



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

# **REVIEW OF VIOLENCE PREVENTION AT THE MICCOSUKEE INDIAN SCHOOL**



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

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Memorandum

To: Mr. Manuel Varela  
Principal, Miccosukee Indian School

From: Mary L. Kendall   
Deputy Inspector General

Subject: Inspection Report – Review of Violence Prevention at the Miccosukee Indian School  
Report No. C-IS-BIE-0012-2014

This memorandum transmits the results of our inspection of violence prevention efforts at the Miccosukee Indian 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.

We did not have any findings in this report. The safety measures in place at Miccosukee Indian School were comprehensive in terms of preventing violence against both students and staff, from internal and external threats. Therefore, a written response is not required.

The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit, inspection, and evaluation reports issued.

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## Results in Brief

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

Specifically, the Miccosukee Indian School's comprehensive emergency plan contained all five topics we chose to review. In addition, training on violence prevention and emergency preparedness was provided to both staff and students. Further, school personnel were able to successfully run both lock-down and evacuation drills during our visit on February 14, 2014.

Finally, of the 18 safety measures we checked for, Miccosukee Indian School did not have 3 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 tenth 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. Miccosukee Indian School, located on the Tamiami Trail Reservation in Miami, FL, was not among the schools previously visited.

Notably, Miccosukee Indian School's lock-down drills could be used as an example of a best practice for other schools. The drills were quick, efficient, and thorough, and ensured the safety of staff and students.

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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.

The Miccosukee Indian School was not among the schools previously visited.

BIE funds 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 respected tribes. The remaining 54 were operated directly by BIE. The Miccosukee Indian School is a contract-operated day school for students in kindergarten through twelfth grade, located on the Tamiami Trail Reservation in Miami, FL.

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# Findings

The safety measures in place at Miccosukee Indian School were comprehensive in terms of preventing violence against both students and staff, from internal and external threats. Specifically, we found the school—

- had an adequate comprehensive emergency plan in place;
- provided training in violence prevention and emergency preparedness to both staff and students, and was able to run both lock-down and evacuation drills during our visit; and
- was missing only 3 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 Miccosukee Indian School's emergency plan against the same key topic areas (see Appendix 4). We found that the school had an adequate comprehensive emergency plan in place. Specifically, we found that the emergency plan contained sections on, and adequately covered, all five topic areas.

## Training

We found that training in basic violence prevention during crisis situations and emergency preparedness was provided (see Appendix 5). In addition, school personnel were able to run both lock-down and evacuation drills 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 included 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 Miccosukee Indian School against these same topics. We found that—

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

The school decided not to provide training to students in the two areas not covered, gangs and suicide prevention, because of cultural sensitivities and community needs.

In addition, 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.

We found that the school's lock-down drills could be used as an example of a best practice for other schools. Specifically, not only were the drills quick and efficient, but an armed security guard checked the entire facility to ensure it was securely locked down and all staff and students were safe. To end the lock-down, tribal police went to each room, showing their badges to give the all-clear message, so that staff members knew that the all-clear message was not a ploy by unauthorized individuals. While such steps required extra time and effort to return to normal operations after a lock-down, they also ensured the safety of staff and students.

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

When we arrived on campus on February 14, 2014, we were unable to enter the building through any entrance other than the main visitors' entrance. At that entrance, the visitors' sign-in station is manned by an armed security officer. In addition, a second armed security officer patrols the building and perimeter. Further, security camera feeds are monitored real time in a building nearby and any questionable activity is communicated via radio to the security officers inside the school. The security officers also have the ability to communicate with the tribal police via radio when they need assistance.

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.

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## **Conclusion**

Comprehensive emergency planning, practice, and implementation of appropriate safety measures resulted in Miccosukee Indian School being prepared to prevent violence and ensure the safety of students and staff. Specifically, the school had an effective comprehensive emergency plan and provided the necessary training in both violence prevention and emergency preparedness. Further, the school's lock-down drills could be used as an example of a best practice for other schools. Although the school was missing 3 of the 18 safety measures we inspected (see Appendix 6), the school's security officers and other security features ensured the safety of students and staff from internal or external threats.

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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 Miccosukee Indian School, located on the Tamiami Trail Reservation in Miami, FL. 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 Miccosukee Indian 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 February 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 Miccosukee Indian School; and
- visited Miccosukee Indian School on February 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 Dormitory)	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 <sup>^</sup>	BIE	Sells, AZ	9-12	April 10, 2008
Santa Rosa Boarding School	BIE	Sells, AZ	K-8	April 11, 2008
Pine Ridge School <sup>^</sup>	BIE	Pine Ridge, SD	K-12	April 17, 2008
Ojo Encino Day School <sup>*</sup>	BIE	Cuba, NM	K-8	April 22, 2008
Chemawa Indian School <sup>^*</sup>	BIE	Salem, OR	9-12	April 22, 2008
Te Tsu Geh Oweenge Day School <sup>*</sup>	BIE	Santa Fe, NM	K-6	April 23, 2008
Blackfeet Dormitory	BIE	Browning, MT	1-12	April 24, 2008
San Ildefonso Day School <sup>*</sup>	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 <sup>^</sup>	BIE	Sells, AZ	9-12	February 11, 2009
Pine Ridge School <sup>^</sup>	BIE	Pine Ridge, SD	K-12	February 5, 2009
Chemawa Indian School <sup>^#*</sup>	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	✓	
Adequately Covered Shootings	✓	
Adequately Covered Fights	✓	
Adequately Covered Hostage Situations	✓	
Adequately Covered Off-Campus Emergencies	✓	
Plan Less Than A Year Old	✓	

## 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		X
Conflict resolution	✓	
Anger management	✓	
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	✓	
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		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.

