



OFFICE OF  
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U.S. DEPARTMENT OF THE INTERIOR

# **REVIEW OF VIOLENCE PREVENTION AT THE PIERRE INDIAN LEARNING CENTER**

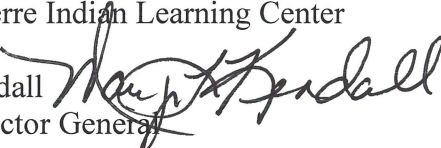


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U.S. DEPARTMENT OF THE INTERIOR

JUN 22 2015

Memorandum

To: Ms. Veronica Pietz  
Principal, Pierre Indian Learning Center

From: Mary L. Kendall   
Deputy Inspector General

Subject: Inspection Report – Review of Violence Prevention at the Pierre Indian Learning Center  
Report No. C-IS-BIE-0005-2014

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

Please provide us with your written response to this report within 30 days. The response should provide information on actions taken or planned to address the recommendations, as well as target dates and title(s) of the official(s) responsible for implementation. Please send your response to:

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The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit, inspection, and evaluation reports issued; actions taken to implement our recommendations; and recommendations that have not been implemented.

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## Results in Brief

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

Specifically, Pierre Indian Learning Center's comprehensive emergency plan did not cover fights, hostage situations, or off-campus emergencies. In addition, we noted problems with the evacuation and lock-down drills run during our visit. Training in violence prevention and emergency preparedness was provided, however, to both students and staff,

Finally, of the 18 safety measures we checked for, Pierre Indian Learning Center did not have 13 in place. While no single safety measure is so critical that its absence at an educational facility is cause for immediate concern, we found that the more safety measures not in place, the less prepared the facility is to respond to an incident.

This is the seventh in a series of 16 inspections regarding violence prevention at schools funded by the Bureau of Indian Education. We issued reports in 2008 and 2010 on this same topic where we concluded that schools were not prepared to prevent violence and ensure the safety of students and staff. Pierre Indian Learning Center, located in Pierre, SD, was not among the facilities previously visited.

We provide five recommendations to help Pierre Indian Learning Center improve its safety measures and its violence prevention and emergency preparedness.

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# Introduction

## Objective

Our objective was to determine the quality of safety measures in place to prevent violence against students and staff from internal and external threats at schools funded by the Bureau of Indian Education (BIE). The scope and methodology for this inspection are included in Appendix 1.

## Background

In this current series of inspections, we assessed safety measures and procedures at a non-statistical selection of 16 Indian schools: 7 BIE-operated, 8 grant-operated, and 1 contract-operated (see Appendix 2). We visited 6 of the 16 schools in previous evaluations (see Appendix 3). Specifically, we visited 28 BIE-funded schools in 2 previous evaluations:

- Controls to Prevent Violence at Bureau of Indian Education Operated Education Facilities (Report No. NM-EV-BIE-0001-2008) issued August 2008; and
- School Violence Prevention (Report No. NM-EV-BIE-0003-2008) issued February 2010.

Pierre Indian Learning Center was not among the facilities previously visited.

In the 2013/2014 school year, BIE funded 185 schools in 23 states, including 119 day schools, 52 boarding schools, and 14 peripheral dormitories. Of these schools, 131 were grant- or contract-operated schools funded through grant agreements or contracts with BIE and operated by the respected tribes. The remaining 54 were operated directly by BIE. Pierre Indian Learning Center, located in Pierre, SD, is a grant-operated off-reservation boarding school for students in first through eighth grade.

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# Findings

The quality of safety measures in place at Pierre Indian Learning Center was inadequate to prevent violence against both students and staff, from internal and external threats. Specifically, we found the facility—

- had an inadequate comprehensive emergency plan;
- provided training in basic violence prevention and emergency preparedness to both staff and students, but noted problems during both evacuation and lock-down drills run during our visit; and
- was missing 13 of the 18 safety measures we inspected (see Appendix 6).

## Emergency Preparedness/Security Plans

In our prior evaluations (see Appendix 3), we reviewed school emergency plans against five key topic areas including bomb threats, shootings, fights, hostage situations, and off-campus emergencies. We evaluated the Pierre Indian Learning Center emergency plan against the same key topic areas (see Appendix 4). We found that the facility had an inadequate comprehensive emergency plan.

