority of students reside in the onsite dorms; the remaining students are local day students.

We selected Riverside Indian School because its FY 2024 safety and health inspection included one catastrophic deficiency and a high number of critical and significant deficiencies.⁵

Figure 1: Riverside Indian School Campus and Entrance to Main School Building



Sources: Satellite imagery: ArcGIS. Riverside Indian School entrance inset image: BIE.

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 Management.⁶

⁵ We based our risk assessment on BIE's 2024 inspection results (discussed in more detail below).

⁶ Formerly the 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 plans, and facilities that meet IA policy, adopted safety and health codes, and mandated standards for IA controlled facilities.”⁷ 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 Program⁸ 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 follow this requirement and identify a CDSO at each location.⁹

BIE Branch of Facility Management

Under BIE, the Branch of Facility Management provides technical services for all BIE locations, including BIE-operated and tribally controlled 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; one specialist is generally assigned to multiple schools and works collaboratively with Branch of Safety Management inspectors.

BIE Branch of Safety Management

Under BIE, the Branch of Safety Management 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 Management; once an inspection is completed, the inspector collaborates with the Branch of Facility Management as needed to address deficiencies.

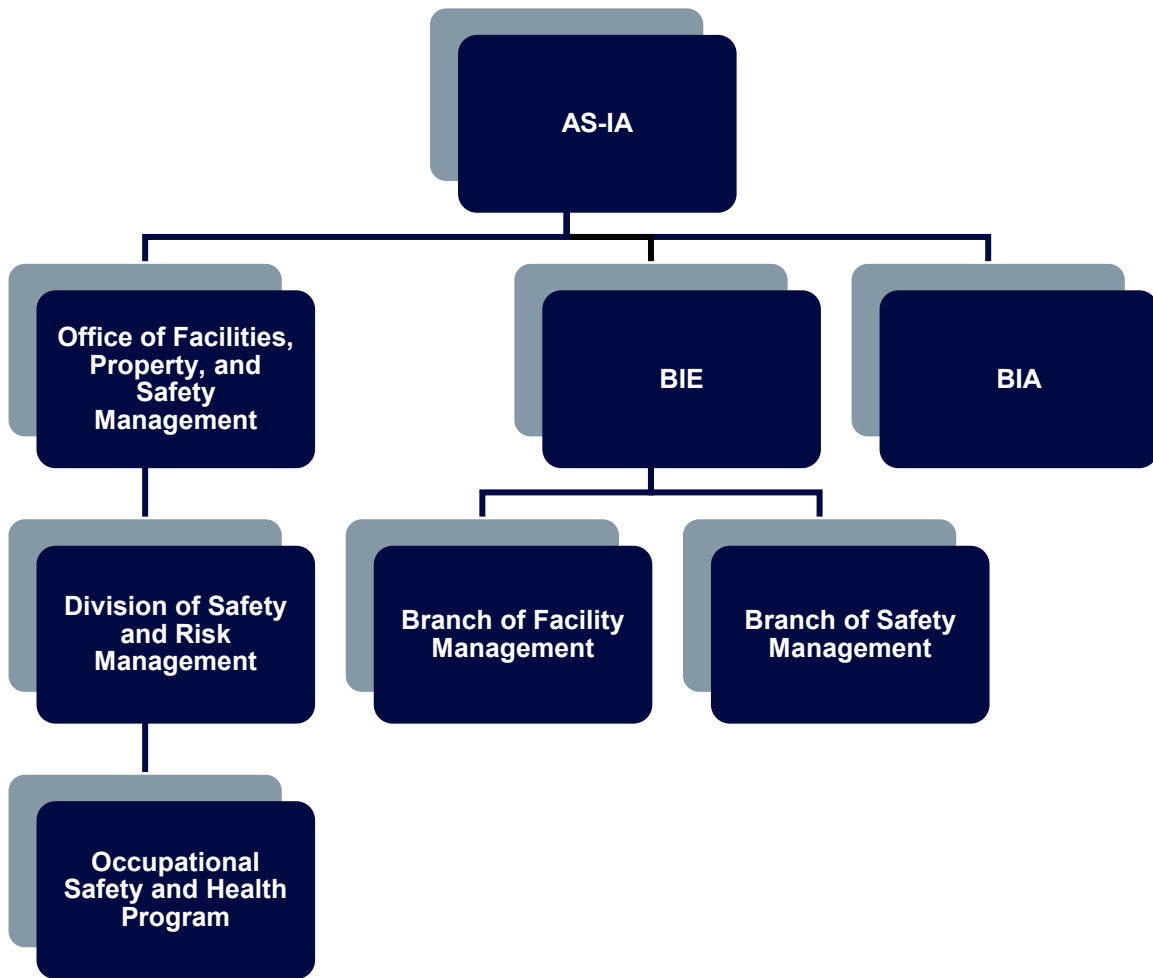
See Figure 2 for an AS-IA facilities management organizational chart.

⁷ Indian Affairs, *Division of Safety and Risk Management (DSRM)*, <https://www.bia.gov/as-ia/ofpsm/dsrn>.

⁸ 25 IAM 3, “Occupational Safety and Health Program,” issued August 21, 2023. The *IAM* contains policies, procedures, and general guidance for IA employees who govern internal IA operations.

⁹ 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

Federal regulations¹⁰ require annual inspections for safety and health compliance at all facilities and other areas under BIE's control. In August 2022, the Division of Safety and Risk Management established IA internal operating procedures for meeting safety, health, and accessibility inspection and evaluation requirements outlined in Federal regulations and DOI policy. BIE's Branch of Safety Management 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 accident and incident prevention) for all tribally controlled and BIE-operated schools. This responsibility was transferred from BIA to BIE in 2023.¹¹

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

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

¹¹ 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. Available at https://www.doioig.gov/sites/default/files/2021-migration/FinalEvaluationReport_BIEDeferredMaintenance_Public.pdf.

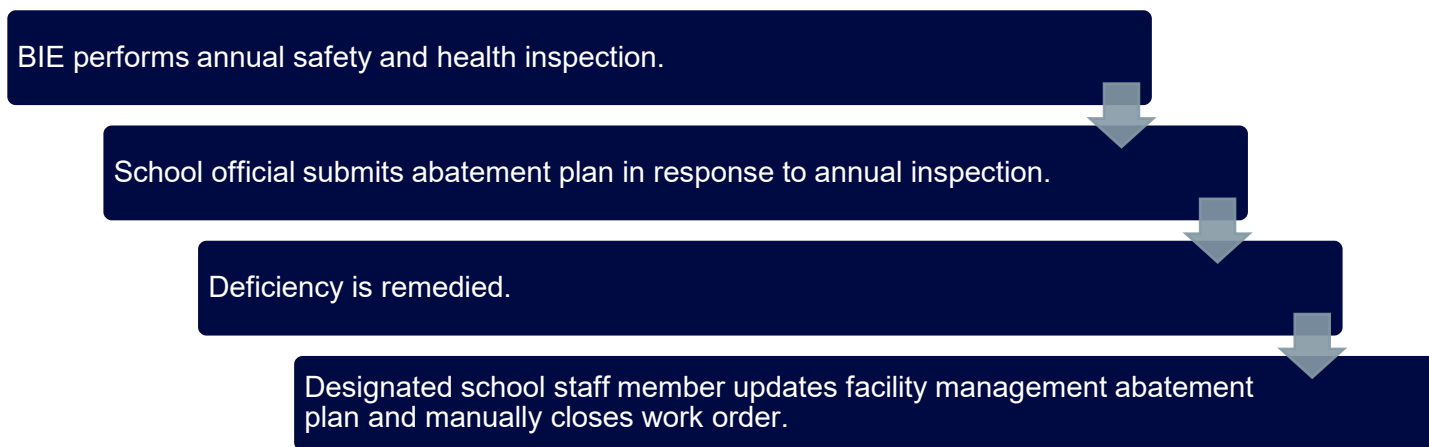
electrical and standby power systems. For each deficiency identified, the specialist selects the appropriate severity category¹² based on the worst credible consequence that can occur as the result of the hazard:

- 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 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.

The catastrophic deficiency for Riverside Indian School's fire detection alarm system (discussed later in our report) was required to be abated within one day. We discuss a number of deficiencies of particular concern in more detail in our findings below but note that abatement requirements for critical, significant, and minor deficiencies are specific to the identified type of deficiency. For example, Riverside Indian School's critical deficiency on inoperable emergency lighting has an abatement period of 45 days; the significant deficiency identifying an incorrectly used power strip has an abatement period of 90 days; and the minor deficiency noting a need for an electrical junction box cover has an abatement period of 120 days. Once the 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 operations plan, (3) training, (4) drills and exercises, (5) a memorandum of understanding (MOU) with local

¹² We focused on these severity categories because they reflect the potential consequence of an identified deficiency. As discussed in the "Conclusions and Recommendations" section and in BIE's response to our draft report, BIE identifies deficiencies using Risk Assessment Codes that account for these severity categories as well as the probability of the harm occurring. We do not discount the importance of assessing probability, but our inspection focuses on the severity of the deficiencies because of the significance of the risk that they present to students and staff.

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

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 facilities management staff. Additionally, the bureau security manager reviews and revises security plans as necessary to ensure they accurately reflect current conditions.

