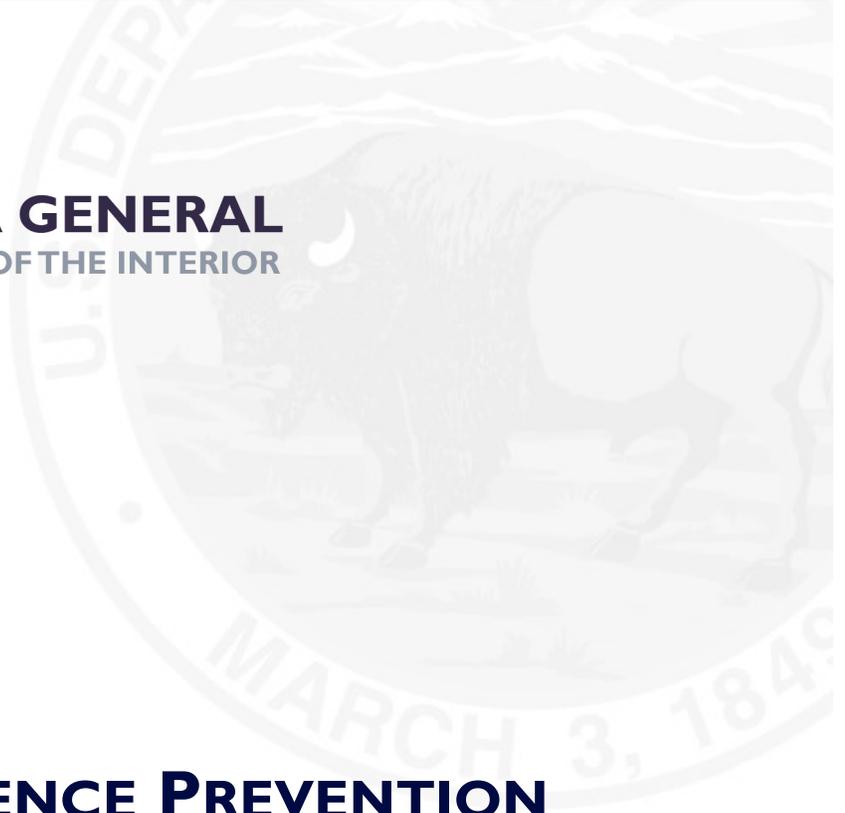




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U.S. DEPARTMENT OF THE INTERIOR



REVIEW OF VIOLENCE PREVENTION AT THE TONALEA DAY SCHOOL

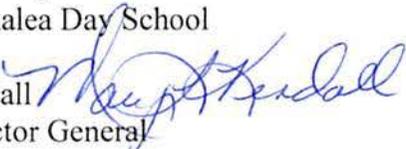


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U.S. DEPARTMENT OF THE INTERIOR

APR 09 2015

Memorandum

To: Dr. Deborah Holgate
Principal, Tonalea Day School

From: Mary L. Kendall 
Deputy Inspector General

Subject: Inspection Report – Review of Violence Prevention at the Tonalea Day School
Report No. C-IS-BIE-0008-2014

This memorandum transmits the findings of our inspection of violence prevention efforts at the Tonalea Day 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:

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

Specifically, Tonalea Day School's comprehensive emergency plan was difficult to understand and did not adequately cover four of five topic areas we chose to evaluate. Also, the roles and responsibilities of school staff during an emergency were not clearly defined. Further, training was not provided to staff and students on several violence prevention and emergency preparedness topics we reviewed.

Further, of the 18 safety measures we checked for, Tonalea Day School did not have 7 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 second 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. Tonalea Day School, located on the Navajo Reservation in Tonalea, AZ, was not among the schools previously visited.

We provide four recommendations to help Tonalea Day 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.

Tonalea Day 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. Tonalea Day School, located on the Navajo Reservation in Tonalea, AZ, is a BIE-operated day school for students in kindergarten through eighth grade.

Findings

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

- had an inadequate and confusing comprehensive emergency plan;
- had inadequate training in basic violence prevention; and
- was missing 7 of the 18 safety measures we inspected (see Appendix 6).

Emergency Preparedness/Security Plans

In 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 Tonalea Day School’s emergency plan against the same key topic areas (see Appendix 4). We found the school’s emergency plan was inadequate and confusing.

We found that the emergency plan contained information on all five of the topic areas; however, a closer review revealed that the plan did not adequately address four of the five topic areas. For example, the plan did not indicate a safe location where staff and students were to go when evacuating the facility during a bomb threat. In addition, the plan did not contain information on how to keep children safe in the event of an evacuation during an active shooter situation prior to the arrival of emergency responders. Such information must be part of comprehensive emergency planning to protect students and staff in dangerous situations.

