



Office of
INSPECTOR GENERAL

U.S. Department of the Interior

EVALUATION REPORT



School Violence Prevention

Cover Photos

Top Left:

Community Park near Gila Crossing Day School in Arizona

Bottom Left:

Classroom wall at St. Stephens Indian School in Wyoming

Middle:

Weapon Confiscated at Chemawa Indian School in Oregon

Top Right:

Drug Paraphernalia Confiscated at Sherman Indian High School in California

Bottom Right:

Area near Northern Cheyenne Tribal School in Montana



United States Department of the Interior

OFFICE OF INSPECTOR GENERAL
Washington, DC 20240

FEB 03 2010

Memorandum

To: Larry Echo Hawk
Assistant Secretary, Indian Affairs

From: Mary Kendall
Inspector General, Acting

Subject: Evaluation Report – School Violence Prevention (NM-EV-BIE-0003-2008)

This memorandum transmits our report detailing the results of our evaluation of School Violence Prevention measures. We conducted this review to evaluate the quality of school safety measures in place at Bureau of Indian Education (BIE) funded schools to prevent violence, against both students and staff, from internal and external threats.

Overall, our evaluation revealed many indicators of potential violence, deficiencies in school policies aimed at preventing violence, and substantial deficiencies in preventative and emergency safety procedures resulting in schools being dangerously unprepared to prevent violence and ensure the safety of students and staff.

The report contains four recommendations which, if implemented, will improve safety measures in place at BIE funded schools. We would appreciate being kept apprised of the actions the Department has taken on our recommendations as we will track the status of their implementation. Please submit a written response 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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WHY WE DID THIS EVALUATION

A number of infamous school tragedies, such as Columbine High School (15 killed in April 1999) and Virginia Tech (33 killed in April 2007) have made front page news. While there have been no similar acts of violence at Bureau of Indian Education (BIE) Indian Schools, school violence is moving into Indian country. For example, in March 2005, 16-year-old student Jeff Weiss shot and killed eight people (including himself) at Red Lake High School, a public school on the Red Lake Indian reservation in rural Minnesota. He also killed two other individuals in the community.

78 percent of public schools experienced one or more violent incidents of crime such as rape, sexual battery, and physical attacks

The “Indicators of School Crime and Safety: 2007” report (December 2007)¹ paints a grim picture of violence in public elementary and secondary schools across the United States. According to the report, during the 2005-2006 school year, 78 percent of schools experienced one or more violent incidents of crime such as rape, sexual battery, and physical attacks. Over 1.5 million students, ages 12-18, were victims of on-campus non-fatal crimes in 2005. In addition, 8 percent of students in grades 9 - 12 reported being threatened with a weapon on school property, and 6 percent reported carrying a weapon on-campus. Finally, 14 percent of students aged 12 - 18 also reported being involved in an on-campus fight.

BIE schools face a more relentless weapons problem -- 37 percent of BIE school students reported carrying a weapon on-campus compared to only 6 percent of public school students.

A report entitled, “2000 Youth Risk Behavior Survey of Middle School Students Attending Bureau Funded Schools”² revealed the problem is more severe at BIE-operated schools, citing that 37 percent of students reported carrying a gun to school in the past month and 59 percent reported being involved in physical fights.

Background

In the 2007-2008 school year, BIE funded 184 schools in 23 states, enrolling about 48,000 students. One hundred and twenty-five of these schools are grant schools, which are funded through grant agreements or contracts with the Bureau of Indian Affairs (BIA) and operated by the respective tribes. The remaining schools are managed directly by BIE.

¹ The report was issued jointly by the Department of Education and the Department of Justice.

² The report was prepared by the Bureau of Indian Affairs, Office of Indian Education Programs, in conjunction with the Centers for Disease Control and Prevention, Division of Adolescent School Health.

We assessed safety measures and procedures at a non-statistical selection of 22 Indian schools, 6 BIE-operated and 16 grant. We also revisited three campuses to determine whether the conditions we noted had been corrected (*see Appendix 1*). We visited a wide range of campuses. They included students from kindergarten through twelfth grade, with enrollments from 35 to 900, on grounds of up to 300 acres, in rural and urban settings. On some campuses, students lived in dormitories seven days per week, while on others students went home daily.

In a previous evaluation, we visited nine BIE-operated schools. The results of that evaluation are documented in an August 1, 2008 report titled *Evaluation of Controls to Prevent Violence at Bureau of Indian Education Operated Education Facilities* (Report No. NM-EV-BIE-0001-2008). Our research identified no laws, presidential orders, or directives outlining safety measures for Indian schools. Additionally, grant agreements awarded to Indian schools are void of conditions or requirements aimed at preventing campus violence. Therefore, we performed research on public school measures and compiled our own safety measures against which to evaluate the schools, among them: security fencing, surveillance systems, visitor procedures, and emergency preparedness procedures.

RESULTS OF EVALUATION

Extreme and relatively rare incidents, like the Red Lake shooting, and other acts of school violence could potentially be prevented by appropriate school safety preparedness. Therefore, we conducted this review to evaluate the quality of school safety measures in place to prevent violence, against both students and staff, from internal and external threats (*see Appendix 2*).

Our evaluation revealed many indicators of potential violence, deficiencies in school policies aimed at preventing violence, and substantial deficiencies in preventative and emergency safety procedures resulting in schools being dangerously unprepared to prevent violence and ensure the safety of students and staff.

Indicators of Potential Violence

Perhaps one of the most critical methods of deterring on-campus violence lies in a school's overall awareness and ability to detect and understand indicators of violence.