BIE Background Checks and Standards of Character

BIE's Human Resources Personnel Security (PERSEC) section verifies that all employees, volunteers, and contractors meet the minimum standards of character to ensure the safety of Indian children and employees at BIE-operated schools; PERSEC also provides oversight for suitability programs at tribally controlled schools. Federal regulations establish minimum standards for employment to prevent individuals who have been found guilty of crimes of violence, offenses against children, or sexual crimes from having regular contact with or control over Indian children.¹⁸ To do so, PERSEC facilitates an OPM background investigation and reviews the results to make a suitability for employment determination—that is, to assess the likely effect of the subject's character or conduct on their Government service. PERSEC uses these Federal regulation standards¹⁹ to evaluate whether employees will fulfill their position duties and responsibilities effectively, and, in doing so, ensure that an individual's past conduct will not interfere with their performance of duties or create an immediate or long-term risk to children.

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).

¹⁸ 25 C.F.R. Part 63, Subpart B—Minimum Standards of Character and Suitability for Employment.

¹⁹ *Id.* at § 63.12.

Results of Inspection

We found that BIE needs to take several actions to improve safety and health at Riverside Indian School for its students and staff. Specifically, we found the following:

- BIE did not always ensure safety and health deficiencies were addressed or resolved timely:
 - BIE did not ensure that a catastrophic deficiency related to an inoperable fire alarm system was immediately corrected. The catastrophic deficiency reported in January 2024 had not been corrected as of February 2025. In addition, BIE did not require the school to establish measures to mitigate the deficiency. Specifically, the school was not put on a required fire watch as a mitigating measure until November 2024, which was after our site visit.
 - BIE did not ensure the critical and significant deficiencies identified during safety and health inspections were resolved timely. We identified numerous critical and significant deficiencies that remain uncorrected well beyond the original abatement period—including some that were initially identified more than six years ago. In addition, for those deficiencies that had been corrected, some took as long as six years to correct, and none were completed within the established abatement period.
- BIE did not have reliable data in its facility management system, which is the system all schools use to monitor operations and maintenance. We identified a significant number of inaccurate and incomplete work orders.
- Riverside Indian School did not implement a comprehensive emergency management program. In particular, the school did not fully meet all the specified requirements of the program and did not have a security plan.

We did, however, confirm that BIE completed required suitability for employment determinations to ensure school employees met the minimum standards of character based on background checks.

BIE Did Not Always Ensure Deficiencies at Riverside Indian School Were Addressed or Resolved Timely

As discussed above, Federal regulations²⁰ and DOI policy²¹ 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. Generally, the facility management system automatically generates abatement periods, which define the number of days for the school to remedy the deficiency. At the time of our review, the employees at Riverside Indian School did not have access to or training on the facility management system; they instead relied on support from BIE employees external to the school for data entry and adjustments.

We reviewed the FY 2022, 2023, and 2024 annual safety and health inspection reports and found that the FY 2024 inspections identified more than 200 deficiencies at Riverside Indian School—70 of which were repeat deficiencies.²² Figure 4 shows the total number of deficiencies and repeat deficiencies identified on the safety and health inspection reports by severity for FYs 2022 through 2024.

²⁰ 29 C.F.R. Part 1960, Subpart D.

²¹ 485 DM 6.

²² A deficiency is categorized as a "repeat" deficiency if that issue had been identified as a deficiency in any prior inspection. In some cases, a deficiency that had been previously identified and corrected may appear as a repeat if the same issue is identified again in a later inspection report.

Figure 4: FY 2022-2024 Total and Repeat Deficiencies by Severity²³

Severity	FY 2022		FY 2023		FY 2024	
	Total	Repeat	Total	Repeat	Total	Repeat
I-Catastrophic	0	0	0	0	1	0
II-Critical	5	3	10	5	24	7
III-Significant	81	72	49	0	143	48
IV-Minor	3	2	33	1	40	15
Totals	89	77	92	6	208	70

BIE Did Not Correct Riverside Indian School's Catastrophic Deficiency

The FY 2024 annual safety and health inspection, completed in January 2024, identified an inoperative fire detection alarm system as a category I catastrophic deficiency, which poses an imminent and immediate danger of death or permanent disability. Despite this risk, BIE did not correct the deficiency within its one-day abatement period. As of February 2025, the fire detection alarm system was still inoperable—over a year after BIE originally identified it.

In addition, BIE did not establish a strategy to mitigate the risk of the inoperable fire detection alarm system. During our discussions with the school's newly assigned safety and health inspector, we learned that the required mitigation for this catastrophic deficiency would be to put the school on fire watch.²⁴ After our visit, we confirmed the accuracy of this information with the acting Branch of Safety Management manager. The manager stated that "the school should be on a Fire Watch Plan for either a fire alarm or fire sprinkler system impairment" and was required to immediately develop a plan and submit it to the Branch of Safety Management to be forwarded to the IA Division of Safety and Risk Management.

When we interviewed the original BIE safety inspector responsible for the 2024 report, he stated that the school was not initially placed on fire watch because he understood that the alarm system was functioning even though the system showed multiple error codes, which could lead to the system malfunctioning and not properly alerting students and staff. We observed similar error code issues during our visit. After our visit, the school implemented the fire watch for buildings affected by the inoperable fire detection alarm system in November 2024. In February 2025, BIE told us it created a new work order to replace and repair multiple fire-related deficiencies, including the catastrophic fire alarm detection system deficiency. As of February 2025, the new work order is waiting on BIA's Division of Facilities Management and Construction approval to fund and move forward with the project.

We found that communication weaknesses between the school and BIE's Branch of Facility Management in Albuquerque, New Mexico, contributed to lack of timely correction for the deficiency. The BIE Facilities Operations Specialist incorrectly believed that BIE had fixed the alarm system after initially confusing Riverside

²³ The FY 2024 deficiencies reported were the combined results of two inspections conducted in January and March 2024. BIE conducted its annual safety and health inspection in January 2024 and reported 163 total deficiencies. The March 2024 report was associated with an "alternate" BIA safety and health inspection, which found 45 deficiencies (including 4 previously reported in January 2024—2 significant and 2 minor). A BIA safety and health manager requested that BIA staff complete the March inspection for BIA-occupied buildings at Riverside Indian School. Although the buildings remain school property, the BIA inspector conducted the review without the school's knowledge or involvement because the health and safety manager believed it was important to inspect space occupied by BIA staff members. According to BIA, the resulting deficiencies from that inspection are either BIE or BIA's responsibility depending on if they were occupant-related (BIA) or building-related (BIE). The manager told us that he thought there was an agreement in place between the principal and BIA, but he could not confirm it. He informed us that BIA occupation of school buildings was a unique situation.

²⁴ "Fire watch" is the assignment of a person or persons to an area for the express purpose of notifying the fire department and the building occupants of an emergency, preventing a fire from occurring, extinguishing small fires, or protecting the public from fire or life safety dangers. The DOI IA *Fire Watch Guidelines*, dated October 2014, state, "Where a required fire alarm system is out of service for more than 4 hours in a 24-hour period, the authority having jurisdiction shall be notified, and the building shall be evacuated or an approved fire watch shall be provided for all parties left unprotected by the shutdown until the fire alarm system has been returned to service."

Indian School with another school. In November 2024, the Facilities Operations Specialist told us he had an increased workload due to staff departures that may have contributed to the confusion.²⁵ In addition, the school did not take immediate action to correct this specific deficiency while it determined if the system should be replaced at an estimated cost of \$100,000, which would require additional BIE funding and approval.

A fully functioning fire alarm system ensures that students and staff are quickly alerted to any potential fire and that emergency responders can be notified immediately. Otherwise, a fire could go undiscovered, resulting in a delayed response to minimize property damage and preventing timely evacuation to avoid harm to students and staff.

Recommendations
<p>We recommend that BIE:</p> <ol style="list-style-type: none">1. Ensure that Riverside Indian School has a fully functioning fire detection alarm system.2. Develop a strategy to monitor future catastrophic deficiencies until corrected, and, if a deficiency cannot be fixed within the abatement period, identify and implement mitigating measures.

BIE Did Not Always Ensure Critical and Significant Deficiencies Were Addressed or Resolved Timely

In addition to the catastrophic deficiency identified above, we found that BIE did not ensure critical and significant deficiencies were resolved timely. We also identified numerous critical and significant deficiencies that remained uncorrected well beyond the original abatement periods, some of which were initially identified more than six years ago.

