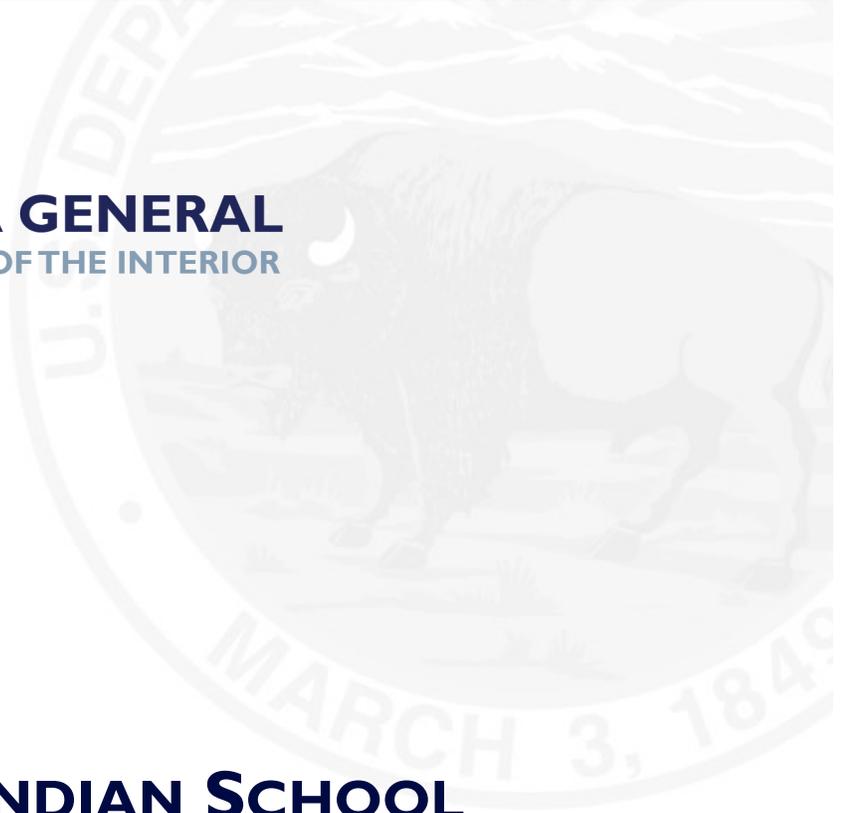




OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR



CONDITION OF INDIAN SCHOOL FACILITIES



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

SEP 30 2016

Memorandum

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Subject: Final Evaluation Report – Condition of Indian School Facilities
Report No. C-EV-BIE-0023-2014

This memorandum transmits our report detailing the results of our evaluation on the condition of the Bureau of Indian Education-funded school facilities and the efforts being made to maintain them.

We did not receive a formal response from Indian Affairs. We are therefore referring all recommendations to the Assistant Secretary for Policy, Management and Budget for resolution and implementation tracking.

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.

If you have any questions regarding this memorandum or the subject report, please contact me at 202-208-5745.

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Results in Brief

The Bureau of Indian Affairs (BIA) and the Bureau of Indian Education (BIE) fund and oversee 183 Indian schools throughout the Nation, with an estimated annual attendance of over 40,000 students. We evaluated the condition of the schools to determine if the facilities were safe for students and staff and BIA and BIE management practices provided the schools with the support necessary for creating and maintaining an environment conducive to learning.

Indian Schools are well recognized—by Congress, bureau personnel, school officials, and the media—as broadly in poor condition. Federal agencies have found many of the same issues and effects on the condition of school facilities.

We found that the bureaus' management of Indian school facilities has several systemic programmatic weaknesses. These include problems with access to the facility management systems and information on transitioning to the new system, Maximo. Specifically, the bureaus are transitioning to using Maximo for facilities management but have not adequately communicated the transition to the schools. In addition, the Facilities Condition Index, an important valuation tool used for funding decisions, poorly represents actual school conditions, regardless of what facilities management system is used to log the information. Further, the overall execution of custodial oversight is inadequate. For example, the bureaus have not consistently communicated their custodial roles and responsibilities to each other or the schools, provided adequate oversight of fund expenditures or project completion, and ensured that necessary school inspections are consistent and completed.

In addition to the programmatic issues, we also found major facility deficiencies and health and safety concerns. We focused on deficiencies that should be addressed promptly, including—

- asbestos, radon, and mold;
- structural concerns and condemned buildings;
- electrical issues;
- grounds and drainage problems;
- damaged and deteriorated roofs;
- plumbing, corrosion, and moisture damage;
- reliance on temporary structures as permanent solutions; and
- problems with fire safety systems.

In addition to the facility deficiencies, we found that much of this information is not being documented in BIA's facilities management systems. When schools do not provide the information to BIA, regardless of the reason, the information used to make school facility funding decisions at every level of the U.S. Government is inaccurate and incomplete.

We provide 21 recommendations to help the bureaus develop promising practices and implement plans to improve the operation and condition of Indian school facilities. BIA and BIE gave no formal response to our report, so we consider all 21 recommendations unresolved and unimplemented and will refer them to the Assistant Secretary for Policy, Management and Budget for resolution and implementation tracking.

Introduction

Objective

We conducted site visits at 13 schools to examine the condition of Bureau of Indian Education (BIE)-funded school facilities and an overall evaluation of the efforts that have been made to maintain the facilities. See Appendix 1 for the scope and methodology of this report.

Background

The quality of Indian education and the success of American Indian students is an area of interest at the highest levels of the Federal Government. The White House, Congress, U.S. Department of Education, U.S. Department of the Interior (DOI), and BIE have all expressed interest in improving the current state of the Indian school system.

Prior Audit Coverage

The U.S. Government Accountability Office (GAO) has recently placed an emphasis on evaluating BIA's management of school facilities. Most recently, GAO previewed its observations in this area through testimony before the House Appropriations Subcommittee on Interior and the Environment. GAO's ongoing work has focused on areas that complement the work we conducted, and we have coordinated extensively with GAO on these areas. Consistent with our findings, GAO's preliminary results indicate that issues with the quality of data on school conditions—such as inconsistent data entry by schools and inadequate quality controls—make determining the number of schools that are in poor condition difficult. These issues impede Indian Affairs' ability to effectively track and address school facility problems (see Appendix 2).¹

The Challenge of Providing a Quality Environment for Education

One component of providing a quality education is to have school facilities that are safe and conducive to learning. According to the Department of Education, research links the condition of school facilities to students' academic achievement and positive behavior.² Several of these studies have found that students in decaying school environments score lower on the academic achievement tests than their peers who attend schools in fair or good condition. Further, environmental conditions such as peeling paint, nonfunctioning toilets, poor lighting, and inoperative heating and cooling systems can affect the learning,

¹ To include facility components within the Office of the Assistant Secretary, BIE, and BIA, this report generally addresses Indian Affairs as a whole. To minimize confusion and to keep the discussion focused, we do not distinguish between the regional, field, and policy levels of the facilities offices.

² For more specific information on these and other related findings, see the U.S. Department of Education webpage for "Impact of Inadequate School Facilities on Student Learning" at <http://www2.ed.gov/offices/OESE/archives/inits/construction/impact2.html>.

health, and staff and student morale. Deteriorating school conditions are a systemic problem across the Indian school system.

Indian education operates in an environment of mixed, shared, and shifting responsibilities. In general, BIE is responsible for administering and overseeing the educational and grant programs, while oversight of facilities is shared among several BIA offices that operate independently of one another. The Division of Facilities Management and Construction (DFMC) is responsible for developing and implementing procedures, processes, and systems to execute and monitor the facilities program while facilities personnel in BIA's regional and BIE's agency offices implement the facilities program at the field level.

BIA and BIE provide funding and have oversight responsibilities for 183 primary and secondary schools and dormitories across the United States, with an estimated annual attendance of more than 40,000 students. BIE directly operates 57 of these schools and dormitories, and the remaining schools are grant and contract schools that tribes have elected to operate with a varying amount of assistance from the bureaus. Even though BIA manages the facilities management system and allocates the facility-related funding that goes to each school, BIE and BIA both are tasked with overseeing and assisting schools with their facilities maintenance efforts.

Over the last decade, DOI and its bureaus have taken several steps toward better understanding the condition of Indian education and the changes needed for a system that successfully balances the needs of the American Indian communities and the custodial responsibilities of the Government. Increased emphasis has been placed on tribes assuming more control of schools, BIE becoming more responsive and responsible, and BIA improving its funding transparency and perceived fairness.

Blueprint for Reform

In June 2014, DOI issued the Blueprint for Reform (Blueprint), a report that called for extensive reorganization of BIE to improve Indian education. This report concluded that “organizational and budgetary fragmentation . . . prevent BIE from adopting and implementing reforms and limit the BIE's ability to provide the support that its schools need in order to be successful.” The Blueprint is largely focused on BIE organizational changes and educational responsibilities, but briefly mentions the need to address the poor and failing condition of many school facilities. The report said that schools were frustrated with the bureaucratic divisions of the BIA and BIE facilities offices in regard to major repairs and the poor condition of schools. The report's recommendation was to restructure BIE to take more control of funding allocation and decision making regarding all custodial aspects of Indian schools.

According to the Blueprint, the redesigned BIE will—

- support tribes in school capacity building;
- provide greater flexibility and resources to support educational reforms;
- facilitate sharing effective practices among tribally controlled and BIE-operated schools; and
- promote tribal self-governance and self-determination by encouraging tribes to operate BIE-funded schools.