A May 2002 U.S. Secret Service report analyzing 37 school-based attacks found that most attackers engaged in some behavior prior to the incident that caused others concern or indicated a need for help (*see Appendix 3*). The Red Lake shooter was known to have created animation depicting extremely violent acts of death and elaborate drawings of people



Student Artwork on Dormitory Wall at
Chemawa Indian School, OR



Student Artwork on
Dormitory Wall at
Chemawa Indian School,

being shot or hanged. During our visit to Chemawa Indian School in Oregon we saw similarly violent drawings inside a student's dormitory room. A portion of one wall was covered with depictions of a beheading, stabbing, and a body hanging from a tree. Chemawa school officials were unaware of the violent depictions until we brought it to their attention. The school official said the student should have been referred to counseling, and that dormitory checks were not being adequately performed or the artwork would already have been removed.

Indicators of violence, such as Chemawa's graphic drawings, are reminders that deadly acts of school violence can strike even seemingly peaceful schools.

Teachers, administrators, and other staff should be trained to understand

and address all indicators of violence. We found, however, that training in basic violence prevention such as anger management, bully prevention, and gang awareness was not provided at many of the schools we visited (*see Appendix 4*). Additionally, staff members at some schools stated they were not trained on how to recognize gang indicators.

Students at Chemawa Indian School had moved into a new dormitory in January 2010, just days before we revisited the campus. As a result, little was seen on the dorm walls. Additionally, a new School Supervisor started around the same time. He stated that daily room checks will occur vigilantly to prevent the dormitory from becoming as "degraded" as the old dorms.

Additionally, tracking violence and/or violent trends within Indian schools is particularly problematic because no functional, comprehensive reporting or tracking system exists. BIE does maintain an online database known as the Native American Student Information System (NASIS), where schools can enter information related to school violence. We found, however, that Indian schools submit data inconsistently, if at all, and BIE does not verify that the entered data is accurate. For example, the Sherman Indian High principal in California said his school enters data into NASIS but acknowledged the system's shortcomings. He said they do not have a set procedure to ensure that all incidents are entered, and that NASIS definitions, documents, and forms change so frequently that staff members are unsure which are most current. School

As of January 2010, staff at Sherman Indian High School continued to report problems with NASIS, which they stated was not user friendly.

staff members went on to say that the same data could be entered in many different ways because there is no consistent system. Additionally, information in the database is essentially useless because BIE does not or cannot analyze and interpret the data.

Though we found few statistics on violence indicators at Indian schools, we found a wealth of supporting anecdotal evidence during our visits to schools, including major indicators of violence such as confiscated weapons, signs of gang activity, and substance abuse.

Weapons and Related Violence

Many schools are in violent communities, which affect the daily lives of students. “Indian country communities suffer a violent crime rate that is two to three times greater than the national average,” according to an Office of Juvenile Justice and Delinquency Prevention report dated March 2004. Additionally, a 2001 National Institute of Justice report entitled, “Policing on American Indian Reservations” cited “dramatic increases in violent crime on reservations, especially among youth.” Such increase in violence in the community can lead to on-campus violence.

Indian country's violent crime rate is two to three times the national average.

A Gila Crossing Day School staff member said, “Students are exposed to daily violence outside of school. The school is in the heart of a crime area ... drugs, guns, homicides, shootings - you name it.” This community violence has been felt on campus. Specifically, the school went on lockdown twice during the 2008-09 school year after nearby gunshots were heard. On one occasion, police took nearly 20 minutes to respond. In November 2008, shots were fired at the school building, leaving two



Building in the Community near Gila Crossing Day School, AZ



Bullet Hole in the Wall of the Gila Crossing Day School, AZ

bullet holes in a classroom exterior. Although the shots were not fired during school hours, the holes are on-campus reminders of ongoing community violence.

Gila Crossing Day School is not alone in being affected by community violence. For example, the Chemawa Indian School dormitory was locked down, just days before our visit, because of nearby gunshots. Additionally, at Mandaree Day School in North Dakota, bomb-making material was found in an adjacent house which resulted in the school being evacuated just one week before our visit. Finally, local law enforcement said the Arizona reservation near Phoenix, on which Salt River Elementary School is located, experienced more than 50 drive-by shootings in one month. Some of these shootings were within two miles of the school. Cars park and drive right outside classroom windows at St. Stephens Indian School in Wyoming, and a staff member told us he thinks a drive-by shooting is a significant possibility.

Our site visits revealed that community violence may be seeping into school hallways. We observed confiscated weapons at several schools including brass knuckles, a knife, and a box cutter. Staff told us of an incident in which a student at St. Stephens was found to have two baseball bats in a car on campus to be used as weapons. Additionally, a staff member at

Sherman Indian High School told us of an incident when one student from a dormitory threatened another with a four-pronged hunting arrow.



Weapons Confiscated from Sherman Indian High School, CA (left), Chemawa Indian School, OR (top right), and St. Stephens Indian School, WY (bottom right).

Physical Security Features

Weapons end up on campuses as a result of numerous inadequate physical security features. For example, almost all of Sherman Indian School's 360 students live on campus, and many take air transportation to reside there. School officials said that they rely on airport security to find dangerous items in students' luggage and do not perform contraband searches upon their arrival. Airport security, however, allows items in checked baggage that the school would not want on campus. We observed that only St. Stephens Indian School utilized a walk-through metal detector. Four other schools used hand-held wands.

Given the fact that Indian communities suffer from high violent crime rates, maintaining a secure campus is as important as keeping weapons off campus. We identified an array of physical security deficiencies, however, in areas such as security fencing, camera surveillance systems, visitor procedures, and security guards (*see Appendix 5*).

Security Fencing

More than 80 percent of the schools we visited did not have adequate fencing, allowing for the potential of unauthorized individuals to enter the campuses.

The fence surrounding the Chemawa campus encloses nearly 300 acres and is so far-reaching that school officials can only access some heavily wooded parts with a four-wheel drive vehicle. In the past, school officials have discovered transient camps inside the perimeter fence and large holes in the fence. Despite the fact that they have repaired many holes, several large openings remain. We saw a partially-completed inner fence immediately around the school, which seemed much easier to maintain, and asked why it was not completed; staff did not know the answer.



