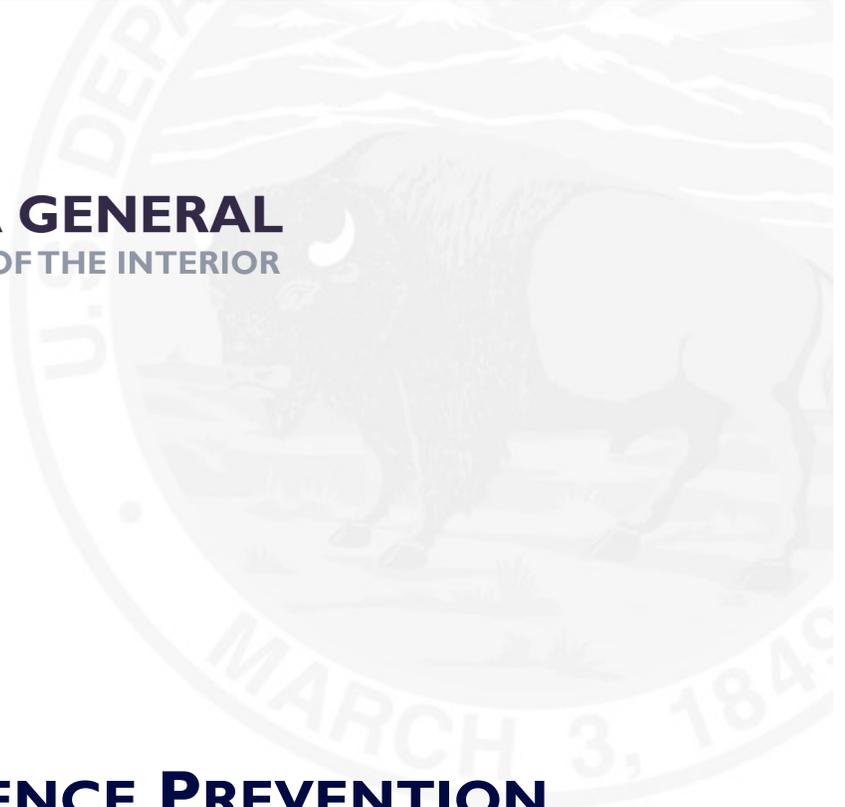




OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR



REVIEW OF VIOLENCE PREVENTION AT THE TE TSU GEH OWEENGE DAY SCHOOL

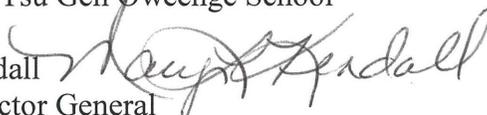


OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

DEC 03 2015

Memorandum

To: Ms. Veronica Martinez
Principal, Te Tsu Geh Oweenge School

From: Mary L. Kendall 
Deputy Inspector General

Subject: Inspection Report – Review of Violence Prevention at the Te Tsu Geh Oweenge School
Report No. C-IS-BIE-0035-2014

This memorandum transmits the findings of our inspection of violence prevention efforts at the Te Tsu Geh Oweenge 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 Te Tsu Geh Oweenge 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 Te Tsu Geh Oweenge School slightly improved its safety measures since our last visit, however, we identified areas for continued improvement.

Specifically, Te Tsu Geh Oweenge School did not have a comprehensive emergency plan. In addition, while the school successfully ran an evacuation drill during our visit on May 21, 2014, school officials felt it would be unsafe for staff and students to perform a lock-down drill since the drill had not been previously practiced. Conversely, training on violence prevention and emergency preparedness was provided to both staff and students.

Further, of the 18 safety measures we checked for, Te Tsu Geh Oweenge School did not have 9 in place, and 1 that was not applicable. 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 fifteenth 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. Te Tsu Geh Oweenge School, located on the Pueblo of Tesuque in Santa Fe, NM, was among the schools previously visited.

We provide six recommendations to help Te Tsu Geh Oweenge 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.

Te Tsu Geh Oweenge 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. Te Tsu Geh Oweenge School is a grant-operated day school for students in kindergarten through sixth grade, located on the Pueblo of Tesuque in Santa Fe, NM.

Findings

The quality of safety measures in place at Te Tsu Geh Oweenge 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, however, we found opportunities for improvement concerning the emergency plan, lock-down drill, and the safety measures we inspected. Specifically, we found the school—

- did not have a comprehensive emergency plan in place;
- had provided training in violence prevention and emergency preparedness to both staff and students, but were unable to run a lock-down drill during our visit; and
- was missing nine of the 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 Te Tsu Geh Oweenge School emergency plan against the same key topic areas in both April 2008 and May 2014 (see Appendix 4).

In 2008, we found that the school had both a comprehensive emergency plan and a flip chart book. In 2014, however, the school only had a flip chart book (see Figure 1). The flip chart book serves the school as a quick reference guide; however, a more comprehensive plan gives those with operational responsibilities more detailed instructions regarding what to do in an emergency, as well as when to do it and why. A comprehensive emergency guide can also make campus-specific instructions available to off-campus emergency responders.

