



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

REVIEW OF VIOLENCE PREVENTION AT THE LUKACHUKAI COMMUNITY SCHOOL




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Memorandum

To: Mr. Arthur Ben
Principal, Lukachukai Community School

From: Mary L. Kendall 
Deputy Inspector General

Subject: Inspection Report – Review of Violence Prevention at the Lukachukai
Community School
Report No. C-IS-BIE-0006-2014

This memorandum transmits the findings of our inspection of violence prevention efforts at the Lukachukai Community School. 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:

Kimberly Elmore
Assistant Inspector General
Office of Audits, Inspections, and Evaluations
U.S. Department of the Interior
Office of Inspector General
Mail Stop 4428
1849 C Street, NW.
Washington, DC 20240

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 Lukachukai Community School to determine the quality of safety measures in place to prevent violence against students and staff from internal and external threats. We found Lukachukai Community School's safety measures to be inadequate.

Specifically, Lukachukai Community School personnel were unable to locate a copy of its comprehensive emergency plan during our visit on January 15, 2014. In addition, while training in violence prevention and emergency preparedness was provided, school personnel were unable to run either a lock-down or evacuation drill during our visit.

Further, of the 18 safety measures we checked for, Lukachukai Community School did not have 8 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 school is to respond to an incident.

This is the third 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. Lukachukai Community School, located on the Navajo Reservation in Lukachukai, AZ, was not among the schools previously visited.

We provide six recommendations to help Lukachukai Community School improve its safety measures and its violence prevention and emergency preparedness training.

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.

Lukachukai Community School was not among the schools 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. The Lukachukai Community School is a grant-operated boarding school for students in kindergarten through eighth grade located on the Navajo Reservation in Lukachukai, AZ.

Findings

The quality of safety measures in place at Lukachukai Community School was inadequate to prevent violence against both students and staff, from internal and external threats. Specifically, we found the school—

- was unable to locate a copy of the comprehensive emergency plan;
- was unable to run either a lock-down or evacuation drill during our visit, although they reported being trained in basic violence prevention; and
- was missing 8 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 Lukachukai Community School’s emergency plan against the same key topic areas. We found that school officials were unable to locate a copy of the comprehensive emergency plan during our visit on January 15, 2014 (see Appendix 4).

A comprehensive emergency plan should always 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 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”¹ (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.

Recommendation

We recommend that Lukachukai Community School:

1. Locate its comprehensive emergency plan and ensure that it contains the key components outlined in Appendix 4 and the BIE Guide. If the comprehensive emergency plan cannot be located, use the BIE Guide to develop a comprehensive plan for use during an emergency; and
2. Distribute the comprehensive emergency plan among all staff members.

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

Training

We found that, while 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), school personnel were unable to run either a lock-down or evacuation drill 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 Lukachukai Community School 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.

While school personnel reported running routine evacuation drills, they could not remember the last time there was a lock-down drill. School officials told us that they were unable to run an evacuation drill during our visit due to the number of school personnel at an off-site conference. The remaining staff did not feel there was a sufficient number of staff on site to safely run an evacuation drill, given the number of staff members needed to supervise the students and operate the fire equipment. In addition, staff explained that in order to run a lock-down drill, the school needed to provide prior notification, and receive parental clearance. Parental clearance is required because students sent text messages to their parents during prior lock-down drills, which resulted in a car accident as concerned parents rushed to the school.

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.

Recommendation

We recommend that Lukachukai Community School:

3. Develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type;
4. Perform both evacuation and lock-down drills routinely during the school year; and
5. Develop evacuation plans that account for different staffing levels in the event an evacuation is necessary during minimal staffing levels.

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 8 of the 18 critical safety measures we inspected were absent (see Appendix 6).

When we arrived on campus on January 15, 2014, we bypassed the main building and entered the main academic building through one of the many unlocked doors. Once in the academic building, we walked down several hallways and passed several staff members and students, but were not challenged or directed to the office despite not having visitor badges displayed. We were asked if we needed any help but, when we said no, we were left to continue wandering the hallways. Later during our visit, another individual entered the school through the same unlocked door and solicited staff and students in the hallway to purchase a rug.

Eventually, we went to the administrative building, to which visitors are directed, but we were not required to sign in or show identification. We also were not given visitor badges to wear while on campus. In addition, the administrative building had no clear view to enable personnel to see all visitors arriving on campus. For example, an off-campus agency held a parenting class in the old kindergarten building directly across from the school dormitory. Individuals arriving on campus for the class could park and have access to the classroom without being detected by school personnel in the administrative building. School officials told us that incidents like the individual selling the rug in the hallway happens frequently. Further, school officials informed us that tourists often come on campus to take pictures. While the campus had adequate security fencing in place, numerous gates were continually left open to allow access to on-campus teacher housing, significantly diminishing the security value of the fencing.

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

Recommendation

We recommend that Lukachukai Community School:

6. 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.

Conclusion and Recommendations

Conclusion

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

Recommendations Summary

We recommend that Lukachukai Community School:

1. Locate its comprehensive emergency plan and ensure that it contains the key components outlined in Appendix 4 and the BIE guide. If the comprehensive emergency guide cannot be located, use the BIE Guide to develop a comprehensive plan for use during an emergency;
2. Distribute the comprehensive emergency plan among all staff members;
3. Develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type;
4. Perform both evacuation and lock-down drills routinely during the school year;
5. Develop evacuation plans that account for different staffing levels in the event an evacuation is necessary during minimal staffing levels; and
6. 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.

Appendix I: Scope and Methodology

Scope

The scope of this inspection was limited to violence prevention programs in place at the Lukachukai Community School, located on the Navajo Reservation in Lukachukai, AZ. 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 Lukachukai Community School 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
 - school documentation;
- interviewed officials at Lukachukai Community School; and
- visited Lukachukai Community School on January 15, 2014.

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

Facility Name	Type	Location	Grades	Date Visited
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.

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
STAFF:		
Crisis/emergency plans	✓	
Conflict resolution	✓	
Anger management	✓	
Bully prevention	✓	
Suicide prevention	✓	
Drugs	✓	
STUDENTS:		
Gangs	✓	
Conflict resolution	✓	
Anger management	✓	
Bully prevention	✓	
Suicide prevention	✓	
Drugs	✓	

Appendix 6: Matrix of Safety Measures

Safety Measures (Summary)	YES	NO
Adequate security fencing*	✓	
Secured exterior doors		X
Designated visitors' entrance	✓	
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	✓	
Hall monitors		X
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		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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Washington Metro Area: 202-208-5300

By Fax: 703-487-5402

By Mail: U.S. Department of the Interior
Office of Inspector General
Mail Stop 4428 MIB
1849 C Street, NW.
Washington, DC 20240