



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

EVALUATION REPORT



EVALUATION OF CONTROLS TO PREVENT VIOLENCE AT BUREAU OF INDIAN EDUCATION OPERATED EDUCATION FACILITIES

Report No. NM-EV-BIE-0001-2008

August 2008



United States Department of the Interior

OFFICE OF INSPECTOR GENERAL

Washington, DC 20240

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Memorandum

To: George T. Skibine
Acting Assistant Secretary, Indian Affairs

From: *for* Earl E. Devaney
Inspector General *Wayne Kendall*

Subject: Evaluation Report – *Evaluation of Controls to Prevent Violence at Bureau of Indian Education Operated Education Facilities* (Report No. NM-EV-BIE-0001-2008)

This memorandum transmits our report detailing the results of our evaluation of Controls to Prevent Violence at Bureau of Indian Education (BIE) Operated Education Facilities. Considering the amount of school violence reported in the news, we wanted to ensure that BIE was taking necessary precautions to protect Indian children at BIE operated education facilities.

We found that education facilities are unprotected and underserved. As a result, BIE is dangerously unprepared to prevent violence and ensure the safety of students and staff.

The report contains three recommendations which, if implemented, will improve controls to prevent school violence and be a catalyst for additional actions that will help to ensure the safety of students and staff at BIE operated education facilities. We would appreciate being kept apprised of the actions the Department takes on our recommendations as we will track the status of their implementation. Please have a written response forwarded to this office within 30 days, identifying plans to address the findings and recommendations cited in this report.

Should you have any questions about this report, please do not hesitate to contact me at (202) 208-5745.

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ABBREVIATIONS

BIE	Bureau of Indian Education
DPA	Division of Performance and Accountability

RESULTS OF EVALUATION

During the 2005/2006 school year, 78 percent of public schools nationwide experienced one or more violent incidents of crime, including rape, sexual battery, and physical attacks. In a 2000 report regarding BIE operated schools, 37 percent of students reported carrying a gun to school during the past month.¹ In light of these statistics, BIE is dangerously unprepared to prevent violence and ensure the safety of students and staff at BIE operated education facilities.

We visited nine BIE operated education facilities (*see Appendix 2*) and compared safety measures in place against 18 critical mainstream measures (*see Appendix 3*)² and found that:

- Critical safety measures were absent at all BIE education facilities visited. At more than half of the education facilities visited, we walked around campuses unchallenged by staff and/or entered classroom buildings through unsecured exterior doors. While several facilities had security cameras, they were not monitored. Additionally, several facilities did not have central alarm systems or intercoms to warn students and staff of emergency situations.
- None of the education facilities visited had adequate emergency preparedness plans to deal with violent incidents such as bomb threats, shootings, fights, and hostage situations. Plans did not adequately address emergency and/or all-clear procedures, evacuation meeting locations, staff responsibilities, or how to validate that all students and staff were safe. We requested facilities run lock-down and evacuation drills during our visits. Several facilities could not run the drills because they had no safe means to lock-down and/or evacuate the facility. Other facilities would not because they believed the drills would cause too much chaos or frighten the students. During the drills that were run, responsible personnel could not always operate available alarm systems, all students and staff were not accounted for, doors were not locked, and safe meeting locations were not identified.

Responsible BIE officials acknowledged the seriousness of school safety. One official stated it was a matter of “when and where” – not “if” – a violent act would happen. Another official acknowledged that some facilities give safety only minimal attention.

Safety and Security

We found no listing of required safety measures for BIE operated education facilities. Therefore, we used several public sources to compile a list of 18 critical mainstream safety measures in areas such as physical access and communication. Some safety measures were absent at all BIE education facilities visited, with the average facility failing to effectively utilize over half of the safety measures identified. For example, at the Santa Rosa Boarding School 14 of 18 critical safety measures were

¹ For complete background information and statistics see *Appendix 1*.

² For a complete description of objective, scope, and methodology see *Appendix 4*.

absent. (See *Figure 1*). The risk of a catastrophic situation is multiplied when numerous safety measures are absent.