Critical Deficiencies (Category II)

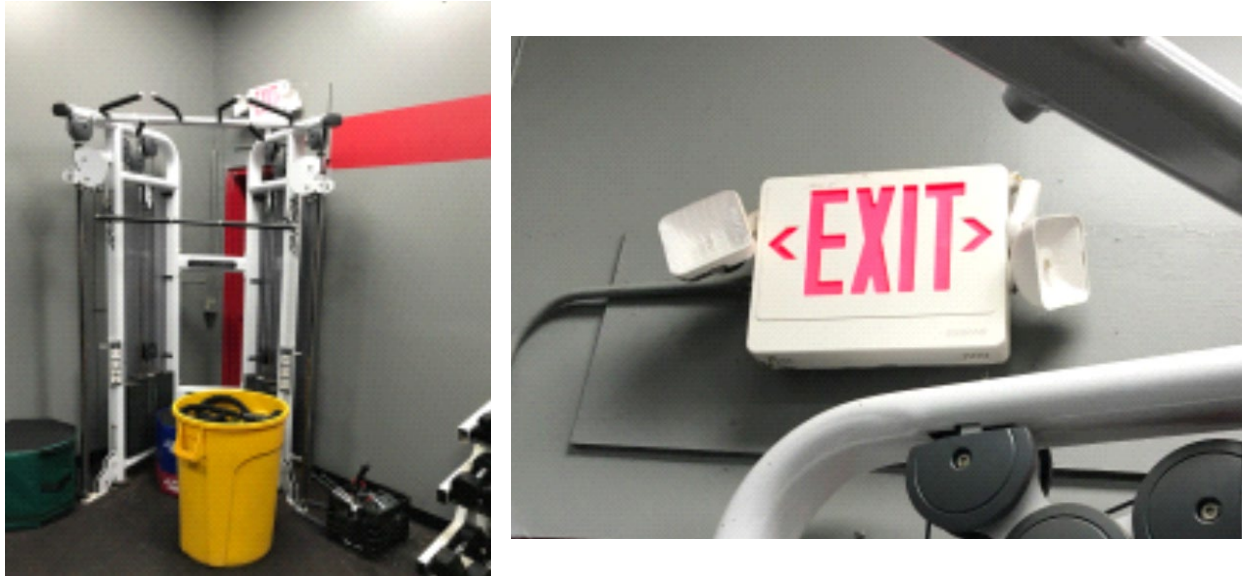
The FY 2024 safety and health inspections of Riverside Indian School, conducted in January and March 2024, identified 24 critical deficiencies—the worst credible consequence of which could result in permanent partial disability or temporary total disability. We reviewed all 24 critical deficiencies²⁶ (7 of which were repeat deficiencies) to verify if they were resolved (see Appendix 2 for the complete testing results summary). During our October 2024 site visit, we observed that 10 remained uncorrected and had surpassed their original abatement period:

- Seven deficiencies for inoperable or broken emergency lighting were listed as closed but were still unresolved (see Figure 5). All exceeded the 45-day abatement period, and two were repeat findings that were originally reported in May 2023. Emergency lighting assists in illuminating escape routes and exits when an emergency requires students and staff to quickly leave a building. Without adequate lighting, students and staff would not be able to clearly find the closest exits.
- BIE failed to clear an exit door blocked by heavy training equipment (see Figure 5) despite it being reported more than a year earlier (in May 2023). This deficiency also had a 45-day abatement period. In case of a fire or other emergency, students and staff would not be able to immediately exit the building, resulting in additional time spent finding another exit—this time could be crucial for a safe escape.

²⁵ The Branch of Facility Management was not in the scope of our inspection; therefore, we did not conduct an analysis of its workforce or workload.

²⁶ We could not verify one critical deficiency because the building was considered condemned, and we could not enter it due to padlocks securing the structure. In addition, although 5 of the 24 critical deficiencies remained open and uncorrected, these deficiencies had not yet exceeded their 365-day abatement period; therefore, we did not report on these open deficiencies.

Figure 5: Blocked Exit and Broken Emergency Lighting



- The other two unaddressed critical deficiencies were for failure to have a required emergency plan with exit routes for two separate buildings. Both of these deficiencies were open beyond the 30-day abatement period. Emergency plans with exit routes provide procedures for safe emergency evacuations.

For the eight corrected critical deficiencies in this sample, five related to emergency lighting (three were repeat findings originally reported May 2023) and all exceeded the 45-day abatement period. The other three corrected deficiencies were related to obstructed egress routes and defective entry ramp grates—all exceeded the abatement periods of 45, 90, and 180 days.

Significant Deficiencies (Category III)

We found that 34 percent (48 of 143) of the significant deficiencies—the worst credible consequence of which could result in hospitalized minor injury or reversible illness—documented in the FY 2024 safety and health inspections were repeat deficiencies. We judgmentally sampled 20 of the 48 significant repeat deficiencies to verify their status (see Appendix 3 for testing results summary). During our October 2024 site visit, we observed that 9 of these 20 deficiencies, or 45 percent, remained uncorrected and had surpassed their original abatement period. For example:

- The school was not fully compliant with national accessibility guidelines.²⁷ There were two deficiencies related to bathroom accessibility. For example, the school's health clinic, which is located in a separate building, did not have an accessible bathroom—making it difficult for students with mobility issues to use the bathroom at the clinic. As a mitigating measure, school staff told us that health officials would go to another location that met accessibility standards if a student with accessibility issues required treatment. This deficiency was originally identified in July 2019 with a 45-day abatement period and had not been corrected as of our site visit.
- The school had not conducted annual fire door inspections or testing as required under national standards.²⁸ This deficiency was originally reported in May 2023 with a 30-day abatement period. Annual fire door inspections ensure that fire doors are properly operating to allow students and staff to

²⁷ *Americans with Disabilities Act and Architectural Barriers Act Accessibility Guidelines* provide guidance for turning spaces, door swing, and other accessibility requirements in rooms such as bathrooms and classrooms.

²⁸ National Fire Protection Association Standard 80, *Standard for Fire Doors and Other Opening Protectives* (2022), 5.2.4.1, "Closing Devices."

leave and to help prevent the spread of a fire. After our visit, the school later provided documentation that fire doors were inspected in November 2024.

For the 11 corrected significant deficiencies in this sample, all exceeded the abatement period by at least a year. One deficiency to correct fire door labels that had been painted over took more than five years to address despite a 30-day abatement period.²⁹

Other Critical and Significant Deficiencies Inaccurately Reported as Corrected and Closed

In addition to our review of the above deficiencies, we statistically sampled 56 of 417 critical and significant deficiencies reported as corrected and closed at Riverside Indian School. We found that the work orders associated with 27 of the sampled deficiencies (9 critical and 18 significant), or 48 percent, had not been corrected and were incorrectly closed. This would project to 202 deficiencies across the population. Many of these closed work order errors were related to safety and fire maintenance issues, such as:

- **Inoperable emergency lighting:** In May 2023 and January 2024, the school's safety and health inspectors reported two critical deficiencies related to nonfunctional emergency lighting. The work orders for these deficiencies were closed in September 2024, indicating the deficiencies had been corrected. As of October 2024, the two deficiencies had not been fixed, presenting a potential hazard if needed during an emergency.³⁰
- **Lack of written fire prevention plans:** Although these seven critical deficiency work orders were first reported in July 2019 and closed in February 2020, the school did not have any written fire prevention plan. The school stated it was working on a written fire prevention plan to identify all fire hazards on campus.³¹ A fire prevention plan helps to prevent fires by describing fuel sources, fire alarms, and extinguishing systems to control the start or spread of a fire.
- **Fire extinguishers not charged or properly mounted:** These two significant deficiencies were first reported in January 2024 with a 30-day abatement period. Although both were closed in September 2024, one fire extinguisher still needed to be charged and the other needed to be properly mounted and marked during our visit in October 2024. Without properly charged, marked, and mounted fire extinguishers, the risk of potential fire spread due to difficulty locating extinguishers increases. Figure 6 shows a discharged (left, circled in yellow) and an unmounted and unmarked fire extinguisher (right).

²⁹ National Fire Protection Association Standard 80, *Standard for Fire Doors and Other Opening Protectives* (2022), 4.2.1, "Listed and Labeled Products."

³⁰ The acting Facility Manager told us that the exit lights and emergency lighting we observed were new and had been installed in 2024. The manager expressed frustration that some of these lights were not working during our visit. This may have been due to improper installation, but we did not confirm whether that was the case.

³¹ The seven written fire prevention plan deficiencies were for seven separate buildings all identified in the same July 2019 inspection.

Figure 6: Discharged and Unmounted Fire Extinguishers



- Fire doors did not latch and secure properly: We found two significant deficiencies where the latching mechanisms on fire doors were not working properly, and the doors did not completely close. National standards state, “Latching hardware operates and secures the door(s) in the closed position.”³² One deficiency was first reported in September 2018 (closed in October 2022) and the other was reported in July 2019 (closed in September 2024)—neither of these latches were working properly in October 2024.

Factors Contributing to Deficiencies Not Corrected Timely

Riverside Indian School’s facilities and maintenance staff did not have facility management system access or training to monitor and manage deficiencies. In addition, the school’s acting Facility Manager was not in a permanent position and had been detailed as the acting Facility Manager since May 2023. We confirmed that the school requested this training from the Branch of Facility Management in February 2024 and again in June 2024; however, training had not been provided as of November 2024. When we requested a status update in February 2025, BIE staff told us that the acting Facility Manager received access to the facility management system in January 2025, BIE scheduled a training session on the facility management system for February 2025, and “all school personnel are invited and encouraged to attend” the training, but Riverside Indian School’s acting Facility Manager was unable to attend that session.

Because the school did not have access or training on the facility management system, the school had to rely on BIE’s regional Branch of Facility Management in Albuquerque, New Mexico, to update the system; however, the infrequency of BIE visits and high workload resulted in data errors. In addition, we found that, in September 2024, BIE attempted to update deficiency statuses in the facility management system. The Branch of Facility Management gave the school’s acting Facility Manager a spreadsheet to identify which deficiencies were corrected and sent the information back to the Facilities Operations Specialist to have the deficiencies updated as closed. The majority of the deficiencies from this walkthrough were listed as corrected and identified for closure; however, as part of our review, we found that some of the identified deficiencies were inaccurately reported as corrected. Riverside Indian School and BIE did not have documents or comments explaining why these deficiencies were considered corrected. In addition, although safety and health inspectors can have facility staff accompany them during inspections—which was the case for the inspections at Riverside Indian School—over time, staff forgot some of the specific deficiency locations, especially in cases with multiple or similar deficiencies such as fire extinguishers and emergency lighting. Without written information, BIE is relying on the inspectors and school staff to remember specific deficiency locations, which may be difficult over time or even impossible if staff present during the inspection are no longer in those roles.

