



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

REVIEW OF VIOLENCE PREVENTION AT THE SAN ILDEFONSO DAY SCHOOL



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Memorandum

To: Ms. Julianna Trujillo
Principal, San Ildefonso Day School

From: Mary L. Kendall 
Deputy Inspector General

Subject: Inspection Report – Review of Violence Prevention at the San Ildefonso Day School
Report No. C-IS-BIE-0037-2014

This memorandum transmits the findings of our inspection of violence prevention efforts at the San Ildefonso 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 San Ildefonso 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 San Ildefonso Day School's safety measures had improved in certain areas since our last visit, however, we also identified areas for continued improvement.

Specifically, San Ildefonso Day School did not have a comprehensive emergency plan. In addition, training was not provided to staff and students on several violence prevention and emergency preparedness topics we evaluated, including conflict resolution, anger management, and suicide prevention. Further, we were not able to run either evacuation or lock-down drills during our visit on May 22, 2014. School officials believed it would be unsafe for staff and students to perform the evacuation drill since it was not practiced regularly and the lock-down drill because it had not been practiced in years. As a result, we were unable to determine the impact of the limited training on the school's ability to effectively and safely evacuate or lock down the school in an emergency.

Further, of the 18 safety measures we checked for, San Ildefonso Day 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 last 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. San Ildefonso Day School, located on the San Ildefonso Pueblo 15 miles north of Santa Fe, NM, was among the schools previously visited.

We provide five recommendations to help San Ildefonso Day 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.

San Ildefonso 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. San Ildefonso Day School is a BIE-operated day school for students in kindergarten through sixth grade, located on the San Ildefonso Pueblo, 15 miles north of Santa Fe, NM.

Findings

The quality of safety measures in place at San Ildefonso Day School had improved in certain areas since our last visit, making the school partially prepared to prevent violence against both students and staff, from internal and external threats. We found opportunities for improvement however, concerning the training of staff and students, and concerning the evacuation and lock-down drills. Specifically, we found the school—

- did not have a comprehensive emergency plan;
- did not provide training to staff and students on several violence prevention and emergency preparedness topics we evaluated, and could not run evacuation or lock-down drills during our visit; 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 San Ildefonso 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 used a flip chart book (see Figure 1) in both 2008 and 2014 but did not have a comprehensive emergency plan in either year. In 2008, the school did have a Continuity of Operations Plan (COOP) that was comprehensive but it still did not adequately cover four of the five key topic areas. During our visit in 2014, however, the auditors noticed the school had a code red sheet and a code green sheet displayed in each classroom, which addressed certain topic areas, not covered in the flip chart.

The school's flip chart book serves 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 plan can also make campus-specific instructions available to off-campus emergency responders.

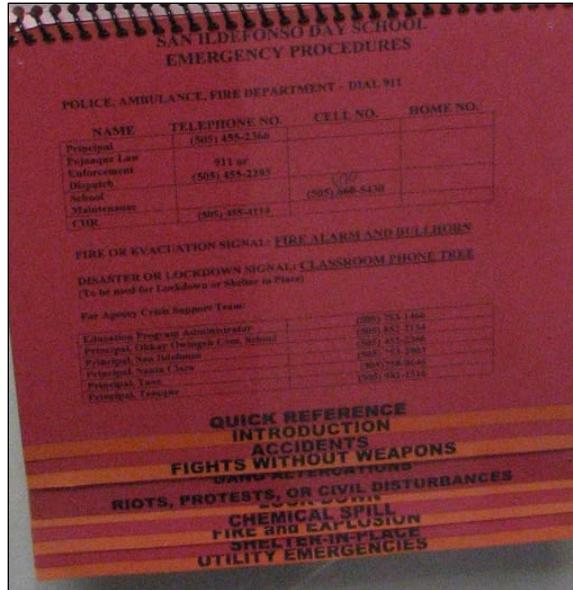


Figure 1. San Ildefonso Day School's emergency procedures flip chart. Source: OIG

We found that the guidance provided by the flip chart, code red sheet, and code green sheet had improved emergency preparedness of the school since our last visit in April 2008, but that it was still missing an adequate section for bomb threats. Specifically, in 2008, the flip chart contained adequate information only on bomb threats. In May 2014, the flip chart, code red sheet, and code green sheet contained information on, and adequately addressed, four of the five key topic areas, including shootings, fights, hostage situations, and off-campus emergencies, but no longer provided adequate information on bomb threats.