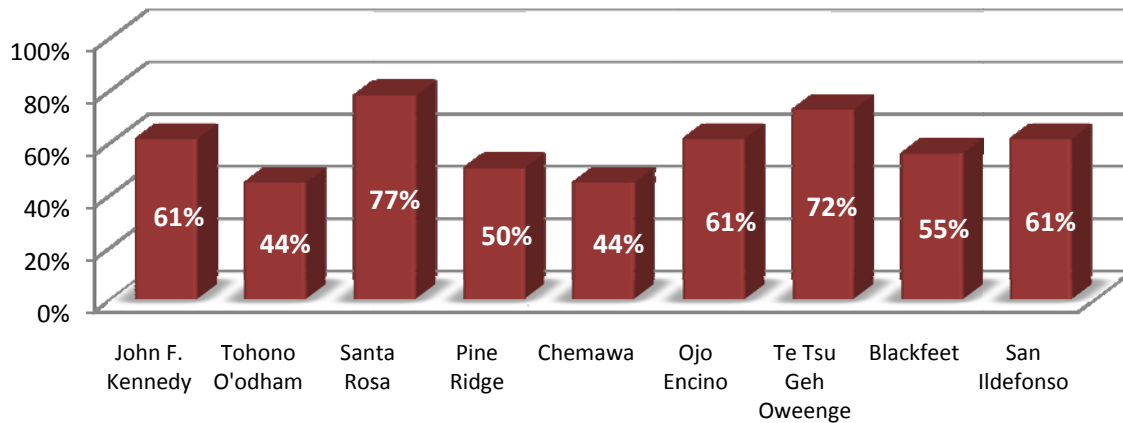


Figure 1: Percentage of Safety Measures Absent at Education Facilities Reviewed

The John F. Kennedy Day School, exemplified this multiplying effect.

We entered John F. Kennedy Day School, without a visitors' badge, through an unlocked exterior door and walked around the campus unchallenged. We were seen by approximately eight staff members but were not confronted or asked about our business on campus. Staff did not view strangers on campus as a threat.

The facility's alarm system was not reliable because of wiring problems. Additionally, one teacher reported that the intercom system did not always work. As a result, emergency situations could not be reported and/or responded to in a timely manner increasing the potential risk.

We were told the facility received a bomb threat about 3 years ago. Local law enforcement did not respond to the call for help and the facility did not have a security guard, so teachers were sent back into the facility to determine whether an actual bomb was present. Emergency responders are approximately thirty miles away from this facility, and the facility has no cell phone service and unreliable land phone lines. As a result, this facility has no dependable means to call for outside help in an emergency and is unprepared to effectively deal with an emergency situation without outside help.

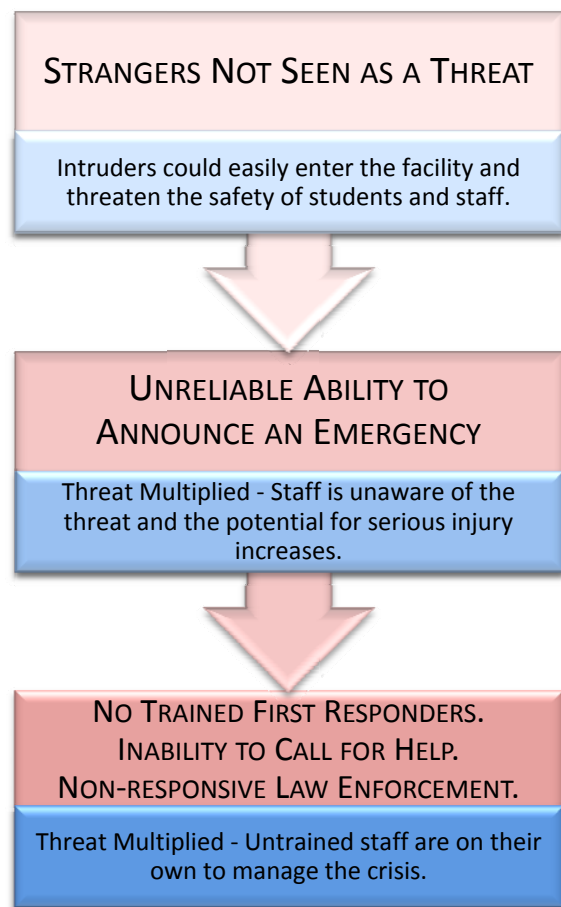


Figure 2: Multiplying Effect

Access and Fencing

At more than half of the education facilities visited, we walked campuses unchallenged by staff and/or entered classroom buildings through unsecured exterior doors. For example, we entered the Santa Rosa Boarding School through an unlocked exterior door and walked around the campus without being questioned by staff. Finally, someone directed us to the office but did not escort us or watch to ensure we went to the office. Additionally:

- While several facilities had security cameras, they were not monitored in real time.
- None of the facilities had metal detectors.
- Most of the facilities did not have security guards.
- Almost all of the facilities did not require visitors to sign in and/or show identification.