BIE's realignment is focused mostly on education programs, but there is an ongoing move to improve facilities management as well—either forward to the tribes, or within BIE when tribes do not take control.

Funding

While BIE is responsible for providing oversight for Indian schools and education, the Bureau of Indian Affairs (BIA) is responsible for funding Indian school facilities and allocates the facility-related funding that goes to each school.

The major funding categories provided by BIA include the following:

- **Operations and Maintenance (O&M):** O&M funds are used for routine repairs and maintenance, janitorial services, utilities, and other basic facility costs.
- **Minor Improvement and Repairs (MI&R):** MI&R funds are used for projects estimated to cost between \$2,500 and \$500,000.
- **Facilities Improvement and Repairs (FI&R):** FI&R funds are used for repair projects estimated to cost in excess of \$500,000.

In addition, special funding for new schools and building replacement has been appropriated intermittently over recent years, and schools can apply for consideration when such funding is available.

Each year, BIA uses a formula to calculate the O&M funds to be allocated to each of the 183 BIE-funded schools. This formula is based on several components, including the overall condition of the school and the estimated costs to operate and maintain the school for a 50-year building life. The information specific to each school's calculated need is based on data that the school or BIA enters in the facilities management system.

With the exception of American Recovery and Reinvestment Act funding provided in 2009, facilities funding over the past several years has declined by nearly half, and BIA has only been able to fund O&M costs at approximately 70 percent of the estimated need. This has forced schools to reduce O&M expenditures, often by avoiding needed repairs when they are initially identified.

Funding for BIA Education Facilities

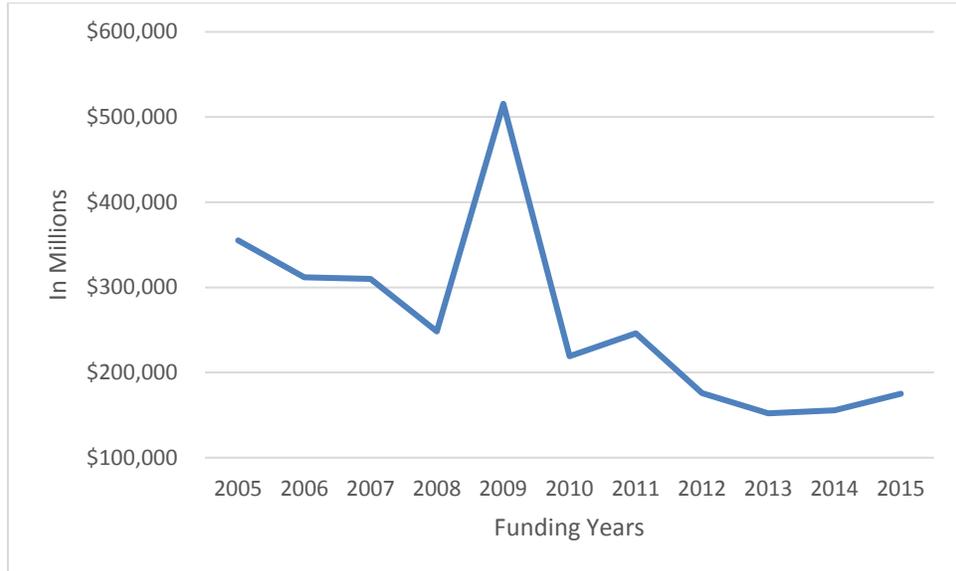


Figure 1. Funding, in millions, for BIA Education Facilities by fiscal year. Source: DOI, Office of Budget

When a school identifies repair needs that will be funded from the MI&R (excess of \$2,500) or FI&R (excess of \$500,000) category, the repair need must be entered into BIA's facility maintenance system. The school then waits until BIA determines whether it has the funds to address the problem. For both funding categories, BIA uses the deficiencies listed in the system to rank the severity and importance of the issue to determine which schools will receive money to correct specific, identified projects. Since these funds have also been affected by severe budget cuts, the schools have been told to prioritize maintenance needs based on health and safety and whether the need negatively affects learning. It is not unusual for projects to sit in the system unfunded for several years. If the facility's deficiency is determined to be critical, however, BIA has provided emergency or immediate funding to the affected school on a case-by-case basis.

For each of these standard funding categories, if the school does not enter the correct information into the BIA facilities managements system, or if deficiencies are not entered at all, potential funding could be lost. In addition, when schools wait until funding is available to document their needs, their chances of attaining funding quickly are likely impaired, because BIA might not be aware of the needs when allocation decisions are made. Further, DOI uses the information in the system to set budgets and communicate facilities program needs to Congress, OMB, and the public.

In addition to the standard funding categories, funding for new schools and replacement buildings also depends on the data in the facility management system to determine funding eligibility and project ranking. BIA is currently not able to

provide this type of funding because this program has not received appropriations for any new schools and will likely not receive funds until the schools that were approved in 2004 are completed. This program, however, has represented a substantial funding source for major school facility improvements in the past and is likely to be refunded.

Facilities Management Systems

BIA maintains the official database for all BIA operations and maintenance programs. Among other things, this system is required to be used to schedule work, enter and maintain inventory data, document actual utility costs, and supply information for funding and management decisions.

According to Facilities Management Information System (FMIS) data, BIA provides funding for almost 1,800 academic and dormitory buildings with a replacement cost of over \$4.6 billion.³ The cost to correct the deficiencies that have already been entered in the system is estimated to be over \$430 million.

Over the last few years, BIA has been transitioning from FMIS to Maximo, a new system required by DOI. At the time of our inspections, Maximo was only minimally operational and FMIS was still the system of record for all funding decisions. BIA provided Maximo training to some school personnel when it was first activated, but schools have been expected to use both systems until the transition is complete.

The Facilities Condition Index

BIA assigns every school a numerical and categorical (good, fair, or poor) ranking intended to convey the overall condition of the school's facilities. This facility condition index (FCI) is used in some of the funding allocations and to provide a quick determination of the school's facility repair needs in relation to the total replacement cost of the buildings. It can also help BIA and BIE determine which schools are in the greatest need of supplemental funding. The FCI list, at the time of our inspection, listed 96 schools in either poor or fair condition.

³ BIA provided us with FMIS data at the outset of our evaluation.

Findings

We found a number of problems at the 13 schools we visited and systemic issues with the efforts being made to maintain school facilities. Despite selecting schools with a range of FCI rankings in FMIS, we found significant problems with the facilities at each school we visited (see Appendix 3 for a summary of issues for each school). Figure 1, below, summarizes the more significant types of issues we observed in our visual inspections of school facilities. Further, a number of factors at the bureau level contribute to facilities condition, including systemic problems in facilities program management. For example, the bureaus have not consistently communicated their custodial roles and responsibilities to each other or the schools, provided adequate oversight of fund expenditures or project completion, and ensured that necessary school inspections are consistent and completed.

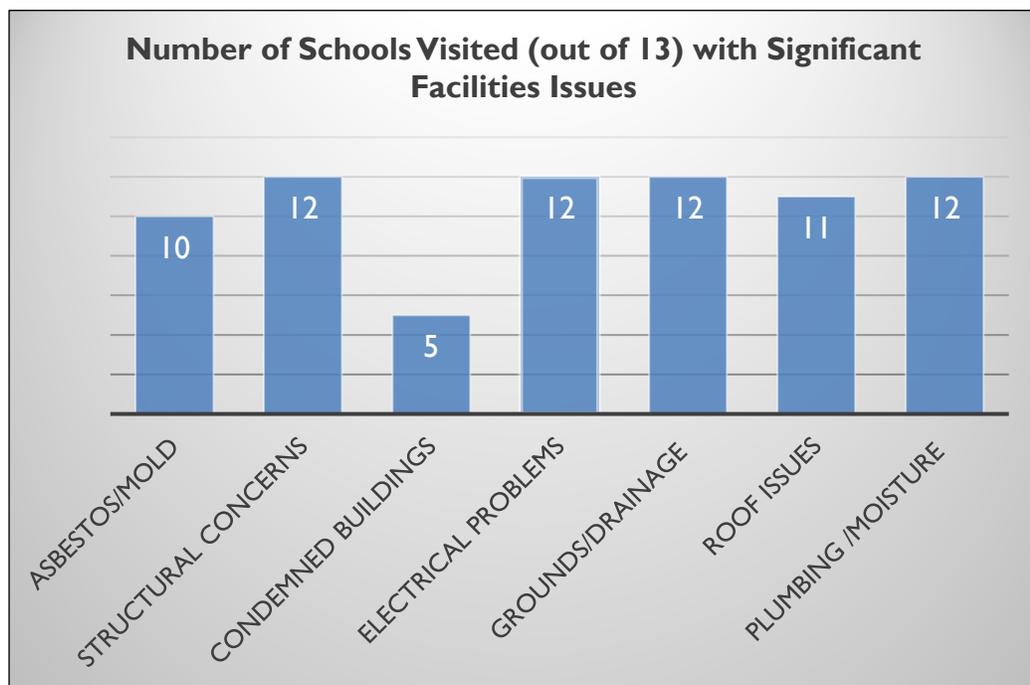


Figure 2. Summary of the more significant facilities issues we found at the 13 schools we visited.