We found that the emergency plan covered bomb threats and shootings. The plan, however, did not adequately cover these topics. For example, the plan did not address the multiple modular buildings used as classrooms and the possible need to evacuate more than one building in a bomb threat situation. Further, the plan did not address how different buildings would be notified, given that each building had its own alarm system and no central intercom system existed. In addition, the information in the plan on shootings outlined how a specific classroom, confronted by an armed individual should respond but did not contain information on how to notify the rest of the school of the gunman. Further, it did not address how a campus lock-down would occur. Finally, the emergency plan did not address fights, hostage situations, or off-campus emergencies.

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

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

## Recommendation

We recommend that Pierre Indian Learning Center:

- I. Use the BIE Guide to update their emergency plan by:
  - identifying a core planning team;
  - forming a common framework;
  - defining and assigning roles and responsibilities;
  - identifying threats and hazards;
  - assessing the risks posed by the identified threats and hazards;
  - prioritizing threats and hazards to be addressed;
  - developing goals and objectives;
  - identifying all possible courses of action and selecting the best available course of action;
  - formatting and writing collaborative and comprehensive emergency plan;
  - reviewing the plan with all stakeholders;
  - obtaining required approvals of the plan; and
  - training stakeholders on the plan and their roles and responsibilities under the plan.

## Training

We found that training in basic violence prevention during crisis situations (e.g., to address anger management and bullying, and to increase awareness of gang activity) and emergency preparedness was provided (see Appendix 5). We noted, however, problems with evacuation and lock-down drills run during our visit.

In our prior evaluations, we identified training topics that should be provided, to some degree, in all BIE-funded educational facilities to help reduce the risk of a violent incident. For staff, the six training topics include crisis/emergency plans, conflict resolution, anger management, suicide prevention, and drugs; for students, the six training topics include gangs, conflict resolution, anger management, bully prevention, and drugs (see Appendix 5). Since this was a follow-up review, we chose to evaluate the training provided at the Pierre Indian Learning Center against these same topics. We found that—

- all six training topics had been provided to staff; and
- all six training topics had been provided to students.

School staff ran an evacuation drill during our visit on January 30, 2014. While watching the drill, we noted that the staff moved students a safe distance from the building and accounted for all students and staff. The drill, however, was only run for the main academic building and did not include the modular classrooms close

to the academic building which could be affected in a fire, bomb threat, or other emergency requiring evacuation of the main academic building. As a result, the school did not use the full training value of the exercise to develop options for all potential situations.

School staff also ran a lock-down drill during our visit despite not routinely run lock-down drills and not knowing when the last lock-down drill had been run. We were told they did not routinely run lock-down drills due to the cumbersome nature of locking down the facility. While watching the lock-down drill, we noted several significant problems. First, teachers in the modular classrooms are notified of the lock-down via a calling tree because the school does not have a central intercom system. During the drill, however, not all teachers received the notification. In addition, the main academic building uses a series of alarms to notify teachers of different emergencies. At least one teacher misunderstood the lock-down alarm for a tornado alarm and was evacuating her students to the tornado shelter rather than going into lock-down. Finally, classrooms in the main academic building cannot be locked from the inside, and the main doors can only be locked by using an Allen wrench, making the process of locking down the main academic building extremely time consuming.

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 require different amounts of planning, time, and resources to perform, including—

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

Before making a decision about how many of which types of exercises to implement, a school should consider the costs and benefits of each type. Ideally, schools should use a combination of exercise types since each have advantages and will allow school administrators to identify different plan strengths and weaknesses.



## Recommendations

We recommend that Pierre Indian Learning Center:

2. Develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type; and
3. Perform both evacuation and lock-down drills, which include all buildings on campus, routinely during the school year.

## Physical Security Features

In our prior evaluations, we found no guidance for required safety measures for BIE-funded education facilities. Therefore, we used several public sources to compile a list of 18 safety measures we considered to be critical in areas such as physical access and communication. We found that 13 of the 18 critical safety measures we inspected were absent (see Appendix 6).

When we arrived on campus on January 30, 2014, we found no signs directing visitors or identifying the buildings on campus. We found the main academic building, however, and entered through one of many unlocked exterior doors. We passed several students and staff members who did not ask who we were or what we were doing on campus, despite our not wearing visitor's badges. Eventually, we asked for directions to the main office because it was not clearly marked.

We also found that—

- no security fencing existed around the campus;
- visitors were not required to sign in or show identification; and
- visitors could enter the building without being detected.

Further, while the dormitory had an adequate camera system, the system covering the academic areas was inadequate. Cameras were limited to only the main academic building. Also, camera feeds were not recorded for later viewing or use, and camera feeds were not monitored in real time for possible developing emergency situations. While school officials agreed the system was inadequate, we found that the system had not been updated or repaired because the company that supplied it had gone out of business and the school could not afford a replacement. Finally, the school has no security guards or school resource officers to compensate for the absence of security fencing, unlocked doors, a central alarm system, an intercom system, and a camera system.