Abandoned Transient Camp (left) and Hole in Perimeter Fencing (right)
at Chemawa Indian School, OR

Twin Buttes Day School in rural North Dakota did not have a fence and the principal is concerned about this unfettered access to the school. There is also no security guard, and the principal said it would take police over an hour to reach the school in case of an emergency. As a compensating measure, teachers keep their doors locked and window shades closed. White Shield School is also in rural North Dakota and also has no fencing or security guard. In March 2008 the school locked down for a possible student with a gun. However, police took 30 minutes to arrive after they were called. Fortunately, the situation was resolved peacefully.

Red Water Elementary School in Mississippi also does not have a fence, and the school's principal expressed concern over having neither a fence nor a security guard. He said he hopes the school can one day put both of these measures in place at their new school that is under construction.

Camera Surveillance Systems

Almost all the schools had operable surveillance cameras, but many of the systems had flaws. For example, the camera system server at Northern Cheyenne Tribal School often went down, leaving its camera system inoperable for up to two weeks. Even when the camera system was operable, images were difficult to see due to poor lighting. Poor lighting at night was also a problem at Yakama Nation Tribal School in Washington. When Yakama classrooms were vandalized overnight, low lighting prevented clear-enough images to identify the intruders. Yakama officials expressed the hope of obtaining more lights to remedy this issue.

Most schools with the surveillance systems did not monitor the systems in real-time, missing out on the possibility of using this valuable tool to prevent or



Surveillance Camera Monitor at
Mandaree Day School, ND

diffuse incidents of violence. Instead, the cameras were only used to review past footage and identify the instigators of suspicious activities or violence.

Three of the schools visited did not have camera systems installed at all. For example, Sherman Indian High School had no cameras, although the principal recognized their benefit and said he would like to install them. Staff members showed us unused surveillance camera equipment in a storage area. They explained that the equipment was purchased for

As of January 2010, the Sherman Indian High School campus still had no surveillance equipment installed and the same camera equipment remained in storage.

nearly \$25,000 several years before our visit, but it had not been installed because an incoming principal doubted its value.

This sprawling 88-acre campus, which houses more than 350 dormitory students 7-days a week but has only one security guard and a perimeter fence wrought with holes, could benefit from a camera system.



Surveillance Camera Equipment in Storage at Sherman Indian High School, CA

Good Examples of Camera Surveillance Systems

In contrast, Salt River Elementary School had 36 functioning cameras inside and outside the elementary and middle schools. In one instance, the cameras allowed officials to identify students who threw drugs into the bushes when the drug dog unit was brought to campus. Additionally, Paschal Sherman Indian School in Washington had 72 surveillance cameras, including one in each classroom. Some cameras rotated and had zoom capabilities. Finally, St. Stephens Indian School even had security cameras installed on its buses.

Visitor Procedures

We found that every school had a designated visitor entrance but a large number of schools did not require visitors to sign in or show identification, and more than half did not require visitors to wear identifying badges. This was of particular concern at Yakama Nation Tribal School, where there was an on-campus adult training center. Visitors were not required to sign-in before entering the training center and school staff could not discern whether a visitor was on campus to use the training center or for other purposes. Yakama staff was notably concerned over a domestic violence class held during school hours because offenders could walk freely among students. The training center services provided were tribal services and, because the school was part of the tribe, the notion was that it was acceptable to use school grounds to provide these services.

At Conehatta Elementary School in Mississippi, we purposely bypassed the designated visitor entrance, wandered the school grounds, and were able to approach several classrooms without being stopped or questioned by staff. It was not until we entered the school's gymnasium through an unlocked exterior door that we were finally questioned. Our ability to wander around campuses unchallenged was a consistent issue at schools we visited. Additionally, while

St. Stephens Indian School had a locked security door at the designated visitors' entrance requiring individuals to be "buzzed-in" to enter the school, we were able to easily bypass this entrance and entered the school through an unlocked kitchen door. While designated visitors' entrances are important security measures, other compensating controls (such as fencing and locked exterior doors) are equally as important.



Entrance to St. Stephens Indian School, WY

Security Guards

About half of the schools visited had a security guard. For example, Two Eagle River School's guard is a local tribal police officer who is provided at no cost to the school. Additionally, Choctaw Central High School had seven guards – one at each of its three entry gates and four on foot.

While security guards are a positive safety measure, as with designated visitors' entrances, compensating controls are necessary. For example, a security guard requested identification from us, as visitors, when we drove onto the Chemawa Indian School campus. Local law enforcement, however, said that because Indian Health Services (IHS) was also on the campus, the security guard could only request limited information from a person said to be visiting IHS due to privacy and confidentiality concerns. Local law enforcement heard that, as a result, drug dealers accessed the campus by telling the security guard they were going to IHS.

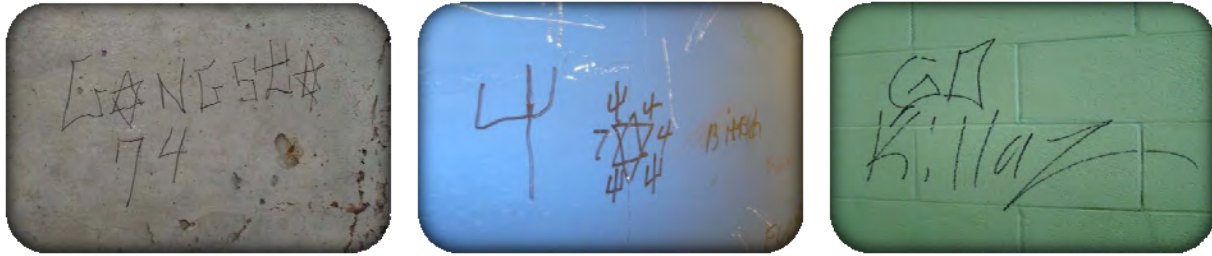


Security Guard Entrance at Choctaw Central High School, MS.