We recognize that no individual safety measure is so critical that its absence is cause for immediate concern; however, detailed guidance and training may enable staff to respond appropriately to a bomb threat. 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 San Ildefonso Day 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; and
2. Update the classroom quick reference guide to include a section on bomb threats.

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 San Ildefonso Day School against these same topics. We found that the school training procedures had significantly declined since 2008.

In April 2008, we found that—

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

During our visit in May 2014, we found that—

- two of six training topics had been provided to staff; and

- one of six training topics had been provided to students.

In addition, school officials reported they ran an evacuation drill once a month, but this could not be verified with documentation, and school officials did not know when the last lock-down drill was performed. As a result, with no clear guidance or protocols, the acting principal believed it would be unsafe for staff and students to run either an evacuation or lock-down drill during our visit.

Inconsistent leadership may have contributed to why the school did not conduct adequate training, have clear guidance, or run routine drills. Specifically, during our visit, school officials informed us that the current acting principal was on a detail from another BIE school and was only there part-time. He spent 2 days a week at San Ildefonso Day School and 3 days a week at his primary school. Further, the school has had 11 different principals over the last 9 years.

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 San Ildefonso Day School:

3. 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; and
4. Implement training in those areas listed in Appendix 5 where training has not occurred.

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 some improvements since 2008. Specifically, in April 2008, we found that 10 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 at the San Ildefonso Pueblo on May 22, 2014, we were stopped at the Pueblo's visitor's center where we were asked to show identification, state the nature of our business, and sign in. The only way to get to the San Ildefonso Day School is by checking in at the visitor's center. Once on campus, the only unlocked door we found led into the main administration building. School officials told us, however, that Pueblo residents and parents often came on campus and go directly to classrooms without checking in at the office. They also said that staff did not notify the office when such visitors are on campus.

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 San Ildefonso Day 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.

Conclusion and Recommendations

Conclusion

San Ildefonso Day School's safety measures have improved since our last visit, however, inadequate training for staff and students, inability to run an evacuation or lock-down drill, and limited implementation of appropriate safety measures, has left San Ildefonso Day School only partially prepared to prevent violence and ensure the safety of students and staff.

Recommendations Summary

We recommend that San Ildefonso Day 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 to include a section on bomb threats.
3. 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.
4. Implement training in those areas listed in Appendix 5 where training has not occurred.
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.

Appendix I: Scope and Methodology

Scope

The scope of this inspection was limited to violence prevention programs in place at the San Ildefonso Day School, a BIE-operated day school located on the San Ildefonso Pueblo, 15 miles north of 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 San Ildefonso 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 San Ildefonso Day School; and
- visited San Ildefonso Day School on May 22, 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	05/22/14		04/24/08	
	YES	NO	YES	NO
Adequately Covered Bomb Threats		X	✓	
Adequately Covered Shootings	✓			X
Adequately Covered Fights	✓			X
Adequately Covered Hostage Situations	✓			X
Adequately Covered Off-Campus Emergencies	✓			X
Plan Less Than A Year Old		X		X

Appendix 5: Training at Education Facility

Training	05/22/14		04/24/08	
	YES	NO	YES	NO
STAFF:				
Crisis/emergency plans		X	✓	
Conflict resolution		X	✓	
Anger management		X	✓	
Bully prevention	✓		✓	
Suicide prevention		X	✓	
Drugs	✓		✓	
STUDENTS:				
Gangs		X	✓	
Conflict resolution		X	✓	
Anger management		X	✓	
Bully prevention	✓		✓	
Suicide prevention		X	✓	
Drugs		X	✓	

Appendix 6: Matrix of Safety Measures

Safety Measures (Summary)	05/22/14		04/24/08	
	YES	NO	YES	NO
Adequate security fencing*	✓		✓	
Secured exterior doors	✓			X
Designated visitors' entrance	✓			X
Visitors' entrance that prevented unobserved entering		X	✓	
Visitors required to sign in or show identification	✓		✓	
Visitors required to wear a visitors' badge		X	✓	
Security camera(s)		X		X
Metal detector		X		X
Security guard		X		X
Hall monitors	✓			X
Operable central alarm systems	✓			X
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		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.