Inadequate security fencing at more than half of the facilities increased security risks. For example, Tohono O’odham High School, Santa Rosa Boarding School, and Chemawa Indian School had either illegal immigrants crossing the campus or transients living on facility property. Responsible facility officials told us that at times these unauthorized individuals either traded drugs for food and water, or sold drugs, to students.



Picture 1: Livestock Fencing with Openings



Picture 2: No Visible Fencing around Campus

Alarms and Communication

More than half of the education facilities visited did not have central alarm systems. Among these facilities, some had no or inoperable systems and others had systems that were not centralized. For example, Blackfeet Dormitory’s alarm system was not connected to one of their buildings. Staff were directed to communicate emergencies to the unconnected building via a two-way radio, however, we were told that staff did not always carry the radios.

Some facilities did not have operable intercom systems. One such facility, Santa Rosa Boarding School, during evacuations, lock-downs, and other emergency situations, sent “runners” throughout each building and across campus to broadcast the security message. In addition to exposing “runners” to potentially dangerous conditions, emergency situations could not be reported and/or responded to in a timely manner, increasing risks to the entire school population.

Recommendation

- (1) Indian Affairs should immediately prepare and implement a plan of action to evaluate the safety and security of each education facility and correct identified weaknesses. At a minimum, corrective actions should ensure:
 - a. Unauthorized individuals cannot gain access to the campus through unlocked or unmonitored doors.
 - b. All facilities have operable, and regularly tested, central alarm and intercom systems.
 - c. Trained first responders are available to respond to emergencies.

Plans

None of the education facilities visited had adequate emergency preparedness plans to deal with violent incidents such as bomb threats, shootings, fights, and hostage situations (*see Appendix 5*). Specifically, emergency preparedness plans did not sufficiently address:

- Staff responsibilities in different emergency situations.
- Signals for different emergencies and/or all-clear procedures.
- Conditions in which an evacuation versus a lock-down would be appropriate.
- Meeting locations for evacuations.
- Off-site emergency shelters.
- Accounting for and/or taking roll to ensure students and staff are accounted for.
- Communicating rolls to responsible facility officials.
- Communication with law enforcement, media, and/or parents.
- Evacuation and/or lock-down testing/drilling requirements.
- Handling emergencies during field trips or other off campus events.

Several facilities provided multiple emergency plans, compounding these weaknesses. In some cases, the same emergency situations were discussed in more than one plan. Therefore, we question how facility officials could determine which plan to follow during the chaos of an emergency.

In April 2006, BIE provided a guide to create an emergency preparedness plan, including a template to be tailored to each facility's individual needs. As a result, we were perplexed by the poor condition of these plans. We questioned whether BIE officials used the guide and template provided. We requested copies of the 2006/2007 plans submitted to BIE's Division of Performance and Accountability (DPA). However, DPA officials were unable to provide copies of these plans.

We also received inconsistent information from BIE regarding emergency preparedness plans. Specifically, responsible DPA officials stated that emergency preparedness plans were not required under Title IV, Safe and Drug-Free Schools and Communities Act (Title IV). However, DPA's "Title IV: 21st Century Schools" report stated that emergency preparedness plans are required under Title IV.

Recommendation

- (2) Indian Affairs should immediately prepare and implement a plan of action to evaluate the emergency preparedness plans at each education facility and correct identified weaknesses. At a minimum, corrective actions should ensure that each education facility has a current emergency preparedness plan in place.

Facility Preparedness

At some education facilities we observed lock-down and/or evacuation drills. Several facilities could not adequately lock-down the campus. At one of these facilities, San Idefonso Day School, neither interior nor exterior door handles could be locked from the inside. As a result, staff needed to go outside to lock doors with keys, exposing staff and students to potential dangers. Another facility, Blackfeet Dormitory, had some doors that could not be locked at all.



Pictures 3 and 4: Doors Cannot be Locked from Inside

We noted numerous other problems with the drills including:

- Facilities did not ensure students and staff were accounted for.
- Rooms were not checked.
- Doors were not locked.
- Safe locations were not identified.
- Responsible officials could not operate alarm systems.