Gang Influences

A report of gang activity indicated that nearly 75 percent of reported gang members in Indian country were school age (based on a March 2004 Office of Juvenile Justice and Delinquency Prevention report). The presence of gang indicators in Indian schools we visited was undeniable. Gang letters and figures were scrawled on the exterior walls, bathroom stalls, and inside the dormitories of almost half of the schools we visited.

Almost 75 percent of gang members in Indian country are school age.



Graffiti on the Wall at Choctaw Central High School, MS (left), Dormitory Bathroom Stall at Choctaw Central High School, MS (center), and Wall at Pine Ridge School, SD (right)

For example, Chemawa dormitory staff said its graffiti problem was “terrible” and “frustrating [because] it shows a lack of pride by the students.” They said they previously held students and parents responsible for the cost of removing graffiti. The rule, however, was no longer enforced. We question why officials stopped enforcing this rule. Specifically, dormitories at Paschal Sherman Indian School in Washington were graffiti free. School officials attributed this to strict rule enforcement. Staff prohibited students responsible for graffiti from living on campus - something the students viewed as a privilege.

One official at Tohono O’Odham High School in Arizona estimated that 75 percent of the school’s students were in gangs. Other schools expressed concern over students whose parents were active gang members. Officials and local law enforcement from several schools said gang activity and involvement was less a campus problem than a community problem. School officials at Chief Leschi School near Seattle, Washington said that community gang activity had led to the deaths of four or five former students and the incarceration of several more for gang-related drive-by shootings.

In 2008, two separate gang-related homicides occurred within 100 yards of Gila Crossing, one claiming the life of a student’s sister. School staff said that 27 different gangs operated in the Gila Crossing community, including “91st Avenue Killers,” “West Side Gang,” “Rez Killers,” “51st Avenue” gangs, and several other Crips and Bloods spinoffs. We were told that local law enforcement was aware of gang members in the community but did not pursue them for fear of retribution. Additionally, the school inexplicably stopped providing gang awareness and resistance training to students.

Contrary to the belief that gang involvement is less a campus problem than a community problem, we observed students wearing gang colors in school. Colored T-shirts, a baseball cap, or even a ballpoint pen with a red or blue cap peeking from a student’s pant pocket can become a display of gang affiliation. Because of this, some schools have dress codes that prohibit students from wearing particular colored clothing and accessories. Ten schools we visited prohibited students from wearing items such as hooded sweatshirts, baseball caps, and other accessories. Some rules were as narrow as to ban colored shoe laces. Chemawa keeps a supply of white T-shirts in the office for students who violate the dress code. Salt River strictly enforces a uniform policy, but allows students some flexibility. Students are required to wear solid black- or khaki-colored bottoms, but can choose from a variety of shirt colors. Dress code policies, however, are useless if not enforced. For example, the Yakama Nation Tribal School superintendent said its policy forbids students from wearing blue or red clothing. During our visit, however, we saw

several students wearing the colors. The superintendent said she was not surprised because the school was poor at enforcing its rules.

Good Examples of Activities to Address Gang Influences

Many schools acknowledged the need to be diligent in recognizing and eliminating gang indicators on-campus and have done so using a variety of available gang prevention programs (see Appendix 6).

Salt River Elementary School administrators, who have implemented a uniform policy, have also maintained an exemplary mix of additional strategies targeted at decreasing gang influences on-campus. Combating the gang problem has been a constant and coordinated effort for Salt River; staff stated that many things have collectively contributed to keeping gang influences out of the school despite the high prevalence of gang activity in the community.

The GREAT Program

GREAT, which stands for Gang Resistance Education and Training, is an in-class curriculum taught by a law enforcement official aimed at preventing student delinquency, violence and gang involvement. GREAT incorporates an elementary level program and a middle school program; it does not, however, have a program targeted at high school students. The staff at Salt River credited this program, which is run by their School Resource Officer, in helping combat their gang problem. Staff members stated that there has been a significant drop in students trying to wear gang colors since the GREAT program was implemented. Salt River also holds an annual GREAT campout for students who maintain satisfactory grades and good behavior.

Salt River's School Resource Officer noted, however, that this program is essentially effective for elementary grade students in the fourth and fifth grade, and said he felt that by the sixth grade students were too set in their ways to be influenced by the GREAT program.

In conjunction with the GREAT program Salt River also instituted a "Police Explorer" program, which allows students to become involved in the duties of local police officers. Through this program students volunteer to participate with the School Resource Officer in activities such as painting over community graffiti.

A Strong School Resource Officer Presence

At Salt River the School Resource Officer stated that he was aware of which students came from families with gang involvement and pays particular attention to these students knowing they do not have a strong support network at home. The School Resource Officer maintains close involvement with all of the school's students, taking time to play basketball or eat lunch with them. He is a highly visible figure at the school, and stated he believes it is important that he fosters a close relationship with the students to build trust and respect.

Parental Involvement

Salt River also maintains zero tolerance for violation of school rules and suspends students for any violation of them. When a student is suspended they are required to meet with the principal, a behavioral specialist, and a parent/guardian to devise an action plan to correct their behavior. At the conclusion of the suspension there is a secondary follow-up meeting with the same team of people. School officials believe that parental involvement is critical to successfully managing student behavior and discipline.

Safe, Respectable, and Responsible Class

Salt River's Safe Respectable and Responsible Class is attended by all students on a rotating schedule and emphasizes character building. It addresses issues such as bullying, substance abuse, suicide, conflict resolution, grief and loss.

Alcohol and Drug Influence

Drugs and alcohol influences cause significant problems in Indian country. Alcohol abuse is the "single biggest challenge" facing Indian communities and police departments, according to a 2001 National Institute of Justice report. Child abuse, domestic violence, assault, driving under the influence, sale of alcohol to minors, and neglect tend to be byproducts of substance abuse.

