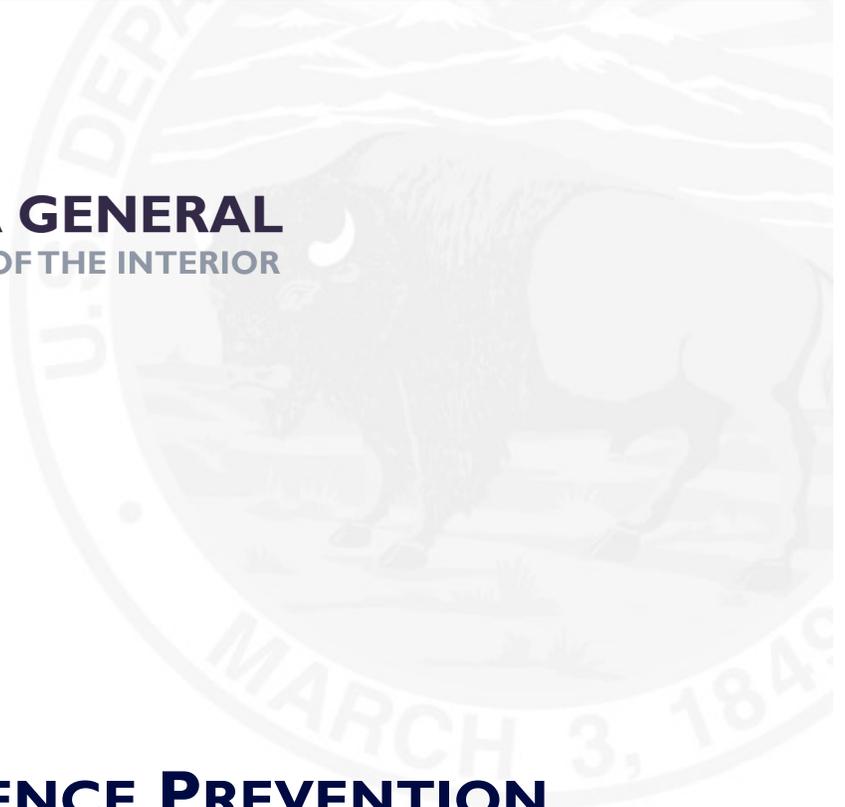




OFFICE OF  
**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR



# **REVIEW OF VIOLENCE PREVENTION AT THE OJO ENCINO DAY SCHOOL**



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

DEC 03 2015

Memorandum

To: Ms. Vickie Blackwater  
Principal, Ojo Encino Day School

From: Mary L. Kendall   
Deputy Inspector General

Subject: Inspection Report – Review of Violence Prevention at the Ojo Encino Day School  
Report No. C-IS-BIE-0033-2014

This memorandum transmits the findings of our inspection of violence prevention efforts at the Ojo Encino 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:

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 Ojo Encino 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 that Ojo Encino Day School had improved its emergency preparedness plans significantly since our last visit, however, the school's other safety measures were inadequate.

Specifically, while Ojo Encino Day School's comprehensive emergency plan contained four of the five topics we reviewed, we found that it did not cover hostage situations. In addition, training on violence prevention and emergency preparedness was not provided to either staff or students. Further, we were unable to run evacuation or lock-down drills during our visit on May 20, 2014, because school officials felt it was unsafe for staff and students to perform drills that they do not practice regularly.

Finally, of the 18 safety measures we checked for, Ojo Encino Day School did not have 5 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 fourteenth 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. Ojo Encino Day School, located on the Navajo Reservation in Cuba, NM, was among the schools previously visited.

We provide five recommendations to help Ojo Encino Day School improve its safety measures.

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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.

Ojo Encino Day 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. Ojo Encino Day School is a BIE-operated day school for students in kindergarten through eighth grade, located on the Navajo Reservation in Cuba, NM.

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# Findings

The quality of safety measures in place at Ojo Encino Day School have slightly improved since our last visit, making the school partially prepared to prevent violence against both students and staff, from internal and external threats. Specifically, we found the school—

- had a comprehensive emergency plan in place but it did not contain detailed guidance to address a hostage situation;
- did not provide training in violence prevention or emergency preparedness to either staff or students, and were unable to run either lock-down or evacuation drills during our visit; and
- was missing 5 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 Ojo Encino Day School emergency plan against the same key topic areas in both April 2008 and May 2014 (see Appendix 4). We found that the school had made significant improvements since 2008 but that the comprehensive emergency plan still did not cover all five key topic areas.

Specifically, in April 2008, we found that the emergency plan did not contain information on any of the five topic areas we reviewed. In May 2014, however, we found that the comprehensive emergency plan contained information on, and adequately covered, four of the five topic areas including bomb threats, shootings, fights, and off-campus emergencies. The emergency plan however, did not cover hostage situations.