For example, at Tohono O’odham High School we requested that both an evacuation and a lock-down drill be run. The responsible official ran the lock-down drill, but was unsure what code to use to announce the drill. Furthermore, classroom staff did not take roll or report attendance to the office. The official stated he would not run the evacuation drill because of serious student behavioral problems. He believed the drill would cause too much chaos and he would be unable to control the students. At Te Tsu Geh Oweenge Day School, the responsible official stated that drills were not conducted because the children would be scared. Finally, of the few emergency preparedness plans in place, most did not address the frequency of testing.

Recommendation

- (3) Indian Affairs should immediately prepare and implement a plan of action to evaluate the preparedness of each education facility and correct identified weaknesses. At a minimum, corrective actions should ensure:
- a. All facilities can be safely locked down or evacuated in the event of an emergency.
 - b. Staff and students are properly trained on emergency procedures.
 - c. Emergency plans are routinely tested.

Specific suggestions, provided as a proposed starting point for Indian Affairs to begin correcting these serious security weaknesses, are included in *Appendix 6*.

BACKGROUND

Why We Performed This Evaluation

Considering school violence reported in the news, we wanted to ensure that the BIE was taking necessary precautions to protect Indian children at BIE operated education facilities. Additionally, we observed potential safety risks during our BIE Background Investigations audit (Report No. Q-IN-BIA-0005-2007, dated April 25, 2008).

We found no laws, Presidential orders, or directives on safety measures for BIE operated facilities. Therefore, we used several public sources to compile a list of mainstream safety measures. We visited nine BIE operated education facilities (*see Appendix 2*) and compared safety measures in place against mainstream measures (*see Appendix 3*).³

Statistics

In December 2007, the U.S. Department of Education and the U.S. Department of Justice released a joint report titled, “Indicators of School Crime and Safety: 2007.” While it stated that violent deaths in school are rare – finding only 35 school-associated violent deaths in elementary and secondary schools during the 2005/2006 school year in the United States – the overall picture painted was grim.

During the 2005/2006 school year, 78 percent of schools experienced one or more violent incidents of crime, including rape, sexual battery, and physical attacks. Overall, 1.5 million students, ages 12 through 18, were victims of nonfatal crimes while at school in 2005. Also in 2005, 8 percent of students in grades 9 through 12 reported being threatened or injured with a weapon on school property, while 6 percent of students reported carrying a weapon on school property during the same timeframe.

In 2005, students ages 12 through 18 reported:

- 14 percent – involved in a fight on school property.
- 24 percent – gangs at their school.
- 28 percent – bullied at school during the last 6 months.
- 6 percent – afraid of being attacked or harmed at school.

The statistics are even worse at BIE operated schools. A report titled, “2000 Youth Risk Behavior Survey of Middle School Students Attending Bureau Funded Schools” stated:

- 37 percent of students reported carrying a gun to school during the past month.
- 59 percent of students reported being involved in a physical fight.

³ For a complete description of objective, scope, and methodology *see Appendix 4*.

FACILITIES VISITED

Facility	Location	Grades	Date Visited
John F. Kennedy Day School	White River AZ	K-8	April 8, 2008
Tohono O'odham High School	Sells AZ	9-12	April 10, 2008
Santa Rosa Boarding School	Sells AZ	K-8	April 11, 2008
Pine Ridge School	Pine Ridge SD	K-12	April 17, 2008
Chemawa Indian School	Salem OR	9-12	April 22, 2008
Ojo Encino Day School	Cuba NM	K-8	April 22, 2008
Te Tsu Geh Oweenge Day School	Santa Fe NM	K-6	April 23, 2008
Blackfeet Dormitory	Browning MT	1-12	April 24, 2008
San Ildefonso Day School	Santa Fe NM	K-6	April 24, 2008

MATRIX OF SAFETY MEASURES AT EDUCATION FACILITIES

Safety Measures	John F. Kennedy	Tohono O'odham	Santa Rosa	Pine Ridge	Chemawa	Ojo Encino	Te Tsu Geh Oweenge	Blackfeet	San Ildefonso	# of Facilities Lacking Safety Measures	% of Facilities Lacking Safety Measures
Adequate security fencing ⁴										5	55%
Secured exterior doors										5	55%
Designated visitors' entrance										4	44%
Visitors' entrance that prevented unobserved entering										2	22%
Visitors required to sign in or show identification										8	88%
Visitors required to wear a visitors' badge										4	44%
Security camera(s)										6	66%
Metal detector										9	100%
Security guard										7	77%
Hall monitors										6	66%
Operable central alarm systems										6	66%
Intercom system in classrooms										3	33%
Exits clearly marked										0	0%
Evacuation maps clearly displayed										4	44%
Graffiti free walls, playground equipment, etc.										5	55%
Student dress code ⁵										3	33%
Staff required to wear identification cards										9	100%
Students required to wear identification cards										9	100%
TOTAL NUMBER OF SAFETY MEASURES ABSENT	11	8	14	9	8	11	13	10	11		

⁴ We defined "adequate security fencing" as chain link, at least 6 feet high, and in good repair.