Systemic Programmatic Issues

We found several issues with the fundamental way in which school facilities are programmatically managed:

- The Blueprint for Reform is not detailed.
- BIA's switch to its new facilities management system has not been fully communicated to all users.
- The FCI does not accurately reflect the actual state of school conditions.
- BIA and BIE are not fulfilling their basic custodial duties for the schools.

The Blueprint opens the potential for the bureaus' roles to change and for tribes to take over their own educational systems and schools, which heightens the need for a robust facilities management system. The resulting complications from the bureaus' mixed responsibilities must be addressed before the major changes envisioned in the Blueprint can be successfully carried out.

The Blueprint for Reform not Appropriately Detailed

The Blueprint, which calls for extensive reorganization, is a good testament to the fact that the bureaus are aware of many of the issues within the Indian education system. In fact, both the Blueprint and subsequent testimony by the BIE Director reflect BIE's desire to take a larger role in school facilities and work toward positive change. BIE also recognizes that it needs to clarify its roles and responsibilities at every level and establish a new office to resolve budget, staffing, and facilities issues in coordination with BIA facilities offices.

BIA and BIE have different, and sometimes opposing, views on what the BIE reorganization will ultimately become. At the center of facilities management concerns are limited staffing and resources, budget allocation control, and bureau responsibility for success and improvement of schools. Currently, both bureaus share or compete in these areas, which can make accountability for outcomes very difficult to assess.

Although BIE desires to have a fully operational division dedicated to school facilities, this would require significant reallocation of BIA's resources to BIE or a substantial increase in resources overall to build BIE's own facilities program support division. In addition, none of the details that would be necessary to separate the school facility duties from BIA have been fully developed or approved. Even BIE admitted to us that it would be unlikely that all the facility responsibilities could be cleanly split between the bureaus. While the bureaus are coordinating over some of the reorganizational changes, they are not consistently communicating or collaborating with each other and neither bureau has created a plan to address the current problems if the reorganization that BIE envisions is not fully realized.

Schools Face Challenges with New Facilities Management System

Although BIA has been working on implementing the DOI mandate to transition from FMIS to Maximo since 2011, the transition has not gone smoothly; generally, schools do not know how to use the new system or even which system they should be using.

Until Maximo is fully implemented, FMIS is still the system of record for schools to input and manage their facility deficiencies. BIA provided Maximo training to many school personnel, but at the time of our work only two components of Maximo were operational. Based on feedback from school personnel who received the training, few are actively using the new system or are confident that

they will remember the training by the time Maximo is fully implemented. Further, since the majority of data input is still tied to FMIS, schools have not been inclined to spend the time interacting with Maximo. We have been told that progress has been made in the transition to Maximo, but that some FMIS capabilities continue to need to be developed in the new system.

BIA is committed to transitioning to Maximo, so it is no longer providing training on FMIS. Without training for FMIS for new school employees, and because turnover has reduced the number of school employees who know how to use FMIS, we found that school employees are not effectively using the system, if at all. As a result, schools have been overly reliant on bureau facilities personnel to enter the data for the schools. This has led to data that is often not fully accurate, up to date, or truly reflecting the priorities and needs of the schools. Further, this inefficient arrangement negatively affects BIA's and BIE's ability to manage the whole facilities management system, as well as their limited resources to the best benefit of the schools.

Further complicating the transition to Maximo is the conflicting information that schools are receiving on the systems that should be used for data entry. While BIA told us that all schools should have been using at least some components of Maximo by the time of our inspections, we learned that the schools received different information on using Maximo depending on which employee from BIA or BIE interacted with the school. For example, one school we visited told us they are not using Maximo because they were told grant schools would not be connected until some undetermined future date.

Schools also communicated frustration with their access to the systems. Inconsistent network connectivity compounds the issue of schools inconsistently using the system. The President's 2016 budget includes a request for funds to extend broadband internet and computer access to all BIE-funded schools. If appropriated, this could help address some of the school facilities offices' connectivity issues. If a system-wide solution is not forthcoming, however, the network infrastructure needs of schools, an overlooked part of modern facilities, will continue to be missing from the facilities management system. In addition to the insufficient technological structure affecting connectivity, schools pointed out several other problems that stop them from using the facilities management systems. For example, we were told multiple times by schools that they encountered problems with account setup, blocked access, or FMIS being offline that stopped them using either system.

When we compared the deficiencies in the system to the deficiencies we noted during our site inspections at the 13 schools, we found a significant number of items not documented, reflecting the inconsistent use of the facilities management systems. Due to the variety of undocumented deficiencies, and the complex nature of estimating the cost to repair the issues, we are unable to determine how significantly the facilities management system is underrepresenting the true needs

of the schools. We believe, however, that the missing deficiencies represent a drastic increase to the current estimate of more than \$430 million. A 2012 report on BIA estimated that if only the 68 worst schools were replaced or rehabilitated it would cost about \$1.3 billion.

The Blueprint conveys the desire to increasingly shift schools over to tribal control with less active management from the bureaus. Given the current struggles that many school officials face with limited facility resources, we found that many rely on assistance by the bureaus to document facility related needs.

Recommendations

We recommend Indian Affairs—

1. Develop, implement, and communicate a detailed project plan for completing the transition to Maximo;
2. Provide access to a more consistent training program for school staff on entering data into both FMIS and Maximo until Maximo is fully implemented;
3. Communicate to schools regarding points of contacts for technical assistance;
4. Ensure accounts and passwords for Maximo are established and used;
5. Create a tracking and reminder system to document which schools are actively accessing their accounts and entering information;
6. Determine which schools have connectivity issues, help the schools identify what is necessary to enhance the networks from the grid reliability stance, and document any infrastructure needs in the facility management system; and
7. Until networks issues are resolved, explore alternative means for capturing the schools' data in the facility management system.

Facilities Condition Index is Misleading

The FCI does not accurately reflect the actual state of school conditions. While the ranking of schools is a transparent and easily understood calculation, the outcome of the calculation is only as accurate as the source data. If the source data is inaccurate, representation of the school's condition can be skewed. In addition, as with any process that uses a single ranking for multiple components, the FCI "smooths out" any variations across the individual components, which can also lead to a misrepresentation of the whole. Since the FCI rating is used in major

funding decisions, the basis of those decisions are not made with information that is truly reflective of an individual school's need.

For example, the FCI lists the Pierre Indian Learning Center as a school in "fair" condition. The school recently built a new dormitory to replace two existing dormitories considered to be in poor condition. Because the maintenance needs entered in the system are substantially inaccurate and lower than what the school realistically needs, the addition of the new building contributed to leveling the FCI to such an extent that the site listing of "fair" is inaccurate. The condition of buildings we observed, including the over 80-year-old main academic building that BIA health and safety inspectors recommend be replaced, was far worse than the FCI implies.

Another school, Tuba City Boarding School, is listed in "good" condition in the FCI. This school campus was largely rebuilt within the last 10 years, so most of the buildings are still relatively new, which is reflected in the FCI. What is hidden, however, is that two buildings from the 1920s were still actively being used for primary school academic purposes at the time of our inspection even though those buildings are extreme health and safety hazards. Several other buildings on the campus, with most accessible to the students, have been condemned for years and sit vacant and further deteriorating.



Figure 3. A room upstairs in a 1930s building that holds elementary classes at Tuba City Boarding School. The school is listed in good condition. Source: OIG photo

Recommendations

We recommend Indian Affairs—

8. Redesign the way FCI is calculated and used in funding allocations to allow consideration for the condition of individual structures.

BIA and BIE Not Fulfilling Basic Custodial Duties for School Facilities

We found a number of issues with how the bureaus are currently handling their custodial responsibility for the schools. BIA and BIE have not—

- consistently communicated their custodial roles and responsibilities to each other or the schools;
- provided adequate oversight of fund expenditures or project completion;
- or
- ensured that necessary school inspections are consistent and completed.

We also question how some local level bureau offices are handling funds on behalf the schools and why some schools have effectively been excluded from the custodial discussion.

BIA and BIE Have Ineffective Communication and Collaboration

BIA and BIE have not consistently communicated with each other or the schools about their custodial roles and responsibilities regarding the schools. Further, school officials were unclear on who to contact or who was responsible in the bureaus for providing facilities assistance.

BIA and BIE operate as two separate entities. The organizational separation, however, is often not recognized by external parties who see little to no difference between the two, especially in cases when both share the same or similar responsibilities, such as with Indian schools. Both BIA and BIE are supposed to be actively involved in the daily execution of school facilities programs and ensure that school facility needs are addressed. This includes having staff that visit the schools or assist the schools remotely.

Adding to the difficulty for external parties in recognizing organizational separation, the bureaus have not collaborated to define the specific roles of each bureau or ensured that those roles are complementary. Instead, the bureaus were unable to explain what each was specifically responsible for or in what situation schools should contact one bureau over the other. Not only has this resulted in confusion for the schools they are tasked with helping, but it has perpetuated an environment in which BIA and BIE are competing for resources, responsibilities,

and relationships. The negative effects of this environment are further exacerbated by a declining number of facilities staff.⁴

In addition, the bureaus did not have an up-to-date contact list. A current contact list is a tool that helps schools and interested parties understand who they should communicate with, something that is especially needed given the bureaus' dual involvement. We found it difficult to identify who the BIE facilities staff were and where they were located and it was only after communicating with offices at the executive level of BIE that we were able to acquire a list of regional facility managers; the list, however, was incomplete and inaccurate. BIE did recently post a directory online, but it is also incomplete and without contact details.