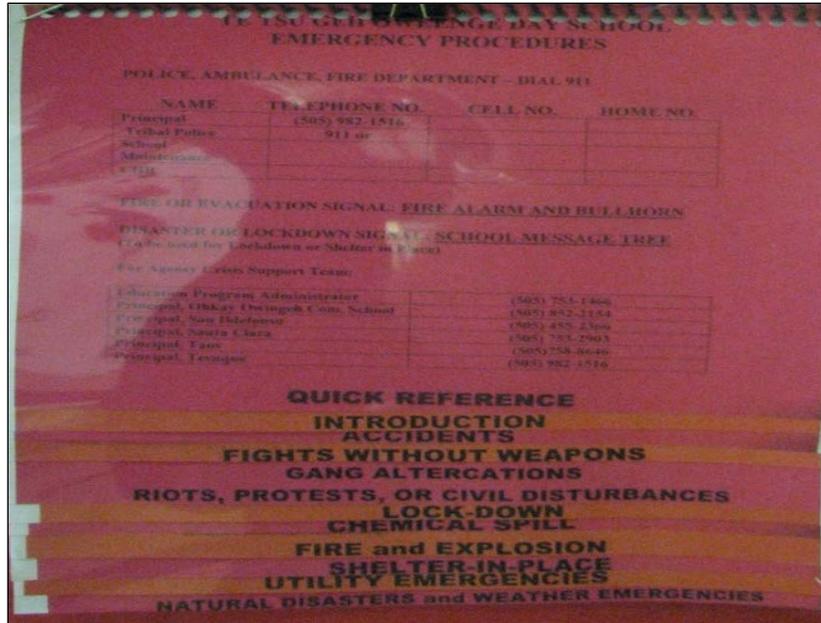


Figure 1. Te Tsu Geh Oweenge School emergency procedures flip chart. Source: OIG

Even though the school only had a flip chart book, we found that the school had improved its emergency procedures since our visit in April 2008; however, the procedures in place were still inadequate. Specifically, in 2008, we found that neither the emergency plan nor the flip chart book contained adequate information on three of the five key topic areas, including bomb threats, shootings, and school fights. They did not, however, contain information on hostage situations, or off campus emergencies. In May 2014, we found that the flip chart book contained information on and adequately covered three of the key topic areas, including shootings, fights, and off-campus emergencies. It did not, however, contain information on bomb threats and hostage situations.

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.

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

Recommendations

We recommend that Te Tsu Geh Oweenge School should:

1. Use the BIE Guide to create a comprehensive 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. Update the classroom quick reference guide for use during an emergency.

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 Te Tsu Geh Oweenge School against these same topics. We found that the school provided training in basic violence prevention during crisis situations and emergency preparedness (see Appendix 5), an improvement to its training procedures since 2008.

In April 2008, we found that—

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

In May 2014, we found that—

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

Specifically, an outside group visited the school to provide training on bully prevention, domestic violence awareness, and tobacco cessation and prevention classes.

In addition, while the school reported running routine evacuations, school officials stated they did not know when the last lock-down drill had been performed. As a result, school officials believed it would be unsafe for staff and students to run a lock-down drill during our visit. They stated that they planned to practice the lock-down drill with staff to work out any problems prior to running an actual drill with students present.

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 Te Tsu Geh Oweenge School:

3. Develop an emergency plan that includes the different types of exercises and the frequency of each exercise type to ensure the greatest training value is obtained from the drills; 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. We found that the school had made limited improvements since 2008. Specifically, in April 2008, of the 18 critical safety measures we inspected, we found 11 were absent, and one was not applicable due to classrooms being located in separate portable buildings. All students were escorted between buildings by teachers negating the need for hallway monitors. In May 2014, of the 18 critical safety measures we inspected, we found that 9 were absent, and one was not applicable due to classrooms being located in separate buildings (see Appendix 6).

When we arrived on campus on May 21, 2014, no one greeted us or questioned our presence on campus. We noticed, however, that the entire parking lot was visible from anywhere on campus, due to the campus' small size. As a result, visitors' entering the campus from the parking lot could easily be seen from any location. Nevertheless, several classroom doors, as well as the administrative office door were propped open, allowing easy access into classrooms. Closer analysis of classroom doors revealed that they would be cumbersome and time consuming to close and lock in an emergency. Specifically, each classroom door had to be locked with an Allen wrench located next to each classroom door (see Figures 2 and 3).