We recognize that no individual safety measure is so critical that its absence is cause for immediate concern; however, detailed guidance and training in this area may enable staff to respond appropriately to a hostage situation. 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"<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 Ojo Encino Day School:

- I. Update its comprehensive emergency plan to include information on how to handle hostage situations.

## 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 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 Ojo Encino Day School against these same topics. We found that training in basic violence prevention during crisis situations and in emergency preparedness was not provided (see Appendix 5).

We found in April 2008 that—

- none of the six training topics had been provided to staff; and
- none of the six training topics had been provided to students.

We found in May 2014 that—

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

In addition, school officials reported they did not run routine evacuation drills, and they had not run a lock-down drill in over 2 years. School officials requested that we not run an evacuation or lock down drill during our visit for safety reasons, since it was the second-to-last day of school and drills were not practiced regularly.

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.

## Recommendations

We recommend that Ojo Encino Day School:

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 exercises and the frequency of each type; and
4. Perform both evacuation and lock-down drills 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. During our visit to Ojo Encino Day School in April 2008, we found that 10 of those 18 critical safety measures were absent, whereas during our visit in May 2014 only 5 of the 18 were absent (see Appendix 6). We also noted, however, that a new building where classes were being held had been constructed since our last visit.

Unlike the older building we visited in 2008, the new school building had a number of security features including secured exterior doors, a designated visitor's entrance, and security cameras. We commend the security upgrades, however, we still noted opportunities for improvement. For example, when we arrived on campus, we walked up to the locked gym door where students decorating the gym for graduation let us inside. Although teachers were also in the gym, no one questioned our presence or directed us to the office to sign in. After talking with the students, we left the gym to walk through the facility. When we entered the cafeteria, the facilities manager asked who we were and what we were doing on campus. He also asked us to provide identification and escorted us to the main office where we observed no one present to monitor visitor sign-in. Anyone could have easily entered the unlocked front door undetected.

We were also impressed with the locking mechanism used for classroom doors in the school, and though they were not one of the 18 safety measures we reviewed, we believe their installation could be used as a best practice by other schools. Specifically, while each classroom had a unique key to open the door from the outside, all classroom doors could be locked from the inside with any classroom key. A significant safety feature, it allowed teachers to follow emergency procedures and lock whatever classroom they were in at the time of an emergency, even if that classroom was not their own.

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 Ojo Encino Day School:

5. Evaluate the five remaining safety measures not implemented in Appendix 6 and determine if they are 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.

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# Conclusion and Recommendations

## Conclusion

Ojo Encino Day School's safety measures have slightly improved since our last visit, however, the school does not run routine evacuation or lock-down drills, which only left Ojo Encino Day School partially prepared to prevent violence and ensure the safety of students and staff.

## Recommendations Summary

We recommend that Ojo Encino Day School:

1. Update its comprehensive emergency plan to include information on how to handle hostage situations.
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 exercises and the frequency of each type.
4. Perform both evacuation and lock-down drills routinely during the school year.
5. Evaluate the five remaining safety measures not implemented in Appendix 6 and determine if they are 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.

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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 Ojo Encino Day School, a BIE-operated day school located on the Navajo Reservation in Cuba, NM. 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 Ojo Encino Day 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 Ojo Encino Day School; and
- visited Ojo Encino Day School on May 20, 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 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	05/20/14		04/22/08	
	YES	NO	YES	NO
Adequately Covered Bomb Threats	✓			X
Adequately Covered Shootings	✓			X
Adequately Covered Fights	✓			X
Adequately Covered Hostage Situations		X		X
Adequately Covered Off-Campus Emergencies	✓			X
Plan Less Than A Year Old	✓			X

## Appendix 5: Training at Education Facility

Training	05/20/14		04/22/08	
	YES	NO	YES	NO
<b>STAFF:</b>				
Crisis/emergency plans		X		X
Conflict resolution		X		X
Anger management		X		X
Bully prevention	✓			X
Suicide prevention		X		X
Drugs *		X		X
<b>STUDENTS:</b>				
Gangs		X		X
Conflict resolution		X		X
Anger management		X		X
Bully prevention	✓			X
Suicide prevention		X		X
Drugs *		X		X

\* For the April 22, 2008 visit, we verified that school officials performed random searches of lockers and backpacks for drugs, however, we could not verify if school officials provided drug training for either staff or students.

## Appendix 6: Matrix of Safety Measures

Safety Measures (Summary)	05/20/14		04/22/08	
	YES	NO	YES	NO
Adequate security fencing*	✓		✓	
Secured exterior doors	✓			X
Designated visitors' entrance	✓			X
Visitors' entrance that prevented unobserved entering		X		X
Visitors required to sign in or show identification	✓		✓	
Visitors required to wear a visitors' badge	✓			X
Security camera(s)	✓			X
Metal detector		X		X
Security guard		X		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**	✓		✓	
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.

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