³² National Fire Protection Association Standard 80, *Standard for Fire Doors and Other Opening Protectives* (2022), 5.2.3.6.2(16), “Swinging Doors with Fire Door Hardware.”

Recommendations

We recommend that BIE:

3. Develop and implement a plan to resolve deficiencies identified in annual safety and health inspections within prescribed abatement timelines.
4. Provide Riverside Indian School's facilities and maintenance staff with access and training on BIE's facility management system, with emphasis on the importance of accurate and complete recordkeeping.

BIE Did Not Have Reliable Information in Its Facility Management System for Riverside Indian School

The U.S. Government Accountability Office's *Standards for Internal Controls 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 assessing risks.³³ As noted in a previous OIG report, 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 operations processes, including safety and health abatement plans and corresponding work orders.³⁴ Work orders are entered into the facility management system in response to inspections, facility condition assessments, and onsite detection from school staff when deficiencies are identified. BIE uses these work orders to track each deficiency's status and completion. Like other Indian schools, Riverside Indian School is responsible for updating the facility management system with new work orders, monitoring open work orders, updating the status of the work orders, and closing work orders when complete.

We found that the data in BIE's facility management system was not reliable, as we identified multiple instances where the data was inaccurate and incomplete. Specifically, in addition to the 48 percent of work orders closed in error, as noted in the "Other Critical and Significant Deficiencies Inaccurately Reported as Corrected and Closed" section above, we found open work orders that should have been closed. We judgmentally sampled and tested 15 of 44 open work orders and found that 7 of the 15 had been resolved and should have been closed in the facility management system. For example, the March 2024 report identified that sinks were incorrectly installed or not maintained properly. At the time of our site visit, the sinks had been replaced; however, the work order remained open.

In addition, we found that information related to the safety and health deficiency work orders in the facility management system was incomplete. Specifically, out of the 116 work orders we reviewed, 84 (72 percent) did not have room numbers or other location descriptions. Riverside Indian School is a large campus with more than 30 buildings, including a 64,000-square-foot main school building, which makes documenting accurate location information essential to effectively locate and correct each deficiency. During our site visit, even though we were accompanied by facility staff and the BIE inspector, we could not easily locate several deficiencies due to vague information entered into the facility management system. For example, we could not easily locate specific deficiencies, such as fire extinguishers, fire doors, and emergency lighting, which we found in multiple locations throughout a building. We also reviewed a closed work order that required an annual inspection of a carbon monoxide detector; however, neither BIE staff nor our own staff could find the detector during our review. Lack of deficiency location was also an issue found during our inspection of Tate

³³ Green Book, Principle 13.05, "Data Processed into Quality Information."

³⁴ Report No. 2022-CR-036 included recommendations related to the facility management system.

Topa Tribal School.³⁵ Inaccurate or incomplete data create an additional burden for staff assigned to resolve identified deficiencies.

As detailed in the “Factors Contributing to Deficiencies Not Corrected Timely” section above, the inaccuracies in the facility management system data occurred, in part, because none of the current staff at Riverside Indian School have access to or training on the facility management system and relied on BIE external support to access and update data.

Failure to accurately report the status of work orders may create inefficiencies in funding, result in inadequate monitoring, create a perception of a safe environment when risks persist, and potentially expose students and staff to problematic conditions. Using vague language to describe the location of deficiencies within the system can also create inefficiencies and frustration for those attempting to correct the problems. Furthermore, erroneously closed deficiencies and work orders can skew a school’s facility condition index³⁶ rating. In this case, Riverside Indian School’s June 2023 Facility Condition Assessment stated the school’s overall facility condition index rating was “fair,” and according to BIE, the rating had improved to “good” as of September 2024.³⁷ This change can affect the school’s budget because additional funds can be diverted to schools with a lower rating of fair or poor.

Recommendations

We recommend that BIE:

5. Develop guidance to ensure that safety and health reports and associated work orders include detailed location information so BIE staff can easily find the deficiencies.
6. Ensure that all safety and health deficiency work orders have the correct status either in an open status awaiting correction or as closed confirming that BIE has corrected the deficiency.

Riverside Indian School Did Not Have a Comprehensive Emergency Management Program and Did Not Have a Security Plan

The *IAM* requires every BIE-operated school to create and implement an emergency management program. This program shall 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, (6) emergency supplies and equipment, and (7) other safe school measures (as resources permit).³⁸ The purpose of BIE’s emergency management program is to “ensure a safe and secure learning and work environment for all students, personnel, and visitors of BIE-operated schools and dormitories.” This is especially important for Riverside Indian School, where the majority of students reside onsite during the school year and therefore are more susceptible to emergencies on campus.

We found that Riverside Indian School did not implement a comprehensive emergency management program. Although the school did have the components of an emergency management program, it did not fully meet all

³⁵ During our inspection of Tate Topa Tribal School, we found that out of 103 work orders reviewed, 86 (83 percent) lacked room numbers or specific location information.

³⁶ The facility condition index is the calculated ratio of a facility’s deficiency cost versus replacement cost and represents a facility’s condition as “good,” “fair,” or “poor.”

³⁷ We did not attempt to calculate Riverside Indian School’s facility condition index but believe that unreliable facility management data could impact the rating. In addition, as noted earlier, the school had one building that was considered condemned and could not be entered.

³⁸ 30 *IAM* 12.

the specified *IAM* requirements. We also found that the school did not have a security plan per DOI policy, and the CDSO had not been trained as required.

Emergency Management Plan

The *IAM* requires each school to have an emergency management plan with a copy of the plan to be submitted to the ERC by July 31 of each year. The plan shall have, at a minimum, eight components: (1) designation of emergency management team members, (2) a communications plan, (3) an evacuation plan, (4) designation of an offsite evacuation location, (5) designation of a reunification site location, (6) lockdown procedures, (7) shelter-in-place procedures, and (8) incident-specific protocols.³⁹ Although Riverside Indian School did have an emergency management plan, “2024-2025 Emergency Operation Plan,” it did not (1) submit the plan to the ERC, (2) provide lockdown and shelter-in-place protocols for students and teachers, (3) identify a designated offsite evacuation location, and (4) identify a reunification site location.

Continuity of Operations Plan

The school had the required continuity of operations plan.⁴⁰ BIE did not, however, update it for the school year and did not submit it to the ERC by August 31 of each year as required.

Training

The *IAM* requires that each school train personnel on the contents of its emergency management plan, continuity of operations plan, and other components of its program, as well as maintain a training log.⁴¹ Although the school did provide emergency trainings, such as fire drills and lockdown drills, it did not provide training on all contents of the emergency management program (e.g., the continuity of operations plan) to all staff and did not have a training log.

Drills and Exercises

The *IAM* requires every school to conduct tabletop exercises of evacuations and lockdown drills with critiques at least once each semester.⁴² In addition, the principal must notify all students, staff, and parents of the emergency management program and the components that apply to each annually. The school did hold required fire evacuation, tornado, and security lockdown drills and exercises but did not critique the results as required. The school did not notify all students, staff, and parents of the emergency management program and communicate the applicable components of its emergency management plan.

Memorandum of Understanding

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.⁴³ The school had an established MOU with BIA for the school resource officer program, but it did not establish the roles and responsibilities for BIA resource officers for before, during, and after each emergency incident as required. The school did not pursue similar agreements with local emergency responders.

³⁹ *Id.* at § 1.3(A), “Policy.”

⁴⁰ *Id.* at § 1.3(B), “Continuity of Operations Plan.”

⁴¹ *Id.* at § 1.3(C), “Training.”

⁴² *Id.* at § 1.3(D), “Drills and Exercises.”

⁴³ *Id.* at § 1.3(E), “Memorandum of Understanding.”

Emergency Supplies and Equipment

The school procured emergency first aid supplies and equipment as required;⁴⁴ however, it did not notify all staff within the school and each dormitory of the location of emergency supplies and equipment. We also found expired first aid supplies in the maintenance and carpenter shop buildings, including expired eye saline wash that would be used to flush eyes in an emergency. We also found expired medicines, including one with a 2014 expiration date.

Lack of Security Plan

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.⁴⁵ In addition, BIE developed a safe schools planning guide to help keep children, employees, visitors, and school property safe and secure from a variety of hazards.⁴⁶

We requested the security plan, and the school informed us that it did not have one. The school told us that staff started the security plan process by requesting and completing the security threat assessment for the school, which is “to identify vulnerabilities, develop countermeasures and evaluate the appropriate security safeguards.”⁴⁷ The school also stated that it began implementing most of the identified protocols from the assessment. However, at the time of our visit, the school did not know it was required to have a security plan, which establishes security requirements for the school to safeguard students and staff as well as school property.

Although the school did not have a security plan, the school did have security measures, including security guards at the school entrance, security cameras, and onsite BIA school resource officers. We learned that some of the security cameras did not function properly; however, contractors were working with the school’s information technology personnel to rectify the issues.

School staff told us that the school did not implement a comprehensive emergency management program because the school was unaware of some of the requirements of a fully comprehensive emergency management program and security plan, and BIE did not contact the school on the required plan submissions to ensure compliance.

Collateral Duty Safety Officer

Although the BIE safety and health inspector informed the acting Facility Manager that he was the school’s CDSO in January 2024, as of our visit in October 2024, the acting Facility Manager had not received and was not informed of any required CDSO training. As discussed previously, the IA Occupational Safety and Health Program requires each Indian school to have a CDSO.⁴⁸ Among other duties, the CDSO is responsible for 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. Although the CDSO is not necessarily responsible for performing maintenance,⁴⁹ without a trained CDSO, the staff and students at the school lack a dedicated individual focused on helping identify occupational safety and health issues and assist staff with correcting deficiencies.