Without clear definitions of roles or a systematic method of communication in place, the way schools reach out for assistance varies with each school. Some schools indicated they had an active interaction with BIA personnel, some with BIE personnel, some rarely communicated with facilities staff from either bureau, and some had contact with staff from both bureaus. In addition, schools were inconsistent in whether they worked with field, regional, or headquarters level personnel. Consistent with the view of there being only a single bureau, some school officials confuse which bureau their contact person was from. This inconsistent and inefficient communication with schools adds to the difficulty that schools face in maintaining and improving their facilities.

One way inconsistent communication has potentially affected schools, is through the dissemination of funding opportunity information. BIA and BIE have not consistently communicated to the schools that there are, or have been, other funding sources to apply for outside MI&R and FI&R, such as the funding for new schools and building replacements that schools used to be able to apply and compete for. Some school officials, including a facilities manager who has held that position for 30 years, however, told us that they were unaware there were ever any special funding opportunities or application processes. If these programs are funded again and schools are not made aware, then schools may again be left out for reasonable consideration. In addition, there may be available funding outside BIE or BIA, but this information is also not communicated to schools. For example, there may be opportunities to apply for funding from another Federal department as one school did when BIA was unable to eradicate a black widow infestation at the school—the school applied for and received funding from the U.S. Environmental Protection Agency.

Rosebud Dormitory staff recommended that BIA, BIE, and the schools should set up an “exchange type” program for facilities managers. Such a program

⁴ “Preliminary Results Show Continued Challenges to the Oversight and Support of Education Facilities,” GAO-15-389T, February 27, 2015. <http://www.gao.gov/products/GAO-15-389T>

would allow facilities managers to see issues at each school from an outsider's perspective, give them a fresh view of issues at their own school, and add an additional level of inspection.

The frequent personnel changes and understaffing at the school level amplify the need for both bureaus to have clear, consistent, and frequent communication with the schools as well as each other. High employee turnover create instability and lost institutional knowledge. In addition, when schools do not have the resources or staff—an issue at almost every school we visited—it is not always possible to maintain schools and document needed facility repairs. Entering information into the systems, determining solutions, and finding quotes for fixes, all take a substantial amount of time and expertise. With the combination of understaffing, lost institutional knowledge, and ongoing budget shortages, schools have found it easier to get money if they just wait for an asset to break, which only compounds the ongoing deterioration of the schools.

The staff at Tuba City Boarding School told us that they feel as though the schools are operating as an “island” and recommended that BIA and BIE help the schools set up a method of regular communication, such as a webinar, for schools to communicate with each other and the bureaus on a routine basis without needing to expend limited resources on travel.

We consistently found that the effectiveness of the bureaus' relationships with the schools depends on the effort of the bureau facilities contact. According to one BIE employee whose role is to assist schools in achieving educational success, the relationship between BIE educational offices and the schools is not always productive or healthy.

Recommendations

We recommend that Indian Affairs—

9. Identify and clarify the specific roles and responsibilities that BIA and BIE have in school facilities management and then publicize those roles and responsibilities to bureau staff and schools;
10. Update contact lists for both BIA and BIE facilities personnel and post them online and distribute them to the schools; and
11. Implement a strategy to improve communication between the bureaus and the schools and to share information including alternate and in-house funding sources, updated contact information, and best practices.

BIA and BIE Not Monitoring Projects and Verifying School Expenditures

We found that the bureaus are not performing basic oversight duties, including adequately monitoring projects or verifying expenditures. A fundamental issue that the bureaus and schools have to face every year is trying to maintain and repair facilities without sufficient funds, regardless of whether it is O&M or project-specific repair funds.

The combination of O&M being underfunded and the bureaus' inadequate oversight leaves the schools to use funds from other sources to cover costs. We found that most of the inspected schools are using at least some of their annual maintenance money to help cover standard operating costs, such as utilities and janitorial expenses. If the school does not have other means of refunding the maintenance budget, then basic repairs cannot be performed. A few schools have been able to acquire supplemental funding from tribal sources, but most of the schools we visited rely on the money provided by the bureaus.

To cover unavoidable maintenance expenses, some school officials told us they have used Indian School Equalization Program (ISEP) funds. These are educational and academic program funds, not facility-related funds. We did not assess whether there were any legal exceptions to using ISEP funds for other purposes. Working with schools to identify budget shortfalls and helping schools implement base practices could help prevent the use of academic funding for facility purposes, but school officials we interviewed did not report receiving this type of assistance from the bureaus.

With the ongoing shortage of funds to adequately repair all the existing facility deficiencies, BIA has a multilevel review and ranking process in place to help it allocate repair funds fairly to schools with the most critical projects. Specific projects are selected for funding based on information that is provided in the facilities management system. Fairness of the process depends on consistency in

selection and oversight of expended funds. If the money can be used for alternative projects or retained by the schools for discretionary purposes, then the process is no longer fair and the benefit of ranking is undermined. We found multiple instances where the bureaus are not properly monitoring projects to verify that expenditures are used exclusively for selected projects with any remaining funds returned to the bureaus. For example, one school official told us that a bureau contact informally allowed the school to use any excess money from the selected project for another project that had not been selected. The school official admitted that even without specific permission, they continue to retain any excess funds since this has been allowed in the past.

Also important to making sure the funds are expended properly is verifying the quality and completeness of maintenance and construction projects. If projects are not done properly, it can cost additional money to correct the problem. For example, the fire safety system at Pine Hill School was improperly repaired and has since cost the bureaus over \$1 million to replace. In addition, if problems are not corrected immediately, the poor repair could cause damage to other connected facility components. We found multiple instances in which construction and repair projects were poorly executed.

For example, the Flandreau Indian School was awarded approximately \$15 million in funding for extensive repairs around the campus based on deficiencies listed in the FMIS backlog. By the end of the project, however, over \$19 million had been expended, but the work was not done correctly; the school has documented problems—problems that were extensive enough to fill multiple binders. One problem reported to us was that water pipes were not installed below the frost level, so water faucets had to be run continuously throughout the winter to prevent the underground pipes from freezing and bursting. In addition, the school had not received updated documentation of where these pipes, and other underground infrastructure, were placed. Consequently, any future work risks damaging the buried infrastructure, or would entail incurring additional costs to locate the infrastructure before work could proceed.



Figure 4. Bleachers mark the edge of the athletic play area at Flandreau Indian School. After millions of facilities dollars were spent on infrastructure improvements, one of many poorly executed projects resulted in light posts being installed in the middle of the field—despite the protests of school officials. Source: OIG photo

Sicangu Owayawa Oti (Rosebud Dormitory) recently spent over \$750,000 to replace a roof, but the replacement project was poorly executed. We found many areas of excess roofing material which created "rolls" in the roof. The rolls in the roof can contribute to faster deterioration of the roof materials (see Figure 4). Several soft spots in the underlayment indicate that previously damaged plywood was not replaced prior to reroofing. Further, unevenly installed insulation material created sharp edges for the roof to continually chafe against, allowing standing water to collect on the roof, creating the potential for future leaks at unprotected edges of the roof. In addition, nails holding the gutter down were already lifting under the roof and the sharp metal edges of the improperly installed gutters were cutting against the roofing material. We also saw old, disconnected roof vents that should have been removed to reduce the openings in the roof and minimize places vulnerable to damage and leaks, but instead were recut into the roof.

The new campus for Cherokee Central Schools was completed in 2009. Even during the construction phase, the extensive level of cracking in floors and poor quality workmanship were noted on work plans. The construction continued, however, and only 5 years later, cracking is visible on building walls and floors throughout the campus, water floods into at least one building during storms, and flooding around other buildings has left standing water long enough to allow tadpoles to thrive. In addition, a cinderblock wall section directly supporting the roof in a gym is already caving inward.



Figure 5. Rolls in the new roof at Rosebud Dormitory indicate poor quality installation and increase the likelihood of future problems.

Failure to make repairs, or make them correctly, can lead to more significant concerns in the future; including, more expensive repairs later and accelerated deterioration of the facility over time. Further, when resources are scarce, the bureaus have a heightened responsibility to make sure funds allocated to correct existing deficiencies are not wasted.

Recommendations

We recommend that Indian Affairs—

12. Improve monitoring to ensure funds are used for the intended and approved purposes and that projects are completed to applicable quality standards; and
13. Communicate that unspent funds should be returned for potential reallocation.

School Inspections Not Being Performed as Scheduled

The bureaus have two tools that provide the most consistent onsite contact with the schools: a condition assessment every 3 years, and a healthy and safety inspection every year. Both of these proactive physical inspections are meant to detect facility problems at the schools. We found problems, however, with the completeness and consistency of these inspections. If these inspections are not thorough, then problems are likely to be identified only once something breaks or hits a critical level of deterioration.

BIA has contracted with an outside vendor to conduct physical inspections of school facilities on a 3-year rotation and provide a listing of deficiencies to be entered into the facilities management system backlog. Of the 183 total schools, 10 schools had never had a condition assessment visit and at least 31 other schools had not been inspected in more than 3 years. For the 13 schools we visited, 12 had had at least 1 condition assessment, and almost all those schools found the interactions with the inspectors helpful. Cherokee Central Schools had not had a condition assessment at the time of our review.