Site visits revealed that even though drug and alcohol abuse may not run rampant inside school walls, it is a community issue which affects students at school. Local law enforcement and school officials confirmed that drug dealers live within a half mile of three different schools we visited. School officials at Northern Cheyenne Tribal School in Montana said they filed a report with BIA police in 2006 about a drug dealer located two blocks from the school, yet nothing was done to address the issue. Drug dealers have been caught on the campus at Chief Leschi School in Washington. An on-going police investigation has identified ten students, including a 12-year old, at St. Stephens who were distributing drugs at school.

Alcohol abuse is the single biggest challenge facing Indian communities.

A Chemawa staff member said students could easily access drugs and acknowledged many entry points for drugs to reach campus. In fact, during the 2008-09 school year, 25 bags of marijuana were discovered inside a classroom and 65 more were found in a student's possession. A school source said, "as near to 100 percent as you can get" of Chemawa students use drugs and felt school administrators inconsistently enforced drug policies, rendering prosecution and punishment weak deterrents. Staff also said that the high amount of drug use on campus is directly correlated to a high amount of student fighting. Law enforcement officials told us of a student at Chemawa who assaulted another student in class for being a "snitch" to a drug incident.

School officials at Sherman Indian High School estimated that about half of their students use drugs and said that marijuana and alcohol have been found in the dormitories.



Graffiti on the Dormitory Wall at Sherman Indian High School, CA (left), Student Classroom Folder at St. Stephens Indian School, WY (center), and Drug Paraphernalia Confiscated at Sherman Indian High School, CA (right)

Good Examples of Activities Addressing Drug and Alcohol Influences

Drug Dogs

Several schools we visited utilized the services of drug dogs to dissuade students from bringing drugs on campus, and to identify and punish those that do. For example, Salt River Elementary School staff members informed us that they utilize a drug dog on an annual basis. This past year the dog was also brought in as an informational part of Career Day to inform students of its use and benefits. At Two Eagle River School the local county sheriff's department brings a drug dog on campus every month to conduct searches. The school credits the positive relationship with the sheriff's department as highly beneficial in obtaining services such as this.

The principal at Sherman Indian High School stated that the school has utilized a contractor to bring drug dogs on campus; due to a lack of money, however, they have not utilized this expensive service this year. The Sherman principal estimated the service costs approximately \$1,200 per visit. Other schools indicated they would like to have more frequent drug dog visits than they were able to arrange with their local law enforcement entities.

When we revisited Sherman Indian High School in January 2010, we learned that several police departments recently used the school for drug dog certification activities, which provided some coverage of the school grounds.

The Gila Crossing Day School principal expressed the desire to use a drug dog; a tribal decision, however, has prevented school administrators from using drug dogs.

Drug Testing of Students

Two schools we visited approached the issue differently by requiring some students to undergo drug testing. Two Eagle River School drug tests students who wish to

participate in certain extracurricular activities such as sports teams, clubs, and drum groups. Staff members stated this is a precautionary measure and do not feel there is a drug problem on campus. When students at Yakama Nation Tribal School have an unexcused absence they are required to undergo drug testing. This is done in an effort to discourage students from skipping school to do drugs.

Emergency Preparedness

We reviewed emergency plans at almost all schools visited. Plans covered a wide range of emergency scenarios but failed to adequately address off-campus emergencies (*see Appendix 7*). Running the emergency drills contained in the emergency plan is key to identifying plan weaknesses. For example, Yakama administrators said by conducting drills they discovered weaknesses in their emergency plan. During a 2006 emergency evacuation drill, staff realized the evacuation site was too far away, highway closures prevented parents from picking up children, and they did not have a key to the evacuation site building. A new evacuation site has since been established. Therefore, we requested each school to run the emergency drills contained in their plan. We noted numerous deficiencies in schools' abilities to run the drills due to high staff turnover, ineffective intercom systems, and inadequate classroom security.

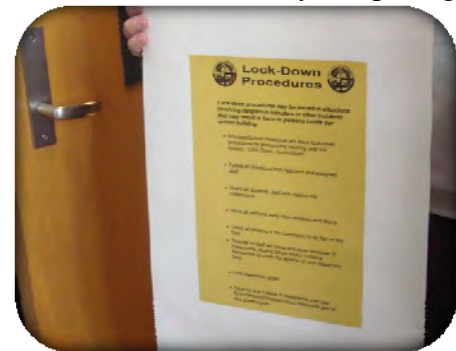
Due to inadequate training caused by high staff turnover, the Mandaree Day School was unable to perform emergency drills during our visit. The principal, who had been with the school only two weeks at the time of our visit, expressed uncertainty over emergency procedures. When asked to perform the lockdown, school officials said that they did not know how to announce it. Even after contacting several staff members, they were unable to determine the announcement code and, ultimately, could not perform the drill. When we requested an evacuation drill instead, school officials did not know the procedures and could not perform that drill either. Additionally, the Muckleshoot Tribal School principal, who assumed the position two months before our visit, said that 40 percent of the school's teachers were also new and had not been trained on emergency plans or drill procedures. As a result, the principal had yet to conduct a drill that year. Further, despite numerous requests, Muckleshoot failed to provide emergency planning documents for our review. Conversely, all four of the Two Eagle River School staff members to whom we spoke had been with the school for more than 13 years. These staff members were well versed in emergency procedures. Additionally, Salt River typically experiences a turnover of only three or four out of 77 staff members every year. When asked, both Two Eagle and Salt River Elementary schools comfortably executed efficient lockdown drills in our presence.

When we revisited Muckleshoot Tribal School in January 2010, we learned that turnover continued with a new principal being hired that same month. Additionally, while the new school had been constructed and an emergency plan was partially completed, staff had still not been trained on the procedures nor had the procedures been tested and/or drilled.