⁴⁴ *Id.* at § 1.3(F), “Emergency Supplies and Equipment.”

⁴⁵ 444 DM 1.4(H), “Physical Security.”

⁴⁶ BIE, *Safe Schools Planning: A Guide for Educators*, dated September 2009, <https://www.bie.edu/sites/default/files/documents/idc010036.pdf>.

⁴⁷ 444 DM 1.6, “Security Assessment.”

⁴⁸ 25 IAM 3.

⁴⁹ 485 DM 28, “Collateral Duty Safety and Occupational Health Officer Program,” issued March 12, 1999.

During our visit in October 2024, the newly assigned safety and health inspector informed the acting Facility Manager of the CDSO requirements and provided him with training information. We followed up with BIE safety staff to obtain a training update; as of February 2025, the acting Facility Manager completed six required CDSO training sessions and is scheduled for another two sessions in May 2025.

Recommendations

We recommend that BIE require Riverside Indian School to:

7. Ensure that all components of the emergency management program are fully implemented and emergency management plans and continuity of operations plans are submitted as required.
8. Develop and implement a security plan as required by DOI policy.
9. 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.

We recommend that BIE:

10. Ensure all schools have submitted the required emergency management plans and continuity of operations plans.

Conclusion and Recommendations

Conclusion

BIE is responsible for performing annual safety and health inspections at all Indian schools to identify deficiencies. BIE is also required to ensure identified deficiencies are corrected and that each school has a comprehensive emergency management program to provide a safe school environment for students and staff. BIE and Riverside Indian 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, BIE relies on the facility management system for decision making, which makes it critical that the system be reviewed and updated to provide an accurate database of work orders for more efficient and effective oversight.

The deficiencies we found occurred because BIE did not ensure that the school had at least one staff member with access and training to the facility management system to timely update and monitor work orders; BIE did not communicate regularly on open work orders, specifically ensuring continuous monitoring of the identified catastrophic deficiency; and the school was unaware of the emergency management program and security plan requirements.

We make 10 recommendations that, if implemented, will improve the school's overall facility condition by reducing the number of safety and health deficiencies and increasing the staff's ability to respond to maintenance requirements. We note that although our inspection involved a sample of Riverside Indian School facility management work orders, our finding related to inaccuracies in the 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 10 recommendations and provided supplemental documents with their response. We consider Recommendations 1, 3, and 4 through 10 resolved and Recommendation 2 unresolved. We determined that Recommendation 1 is significant and will be reported as such in our semiannual report to Congress in accordance with the Inspector General Act.⁵⁰ 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:

1. Ensure that Riverside Indian School has a fully functioning fire detection alarm system.

BIE Response: BIE concurred with this recommendation and stated that its "Branch of Safety Management (BSM) is monitoring the fire detection alarm system at Riverside Indian School," and its "Branch of Facilities Management (BFM) is scheduling necessary upgrades and maintenance to ensure compliance with safety standards and regulations." In addition, BIE said that it has submitted the work orders for approval, and the "Indian Affairs' Division of Safety and Risk Management (DRSM) is verifying the installation scope to ensure compliance with National Fire Protection Association (NFPA) codes and DSRM design standards."

BIE provided a December 31, 2025 target implementation date.

⁵⁰ 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.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider it implemented when the installation is completed, and the work order status is updated to closed.

2. Develop a strategy to monitor future catastrophic deficiencies until corrected, and, if a deficiency cannot be fixed within the abatement period, identify and implement mitigating measures.

BIE Response: BIE stated that it concurred with this recommendation but also explained that it “believes this recommendation has been effectively addressed through the existing processes in place.” BIE said that “[w]hile ‘catastrophic deficiency’ is not a term we typically use; we recognize it as a severity category that reflects the potential impact of deficiencies,” and that BIE uses “Risk Assessment Codes (RACs) to prioritize deficiencies based on both probability and severity.” BIE further stated that when the deficiency cannot be corrected within the prescribed abatement period, BIE facility management and safety personnel “collaborate with local school staff to implement temporary mitigating measures.” In addition, BIE stated that it is “proactively notifying all schools to actively update and submit Safety, Accessibility, and Fire (SA&F) projects for FY26 prioritization,” and has distributed a memorandum⁵¹ and guidance “outlining the process for identifying and addressing deficiencies, ensuring that all staff are informed and equipped to respond appropriately.”

BIE further stated, “If this recommendation is not accepted as resolved, BIE proposes a target date of December 31, 2025, for further action to ensure all necessary measures are in place.”

OIG Comment: Although BIE stated that it concurred with this recommendation and expressed its belief that existing processes are sufficient, based on BIE’s response, we consider this recommendation unresolved.

As an initial matter, we acknowledge BIE’s comments on RACs and their relation to severity categories. We also note that BIE classified the catastrophic deficiency at Riverside Indian School as RAC-1 (imminent danger)—the highest RAC rating.⁵² As described previously, our scope focused on safety and health deficiency severity determinations regardless of the probability of occurrence because using the deficiency severity enabled us to address the scale of each problem and its potential to harm students and staff. That is, we directed our analysis to circumstances in which a qualified safety and health inspector concluded that there was a reasonable chance a deficiency could seriously injure, permanently disable, or even kill a student or staff member—the standards for applying a designation of “catastrophic.”

Regardless of terminology, the response and supplemental documents BIE provided demonstrate that it is taking action to annually prioritize and correct safety and health deficiencies, including the backlog of deficiencies, through its FY 2026 prioritization process. However, the intent of our recommendation was to develop an overall strategy to address catastrophic deficiencies that should be corrected immediately or within a short timeframe when the inspectors identify these deficiencies and to monitor them closely until they are corrected. We made this recommendation because BIE did not have an overall strategy or prioritization for catastrophic deficiencies—including those classified as RAC-1 (imminent danger)—to ensure these deficiencies receive immediate attention. As stated in our report, although the safety and health inspector assigned the catastrophic deficiency a one-day abatement period and the deficiency was recorded in the facility management system as a RAC-1, BIE did not mitigate its risk by putting the school on fire watch until we visited the site. That occurred 10 months after the safety and health inspector first identified the deficiency. Moreover, BFM staff were not monitoring the remediation of the deficiency, as there was confusion between the catastrophic deficiency at Riverside Indian School and another school.

⁵¹ BIE’s response included its *FY26 Project Prioritization Process* memorandum and attachments, dated May 8, 2025.

⁵² The are five RAC levels: RAC-1 (immediate danger), RAC-2 (high-level risk), RAC-3 (medium-level risk), RAC-4 (low-level risk), and RAC-5 (lowest level risk).

We will consider this recommendation resolved when BIE states it will develop a strategy to ensure catastrophic deficiencies (whether classified as RAC-1 or not) are monitored, including identifying and implementing mitigating measures, when required. We will consider it implemented when BIE provides the strategy to monitor catastrophic deficiencies (whether classified as RAC-1 or not) and to implement any mitigating measures.

3. Develop and implement a plan to resolve deficiencies identified in annual safety and health inspections within prescribed abatement timelines.

BIE Response: BIE concurred with this recommendation and acknowledged the “importance of addressing deficiencies” identified in these inspections. BIE stated that “[w]e believe that our existing processes effectively address this recommendation” and identified multiple actions to address the concerns. Specifically, BIE said it “will continue to monitor deficiencies identified during safety and health inspections and ensure that they are documented and tracked for timely resolution.” In addition, BIE stated it “will provide ongoing training to staff on the importance of addressing deficiencies promptly,” and “will work closely with schools to develop action plans for resolving identified deficiencies.” BIE also stated that BFM “has identified approximately 800 backlogged Safety, Accessibility, and Fire (SA&F) work orders created during previous safety inspections,” and issued a memo emphasizing that FY 2026 projects will focus on correcting the deficiency backlog.

BIE further stated, “If this recommendation is not accepted as resolved, BIE proposes a target date of December 31, 2025, for further action to ensure all necessary measures are in place.”

OIG Comment: As summarized above, BIE stated that it concurred with this recommendation and also expressed its belief that existing processes address it. Based on BIE’s response, we consider this recommendation resolved but not fully implemented.

As summarized in its response, BIE identified multiple steps that it is currently undertaking, and we agree that these are positive steps that, in coordination with the school’s facilities staff, would address the recommendation. We also agree that BIE has implemented part of the recommendation. BIE has not, however, included a plan to ensure Riverside Indian School’s deficiencies will be resolved within abatement timelines. Accordingly, we do not consider this recommendation fully implemented and are accepting the December 2025 date BIE provided as its target implementation date. We will consider this recommendation implemented when BIE provides documentation that it has developed and implemented a plan to resolve deficiencies identified in Riverside Indian School’s annual safety and health inspections within prescribed abatement timelines.

4. Provide Riverside Indian School’s facilities and maintenance staff with access and training on BIE’s facility management system, with emphasis on the importance of accurate and complete recordkeeping.

BIE Response: BIE concurred with this recommendation and stated it will “ensure that all facilities and maintenance staff at Riverside Indian School have access to the BIE facility management system.” BIE also stated that BFM will organize comprehensive training sessions highlighting the importance of “accurate and complete recordkeeping, ensuring that staff understand how proper documentation contributes to effective facility management and compliance with safety standards.” In addition, BIE stated it will hold regional training sessions in July 2025 and will continue to offer monthly virtual facility management system training sessions.