As we mentioned in our prior report, we recognize that no individual safety measure is so critical that its absence is cause for immediate concern. The fewer safety measures used at an educational facility, however, the less likely it is

prepared to respond adequately to an incident, ensuring the safety of students and staff from internal or external threats.

## **Recommendations**

We recommend that Pierre Indian Learning Center:

4. Evaluate the 18 safety measures in Appendix 6 and determine the correct combination of safety measures for the campus necessary to ensure the safety of staff and students from internal and external threats. Once determined, work to put the selected safety measures in place; and
5. Put up signs indicating where visitors should report on campus.

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# Conclusion and Recommendations

## Conclusion

Inadequate emergency planning, school-wide practice of these plans, and implementation of appropriate safety measures resulted in Pierre Indian Learning Center being unprepared to prevent violence or ensure the safety of students and staff.

## Recommendations Summary

We recommend that Pierre Indian Learning Center:

1. Use the BIE Guide to update their emergency plan by:
  - identifying a core planning team;
  - forming a common framework;
  - defining and assigning roles and responsibilities;
  - identifying threats and hazards;
  - assessing the risks posed by the identified threats and hazards;
  - prioritizing threats and hazards to be addressed;
  - developing goals and objectives;
  - identifying all possible courses of action and selecting the best available course of action;
  - formatting and writing collaborative and comprehensive emergency plan;
  - reviewing the plan with all stakeholders;
  - obtaining required approvals of the plan; and
  - training stakeholders on the plan and their roles and responsibilities under the plan.
2. Develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type;
3. Perform both evacuation and lock-down drills, which include all buildings on campus, routinely during the school year;
4. Evaluate the 18 safety measures in Appendix 6 and determine the correct combination of safety measures for the campus necessary to ensure the safety of staff and students from internal and external threats. Once determined, work to put the selected safety measures in place; and
5. Put up signs indicating where visitors should report on campus.

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# Appendix I: Scope and Methodology

## Scope

The scope of this inspection was limited to violence prevention programs in place at the Pierre Indian Learning Center, an off-reservation boarding school located in Pierre, SD. We performed the same inspection at 15 other schools funded by the Bureau of Indian Education (BIE), which are listed in Appendix 2.

We also performed separate reviews at the Pierre Indian Learning Center to evaluate the programs in place at schools funded by BIE to improve academic achievement and the condition of educational facilities. The results of those reviews will be presented in separate reports.

## Methodology

We conducted this review from January 2014 to August 2014 in accordance with the Quality Standards for Inspections and Evaluations as put forth by the Council of the Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our conclusions.

To address our objective, we:

- reviewed the following items—
  - criteria (including laws, regulations, policies, and procedures),
  - studies,
  - prior reports, and
  - facility documentation;
- interviewed officials at Pierre Indian Learning Center; and
- visited Pierre Indian Learning Center on January 30, 2014.

We did not extensively review training records and materials, but relied on information provided to us through our interviews with facility officials.

## Appendix 2: Schools Visited

Facility Name	Type	Location	Grades	Date Visited
Tonalea Day School	BIE	Tonalea, AZ	K-8	January 14, 2014
Lukachukai Community School	Grant	Lukachukai, AZ	K-8	January 15, 2014
Tuba City Boarding School	BIE	Tuba City, AZ	K-8	January 16, 2014
Moencopi Day School	Grant	Tuba City, AZ	K-6	January 17, 2014
Flandreau Indian School	BIE	Flandreau, SD	9-12	January 28, 2014
Sicangu Owayawa Oti (Rosebud Dorm)	Grant	Mission, SD	1-12	January 29, 2014
Pierre Indian Learning Center	Grant	Pierre, SD	1-8	January 30, 2014
Cherokee Central Schools	Grant	Cherokee, NC	K-12	February 11, 2014
Ahfachkee Indian School	Grant	Clewiston, FL	PreK-12	February 13, 2014
Miccosukee Indian School	Contract	Miami, FL	K-12	February 14, 2014
Chemawa Indian School*	BIE	Salem, OR	9-12	April 28, 2014
Yakama Nation Tribal School*	Grant	Toppenish, WA	9-12	April 30, 2014
Paschal Sherman Indian School*	Grant	Omak, WA	K-9	May 1, 2014
Ojo Encino Day School*	BIE	Cuba, NM	K-8	May 20, 2014
Te Tsu Geh Oweenge Day School*	BIE	Santa Fe, NM	K-6	May 21, 2014
San Ildefonso Day School*	BIE	Santa Fe, NM	K-6	May 22, 2014

\* We revisited these six campuses from our prior reviews (see Appendix 3) to determine whether conditions noted had been corrected.