Several schools struggled to perform emergency drills due to ineffective intercom systems. For example, because Yakama Nation Tribal School did not have an operable intercom system, it signified drills with specific bell sequences. School administrators acknowledged inherent

weaknesses in this system. On one occasion an actual bomb threat was treated like a fire drill because there was no intercom system to communicate anything different to classrooms. On another occasion an escaped convict was headed toward the school at the same time the school called a fire drill, but school officials could not warn teachers. Children were evacuated from classrooms and moved outside, unaware of the threat. Before a new intercom system could be installed, the school's electrical wiring would need to be updated. Additionally, at Gila Crossing, parts of the campus did not perform the lockdown drill because the intercom announcement was inaudible on sections of the campus. Conversely, Sherman Indian High School had an extensive intercom system, audible both inside and outside campus buildings, and was able to perform the lockdown drill efficiently. After school officials announced the drill over the intercom system, the security guard at the school's entrance locked the drive-in gate and came in to assist teachers and staff, who performed the drill quickly and effectively.

Lockdown drills we observed revealed that most schools had classroom doors that could only be locked from the outside. As a result, staff needed to go outside to lock doors with keys, exposing staff and students to potential dangers. Staff at Paschal Sherman Indian School recognized this weakness and developed a workaround allowing teachers to lock doors from the inside by removing a small door insert. Additionally, uncovered windows in the classroom doors, like at Northern Cheyenne Tribal School, allow potential shooters to see staff and students inside locked classrooms, making them more likely to be targets. Chief Leschi School had a creative way to cover classroom door windows in case of a lockdown emergency. Teachers could quickly place pre-fit poster board, secured by Velcro, over the door windows. Additionally, the lockdown procedures were printed on the board for added emphasis.



Lockdown Window Covering at
Chief Leschi School, WA

RECOMMENDATIONS

Recommendation 1. Indian Affairs should develop safety policies that establish minimum safeguards that must be in place at all Indian education facilities to protect students and staff from internal and external threats.

Recommendation 2. Once safety policies are developed, Indian Affairs should immediately prepare and implement a plan of action to evaluate the safety and security of each education facility against the safety policy. After this evaluation is completed:

- (a) At the BIE operated education facilities, immediately correct identified weaknesses.
- (b) At the grant operated education facilities, determine whether identified weaknesses involve the violation of the right, or endangerment of the health, safety, or welfare of any persons. If Indian Affairs determines that there is “an immediate threat of imminent harm to the safety of any person” and that this threat “arises from the failure of the grantor to fulfill requirements of the grant” the Secretary should immediately rescind the grant and resume control of the facility and immediately correct identified weaknesses.

Recommendation 3. Indian Affairs should prepare and implement a plan of action to evaluate grant agreements. Grant agreements should be updated to require the establishment of, and adherence to, all BIE safety policies.

Recommendation 4. Indian Affairs should develop and implement a plan to ensure all teachers in schools receiving BIE funding are trained, at least annually, in gang indicators, school specific emergency plans and procedures, conflict resolution, anger management, bully prevention, suicide prevention, and drug abuse resistance.

FACILITIES VISITED

Facility Name	BIE/Grant Operated	Location	Grades	Date Visited
White Shield School	Grant	Roseglen ND	K-12	September 16, 2008
Mandaree Day School	Grant	Mandaree ND	K-12	September 17, 2008
Twin Buttes Day School	Grant	Halliday ND	K-8	September 18, 2008
Red Water Elementary School	Grant	Carthage MS	K-8	September 30, 2008
Tucker Elementary School	Grant	Philadelphia MS	K-8	October 1, 2008
Choctaw Central High School	Grant	Choctaw MS	9-12	October 2, 2008
Conehatta Elementary School	Grant	Conehatta MS	K-8	October 3, 2008
Two Eagle River School	Grant	Pablo MT	K-12	October 7, 2008
Northern Cheyenne Tribal School	Grant	Busby MT	K-12	October 9, 2008
Chief Leschi School	Grant	Payallup WA	K-12	October 20, 2008
Muckleshoot Tribal School *	Grant	Auburn WA	K-12	October 20, 2008 January 13, 2010
Yakama Nation Tribal School	Grant	Yakima WA	9-12	October 21, 2008
Paschal Sherman Indian School	Grant	Omak WA	K-9	October 23, 2008
St. Stephens Indian School	Grant	St. Stephens WY	K-12	October 30, 2008
Pine Ridge School	BIE	Pine Ridge SD	K-12	February 5, 2009
Chemawa Indian School *	BIE	Salem OR	9-12	February 10, 2009 January 11, 2010
Tohono O'Odham High School	BIE	Sells AZ	9-12	February 11, 2009
Dunseith Day School	BIE	Dunseith ND	K-8	February 18, 2009
Ojibwa Indian School	BIE	Belcourt ND	K-8	February 19, 2009
Sherman Indian High School *	BIE	Riverside CA	9-12	February 23, 2009 January 15, 2010
Gila Crossing Day School	Grant	Laveen AZ	K-8	February 25, 2009
Salt River Elementary School	Grant	Scottsdale AZ	K-6	February 26, 2009

* We revisited these three campuses to determine whether conditions noted had been corrected.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The objective of our evaluation was to determine the quality of safety measures at grant operated education facilities to prevent violence, against both students and staff, from internal and external threats.³

During the course of the evaluation, we identified significant gang indicators at grant operated schools and decided to expand our evaluation to include three BIE operated education facilities (Dunseith Day School, Ojibwa Indian School, and Sherman Indian High School) to determine whether similar gang indicators were present.