Inspections are scheduled to happen at the school and last for no more than 1 day. Given the condition of the schools, we question how thorough an inspection of the grounds, buildings, and equipment can be conducted in those few hours. Further, when we provided school officials with a current listing of all deficiencies in the facilities system backlog, some noted that the status of items had been incorrectly altered without explanation.

Laguna Elementary Staff recommends that Follow-up visits should become a part of the condition assessment to make sure that the school and bureaus are taking corrective action. This would help ensure accountability and make condition assessments more consistent with health and safety inspections in that the inspector would document issues and require certain actions to be taken to correct deficiencies within a specified timeframe.

When we compared the backlog of deficiencies in FMIS to the issues that we physically observed at the schools, we found a substantial number of issues that were not in the system. These issues could have been identified by regular inspections. For example, the Pierre Indian Learning Center main school building has no ventilation system, the gutters drain towards the foundation, the water heater and boiler equipment is damaged, the bathroom walls are so moisture-damaged they need to be removed and replaced, and the floor on the ground level is buckling upward. Not one of these issues had been entered into FMIS. Health and safety inspections are required to be conducted at least annually, and they should be the most consistently performed inspections at the schools. GAO recently issued a report on these inspections, however, and found that 69 out of 180 BIE school locations were not inspected in fiscal year 2015.⁵

While inspections include a look at the buildings and an evaluation of existing safety plans, there are no systematic checklists, so the items checked vary by

⁵ "Key Actions Needed to Ensure Safety and Health at Indian School Facilities," GAO-16-313, March 2016. <http://www.gao.gov/assets/680/675731.pdf>

inspector. For example, one inspector told us that he had been doing inspections so long that he no longer used lists to structure his work. We saw evidence of these inconsistent approaches at the schools. The following are just a few examples:

- At Pine Hill School, several fire extinguisher had expired inspection tags or were inaccessible.
- At the Rosebud Dormitory, some equipment had no evidence of being checked for more than 8 years.
- At Moencopi Day School, the boiler room was bolted shut which precluded any inspection taking place.
- Some schools had water heaters that had been inspected, while others did not.

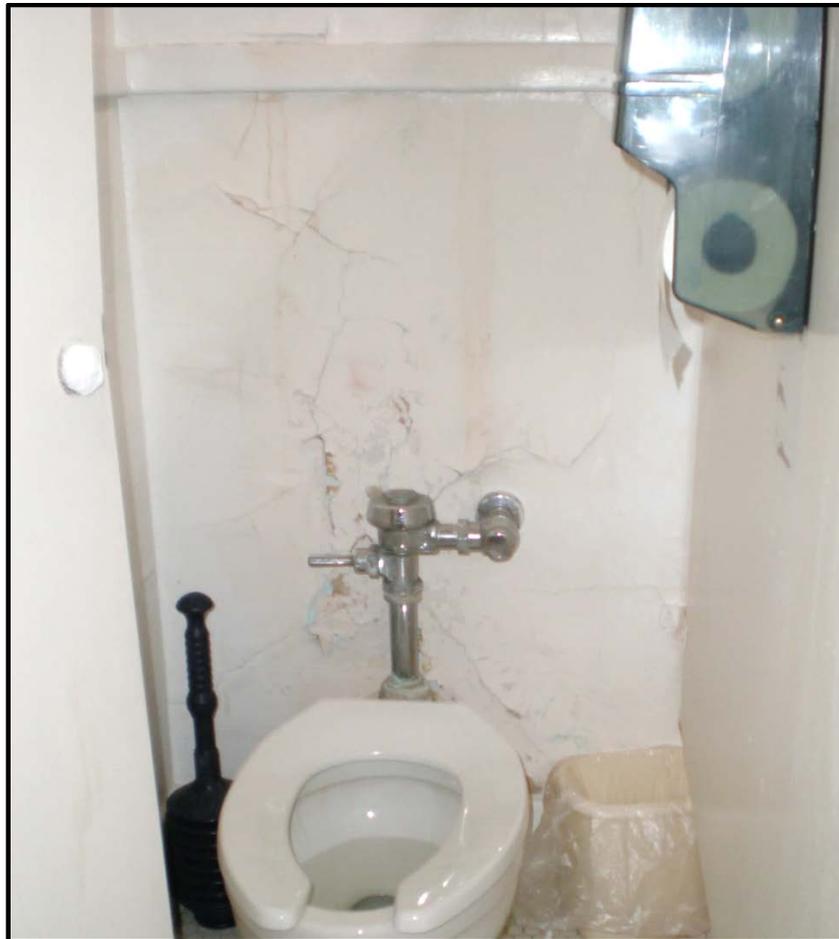


Figure 6. Damaged student bathroom walls at the Pierre Indian Learning Center is just one of many items not documented in the facilities management system.

Recommendations

We recommend that Indian Affairs—

14. Revisit the condition assessment contract to ensure that inspections are thorough, captured in the facilities management system, and completed every 3 years;
15. Create a standardized checklist for minimum critical factors for health and safety inspections; and
16. Create a process to ensure that regional inspectors are consistently addressing the critical factors identified in the health and safety inspection checklist.

BIE-Controlled Funding Presents Problems for Some Schools

For BIE-operated schools, facility funding is managed by the local BIE Education Line Office (ELO). Although we did not find problems at every BIE-operated school, some schools had problems when BIE controlled the funds. One school expressed frustration with the amount of communication and coordination from its ELO contacts. According to school officials, the ELO would only provide part of the annual budget at a time throughout the school year, which prevented the school from being able to plan or budget its resource use or facility needs. Moencopi Day School requested to take over the control and management of its facility funding after the ELO had repeatedly mismanaged the funds, including allowing bills to go unpaid for multiple years.

BIA School Facilities Not on BIE School Listings

During our onsite inspections, we learned of four schools that were not included on the list of BIE-funded schools provided to us at the beginning of our inspections: Spring Creek, Okreek, Rosebud Elementary, and He Dog. These four schools are operated by Todd County School District (TCSD) and do not report to BIE. Many of the school facilities at these schools, however, are included in the BIA facilities management system as BIA-owned assets, and Agreements between TCSD and BIA shows that BIA still retains some level of responsibility for them.

We visited He Dog to perform a quick assessment of the school and found significant health and safety concerns at the site. BIA personnel had conducted health and safety inspections at the tribal schools operated by TCSD and issued a letter requiring immediate action be taken by TCSD to correct the deficiencies.

School personnel informed us that existing lead and asbestos exposure had forced students and classes to be removed from the main school building, but that administrative staff still worked in the building for the full school day. Further, at

least one of the schools had no sprinkler system in the main building and water pooled in classrooms when it rained or the snow melted, causing slipping and electrical shock hazards. At one of the schools, BIA inspectors had documented that a concrete wall was cracking and bulging, posing the possibility that it might collapse onto the school's occupants, and recommended that it be replaced.

For about 10 years, TCSD and BIA have disagreed over who is responsible for the repairs at the four schools. Based on documentation provided by the school district, neither party has accepted the responsibility for the repairs and maintenance of the school buildings. Even though these schools' academic programs may not be funded by BIE, the facilities are BIA-owned and staff and students face hazards in light of longstanding critical needs.

Recommendations

We recommend that Indian Affairs—

17. Ensure BIE properly manages school funds through the implementation of controls over spending priorities and timely distribution of funds, and include a review process to verify adherence to bureau policy; and
18. Identify BIA-owned school facilities that are not on the BIE school listings, including the Todd County School District schools, and ensure facility responsibilities are clearly delineated and upheld.

Individual School Facility Deficiencies

We found a variety of issues at the schools, ranging from collapsing buildings to communication interruptions to plumbing and electrical deficiencies. Some of the issues presented below were documented in the facility management system, but many of the concerns were not included in the database of needed repairs. We provide a sample of some of the most prevalent and significant deficiencies here and a broader list of issues found at each school in Appendix 3.

Asbestos, Mold, and Radon

We found various levels of asbestos and mold at multiple schools, and learned that BIA has found elevated radon levels in and around at least three schools.

Even though every school with asbestos told us the asbestos was being properly managed, some of the areas containing asbestos appeared to be damaged and unprotected:

- One school official told us that all the known asbestos was being properly managed, but that they suspected asbestos existed in ceiling and floor tiles

that had not been tested. This suspected material was not being protected and was damaged in many places.

- Another school had asbestos in its structure and the doors to access that area are located at the bottom of stairs used constantly by students. The doors were unlocked and unrestricted at the time of our visit.
- A dormitory official showed us the extensive amounts of asbestos-based insulation that still existed in the walls and ceilings of the building and said that they were told the cost was too “outrageous” to have it removed.



Figure 7. Thick walls of asbestos insulation are left in one dormitory because the cost to remove it is "outrageous."

Mold not only is an indicator of problems with proper ventilation and plumbing damage, but it is also a health concern and can cause or exacerbate respiratory problems. We found mold in school areas that are heavily used by staff and students:

- An empty closet within the bathroom of a kindergarten classroom at one school had extensive clusters of mold spores, but the door was not locked and could easily be accessed by the students.
- Multiple schools had kitchen areas with what appeared to be mold on ceilings or walls, which not only indicates a problem with damaging levels of moisture build-up, but also creates a sanitary concern with food preparation and storage.