BIE provided a December 31, 2025 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider it implemented when BIE provides evidence that all facility management staff at Riverside Indian School have received access to and training on the facility management system.

5. Develop guidance to ensure that safety and health reports and associated work orders include detailed location information so BIE staff can easily find the deficiencies.

BIE Response: BIE concurred with this recommendation and stated that BIE “is actively working towards a viable solution” and identifying “software issues that hinder the inclusion of detailed location information in safety and health reports and work orders.” In addition, BIE said it will provide the safety team with access to the system “to facilitate better tracking and reporting of deficiencies.” BIE also stated that, in the interim, it has directed its safety team and facility managers to manually input and validate detailed location information in each work order as a stopgap measure—noting that “a comprehensive solution is still needed . . . to fully address the underlying software issues and improve the efficiency of our facility management system.” Finally, BIE requested OIG assistance “in securing support from the Department of [Government Efficiency] (DOGE)” for updates to its facility management systems.

BIE provided a December 31, 2025 target implementation date.

OIG Comment: Based on BIE’s response we consider this recommendation resolved. We will consider it implemented when BIE provides us the recommended written guidance it issued to the safety and health inspectors and facilities maintenance staff requiring detailed location information.

With respect to BIE’s request for OIG assistance with DOGE, we encourage BIE to raise its concerns directly with relevant stakeholders and personnel within DOI. As part of our regular processes, we also provide our reports to various DOI officials who may have an interest in the reports’ subject matter and will do so for this report as well.

6. Ensure that all safety and health deficiency work orders have the correct status either in an open status awaiting correction or as closed confirming that BIE has corrected the deficiency.

BIE Response: BIE concurred with this recommendation and stated its BFM and BSM “will ensure that all facilities and maintenance staff at Riverside Indian School have access to the BIE facility management system” and “will provide technical assistance to school personnel and collaboratively review of the backlog of safety and health deficiency work orders . . . confirming whether they are open and awaiting correction or closed after resolution.” In addition, BIE stated that BFM has taken what it describes as significant steps to address the status of work orders and is preparing an engineering design services contract to help reduce the Safety, Accessibility, and Fire work order backlog.

BIE provided a December 31, 2025 target implementation date.

OIG Comment: Based on BIE’s response, we consider this recommendation resolved. We will consider it implemented when BIE provides documentation demonstrating all work orders in the facility management system related to Riverside Indian School have been reviewed and the status updated as needed.

We recommend that BIE require Riverside Indian School to:

7. Ensure that all components of the emergency management program are fully implemented and emergency management plans and continuity of operations plans are submitted as required.

BIE Response: BIE concurred with this recommendation and stated it “will work with Riverside Indian School to ensure that all aspects of the emergency management program are effectively implemented and will support the development and submission of emergency management and continuity of operations plans.” BIE also stated, “The Associate Deputy Director Bureau Operated Schools is reviewing the school’s emergency management program and ensuring [the school] submits its updated emergency management and continuity of operations plan.”

BIE provided a December 31, 2025 target implementation date.

OIG Comment: Based on BIE's response, we consider this recommendation resolved. We will consider it implemented when BIE provides evidence demonstrating the components of the plans are complete and have been submitted as required.

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

BIE Response: BIE concurred with this recommendation and stated it "will work with Riverside Indian School to develop a security plan that meets DOI policy requirements."

BIE provided a December 31, 2025 target implementation date.

OIG Comment: Based on BIE's response, we consider this recommendation resolved. We will consider it implemented when BIE provides a copy of the completed security plan.

9. 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 it will "work with the school to properly train the collateral duty safety officer (CDSO) to ensure effective management of the safety and health program in line with the Indian Affairs (IA) policy."

BIE provided a December 31, 2025 target implementation date.

OIG Comment: Based on BIE's response, we consider this recommendation resolved. We will consider it implemented when BIE provides evidence that the CDSO completed the required training.

We recommend that BIE:

10. Ensure all schools have submitted the required emergency management plans and continuity of operations plans.

BIE Response: BIE concurred with this recommendation and stated it has created a collaboration site for all school safety specialists to track the submission of emergency action plans and continuity of operations plans, and BIE will regularly review the site to ensure all required plans are submitted in a timely manner. In addition, BIE will "provide ongoing support and guidance to schools in developing and submitting their . . . plans, ensuring compliance with all requirements," and will offer training on the requirements for the plans.

BIE provided a December 31, 2025 target implementation date.

OIG Comment: Based on BIE's response, we consider this recommendation resolved. We will consider it implemented when BIE provides evidence that all schools have submitted the required emergency management plans (also referred to as emergency action plans) and continuity of operation plans.

Appendix 1: Scope and Methodology

Scope

Our inspection focused on Riverside Indian School's fiscal year (FY) 2022 through 2024 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 30, 2024; the school's emergency management program and security plan; and BIE's results of staff background checks.

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 the U.S. Department of the Interior, Bureau of Indian Affairs, BIE, and Riverside Indian School policies, procedures, and guidance.
- Interviewing (both in person and virtually) officials from BIE's Human Resources Personnel Security, Branch of Facility Management, and Branch of Safety Management as well as Riverside Indian School.
- Surveying all school staff members using an emailed survey and an additional email questionnaire to administrative school staff.
- Conducting a site visit in October 2024.
- Reviewing and analyzing all the deficiencies reported on the FY 2024 annual safety and health inspection and organizing the deficiencies by severity: catastrophic, critical, significant, and minor.
- Testing the FY 2024 catastrophic deficiency and 100 percent of the 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 acting Facility Manager, to determine if the deficiency had been resolved.
- Reviewing and analyzing the FY 2022 and 2023 annual safety and health inspection reports to compare with the FY 2024 data to determine the previous total deficiencies and identify repeat deficiencies.
- Testing whether facility management system work orders were properly closed. We statistically sampled 56 closed Riverside Indian School work orders from the population of 417 critical and significant deficiencies 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 56 work orders, with the assistance of the safety and health inspector and the acting Facility Manager, to determine whether the work orders were in the appropriate status. We acknowledge a limitation to testing closed work orders in that a work order could have been closed out and an identical deficiency could have subsequently occurred, which would affect our testing. For example, we found that an exit light and emergency lighting were not working properly, although we were told they were newly installed in 2024. We could not confirm if the lights had been working correctly and then failed or if they had been improperly installed.

- Judgmentally selecting 15 open work orders to verify if the work orders were in the correct status. We found a total of 44 open deficiency work orders and excluded 1 catastrophic and 9 critical work orders since they were already included in our testing of catastrophic and critical deficiencies. Out of 34 work orders, we selected 15 to sample during our site visit. We did not produce estimates based on the judgmentally selected work orders or commingle them with the statistical sample.
- Comparing the list of 144 school staff from Riverside Indian School to the list of Riverside Indian School positions from BIE's Human Resources Personnel Security to verify whether all 144 staff received or had ongoing background checks and suitability for employment determinations, including staff that were due for a five-year update at the time of this inspection.

Appendix 2: Critical Deficiencies Testing Summary

Deficiency	Repeat Deficiency on FY 2024 Inspection Report?	Initial Date Identified	Initial Abatement Period	Corrected in Abatement Period?	Corrected?
Emergency lighting non-operational (Structure 338)	Yes	05/24/2023	45 days	No	Yes
Emergency lighting non-operational (Structure 311)	Yes	05/24/2023	45 days	No	Yes
Emergency lighting non-operational (Structure 298)	Yes	05/24/2023	45 days	No	No
Emergency exit blocked (Structure 298)	Yes	05/24/2023	45 days	No	No
Emergency lighting non-operational (Structure 218)	Yes	05/24/2023	45 days	No	Yes
Emergency lighting non-operational (Structure 1665)	Yes	05/24/2023	45 days	N/A*	N/A*
Emergency lighting non-operational (Structure 315)	Yes	05/24/2023	45 days	No	No
Emergency lighting non-operational (Structure 1666)	No	01/25/2024	45 days	No	No
Emergency lighting non-operational (Structure 216)	No	01/25/2024	45 days	No	No
Emergency lighting non-operational (Structure 317)	No	01/25/2024	45 days	No	Yes
Emergency lighting non-operational (Structure 268)	No	01/25/2024	45 days	No	No
Emergency exit blocked (Structure 311)	No	01/25/2024	45 days	No	Yes
Emergency lighting non-operational (Structure 316)	No	01/25/2024	45 days	No	Yes
Emergency lighting non-operational (Structure 217)	No	01/25/2024	45 days	No	No
Emergency lighting non-operational (Structure 278)	No	01/25/2024	45 days	No	No
Walking surfaces not maintained in safe condition (Structure 337)	No	03/29/2024	90 days	No	Yes

Deficiency	Repeat Deficiency on FY 2024 Inspection Report?	Initial Date Identified	Initial Abatement Period	Corrected in Abatement Period?	Corrected?
Emergency exit blocked (Structure 337)	No	03/29/2024	180 days	No	Yes
Records not stored in non-combustible containers (Structure 337)	No	03/29/2024	365 days	N/A [†]	No
Building electrical system obsolete (Structure 337)	No	03/29/2024	365 days	N/A [†]	No
No emergency action plan with exit route assignments (Structure 337)	No	03/29/2024	30 days	No	No
No emergency action plan with exit route assignments (Structure 336)	No	03/29/2024	30 days	No	No
Change of Use or Occupancy Classification (Structure 336)	No	03/29/2024	365 days	N/A [†]	No
Location did not meet single exit requirements (Structure 336)	No	03/29/2024	365 days	N/A [†]	No
Location did not meet single exit requirements (Structure 337)	No	03/29/2024	365 days	N/A [†]	No

* Deficiency could not be verified; building considered condemned.