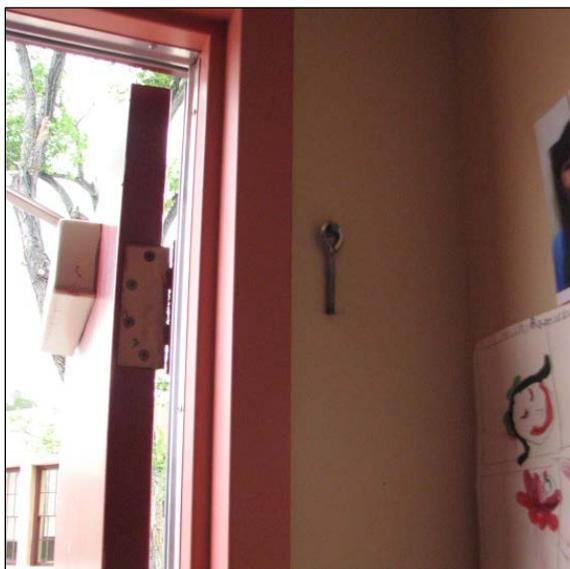


Figure 2. Allen wrench hanging near a classroom door. Source: OIG



Figure 3. An Allen wrench is needed to lock classroom doors. Source: OIG

Finally, although fencing surrounded the entire campus, several sections were not security fencing and, therefore, would not have prevented access to the campus (see Figure 4). In addition, some sections were damaged (see Figure 5). Specifically, school officials stated a tree fell on the fence, damaging it during a storm. The school had submitted a work order to repair the fence.



Figure 4. Security fence joining the non-security fence surrounding the campus. Source: OIG



Figure 5. A damaged section of fence surrounding Te Tsu Geh Oweenge School. Source: OIG

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.

Recommendations

We recommend that Te Tsu Geh Oweenge School:

5. 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; and
6. Follow-up on the status of the work order to repair the damaged section of security fencing.

Conclusion and Recommendations

Conclusion

Te Tsu Geh Oweenge School's safety measures have slightly improved since our last visit, however, an incomplete emergency plan, not performing routine lock-down drills, and limited implementation of appropriate safety measures, resulted in Te Tsu Geh Oweenge School being only partially prepared to prevent violence and ensure the safety of students and staff.

Recommendations Summary

We recommend that Paschal Sherman Indian School:

1. Use the BIE Guide to create their comprehensive 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. Update the classroom quick reference guide for use during an emergency.
3. Develop an emergency plan that includes the different types of exercises and the frequency of each exercise type to ensure the greatest training value is obtained from the drills.
4. Perform both evacuation and lock-down drills routinely during the school year.
5. 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.

6. Follow-up on the status of the work order to repair the damaged section of security fencing.

Appendix I: Scope and Methodology

Scope

The scope of this inspection was limited to violence prevention programs in place at the Te Tsu Geh Oweenge School, a grant-operated day school located on the Pueblo of Tesuque in Santa Fe, 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 Te Tsu Geh Oweenge 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 Te Tsu Geh Oweenge School; and
- visited Te Tsue Geh Oweenge Day School on May 21, 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 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 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 | 05/21/14 | | 04/23/08 | |
|---|----------|----|----------|----|
| | YES | NO | YES | NO |
| Adequately Covered Bomb Threats | | X | | 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 | 05/21/14 | | 04/23/08 | |
|------------------------|----------|----|----------|----|
| | YES | NO | YES | NO |
| STAFF: | | | | |
| Crisis/emergency plans | ✓ | | | X |
| Conflict resolution | ✓ | | | X |
| Anger management | ✓ | | | X |
| Bully prevention | ✓ | | | X |
| Suicide prevention | | X | | X |
| Drugs | ✓ | | | X |
| | | | | |
| STUDENTS: | | | | |
| Gangs | ✓ | | | X |
| Conflict resolution | ✓ | | | X |
| Anger management | ✓ | | | X |
| Bully prevention | ✓ | | | X |
| Suicide prevention | | X | | X |
| Drugs | ✓ | | | X |

Appendix 6: Matrix of Safety Measures

| Safety Measures (Summary) | 05/21/14 | | 04/23/08 | |
|---|----------|----|----------|----|
| | YES | NO | YES | NO |
| Adequate security fencing* | | X | | X |
| 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 | | X |
| Security camera(s) | | X | | X |
| Metal detector | | X | | X |
| Security guard | | X | | X |
| Hall monitors** | | NA | | NA |
| Operable central alarm systems | ✓ | | | X |
| Intercom system in classrooms | ✓ | | | X |
| Exits clearly marked | ✓ | | ✓ | |
| Evacuation maps clearly displayed | ✓ | | ✓ | |
| Graffiti free walls, playground equipment, etc. | ✓ | | ✓ | |
| Student dress code*** | | X | | X |
| Staff required to wear identification cards | ✓ | | | 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 Evaluation of Controls to Prevent Violence at Bureau of Indian Education Operated Education Facilities, Report No. NM-EV-BIE-0001-2008 we reported that Te Tsu Geh Oweenge School did not have hall monitors. We chose to clarify in this report that the category was not applicable since each classroom is its own portable building and thus there are no hallways. Teachers escort children from building to building.

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