Radon is a naturally occurring gas that kills about 21,000 people each year, second only to smoking as a leading cause of lung cancer deaths. The gas is released into the air as uranium naturally breaks down in soil, rock, and water. BIA has identified elevated levels of radon in excess of the Environmental Protection Agency's listed maximum levels in at least three schools, but we found that the results were not being communicated to the schools more than a year later. Further, BIA had not informed the schools of what actions should be taken to protect the health of the staff and students who spend time in the affected buildings.

Structural Concerns

Several schools have buildings with substantial structural breaks or cracks. We found that these were commonly ignored and the cause not addressed or documented in FMIS:

- Flandreau Indian School had a structural crack in one building that was visible both inside a stairwell and outside the building.
- The gymnasium at the Lukachukai Boarding School had an arch-shaped crack extending from the floor to the ceiling that was large enough for daylight to be seen through the wall from the inside as the building shifts during the day.
- Laguna Elementary had been actively monitored in the past, but this monitoring was no longer occurring and the cracking has continued to worsen.
- The historical administration building at Pierre Indian Learning Center had a large break in a foundation wall, but since it is located in the basement utility room, it is apparently ignored. Broken and unprotected tiles also located in this space appear to be asbestos based. No deficiencies were listed in FMIS for this building.



Figure 8. Structural cracks in the stairwell ceiling at Flandreau Indian School.

Condemned Buildings

Seven of the schools we visited have buildings that are listed as condemned or that could be condemned, many of which are accessible to students:

- Tuba City Boarding School still held elementary and preschool classes in two buildings constructed in the 1930s, one of which was approved for condemned status, and the other's top two floors are in such poor condition they were unusable. Further, a condemned building in the middle of the school yard had been fenced off, but other condemned buildings on campus had not been protected from the students. We were told by school administrators that some housing quarters buildings around the school campus have been listed for demolition for 10 – 20 years.
- Lukachukai Boarding School had one building that is collapsing, but still accessible to students from the school play area and to anyone outside the school fence. Three historical buildings were in extremely poor condition, with exposed asbestos and falling ceilings, but they were not protected from the students who play nearby.
- Flandreau Indian School continues to use a building in extremely poor condition because they need the space for school activities (see Figure 8).



Figure 9. Building space is needed for student activities at Flandreau Indian School so this building is kept from being demolished even though parts of the building have been torn out and the doors allow snow to enter.

Electrical Hazards

A variety of electrical hazards were found at all the schools we visited. These included exposed wires, unprotected outlets and wires near water sources, protruding outlets from floors and walls, shorted outlets, and outlets near water sources that do not appear to be properly grounded.

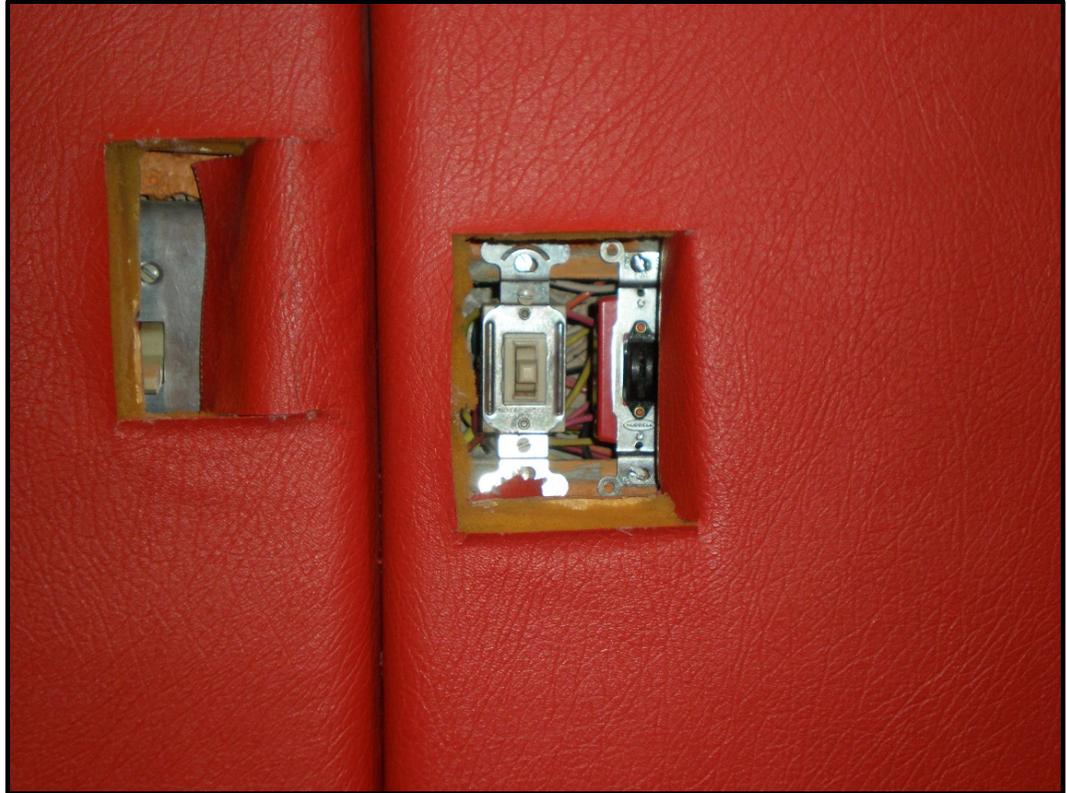


Figure 10. Exposed electrical outlet is a shock and fire hazard located on a padded wall in the cafeteria/gym that students play against at Moencopi Day School.

Grounds Improperly Maintained

Debris and old, unmaintained building materials create safety and trip hazards for staff and students. On some campuses, we found a number of safety hazards lying around, such as—

- old plumbing pipes;
- trash;
- concrete; and
- unused equipment.

In addition, we found instances of missing handrails and incomplete sidewalks, which pose safety and liability problems. Further grounds around many portables are not maintained, leaving overgrowth and causing a fire hazard.

Poor Drainage

Poor drainage can cause accelerated deterioration of structures through soil erosion and shifting or cracking foundations. Backed up drainage areas also become safety hazards in pedestrian walkways. We found drainage problems at many of the schools we visited:

- Improper drainage at Cherokee Central Schools allows rain to flow into the 5-year-old school facilities and may contribute to the extensive cracking in floors and walls.
 - Flooded utility bays under bleachers had up to a couple inches of standing water and the concrete block walls had significant levels of saturation.
 - Lights in the utility bays were not covered and light switches were difficult to locate—a safety concern with the standing water.
 - Standing water was deep enough and existed long enough in one area to allow minnow eggs to flourish.

- A nearby river flooded the bottom floor of the Pierre Indian Learning Center main school building several times over the years, since the building is several feet below the water level. The bottom floor of the main school building is unusable because of the amount of moisture that saturates the building.

Improperly Installed, Damaged, and Deteriorated Roofs

All the schools we visited had indications of water or moisture damage. We directly observed—

- standing water on roofs;
- severely deteriorated or damaged roof materials;
- disassembled or broken equipment left lying around on rooftops;
- improperly drained equipment damaging roof materials; and
- long-term accumulation of debris that indicates a lack of maintenance and can cause excessive deterioration of roof materials.

Like the roof on the Rosebud Dormitory, we also found problems with other roofs that had been recently replaced. Lukachukai Boarding School had the roof replaced on one part of its academic buildings about 5 years ago, but already anticipated problems stemming from the poor quality installation, which includes unsecured nail heads pushing up into the roofing material.

We also found problems with roofs left behind after a building was demolished. When an old dormitory was torn down at Pierre Indian Learning Center, the building components were removed from the site with the exception of the roof sections. These still-fully constructed roof and truss components with exposed wood, metal, and nails were left sitting on the grounds outside the new dormitory, fully accessible to the students.

Plumbing, Corrosion, and Moisture Damage

We found various levels of corrosion on pipes at almost all the campuses. Old equipment is not being maintained and plumbing repairs are not properly performed. Leaking pipes and equipment cause damage to surrounding walls,

ceilings, and floors. In addition, moist locations without proper ventilation can lead to a build-up in moisture and cause damage in walls, and ceilings, and equipment over time. For example:

- Inadequate ventilation in the Miccosukee Indian School gymnasium bathroom—the only bathrooms in the building—has resulted in cracked and buckling ceilings, rusting fixtures, and mold. Additional plumbing problems include damaged sinks, toilets, and the surrounding tile.
- A hot water heater and a boiler were so corroded in the main school building at Pierre Indian Learning Center that both had pools of water sitting under them. In addition, we found exposed electrical wires behind and above the leaking boiler.
- In the computer lab at Borrego Pass School, old water lines and valves were not capped off or removed, so students work on electronic equipment that is directly above water sources. The valves were still attached and, if opened, could cause extensive damage and put the safety of the students at risk of electrical shock.