[†] Deficiency was still within the abatement period at the time of the school site visit.

Appendix 3: Significant Deficiencies Testing Summary

Deficiency	Repeat Deficiency on FY 2024 Inspection Report?	Initial Date Identified	Initial Abatement Period	Corrected in Abatement Period?	Corrected?
Past due annual inspection of fire extinguishers (Structure 339)	Yes	05/24/2023	30 days	No	Yes
Restroom did not meet minimum accessibility requirements (Structure 278)	Yes	07/08/2019	45 days	No	Yes
Missing occupancy load sign (Structure 323)	Yes	05/24/2023	90 days	No	Yes
Blocked fire extinguisher (Structure 340)	Yes	05/24/2023	30 days	No	Yes
Restroom did not meet minimum accessibility requirements (Structure 216)	Yes	07/08/2019	45 days	No	No
Unclear fire doors rating labels (Structure 339)	Yes	05/24/2023	30 days	No	Yes
Flushing facilities not provided (Structure 257)	Yes	05/24/2023	90 days	No	No*
Unclear fire doors rating labels (Structure 298)	Yes	09/17/2018	30 days	No	Yes
Unclear fire doors rating labels (Structure 218)	Yes	09/17/2018	30 days	No	No*
Restroom did not meet minimum accessibility requirements (Structure 217)	Yes	07/08/2019	45 days	No	No
Misuse of power strip (Structure 337)	Yes†	01/25/2024	90 days	No	No*
Fire extinguisher not properly installed and mounted (Structure 298)	Yes	05/24/2023	30 days	No	No
Missing occupancy load sign (Structure 339)	Yes	05/24/2023	90 days	No	No
Unclear fire doors rating labels (Structure 216)	Yes	09/17/2018	30 days	No	No*
Accessible shower stall not provided (Structure 220)	Yes	07/08/2019	45 days	No	Yes
Annual fire door inspections and testing not performed (Structure 339)	Yes	05/24/2023	30 days	No	No
Flushing facilities not provided (Structure 339)	Yes	05/24/2023	90 days	No	Yes
Past due annual inspection of fire extinguishers (Structure 339)	Yes	05/24/2023	30 days	No	Yes

Deficiency	Repeat Deficiency on FY 2024 Inspection Report?	Initial Date Identified	Initial Abatement Period	Corrected in Abatement Period?	Corrected?
No record of inspection of chemistry lab hood (Structure 339)	Yes	05/24/2023	60 days	No	Yes
Past due annual inspection of fire extinguishers (Structure 339)	Yes	05/24/2023	30 days	No	Yes

* Deficiency had been partially abated but not fully corrected.

† Deficiency was listed as a repeat deficiency on the March 2024 inspection.

Appendix 4: Responses to Draft Report

The Bureau of Indian Education's response to our draft report follows on page 32.




UNITED STATES DEPARTMENT OF THE INTERIOR
Bureau of Indian Education
1849 C Street NW, MIB-3610
Washington, DC 20240

June 4, 2025

Memorandum

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

From: Tony Dearman 
Director, Bureau of Indian Education

Subject: Management Response to Recommendations in Draft Report No. 2024-ISP-040, *The Bureau of Indian Education Must Correct Safety and Health Deficiencies and Improve Emergency Preparedness, Security, and Facility Management Accuracy at Riverside Indian 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 Audit Report titled "The Bureau of Indian Education Must Correct Safety and Health Deficiencies and Improve Emergency Preparedness, Security, and Facility Management Accuracy at Riverside Indian School." This memorandum outlines BIE's responses to the audit recommendations, indicating concurrence with all recommendations.

BIE management is committed to addressing the safety and health deficiencies at Riverside Indian School, enhancing staff responsiveness to maintenance needs, and improving the school's security and emergency preparedness. The plans for corrective actions and actions taken by the BIE are detailed below:

Recommendation 1: Ensure that Riverside Indian School has a fully functioning fire detection alarm system.

Actions Planned: The BIE concurs with the recommendation. The BIE Branch of Safety Management (BSM) is monitoring the fire detection alarm system at Riverside Indian School. The BIE Branch of Facilities Management (BFM) is scheduling necessary upgrades and maintenance to ensure compliance with safety standards and regulations.

Responsible Party: BIE Branch of Facilities Management

Action Taken: BIE is committed to the safety of all individuals at Riverside Indian School and has submitted Deferred Maintenance Work Orders (DMWOs) for approval. The Indian Affairs' Division of Safety and Risk Management (DSRM) is verifying the installation scope to ensure

compliance with National Fire Protection Association (NFPA) codes and DSRM design standards. Funding will be requested through the FAR process for the necessary contract.

Target Date: December 31, 2025

Recommendation 2: Develop a strategy to monitor future catastrophic deficiencies until corrected, and, if deficiencies cannot be fixed within the abatement period, identify and implement mitigating measures.

Actions Planned and Taken: The BIE concurs with the recommendation to address deficiencies. The BIE believes this recommendation has been effectively addressed through the existing processes in place. The BIE's Branch of Safety and Branch of Facilities Management will continue to undertake the following actions to ensure ongoing compliance:

- **Definition and Monitoring:** While "catastrophic deficiency" is not a term we typically use; we recognize it as a severity category that reflects the potential impact of deficiencies. Rather, in accordance with industry standards and Indian Affairs policy, we utilize Risk Assessment Codes (RACs) to prioritize deficiencies based on both probability and severity. This approach aligns with 29 CFR 1960 and DSRM protocols, allowing BIE to categorize conditions as "imminent danger," "serious," or "other-than-serious." This targeted triage ensures that the most critical deficiencies are addressed first. When full correction cannot be achieved within the prescribed abatement timeline, BIE Facility Management and Safety personnel collaborate with local school staff to implement temporary mitigating measures, such as isolating hazards, applying administrative controls, or enforcing occupancy limitations.
- **Safety, Accessibility and Fire Proactive Notification:** BIE is proactively notifying all schools to actively update and submit Safety, Accessibility, and Fire (SA&F) projects for FY26 prioritization. We also provide training to schools to address the SA&F backlog effectively.
- **Project Prioritization Memo:** A memo and guidance have been distributed outlining the process for identifying and addressing deficiencies, ensuring that all staff are informed and equipped to respond appropriately. This memo has been shared via e-mail and discussed on various Teams calls with school leaders and BIE leadership. See Attachment A: Project Prioritization Process Memo

If this recommendation is not accepted as resolved, BIE proposes a target date of December 31, 2025, for further action to ensure all necessary measures are in place.

Responsible Party: BIE Branch of Facilities Management.

Recommendation 3: Develop and implement a plan to resolve deficiencies identified in annual safety and health inspections within prescribed abatement timelines.

Actions Planned and Taken: The BIE concurs with the recommendation and acknowledges the importance of addressing deficiencies identified during annual safety and health inspections. We believe that our existing processes effectively address this recommendation.

The following actions are currently being undertaken:

- **Monitoring and Reporting:** BIE will continue to monitor deficiencies identified during safety and health inspections and ensure that they are documented and tracked for timely resolution.
- **Training and Communication:** We will provide ongoing training to staff on the importance of addressing deficiencies promptly and the procedures for reporting and resolving them.
- **Collaboration with Schools:** BIE will work closely with schools to develop action plans for resolving identified deficiencies, ensuring that all parties are aware of their responsibilities and timelines.
- **Backlogged SA&F Work Orders:** BIE's Branch of Facilities Management (BFM) has identified approximately 800 backlogged Safety, Accessibility, and Fire (SA&F) work orders created during previous safety inspections. Site-specific spreadsheets listing these backlogged orders by school have been emailed to the relevant schools, requesting updates on their current status and what is needed to correct the issues.
- **Data Compilation:** All collected data has been compiled into a SA&F Tracker, which includes descriptions of work orders, inspection dates, and their current status.
- **Follow-Up Communications:** BFM has reached out to schools to encourage participation in validating Deferred Maintenance Work Orders (DMWOs). Schools that did not respond after multiple attempts were informed of the urgency and provided additional BIE BFM contacts for future reference.
- **Scope of Work Development:** BFM has drafted a Scope of Work for a future contract to design corrections for outstanding SA&F work orders at Bureau Operated Schools.
- **Project Prioritization Memo:** On May 8, 2025, the BFM Supervisor issued a memo emphasizing that FY26 projects will focus on correcting the SA&F backlog. Attached is the Memo: Attachment A: Prioritization Memo. This memo was distributed to all schools and highlighted that, unless there are extenuating circumstances, each school must prioritize closing out their backlog of SA&F work orders.

If this recommendation is not accepted as resolved, BIE proposes a target date of December 31, 2025, for further action to ensure all necessary measures are in place.

Responsible Party: BIE Branch of Safety Management and Branch of Facilities Management

Recommendation 4: Provide Riverside Indian School's facilities and maintenance staff with access and training on BIE's facility management system, with emphasis on the importance of accurate and complete recordkeeping.