Later in the evaluation, OIG received an allegation of serious safety violations at a BIE operated education facility visited in a previous evaluation. Therefore, we decided to expand our review to include evaluating actions taken at three additional BIE operated education facilities (Chemawa Indian School, Pine Ridge School, and Tohono O'odham High School). Finally, we performed follow-up work to determine whether conditions noted had been corrected at three schools: Muckleshoot Tribal School, Chemawa Indian School, and Sherman Indian High School.

Scope

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

When we expanded our evaluation to look for gang indicator at three 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) and the nine BIE operated education facilities reviewed in the BIE School Violence Prevention evaluation (Report No. NM-EV-BIE-0001-2008, dated August 1, 2008).

When we again expanded our evaluation to review actions taken at previously visited BIE operated education facilities, we limited our selection of BIE operated education facilities to those visited in the BIE School Violence Prevention evaluation (Report No. NM-EV-BIE-0001-2008, dated August 1, 2008).

³ This is the same objective as our previous review titled "Evaluation of Controls to Prevent Violence at Bureau of Indian Education Operated Education Facilities" (Report No. NM-EV-BIE-0001-2008, dated August 1, 2008). The difference in the reviews is NM-EV-BIE-0001-2008 concentrated on BIE operated education facilities and this review concentrated on grant operated education facilities.

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.
- Visited sixteen non-statistically selected grant operated education facilities and six non-statistically selected BIE operated education facilities (*see Appendix 1*).
- Interviewed responsible BIE and education facility officials.
- Evaluated conditions at the education facilities against eighteen predetermined safety measures (*see Appendix 5*).
- Identified six components of an effective emergency preparedness plan and reviewed emergency plans maintained by the education facilities visited against these components (*see Appendix 7*).
- Identified six training areas critical to prevent violence and reviewed training programs in place at the education facilities visited against these critical training areas (*see Appendix 4*).

We performed our work during August 2008 through January 2010 in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

SECRET SERVICE REPORT

A May 2002 U.S. Secret Service report documenting their analysis of 37 school-based attacks spanning about 25 years found that “incidents of targeted school violence are rarely sudden, impulsive acts” and “most attackers engaged in some behavior prior to the incident that caused others concern or indicated a need for help.”

The report identified the following 10 key findings and implications on school-based attacks:

1. **Incidents of targeted violence at schools rarely are sudden, impulsive acts.**
Implication: This is a process that potentially may be knowable or discernable from the attacker’s behaviors and communications.
2. **Prior to most incidents, other people knew about the attacker’s idea and/or plan to attack.**
Implication: Schools can encourage students to report this information in part by identifying and breaking down barriers in the school environment that inadvertently may discourage students from coming forward with this information. Schools also may benefit from ensuring that they have a fair, thoughtful and effective system to respond to whatever information students do bring forward.
3. **Most attackers did not threaten their targets directly prior to advancing the attack.**
Implication: This finding underscores the importance of not waiting for a threat before beginning an inquiry. Other behaviors and communications that may prompt concern, such as hearing that a child is talking about bringing a gun to school, are indicators that the child may pose a threat and therefore should prompt the initiation of efforts to gather information.
4. **There is no accurate or useful profile of students who engaged in targeted school violence.**
Implication: Rather than asking whether a particular student “looks like” those who have launched school-based attacks before, it is more productive to ask whether the student is engaging in behaviors that suggest preparations for an attack, if so how fast the student is moving toward attack, and where intervention may be possible.
5. **Most attackers engaged in some behavior prior to the incident that caused others concern or indicated a need for help.**
Implication: Educators and other adults can learn how to pick up on these signals and make appropriate referrals.
6. **Most attackers had difficulty coping with significant losses or personal failures. Moreover, many had considered or attempted suicide.**
Implication: Information that indicates a student is facing or having trouble dealing with a significantly difficult situation may indicate a need to refer the student to appropriate services and resources. In cases where there is concern about the

possibility that a student may engage in targeted violence, attention should be given to any indication that a student is having difficulty coping with major losses or perceived failures, particularly where these losses or failures appear to have prompted feelings of desperation and hopelessness.

7. Many attackers felt bullied, persecuted or injured by others prior to the attack.

Implication: These attackers told of behaviors that, if they occurred in the workplace, likely would meet legal definitions of harassment and/or assault. Educators can play an important role in ensuring that students are not bullied in schools and that schools not only do not permit bullying but also empower students to let adults in the school know if students are being bullied.

8. Most attackers had access to and had used weapons prior to the attack.

Implication: The large proportion of attackers who acquired their guns from home points to the need for schools and law enforcement officials to collaborate on policies and procedures for responding when a student is thought to have a firearm in school.

9. In many cases, other students were involved in some capacity.

Implication: It is possible that feedback from friends or other may help to move a student from an unformed thought about attacking to developing and advancing a plan to carry out the attack.

10. Despite prompt law enforcement responses, most shooting incidents were stopped by means other than law enforcement intervention.

Implication: The short duration of most incidents of targeted school violence argues for the importance of developing preventative measures in addition to any emergency planning for a school or school district. The preventative measures should include protocols and procedures for responding to and managing threats and other behaviors of concern.

TRAINING AT EDUCATION FACILITIES

Training (Summary)	# of Facilities Lacking Training	% of Facilities Lacking Training
STAFF:		
Crisis/emergency plans	6	27%
Conflict resolution	11	50%
Anger management	13	59%
Bully prevention	5	23%
Suicide prevention	5	23%
Drugs	6	27%
STUDENTS:		
Gangs	8	36%
Conflict resolution	7	32%
Anger management	8	36%
Bully prevention	6	27%
Suicide prevention	8	36%
Drugs	3	14%

MATRIX OF SAFETY MEASURES AT EDUCATION FACILITIES

Safety Measures (Summary)	# of Facilities Lacking Safety Measures	% of Facilities Lacking Safety Measures
Adequate security fencing (note 1)	18	82%
Secured exterior doors	16	73%
Designated visitors' entrance	0	0%
Visitors' entrance that prevented unobserved entering	6	27%
Visitors required to sign in or show identification	18	82%
Visitors required to wear a visitors' badge	13	59%
Security camera(s)	3	14%
Metal detector	17	77%
Security guard	13	59%
Hall monitors	15	68%
Operable central alarm systems	8	36%
Intercom system in classrooms	3	14%
Exits clearly marked	0	0%
Evacuation maps clearly displayed	7	32%
Graffiti free walls, playground equipment, etc.	9	41%
Student dress code (note 2)	10	45%
Staff required to wear identification cards	10	45%
Students required to wear identification cards	21	95%

Note 1: We defined "adequate security fencing" as chain link, at least 6 feet high, and in good repair.

