



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

REVIEW OF VIOLENCE PREVENTION AT THE PASCHAL SHERMAN INDIAN SCHOOL



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OCT 13 2015

Memorandum

To: Ms. Tami Hickle
Superintendent, Paschal Sherman Indian School

From: Mary L. Kendall *Mary L. Kendall*
Deputy Inspector General

Subject: Inspection Report – Review of Violence Prevention at the Paschal Sherman
Indian School
Report No. C-IS-BIE-0029-2014

This memorandum transmits the findings of our inspection of violence prevention efforts at the Paschal Sherman 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 (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 Paschal Sherman 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 that Paschal Sherman Indian School improved its safety measures since our last visit, but we also identified areas for continued improvement.

Specifically, while school personnel were able to run both evacuation and lock-down drills during our visit on May 1, 2014, we found that the school did not appear to use the lock-down drill to identify campus weaknesses and develop options for improvement. Paschal Sherman Indian School's comprehensive emergency plan, however, contained all five topics we reviewed.

Further, of the 18 safety measures we checked for, Paschal Sherman Indian School did not have 6 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 thirteenth 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. Paschal Sherman Indian School, located on the Colville Confederated Tribal Reservation in Omak, WA, was among the schools previously visited.

We provide three recommendations to help Paschal Sherman Indian School improve its safety measures.

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.

Paschal Sherman Indian School was 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 respective tribes. The remaining 54 were operated directly by BIE. Paschal Sherman Indian School is a grant-operated boarding school for students in kindergarten through ninth grade, located on the Colville Confederated Tribal Reservation in Omak, WA.

Findings

The quality of safety measures in place at Paschal Sherman Indian School have improved since our last visit, making the school partially prepared to prevent violence against both students and staff, from internal and external threats, however, we found opportunities for improvement concerning the lock-down drill. Specifically, we found the school—

- had a comprehensive emergency plan in place that covered the five topic areas we reviewed;
- provided training in violence prevention and emergency preparedness to both staff and students, but did not appear to use the lock-down drills to identify campus weaknesses and develop options for improvement; and
- was missing 6 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 Paschal Sherman Indian School emergency plan against the same key topic areas in both October 2008 and May 2014 (see Appendix 4). We found that the school had improved the plan since 2008 and now has an adequate comprehensive emergency plan in place. Specifically, in October 2008, we found that the emergency plan did not address off-campus emergencies. In May 2014, we found that the emergency plan adequately covered all of the five topic areas.

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.

Training

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 members, the six training topics include crisis/emergency plans, conflict resolution, anger management, suicide

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

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 Paschal Sherman Indian School against these same topics. We found that training in basic violence prevention during crisis situations and emergency preparedness was provided (see Appendix 5).

In October 2008, we found that—

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

During our visit in May 2014, we found that—

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

In addition, while the school reported running routine evacuation and lock-down drills, we found that the school did not appear to use the lock-down drill to identify campus weaknesses and develop options that applied to specific situations. School officials reported they conducted four lock-down drills per year, however, we noticed several missteps during the drill conducted the day we visited. For example, while the school had an operable central alarm system, the school's psychologist was unaware of the lock-down drill being conducted. As a result, auditors were able to walk into the psychologist's office while she was in a session with a student and the student's parents. In addition, all classroom doors required a key to be locked. Therefore, at the beginning of the day, all substitute teachers' classroom doors were unlocked by office personnel. When the lock-down was announced, no one returned to lock these doors, leaving the substitute teachers unable to lock the classrooms. As a result, several classrooms containing teachers and students remained unsecured during the drill. Further, a visitor was left in the main atrium during the lock-down drill. Finally, all of these weaknesses inside the academic building were magnified because an exterior classroom door was found to have been propped open during the lock-down drill, allowing anyone to access the facility.

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 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 Paschal Sherman Indian School:

- I. Develop an emergency exercise plan that includes the different types of exercises and the frequency of each type to ensure the greatest training value is obtained from the drills.

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 the school made some improvements since 2008. Specifically, in October 2008, we found that 9 of the 18 critical safety measures we inspected were absent. In May 2014, however, only 6 of the 18 critical safety measures were absent (see Appendix 6).