## Appendix 3: Prior Coverage

### Project NM-EV-BIE-0001-2008

Facility Name	Type	Location	Grades	Date Visited
John F. Kennedy Day School	BIE	White River, AZ	K-8	April 8, 2008
Tohono O'odham High School^	BIE	Sells, AZ	9-12	April 10, 2008
Santa Rosa Boarding School	BIE	Sells, AZ	K-8	April 11, 2008
Pine Ridge School^	BIE	Pine Ridge, SD	K-12	April 17, 2008
Ojo Encino Day School*	BIE	Cuba, NM	K-8	April 22, 2008
Chemawa Indian School^*	BIE	Salem, OR	9-12	April 22, 2008
Te Tsu Geh Oweenge Day School*	BIE	Santa Fe, NM	K-6	April 23, 2008
Blackfeet Dormitory	BIE	Browning, MT	1-12	April 24, 2008
San Ildefonso Day School*	BIE	Santa Fe, NM	K-6	April 24, 2008

### Project NM-EV-BIE-0003-2008

Facility Name	Type	Location	Grades	Date Visited
Tohono O'odham High School^	BIE	Sells, AZ	9-12	February 11, 2009
Pine Ridge School^	BIE	Pine Ridge, SD	K-12	February 5, 2009
Chemawa Indian School^#*	BIE	Salem, OR	9-12	February 10, 2009 January 11, 2010
White Shield School	Grant	Roseglen, ND	K-12	September 16, 2008

<b>Facility Name</b>	<b>Type</b>	<b>Location</b>	<b>Grades</b>	<b>Date Visited</b>
Mandaree Day School	Grant	Mandaree, ND	K-12	September 17, 2008
Twin Buttes Day School	Grant	Halliday, ND	K-8	September 18, 2008
Red Water Elementary School	Grant	Carthage, MS	K-8	September 30, 2008
Tucker Elementary School	Grant	Philadelphia, MS	K-8	October 1, 2008
Choctaw Central High School	Grant	Choctaw, MS	9-12	October 2, 2008
Conehatta Elementary School	Grant	Conehatta, MS	K-8	October 3, 2008
Two Eagle River School	Grant	Pablo, MT	K-12	October 7, 2008
Northern Cheyenne Tribal School	Grant	Busby, MT	K-12	October 9, 2008
Chief Leschi School	Grant	Puyallup, WA	K-12	October 20, 2008
Muckleshoot Tribal School#	Grant	Auburn, WA	K-12	October 20, 2008 January 13, 2010
Yakama Nation Tribal School*	Grant	Yakima, WA	9-12	October 21, 2008
Paschal Sherman Indian School*	Grant	Omak, WA	K-9	October 23, 2008
St. Stephens Indian School	Grant	St. Stephens, WY	K-12	October 30, 2008
Dunseith Day School	BIE	Dunseith, ND	K-8	February 18, 2009
Ojibwa Indian School	BIE	Belcourt, ND	K-8	February 19, 2009
Sherman Indian High School#	BIE	Riverside, CA	9-12	February 23, 2009 January 15, 2010
Gila Crossing Day School	Grant	Laveen, AZ	K-8	February 25, 2009
Salt River Elementary School	Grant	Scottsdale, AZ	K-6	February 26, 2009

^ We visited these schools in both Project NM-EV-BIE-0001-2008 and Project NM-EV-BIE-0003-2008.

# We revisited these three campuses during Project NM-EV-BIE-0003-2008 to determine whether conditions noted had been corrected in the time between visits.

\* We revisited these six campuses in our current reviews (see Appendix 2) to determine whether conditions noted had been corrected.

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

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



## Appendix 5: Training at Education Facility

Training	YES	NO
<b>STAFF:</b>		
Crisis/emergency plans	✓	
Conflict resolution	✓	
Anger management	✓	
Bully prevention	✓	
Suicide prevention	✓	
Drugs	✓	
<b>STUDENTS:</b>		
Gangs	✓	
Conflict resolution	✓	
Anger management	✓	
Bully prevention	✓	
Suicide prevention	✓	
Drugs	✓	

## Appendix 6: Matrix of Safety Measures

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

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

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

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