Actions Planned: The BIE concurs with the recommendation and recognizes BIE management concurs with the recommendation. BIE will ensure the following actions are taken to address the recommendation:

- **Access Provision:** BIE will ensure that all facilities and maintenance staff at Riverside Indian School have access to the BIE facility management system. This will include setting up user accounts and providing necessary permissions to utilize the system effectively.
- **Training Sessions:** BFM will organize comprehensive training sessions focused on the facility management system.
- **Ongoing Support:** BFM will establish a support framework to assist staff in using the facility management system.
- **Emphasis on Recordkeeping:** Training will specifically highlight the importance of accurate and complete recordkeeping, ensuring that staff understand how proper documentation contributes to effective facility management and compliance with safety standards.

Action Taken: BIE has taken significant steps to enhance access to and training on the Maximo facility management system for all Facility Managers, including those at Riverside Indian School:

- **Maximo Bootcamp:** In July 2024, a Maximo Bootcamp was held, providing hands-on training and support for Facility Managers. This event was designed to equip staff with practical skills in using the system effectively.
- **Upcoming Regional Trainings:** Additional regional training sessions are scheduled for July 2025 in Albuquerque, NM, and Bloomington, MN. All school Facility Managers, including those from Riverside, are invited to participate.
- **Monthly Virtual Trainings:** BIE continues to offer monthly virtual Maximo training sessions via Microsoft Teams. These sessions provide practical instruction, Q&A opportunities, and guidance on data entry and recordkeeping.
- **One-on-One Support:** BIE's Branch of Facilities Management is available to provide individualized Maximo training and mentoring for schools that seek additional assistance.
- **Principal and Staff Involvement:** The Principal and school Facility Managers have been included in the training initiatives to ensure comprehensive understanding and engagement with the facility management system.
- **New User Training:** The Division of Facilities Management and Construction (DFMC) offers specialized training for new users to ensure they are well-prepared to utilize the Maximo system effectively.

Responsible Party: BIE Branch of Facilities Management

Target Date: December 31, 2025

Recommendation 5: Develop guidance to ensure the safety and health reports and associated work orders include detailed location information so BIE staff can easily find the deficiencies.

Actions Planned: The BIE concurs with the recommendation and is actively working towards a viable solution. The following actions are planned:

- **Internal Discussions:** BIE will engage in internal discussions with the Office of Facilities and Property Management (OFPSM), Division of Safety and Risk Management

(DSRM), and Division of Facilities Management and Construction (DFMC) to address the recommendation effectively.

- **Software Evaluation:** We are currently navigating through the facility management systems to identify software issues that hinder the inclusion of detailed location information in safety and health reports and work orders.
- **Workaround Identification:** In the interim, we are exploring potential workarounds to enhance the current system's functionality while a long-term solution is developed.
- **Maximo Access for Safety Team:** As part of our future plans, we will provide the Safety team with access to the Maximo system to facilitate better tracking and reporting of deficiencies.
- **Request for OIG Assistance:** We kindly request the assistance of the Office of Inspector General (OIG) in securing support from the Department of General Services (DOGE) to overhaul the antiquated and inefficient facility management systems, particularly S&CAP and the way that S&CAP fails to properly transfer data to Maximo.

Action Taken: In the interim, BIE has directed its Safety team and Facility Managers to manually input and validate detailed location information in each Safety, Accessibility, and Fire (S,A, and F) work order as a stopgap measure. This approach ensures that deficiencies are documented accurately, even as we work towards a more permanent solution. However, a comprehensive solution is still needed from OFPSM, DSRM, and DFMC to fully address the underlying software issues and improve the efficiency of our facility management systems.

Responsible Party: Branch of Facilities Management and Branch of Safety Management

Target Date: December 31, 2025

Recommendation 6: Ensure that all safety and health deficiency work orders have the correct status either in an open status awaiting correction or as closed confirming that BIE has corrected the deficiency.

Actions Planned: The BIE concurs with the recommendation. The Branch of Facilities Management (BFM) and the Branch of Safety Management (BSM) will undertake the following actions:

- **Access to Facility Management System:** BIE will ensure that all facilities and maintenance staff at Riverside Indian School have access to the BIE facility management system. This will include setting up user accounts, providing the necessary permissions to utilize the system effectively, and training appropriate school staff on its use.
- **Backlog Review:** BFM and BSM will provide technical assistance to school personnel and collaboratively review of the backlog of safety and health deficiency work orders to ensure accuracy in their status, confirming whether they are open and awaiting correction or closed after resolution.
- **Contract Preparation:** BFM is actively preparing a contract for engineering design services to assist in reducing the backlog of Safety, Accessibility, and Fire (SAF) work orders

Action Taken: BIE BFM has taken significant steps to address the status of SAF work orders:

- **Notification of Software Limitations:** BIE BFM has notified the Office of Facilities and Property Management (OFPSM), Division of Safety and Risk Management (DSRM), and Division of Facilities Management and Construction (DFMC) about known software glitches in the Maximo and Safety and Compliance Assessment Program (S&CAP) that hinder the effective management of SA&F work orders.
- **Oversight and Reconciliation:** BIE continues to support school personnel in their oversight and management of SA&F work orders. However, the accuracy and utility of the status data will remain limited until the necessary software updates are implemented.

Responsible Party: BIE Branch of Facilities Management, Branch of Safety Management, and local school personnel

Target Date: December 31, 2025

Recommendation 7: Require Riverside Indian School to ensure that all components of the emergency management program are fully implemented, and emergency management plans and continuity of operations plans are submitted as required.

Actions Planned: The BIE concurs with the recommendation. BIE will work with Riverside Indian School to ensure that all aspects of the emergency management program are effectively implemented and will support the development and submission of emergency management and continuity of operations plans.

Actions Taken: The Associate Deputy Director Bureau Operated Schools is reviewing the school's emergency management program and ensuring Riverside Indian Schools submits its updated emergency management and continuity of operations plan.

Responsible Party: BIE Associate Deputy Director Bureau Operated Schools

Target Date: December 31, 2025

Recommendation 8: Require Riverside Indian School to develop and implement a security plan as required by DOI policy.

Actions Planned: The BIE concurs with the recommendation. BIE will work with Riverside Indian School to develop a security plan that meets DOI policy requirements.

Responsible Party: BIE Associate Deputy Director Bureau Operated Schools and Branch of Safety Management

Target Date: December 31, 2025

Recommendation 9: Require Riverside Indian 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.

Actions Planned: The BIE concurs with the recommendation and will work with the school to properly train the collateral duty safety officer (CDSO) to ensure effective management of the safety and health program in line with the Indian Affairs (IA) policy. BIE will continue to provide the remaining training modules tailored for the CDSO, focusing on their roles and responsibilities. The training will include an overview of the IA policy related to safety and health programs and necessary guidelines and procedures.

Responsible Party: BIE Branch of Safety Management

Target Date: December 31, 2025

Recommendation 10: Ensure all schools have submitted the required emergency management plans and continuity of operations plans.

Actions Planned: The BIE concurs with the recommendation and will undertake the following actions:

- **Tracking System Implementation:** A SharePoint site has been created for all school safety specialists to track the submission of Emergency Action Plans (EAP) and Continuity of Operations Plans (COOP). This centralized platform will facilitate easier monitoring and management of these critical documents.
- **Submission Monitoring:** BIE will regularly review the SharePoint site to ensure that all schools are submitting their required plans in a timely manner.
- **Support and Guidance:** BIE will provide ongoing support and guidance to schools in developing and submitting their EAP and COOP plans, ensuring compliance with all requirements.
- **Training Sessions:** Training will be offered to effectively use the SharePoint site and understand the requirements for EAP and COOP submissions.

Responsible Party: BIE Associate Deputy Director Bureau Operated Schools & Branch of Safety Management

Target Date: December 31, 2025

List of Attachments:

- **Attachment A:** Prioritization Memo and Supporting Documents

Appendix 5: Status of Recommendations

Recommendation	Status	Action Required
2024-ISP-040-01 We recommend that the Bureau of Indian Education (BIE) ensure that Riverside Indian School has a fully functioning fire detection alarm system.	Resolved	We will track implementation.
2024-ISP-040-02 We recommend that BIE develop a strategy to monitor future catastrophic deficiencies until corrected, and, if a deficiency cannot be fixed within the abatement period, identify and implement mitigating measures.	Unresolved: pending additional information.	We will meet with BIE to further discuss resolution of this recommendation.
2024-ISP-040-03 We recommend that BIE develop and implement a plan to resolve deficiencies identified in annual safety and health inspections within prescribed abatement timelines.		
2024-ISP-040-04 We recommend that BIE provide Riverside Indian School's facilities and maintenance staff with access and training on BIE's facility management system, with emphasis on the importance of accurate and complete recordkeeping.		
2024-ISP-040-05 We recommend that BIE develop guidance to ensure that safety and health reports and associated work orders include detailed location information so BIE staff can easily find the deficiencies.		
2024-ISP-040-06 We recommend that BIE ensure that all safety and health deficiency work orders have the correct status either in an open status awaiting correction or as closed confirming that BIE has corrected the deficiency.	Resolved	We will track implementation.
2024-ISP-040-07 We recommend that BIE require Riverside Indian School to ensure that all components of the emergency management program are fully implemented and emergency management plans and continuity of operations plans are submitted as required.		
2024-ISP-040-08 We recommend that BIE require Riverside Indian School to develop and implement a security plan as required by DOI policy.		

Recommendation	Status	Action Required
<p>2024-ISP-040-09</p> <p>We recommend that BIE require Riverside Indian 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.</p>	Resolved	We will track implementation.
<p>2024-ISP-040-10</p> <p>We recommend that BIE ensure all schools have submitted the required emergency management plans and continuity of operations plans.</p>		



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U.S. DEPARTMENT OF THE INTERIOR

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