When we arrived on campus on May 1, 2014, we entered the main academic building through an exterior classroom door that was propped open. Once inside, the teacher directed us to the main lobby to sign in. Before arriving at the main lobby, however, we were not challenged by any other staff we encountered in the building. In addition, although the school had a security fence surrounding the entire campus, we observed, and school officials confirmed, that several of the gates were always open. For example, a gate located at the back of the school by the dormitory remained open to allow access to the open area behind the campus (see Figure 1). In addition, gates located between the school ground and the Tribe's adjacent property were also always left open (see Figure 2). Further, a large section of the school's fence was severely damaged. School officials indicated they were in the process of fixing the fence and installing a gate at that location (see Figure 3).



Figure 1. Open gate near the dormitory. Source: OIG



Figure 2. Open gate between the school campus and adjacent tribal property. Source: OIG



Figure 3. Damaged fencing on the school campus. Source: OIG

Finally, the school did not adequately control campus visitors. For example, a funeral was held at the tribal Long House, on the property adjacent to the school, on the day of our visit. Because the gate remained open between the two properties, several former students attending the funeral walked over to the school. The former students, many of them still children and difficult to distinguish from current students, roamed the halls and interrupted classes. The former students did not stop by the office to sign in, so school personnel remained unaware of how many such “visitors” roamed the facility during our visit. While we understand that cultural sensitivities play a role in Indian Country, and that schools often serve as centers of activity, safety measures are needed to protect students and staff. If an actual emergency occurred, such as a fire, school officials could not have ensured that all individuals safely evacuated the facility, especially because they had no way to know the number of individuals present.

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 Paschal Sherman Indian School:

2. Repair the damaged section of fencing; and
3. 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

Paschal Sherman Indian School's safety measures have improved since our last visit, however, inadequate use of the lock-down drill to identify campus weaknesses and develop options for improvement, as well as limited implementation of appropriate safety measures, only left Paschal Sherman Indian School partially prepared to prevent violence and ensure the safety of students and staff.

Recommendations Summary

We recommend that Paschal Sherman Indian School:

1. Develop an emergency exercise plan that includes the different types of plan exercises and the frequency of each exercise type to ensure the greatest training value is obtained from the drills.
2. Repair the damaged section of fencing.
3. 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 Paschal Sherman Indian School, a grant-operated boarding school located on the Colville Confederated Tribal Reservation in Omak, WA. 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 a separate review at the Paschal Sherman Indian School to evaluate the programs in place at schools funded by BIE to improve academic achievement. The result of that review will be presented in a separate report.

Methodology

We conducted this review from May 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 Paschal Sherman Indian School; and
- visited Paschal Sherman Indian School on May 1, 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	8-12	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 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	05/01/14		10/23/08	
	YES	NO	YES	NO
Adequately Covered Bomb Threats	✓		✓	
Adequately Covered Shootings	✓		✓	
Adequately Covered Fights	✓		✓	
Adequately Covered Hostage Situations	✓		✓	
Adequately Covered Off-Campus Emergencies	✓			X
Plan Less Than A Year Old		X	✓	

Appendix 5: Training at Education Facility

Training	05/01/14		10/23/08	
	YES	NO	YES	NO
STAFF:				
Crisis/emergency plans	✓		✓	
Conflict resolution	✓			X
Anger management	✓			X
Bully prevention	✓		✓	
Suicide prevention	✓		✓	
Drugs	✓		✓	
STUDENTS:				
Gangs	✓		✓	
Conflict resolution	✓		✓	
Anger management	✓		✓	
Bully prevention	✓		✓	
Suicide prevention	✓			X
Drugs	✓		✓	

Appendix 6: Matrix of Safety Measures

Safety Measures (Summary)	05/01/14		10/23/08	
	YES	NO	YES	NO
Adequate security fencing*		X		X
Secured exterior doors**		X	✓	
Designated visitors' entrance	✓		✓	
Visitors' entrance that prevented unobserved entering	✓		✓	
Visitors required to sign in or show identification	✓			X
Visitors required to wear a visitors' badge	✓			X
Security camera(s)	✓		✓	
Metal detector		X		X
Security guard	✓			X
Hall monitors		X		X
Operable central alarm systems	✓		✓	
Intercom system in classrooms	✓		✓	
Exits clearly marked	✓		✓	
Evacuation maps clearly displayed	✓			X
Graffiti free walls, playground equipment, etc.	✓		✓	
Student dress code***	✓		✓	
Staff required to wear identification cards		X		X
Students required to wear identification cards		X		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.

** In our evaluation report School Violence Prevention, Report No. NM-EV-BIE-0003-2008 we mistakenly reported observing that Paschal Sherman had secured exterior doors, however, this was not confirmed during our 2008 site visit.

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

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