In addition, the emergency plan contained confusing information, calling for the same code to be used for multiple emergency situations. For example, “code black” would be used for fire, explosions, bomb threats, campus evacuations, chemical spills, and utility emergencies. Without additional information, the code alone would be insufficient. Specifically, if a “code black” is called for a possible fire, the emergency plan calls for staff to turn off lights and other electrical equipment and close classroom windows prior to evacuating the building. If a “code black” is called for a bomb threat, however, the emergency plan calls for staff to leave lights and other electrical equipment on and leave classroom windows open prior to evacuating the building. Without knowing the nature of the emergency (i.e., fire or bomb threat) when “code black” was called, staff would not know how to respond under this plan.

Further, staff members were unclear on their roles and responsibilities in an emergency situation. Specifically, for our questions related to the emergency plan, the principal directed us to two staff members designated to be in charge during an actual emergency. Neither staff member was aware of this responsibility,

however. Studies¹ show that unclear assignment of responsibilities prior to an emergency resulted in communication problems during actual emergencies. These communication problems, in turn, can increase the severity of an emergency and contribute to human casualties and excess property damage.

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.

Recommendation

We recommend that Tonalea Day School should:

- 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 a 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 or to increase awareness of gang activity) was inadequate (see Appendix 5).

¹ The "Guide for Communicating Emergency Response Information for Natural Gas and Hazardous Liquids Pipelines (Report 14)" by the Hazardous Materials Cooperative Research Program issued in November 2014 and the "Coping with Twin Disasters: Health and Human Services Response to the 1989 Hurricane and Earthquake" by the Department of Health and Human Service Office of Inspector General in December 1990.

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

Our prior evaluations identified training topics that, to some degree, should be provided 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 Tonalea Day School against these same topics. We found that—

- three of the six training topics had not been provided to staff; and
- four of the six training topics had not been provided to students.

For example, students were not provided any type of gang awareness or resistance education. In fact, right next door to the school was an old Indian Health Services building covered with graffiti (see Figure 1), which was identified as gang graffiti by school officials.



Figure 1: Graffiti covered Indian Health Services building next to Tonalea Day School.
Source: OIG

In addition, while the school reported running routine evacuation and lock-down drills, we found that the school did not always use the training value of these exercises to develop options that applied to specific situations. For example, during our visit, we noticed that all staff members had to step into the hallway during a lock-down drill to validate that their classroom doors were properly locked. Tonalea Day School staff, however, accepted this as how lock-downs were performed without recognizing the inherent risk associated with teachers stepping into the hallway during a potential active shooter situation. Further, if doors could not be locked, the emergency plan called for passing students out the window, often into a completely fenced play area with no place to hide or any means of escape. Again, Tonalea Day School staff did not see this as a problem, and so did not use the lock-down drill as a learning opportunity to develop alternatives.

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 deciding 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 has advantages and will allow school administrators to identify different plan strengths and weaknesses.

Recommendations

We recommend that Tonalea Day School should:

2. Implement training in those areas listed in Appendix 5 where training has not occurred; and
3. Develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type.

Physical Security Features

In our prior evaluations, we found no guidance for required safety measures for BIE-funded educational 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 7 of the 18 critical safety measures we inspected were absent (see Appendix 6).

When we arrived on campus on January 14, 2014, we walked around the campus and checked numerous exterior doors; all but the main visitor's entrance were locked. Later, when touring the campus with school personnel, they remarked that at least two doors in the back of the school were usually unlocked or propped open. These doors are directly opposite an open gate in the fence line, which is left open from Monday morning to Friday evening for students to more easily access the campus, but which is also close to a structure school officials identified as the "drug house" and damaged fencing.

The school also had no resource officer or on-campus security. The principal stated that the facility manager had received training and could act as a security officer in an emergency. The facility manager, however, stated that he had never received such training. In addition, school personnel indicated that the tribal police do not reliably notify the school of relevant local emergencies or events that could necessitate actions, such as a school lock-down. Further, when the school called the tribal police during an emergency in the past, the response time was 3 hours.

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 Tonalea Day school should:

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.

Conclusion and Recommendations

Conclusion

Inadequate emergency planning, training, and implementation of appropriate safety measures resulted in Tonalea Day School being unprepared to prevent violence or ensure the safety of students and staff.

Recommendations Summary

We recommend that Tonalea Day School should:

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 a 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. Implement training in those areas listed in Appendix 5 where training has not occurred.
3. Develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type.
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.

Appendix I: Scope and Methodology

Scope

The scope of this inspection was limited to violence prevention programs in place at the Tonalea Day School, located on the Navajo Reservation in Tonalea, 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 Tonalea Day 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 Tonalea Day School; and
- visited Tonalea Day School on January 14, 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	✓	
Adequately Covered Hostage Situations		X
Adequately Covered Off-Campus Emergencies		X
Plan Less Than A Year Old	✓	

Appendix 5: Training at Education Facility

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

Appendix 6: Matrix of Safety Measures

Safety Measures (Summary)	YES	NO
Adequate security fencing*		X
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		X
Security guard		X
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**		X
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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