⁵ Dress codes reduced violence and gang activity in benchmarked mainstream education facilities.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The objective of our evaluation was to determine the quality of safety measures at BIE operated education facilities to prevent violence, against both students and staff, from internal and external threats.

Scope

The scope of our evaluation was BIE operated education facilities. We specifically excluded the fifteen BIE operated education facilities reviewed in the BIE Background Investigations audit (Report No. Q-IN-BIA-0005-2007, dated April 25, 2008).

Methodology

To meet our objective we:

- Searched for applicable laws and regulations.
- Searched public school system requirements and compiled eighteen mainstream safety measures, based on Virginia, New York, and Texas state requirements, applicable to education facilities (*see Appendix 3*).
- Visited nine non-statistically selected BIE education facilities (*see Appendix 2*).
- Interviewed responsible BIE and education facility officials.
- Evaluated conditions at the education facilities against eighteen predetermined safety measures (*see Appendix 3*).
- Identified six components of an effective emergency preparedness plan (*see Appendix 5*).
- Reviewed emergency plans maintained by the education facilities visited (*see Appendix 5*).
- Reviewed emergency plans maintained by BIE for the education facilities visited.

We performed our work during March through June 2008 in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

REVIEW OF SIX MAJOR COMPONENTS OF EMERGENCY PREPAREDNESS PLANS AT NINE EDUCATION FACILITIES

Preparedness Plan Components	% of Facilities with Inadequate Plan Component	Comments
Bomb Threats	88 %	Plans did not adequately address bomb threats
Shootings	100 %	Plans did not adequately address shootings
Fights	100 %	Plans did not adequately address fights
Hostage Situations	100 %	Plans did not adequately address hostage situations
Campus Emergencies	100 %	Plans did not adequately address off-campus emergencies
Annual Updates	66 %	Plans had not been updated within the last year

SUGGESTIONS

The following suggestions are included as a proposed starting point to assist Indian Affairs in implementing the recommendations related to Safety and Security, Plans, and Facility Preparedness. This list of suggestions is not intended to be all inclusive but is instead provided as a tool for Indian Affairs to begin correcting the serious security weaknesses identified in our evaluation.

Safety and Security

To control access to facilities and campuses (*Recommendation 1a*):

- (1) Require all education facility exterior doors, with the exception of one designated and clearly marked visitors' entrance, be secured from the outside. If other doors must be used during the day, ensure procedures are in place to immediately re-secure the door after use.
- (2) Require education facilities to establish procedures for visitors to sign in, provide proper identification, and receive a visitors' badge. Once established, train staff on appropriate steps to take when someone is seen on campus unescorted or without a clearly displayed visitors' badge.
- (3) Require all education facilities have adequate security fencing, including operable gates, around the immediate campus and recreation fields.

Require all facilities to have operable central alarm and intercom systems (*Recommendation 1b*):

- (4) Require education facilities to have and test central alarm and intercom systems. Ensure all buildings are connected to these systems.

As necessary, obtain, identify and coordinate with trained first responders so they are available to respond to emergencies (*Recommendation 1c*):

- (5) Analyze education facility security guard needs considering facility location, weaknesses, threats, and proximity to emergency responders. Once analysis is completed, determine which facilities should have certified security guards qualified as first responders.

Plans

Require each education facility to have a current emergency plan in place (*Recommendation 2*):

- (6) Assist each education facility in using the emergency preparedness plan template and tailoring the contents to individual facility needs.

Facility Preparedness

Require that facilities can be safely locked down or evacuated (*Recommendation 3a*):

- (7) All classroom doors should be equipped with interior locks and window coverings to increase occupant safety.

To develop properly trained staff and students (*Recommendation 3b*):

- (8) Require all personnel and students be trained on their individual roles and responsibilities.

Emergency plans should be routinely tested (*Recommendation 3c*):

- (9) Require each facility to establish a routine testing schedule for alarms, evacuations, and lock-down drills. Require each facility to analyze these test results to determine if revisions are necessary.

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