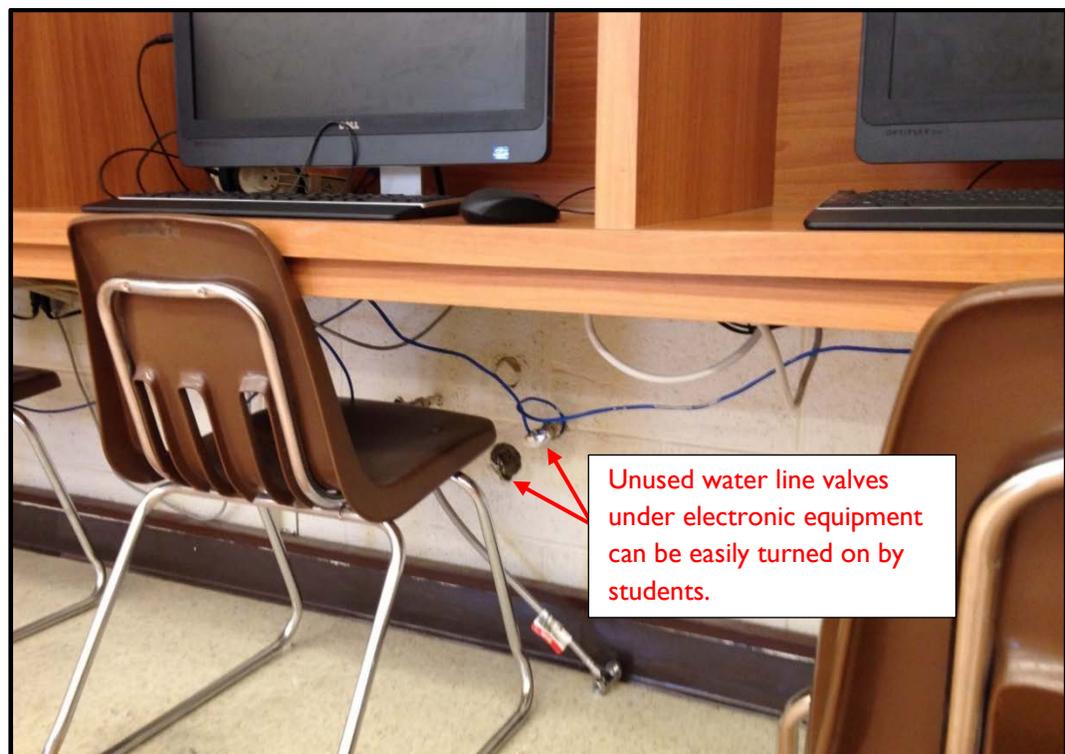


Figure 11. Unused water lines are easily accessible to students and present unnecessary safety risks so close to electronic equipment.

Overreliance on Temporary Structures

Portables are temporary structures and not meant to be permanent solutions. BIA, however, has acknowledged that it intentionally relies on portables to help address facility issues.

Seven of the 13 schools we visited relied on portable buildings to supplement instructional space. We found some portables that were in worse condition than nearby permanent structures. According to an international nonprofit trade association that represents the modular construction industry, the maintenance program of the user is critical to the useful life of the portable classroom. We found, however, portables that were in visibly poor condition and portables that were being used past their useful lives.

- Ahfachkee Day School had floors in two classroom portables that were so damaged that we could feel the floor sag considerably while walking across the surface and the facilities manager agreed that the condition of the floor was unsafe.
- Pierre Indian Learning Center had several portable classrooms that were visibly in poor condition even though most of the portables were listed in good condition in the facilities management system.



Figure 12. Pierre Indian Learning Center portable in visibly poor condition, with damaged walls, gutters, roof, and window treatments.

Cherokee Central Schools attempted to strategically build a school to accommodate future growth without the use of portables, but BIA restricted its O&M to existing space use. School officials told us that BIA decided they would not reassess the space use for 7 years.

Portable structures are not designed to withstand the same type or level of exposure that permanent structures are built to handle. Thus, it is all the more

critical that additional care is taken to ensure the structures and the areas around them are maintained in proper condition.

Fire Safety Systems Missing or Not Installed Correctly

At least five schools we inspected were missing working school-wide fire safety systems. Other schools had systems that were either poorly installed or poorly located and had expired extinguishers, which poses an unnecessary risk to the safety of staff and students. For example:

- Tonalea Day School had a sprinkler system installed, but it did not work and was installed above the ceiling tiles.
- Flandreau Indian School had sprinklers as part of its fire protection system, but at least one sprinkler head was installed adjacent to a lighting fixture in a manner which could pose an electrical shock hazard if water was activated.
- Over \$1 million has been expended at Pine Hill School for a fire system that was started in 2010, but as of the time of our visit had yet to be completed.



Figure 13. A sprinkler head at one school that was installed so it aims directly at an adjacent lighting fixture.

Recommendations

We recommend Indian Affairs—

19. Take corrective action for the deficiencies noted in this report or ensure that these items are entered into FMIS for future funding consideration;
20. Take immediate action to correct the health and safety issues identified in this report or ensure that the students and staff are adequately protected until these problems are resolved; and
21. Review the existing inventory for the schools and make any necessary corrections so the inventory and additional needs of the schools are accurately reflected for funding considerations.

Conclusion and Recommendations

Conclusion

BIA and BIE require significant improvements in the way they administer facilities-related funding and assistance to Indian schools. While they are required to balance a program that is continually facing budget cuts, BIA and BIE have the opportunity and obligation to make changes that will positively affect future generations of Native American students. The bureaus are working on a roadmap to make the necessary changes, but meaningful changes will require attention to detail and time to implement and institutionalize. Dedicated commitment, at all programmatic levels, to long-term solutions is required to both address specific deficiencies in facilities now and ensure more proactive management of facilities in the future.

In addition to addressing the systemic programmatic issues, we encourage the bureaus to take a fresh look at the major facility deficiencies that we found common to schools and address those issues, as well as ensure that the deficiencies are entered into the facilities management system so the true condition of schools is accurately reflected. Further, the health and safety concerns should be assessed for immediate corrective action so unnecessary risks are not taken with the welfare of school students, staff, and visitors.

While we were inspecting the schools, school officials shared some recommendations with us that they believed would help with facilities management. We encourage the bureaus to consider the schools' recommendations and include key officials in discussions of changes, where appropriate, so schools have input into the decisions that impact the success of their facilities management efforts.

Recommendations Summary

We provided 21 recommendations to help the bureaus develop promising practices to ensure that Indian school facilities are operated and maintained properly for the students. These recommendations should be coordinated between BIA and BIE as both bureaus continue to develop the Blueprint.

We recommend that Indian Affairs:

1. Provide consistent communication to schools regarding the status of Maximo implementation and use;
2. Provide access to a more consistent training program for school staff on entering data into both FMIS and Maximo until Maximo is fully implemented;

3. Communicate to schools regarding points of contacts for technical assistance;
4. Ensure accounts and passwords for Maximo are established and used;
5. Create a tracking and reminder system to document which schools are actively accessing their accounts and entering information;
6. Determine which schools have connectivity issues, help the schools identify what is necessary to enhance the networks from the grid reliability stance, and document any infrastructure needs in the facility management system;
7. Until networks issues are resolved, explore alternative means for capturing the schools' data in the facility management system.
8. Revisit the way FCI is used in funding allocations to allow consideration for the condition of individual structures;
9. Identify and clarify the specific roles and responsibilities that BIA and BIE have in school facilities management and then publicize those roles and responsibilities to bureau staff and schools;
10. Update contact lists for both BIA and BIE facilities personnel and post them online and distribute them to the schools;
11. Devise and implement a strategy to improve communication between the bureaus and the schools to share information including alternate and in-house funding sources, updated contact information, and best practices;
12. Improve monitoring to ensure funds are used for the intended and approved purposes and that projects are completed to standard;
13. Communicate that unspent funds should be returned for potential reallocation;
14. BIA revisit the condition assessment contract to ensure that inspections are thorough, captured in the facilities management system, and completed every 3 years;
15. Create a standardized checklist for minimum critical factors for health and safety inspections;
16. Create a process to ensure that regional inspectors are consistently addressing these critical factors;
17. Ensure BIE properly manages school funds through the implementation of controls over spending priorities and timely distribution of funds, and include a review process to verify adherence to bureau policy;

18. Identify BIA-owned school facilities that are not on the BIE school listings, including the Todd County School District schools, and ensure facility responsibilities are clearly delineated and upheld;
19. Take corrective action for the deficiencies noted in this report or ensure that these items are entered into FMIS for future funding consideration;
20. Take immediate action to correct the health and safety issues identified in this report or ensure that the students and staff are adequately protected until these problems are resolved; and
21. Review the existing inventory for the schools and make any necessary corrections so the inventory and additional needs of the schools are accurately reflected for funding considerations.

Although bureau officials provided some limited information in response to our draft report, Indian Affairs gave no formal response. We therefore consider all 21 recommendations unresolved and unimplemented. We will refer all 21 recommendations to the Assistant Secretary for Policy, Management and Budget for resolution and to track their implementation (see Appendix 4 for a status of recommendations).

Appendix I: Scope and Methodology

Scope

Our evaluation examined the condition of school facilities funded by the Bureau of Indian Affairs (BIA) and the Bureau of Indian Education (BIE), focusing on the efforts being taken to maintain the facilities in the best condition possible and in a manner that is safe for staff and students. We conducted interviews of school officials and onsite inspections of facilities at 13 schools from January through October, 2014.

We conducted our evaluation in accordance with the Quality Standards for Inspection and Evaluation 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 conclusion and recommendation.

Methodology

To accomplish our objective, we—

- obtained and reviewed funding and facility system data for each school, including the reported list of facility deficiencies;
- interviewed BIA and BIE facilities personnel from the field to executive levels to understand the roles and responsibilities of each bureau and the impact of intended changes associated with the BIE reorganization;
- reviewed applicable Federal laws, hearings, press statements, prior audit work, and key bureau documents and reports; and
- visited 13 schools, where we interviewed key school personnel responsible for the facilities and conducted a basic visual inspection of the facilities and grounds.