Note 2: Dress codes reduced violence and gang activity in benchmarked mainstream education facilities.

Safety Measures (by Facility)	White Shield	Mandaree	Twin Buttes	Red Water	Tucker	Choctaw	Conehatta	Two Eagle	Northern Cheyenne	Chief Leschi	Muckleshoot (note 3)
Adequate security fencing											
Secured exterior doors								✓			n/a
Designated visitors' entrance	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Visitors' entrance that prevented unobserved entering			✓	✓	✓	✓	✓			✓	✓
Visitors required to sign in and show identification										✓	n/a
Visitors required to wear a visitors' badge						✓		✓		✓	n/a
Security camera(s)	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓
Metal detector					✓	✓	✓			✓	
Security guard						✓		✓		✓	✓
Hall monitors	✓					✓				✓	n/a
Operable central alarm systems	✓		✓	✓	✓		✓	✓		✓	
Intercom system in classrooms	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓
Exits clearly marked	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Evacuation maps clearly displayed				✓	✓	✓	✓		✓	✓	✓
Graffiti free walls, playground equipment, etc.	✓	✓	✓	✓	✓		✓		✓	✓	✓
Student dress code						✓	✓		✓	✓	
Staff required to wear identification cards				✓	✓	✓	✓			✓	✓
Students required to wear identification cards											
TOTAL NUMBER OF SAFETY MEASURES ABSENT	11	13	12	9	8	6	7	10	12	3	5

Note 3: Not all measures could be assessed because school was cancelled the day of our visit.

Safety Measures (by Facility)	Yakama	Paschal Sherman	St. Stephens	Pine Ridge	Chemawa	Tohono O'Odham	Dunseith	Ojibwa	Sherman	Gila Crossing	Salt River
Adequate security fencing	✓			✓			✓				✓
Secured exterior doors		✓				✓		✓			✓
Designated visitors' entrance	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Visitors' entrance that prevented unobserved entering	✓	✓			✓	✓	✓	✓	✓	✓	✓
Visitors required to sign in and show identification					✓	✓					
Visitors required to wear a visitors' badge					✓	✓	✓			✓	✓
Security camera(s)	✓	✓	✓	✓	✓	✓	✓			✓	✓
Metal detector			✓								
Security guard			✓	✓	✓				✓		✓
Hall monitors				✓	✓	✓					
Operable central alarm systems	✓	✓				✓	✓	✓	✓	✓	
Intercom system in classrooms		✓		✓	✓	✓	✓	✓	✓	✓	✓
Exits clearly marked	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Evacuation maps clearly displayed	✓		✓	✓	✓	✓			✓	✓	✓
Graffiti free walls, playground equipment, etc.		✓					✓	✓		✓	
Student dress code	✓	✓	✓		✓	✓			✓	✓	✓
Staff required to wear identification cards	✓					✓	✓		✓	✓	✓
Students required to wear identification cards	✓										
TOTAL NUMBER OF SAFETY MEASURES ABSENT	8	9	11	10	7	5	8	11	9	7	6

SELECTED GANG PREVENTION PROGRAMS

Program	Description
Gang Resistance Education and Training - GREAT	A school-based, law enforcement officer-instructed classroom curriculum. With prevention as its primary objective, the program is intended as an immunization against delinquency, youth violence, and gang membership.
Law-Related Education – LRE	Programs draw practical connections among the everyday lives of young people and the law, human rights, and democratic values in order to improve academic performance and prevent general delinquency.
Responding in Peaceful and Positive Ways – RIPP	A school-based violence prevention program designed to provide students in middle and junior high schools with conflict resolution strategies and skills including and highlights the relationship between self-image and gang-related behaviors.
Gang Prevention Through Targeted Outreach – GPTTO and Gang Intervention Through Targeted Outreach – GITTO	Boys and Girls Clubs of America attempt to involve participants in all aspects of the Club's programming rather than gang activities. GITTO includes additional programming that addresses five core areas of character and leadership development, education and career development, health and life skills, the arts, and fitness.
Skills Mastery and Resistance Training – SMART and Street SMART	Boys and Girls Clubs of America curriculum designed to help young people ages 11-13 effectively resist gangs and violence, resolve conflicts, and be positive peer helpers in their communities.
Community Oriented Policing Services – COPS	Awards grants to tribal, state, and local law enforcement agencies to hire and train community policing professionals, acquire cutting-edge crime-fighting technologies, and develop and test innovative policing strategies.
Phoenix Gang Intervention and Prevention	Evidence-based resources for schools and community-based programs. In school (grades 4-10) program designed to enable students to identify risk factors relating to negative behavior and to develop "coping options."

***REVIEW OF SIX MAJOR COMPONENTS OF EMERGENCY
PREPAREDNESS PLANS***

Preparedness Plan Components	% of Facilities with Inadequate Plan Component	Comments
Bomb Threats	5%	Plans did not adequately address bomb threats
Shootings	15%	Plans did not adequately address shootings
Fights	55%	Plans did not adequately address fights
Hostage Situations	30%	Plans did not adequately address hostage situations
Off-Campus Emergencies	100%	Plans did not adequately address off-campus emergencies
Annual Updates	30%	Plans had not been updated within the last year

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