



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

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Memorandum

To: Ann Marie Bledsoe Downes
Acting Director, Bureau of Indian Education

From: Kimberly Elmore *Kimberly Elmore*
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Subject: Management Advisory – Summary of Bureau of Indian Education Violence
Prevention Inspections
Report No. 2015-CR-074

In this advisory, we summarize a series of inspections our office conducted to determine the quality of measures in place at schools funded by the Bureau of Indian Education (BIE) to prevent violence, against both students and staff, from internal and external threats. We visited 16 schools (see Attachment 1), identified the safety measures in place (see Attachment 2), and made recommendations for improving safety measures at each school. A number of schools have already begun implementing our recommendations.

Background

In the 2013/2014 school year, BIE funded approximately 185 schools in 23 states, including 119 day schools, 52 boarding schools, and 14 peripheral dormitories. Of these schools, 131 were grant- or contract-operated schools funded through grant agreements or contracts with BIE and operated by the respective tribes. The remaining 54 were operated directly by BIE. Between January and May 2014, we visited a non-statistical selection of 16 BIE-funded schools in order to assess the safety measures and procedures in place to prevent violence against students and staff. The inspections were a continuation of prior work our office has conducted in this area.

For these inspections, we reviewed school emergency plans, identified the training topics provided to students and staff to help reduce the risk of a violent incident, and observed evacuation and lock-down drills where possible. We also examined the physical safety features in place at each school and compared them to a list of 18 critical safety measures we identified in previous reports.²

² “Controls to Prevent Violence at Bureau of Indian Education Operated Education Facilities” (Report No. NM-EV-BIE-0001-2008), and “School Violence Prevention” (Report No. NM-EV-BIE-0003-2008).

Findings

Schools' Emergency Preparedness/Security Plans Need Improvement

In prior reports, we reviewed school emergency plans against five key topic areas including bomb threats, shootings, fights, hostage situations, and off-campus emergencies. During our inspections, we compared schools' emergency plans against the same topic areas and found only four of the 16 sites we visited—Cherokee Central Schools, Miccosukee Indian School, Paschal Sherman Indian School, and Yakama Nation Tribal School—had emergency plans that covered all five topics.

A comprehensive emergency plan should be readily available to provide those with operational responsibilities detailed instructions on what to do in an emergency, when to do it, and why to do it, while also providing instructions to outside emergency responders on how to provide campus-specific support during an emergency. In September 2009, BIE's Division of Performance and Accountability issued "Safe Schools Planning: A Guide for Educators"² (Guide) to help schools develop emergency plans. The Guide explained how to create a safe school program, including a comprehensive emergency plan. It also provided emergency preparedness and continuity of operations templates that could be tailored to individual schools. For the remaining schools, we recommended that they either update their plans to include missing topic(s), or update or create (whichever applied) emergency plans based on tenets outlined in the Guide.

Schools Provide Violence Prevention Training, but More Topics Could Be Covered

In our prior reviews, we identified training topics that should be provided, to some degree, in all BIE-funded educational facilities to help reduce the risk of a violent incident. The training topics we identified for both students and staff include conflict resolution, anger management, bully prevention, suicide prevention, and drugs. In addition, we noted that staff should receive training related to crises/emergency plans, and students should receive training related to gangs. Since these inspections were a continuation of prior work in this area, we evaluated the schools' training using these same topics. We found that only seven of the schools' we visited provided training on all six topics we identified for each group:

- Chemawa Indian School;
- Lukachukai Community School;
- Paschal Sherman Indian School;
- Pierre Indian Learning Center;
- Sicangu Owayawa Oti (Rosebud Dorm);
- Tuba City Boarding School; and
- Yakama Nation Tribal School.

Conflict resolution and anger management were the least covered training topics for staff at the 16 schools we visited (6 schools did not provide this training), whereas training related to

² The guide can be found at <http://www.bie.edu/Programs/SSS/> under 2009 Safe Schools Planning Guide.

suicide prevention and gangs were the least covered training topics for students (8 schools and 7 schools, respectively, did not provide this training). Bullying prevention training, however, was provided to students and staff at all 16 schools we visited.

Schools Need to Improve How They Conduct Evacuation and Lock-down Drills

During our site visits, we also asked school officials to perform an evacuation drill and a lock-down drill. We were able to observe evacuation drills at 10 of the schools and a lock-down drill at 8 schools.³ Three schools declined our request to conduct either drill, citing safety concerns based on inexperienced staff on hand to conduct the exercises. Two schools were willing to run the evacuation drill, but declined to run the lock-down drill—one cited safety concerns due to inexperience with running such exercises, the other noted that such drills were not common practice. For the drills we were able to observe, we noted several opportunities for improvement, particularly with the lock-down drills. Only one school, Miccosukee Indian School, performed both drills in an exemplary fashion.

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

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

Before making a decision about how many and which types of exercises to implement, schools should consider the costs and benefits of each type. Ideally, schools should use a combination of exercise types since each have advantages and will allow school administrators to identify different plan strengths and weaknesses. As such, our recommendations to the schools primarily encouraged them to develop an emergency plan exercise schedule that includes the different types of plan exercises, the frequency of each exercise and type and, where applicable, routine performance of drills throughout the school year.