The facility inspections were not intended to be comprehensive assessments of all the structures and did not include mechanical or electrical tests of systems or equipment. The inspections were, however, intended to identify issues or concerns with the structures, equipment, and grounds that any facility manager or reasonably experienced facility staff should be able to identify and document or repair. Some of the areas considered during the inspections included:

- windows and doors were not damaged, closed securely, and worked properly
- equipment was being maintained and had passed required inspections
- building foundations and structural walls were not cracked or damaged
- floors and sidewalks were in good condition and did not pose trip hazards
- condemned buildings were adequately protected from student access
- roofs and gutters were in good condition and did not leak
- walls were in good condition without unrepaired damage

- kitchens were clean and maintained
- asbestos-based materials were protected from student exposure
- plumbing fixtures were in good working condition and pipes did not leak
- grounds were being maintained and did not present fire or safety hazards
- electrical wires and outlets were properly protected and covered.

Schools and Offices Visited

For our site visits, we selected schools that were geographically diverse and varied in size. In addition, the selected schools fit into the categories of grant, contract, or BIE-operated; boarding or non-boarding; and good, fair, or poor in terms of facilities conditions. We also visited bureau offices and conducted interviews of BIA and BIE officials at the field, regional, and senior levels.

- Ahfachkee Day School
- Dibe Yazhi Habitiin Olta, Inc (Borrego Pass)
- Cherokee Central Schools
- Flandreau Indian School
- Laguna Elementary School
- Lukachukai Boarding School
- Miccosukee Indian School
- Moencopi Day School
- Pierre Indian Learning Center
- Pine Hill School
- Sicangu Owayawa Oti (Rosebud Dormitory)
- Tonalea Day School
- Tuba City Boarding School
- He Dog School (unplanned school visit – school not on BIE school listings)
- BIA, Office of Facilities Management and Construction – Albuquerque, NM
 - Division of Facilities, Management, and Construction
 - Division of Planning and Programming
 - Division of Operations and Maintenance
 - Division of Safety and Risk Management
- BIA, Facilities Management, Southwest Region
- BIA, Facilities Management, Great Plains Region
- BIA, Facilities Management, Eastern Region (telephone)
- BIA, Safety and Occupational Health, Great Plains Region
- BIA, Office of Facilities, Property, and Safety Management (telephone)
- BIE, Education Line Office, NM Navajo Central/Eastern Navajo Agency
- BIE, Education Line Office, NM South
- BIE, Office of the Director (telephone)

Appendix 2: Prior Audit Coverage

Indian Affairs: Preliminary Results Show Continued Challenges to the Oversight and Support of Education Facilities (Report No. GAO-15-389T)

In 2015, the U.S. Government Accountability Office (GAO) previewed its observations on Indian school facilities through testimony before the House Appropriations Subcommittee on Interior and the Environment. GAO's preliminary results indicate that issues with the quality of data on school conditions—such as inconsistent data entry by schools and inadequate quality controls—make determining the number of schools that are in poor condition difficult. These issues impede Indian Affairs' ability to effectively track and address school facility problems. While national information is limited, GAO's ongoing work has found that BIE schools in three States faced a variety of facility-related challenges, including problems with the quality of new construction, limited funding, remote locations, and aging buildings and infrastructure.

Indian Affairs: Bureau of Indian Education Needs to Improve Oversight of School Spending (Report No. GAO-15-121)

In 2014, GAO found that some BIE schools spend substantially more per pupil than public schools nationwide. Several factors may help explain the higher per pupil expenditures at BIE-operated schools, such as their student demographics, remote location, and small enrollment. GAO also reported that BIE lacks sufficient staff with expertise to oversee school expenditures. Since 2011, the number of BIE full-time administrators located on or near Indian reservations to oversee school expenditures decreased from 22 to 13, due partly to budget cuts. BIE's processes for oversight do not adequately ensure that funds are spent appropriately. BIE lacks written procedures for how and when staff should monitor school spending and does not use a risk-based approach to prioritize how it should use its limited resources for oversight.

Indian Affairs: Management Challenges Continue to Hinder Efforts to Improve Education (Report No. GAO-13-342T)

In 2013, GAO found that management challenges within the Department of Interior's Office of the Assistant Secretary - Indian Affairs (Indian Affairs), such as fragmented administrative structures and frequent turnover in leadership, continue to hamper efforts to improve Indian education. Incompatible procedures and lack of clear roles for the Bureau of Indian Education and the Indian Affairs' Deputy Assistant Secretary for Management (DAS-M), contributed to delays in schools acquiring needed materials and resources. According to BIE officials, some DAS-M staff are not aware of the necessary procedures and timelines to meet schools' needs. A study commissioned by Indian Affairs to evaluate the administrative support structure for BIE and the Bureau of Indian Affairs (BIA)--also under Indian Affairs--concluded that organizations within Indian Affairs, including DAS-M, BIA, and BIE, do not coordinate effectively and

communication among them is poor. Similarly, preliminary results from GAO's work suggest that lack of consistent leadership within DAS-M and BIE hinders collaboration between the two offices.

School Facilities: Physical Conditions in School Districts Receiving Impact Aid for Students Residing on Indian Lands (Report No. GAO-10-32)

In 2009, GAO found that limited nationwide data are available about the physical condition of public school facilities in school districts that receive Impact Aid funding for students living on Indian lands, although data from three States indicate the conditions range from good to poor. The research studies GAO reviewed on the relationship between the condition of school facilities and student outcomes often indicated that better facilities were associated with better student outcomes, but there is not necessarily a direct causal relationship. A majority of the studies GAO reviewed indicated that better school facilities were associated with better student outcomes—such as higher scores on achievement tests or higher student attendance rates.

Bureau of Indian Affairs and Bureau of Indian Education: Schools in Need of Immediate Action (Report No. C-IN-BIA-0008-2007)

In 2007, the OIG published this flash report, which noted severe deterioration at elementary and secondary schools, including boarding schools, that directly affects the health and safety of Indian children and their ability to receive an education. Deterioration ranged from minor deficiencies, such as leaking roofs, to severe deficiencies, such as classroom walls buckling and separating from their foundation. Other severe deficiencies included outdated electrical systems, inadequate fire detection and suppression systems, improperly maintained furnaces, and condemned school buildings that have not been torn down to remove the health and safety hazards. Some of these buildings had been condemned for over 10 years and were still not surrounded by protective fencing to prevent access to students.

School Construction Program: Improvements Needed to Ensure Safety and Program Performance (Report No. W-FL-BIA-0047-2002)

In 2004, the OIG performed a review of the Bureau of Indian Affairs' (BIA) school construction program and found that no one in BIA ensures that school buildings are not occupied until identified safety deficiencies are corrected and BIA has inspected and certified the facilities for occupancy. Over the years, the poor condition of these schools has become an issue of national concern. There appeared to be confusion on who is responsible for enforcing safety codes. BIA does not have a policy for using excess project funds or "savings." OFMC and DSRM officials stated that present staffing levels were insufficient to effectively monitor performance of the school construction program.

Appendix 3: Individual School Facility Deficiencies

Facility issues found during inspection, by school*	Asbestos	Mold	Structural	Unprotected Condemned Buildings	Electrical Problems	Grounds and Drainage	Roofs	Plumbing and Corrosion	Moisture Damage	Reliance on Portables	Inadequate Fire Systems	Multiple Damaged Window or Doors	Damaged Flooring	Failed or Missing Equipment Inspections	Fencing Issues	HVAC or Swamp Cooler issues	Inadequately Cleaned Kitchens	Faulty Gutter Systems	Support Buildings in Poor Condition	Damaged Interior or Exterior Walls
Borrego Pass School	X	X	X		X	X	**	X	X	X	X	X	X	X	**			X	X	X
Laguna Elementary	X	X	X		X		X	X	X	X	**	X	X	X	**			X	X	X
Lukachukai Boarding School	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X			X	X
Moencopi Day School			X	X	X	X	X	X		X		X		X		X	X	X		X
Tonalea Day School	X		X		X	X	X				X	X				X		X	X	X
Pierre Indian Learning Center	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	X
Pine Hill School	X	X	X	**	X	X	X	X	X		X	X	X	**	X	**		X	X	X
Rosebud Dormitory	X	X	X		X	X	X	X				X	X	X	X	X	X	X	X	X
Ahfachkee Day School		X	X		X	X	X	X	X	X		X	X				X		X	X
Cherokee Central Schools			X			X	X		X			X					X	X		X
Flandreau Indian School	X		X	X	X	X	X	X	X		X	X	X		X			X	X	X
Miccosukee Indian School					X	X		X	X			X			X	X	**		**	X
Tuba City Boarding School	X	X	X	X	X	X	X	X	X	X		X		X	X	X	X			X

*Ordered by FCI ranking of Good (green), Fair (yellow), or Poor (red). BIA provided us with FCI rankings used at the beginning of this evaluation.

**=Did not inspect.

Appendix 4: Status of Recommendations

Recommendations	Status	Action Required
I – 21	Open - unresolved and unimplemented	These recommendations will be referred to the Assistant Secretary, Policy, Management and Budget for resolution and implementation tracking.

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