Schools Should Evaluate Necessary Safety Measures and Implement Accordingly

In our prior reviews, we found no guidance for required safety measures at BIE-funded education facilities. Therefore, we used several public sources to compile a list of 18 safety measures we considered to be critical in areas such as physical access and communication (see Attachment 2). We used these same 18 measures while inspecting each school's physical safety features during our site visits and identified what features each school had in place and what was missing. We were happy to find that four sites—Chemewa Indian School, Cherokee Central Schools, Miccosukee Indian School, and Tuba City Boarding School— had 15 or more safety

³ Three of the schools we visited did not have any students present on the day of our visit so we were unable to observe drills being conducted.

features in place, increasing the likelihood of ensuring student and staff safety. We found that six schools, however, had nine or less of the safety features in place.

We recognize that no individual safety measure is so critical that its absence is cause for immediate concern. The fewer safety measures used at an educational facility, however, the less likely a school is prepared to respond adequately to an incident, ensuring the safety of students and staff from internal and external threats. Our primary recommendation to the schools was to evaluate the list of critical safety measures we identified and determine what combination worked for their particular campus to ensure the safety of staff and students from internal and external threats, and to work towards putting those safety measures in place.

Conclusion

We provided each school we visited with a final report documenting our findings and recommendations. We also encouraged school officials to respond to our recommendations, outlining information on the actions taken or planned to address them. We were pleased that the following schools provided us information on their varying efforts to implement our recommendations:

- Ahfachkee Indian School;
- Flandreau Indian School;
- Ojo Encino Day School;
- Pierre Indian Learning Center;
- Sicangu Owayawa Oti (Rosebud Dorm);
- Te Tsu Geh Oweenge School;
- Tonalea Day School; and
- Yakama Nation Tribal School.

We will not formally track each individual school's implementation of our recommendations, but strongly suggest that BIE do this.

In September 2015, shortly before we concluded issuing our inspection reports, we examined the implementation of recommendations from our two previous BIE violence prevention reports. In those verification reviews we noted that two recommendations, not dissimilar from the recommendations in our school inspections, still require action.⁴ Specifically, one recommendation was unresolved and one recommendation was resolved but not implemented. We encourage BIE to continue its stated commitment to improve school safety and address the open recommendations mentioned in our previous reports.

⁴ Verification Review of Recommendations for the Report, "Evaluation of Controls to Prevent Violence at Bureau of Indian Education Operated Education Facilities" (Report No. NM-EV-BIE-0001-2008), and Verification Review of Recommendations for the Report, "Bureau of Indian Education: School Violence Prevention" (Report No. NM-EV-BIE-0003-2008).

We have provided this information for your evaluation and action, as you determine appropriate, to help prevent serious problems in the future. If you have any further questions or need further information, please contact me at 202-208-5745.

Attachments (2)

Schools Visited

Facility Name	Location	Grades	Date Visited	Report No.
Tonalea Day School	Tonalea, AZ	K-8	January 14, 2014	C-IS-BIE-0008-2014
Lukachukai Community School	Lukachukai, AZ	K-8	January 15, 2014	C-IS-BIE-0006-2014
Tuba City Boarding School	Tuba City, AZ	K-8	January 16, 2014	C-IS-BIE-0009-2014
Moencopi Day School	Tuba City, AZ	K-6	January 17, 2014	C-IS-BIE-0007-2014
Flandreau Indian School	Flandreau, SD	9-12	January 28, 2014	C-IS-BIE-0003-2014
Sicangu Owayawa Oti (Rosebud Dorm)	Mission, SD	1-12	January 29, 2014	C-IS-BIE-0004-2014
Pierre Indian Learning Center	Pierre, SD	1-8	January 30, 2014	C-IS-BIE-0005-2014
Cherokee Central Schools	Cherokee, NC	K-12	February 11, 2014	C-IS-BIE-0010-2014
Ahfachkee Indian School	Clewiston, FL	PreK-12	February 13, 2014	C-IS-BIE-0011-2014
Miccosukee Indian School	Miami, FL	K-12	February 14, 2014	C-IS-BIE-0012-2014
Chemawa Indian School*	Salem, OR	9-12	April 28, 2014	C-IS-BIE-0025-2014
Yakama Nation Tribal School*	Toppenish, WA	8-12	April 30, 2014	C-IS-BIE-0027-2014
Paschal Sherman Indian School*	Omak, WA	K-9	May 1, 2014	C-IS-BIE-0029-2014
Ojo Encino Day School*	Cuba, NM	K-8	May 20, 2014	C-IS-BIE-0033-2014
Te Tsu Geh Oweenge School*	Santa Fe, NM	K-6	May 21, 2014	C-IS-BIE-0035-2014
San Ildefonso Day School*	Santa Fe, NM	K-6	May 22, 2014	C-IS-BIE-0037-2014

* These six campuses were visited in previous reviews.

Safety Measures Inspected

List of Safety Measures
Adequate security fencing*
Secured exterior doors
Designated visitors' entrance
Visitors' entrance that prevented unobserved entering
Visitors required to sign in or show identification
Visitors required to wear a visitors' badge
Security camera(s)
Metal detector
Security guard
Hall monitors
Operable central alarm systems
Intercom system in classrooms
Exits clearly marked
Evacuation maps clearly displayed
Graffiti free walls, playground equipment, etc.
Student dress code**
Staff required to wear identification cards
Students required to wear identification cards

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

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