



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

REVIEW OF VIOLENCE PREVENTION AT THE CHEROKEE CENTRAL SCHOOLS



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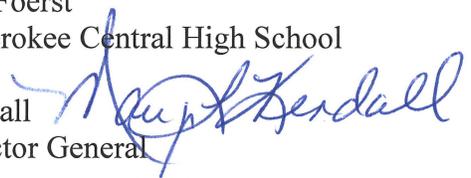
JUN 22 2015

Memorandum

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Principal, Cherokee Central Middle School

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From: Mary L. Kendall 
Deputy Inspector General

Subject: Inspection Report – Review of Violence Prevention at the Cherokee Central Schools
Report No. C-IS-BIE-0010-2014

This memorandum transmits the findings of our inspection of violence prevention efforts at the Cherokee Central Schools. Our objective was to determine the quality of education facility safety measures in place to prevent violence against students and staff from internal and external threats at schools funded by the Bureau of Indian Education (BIE).

Please provide us with your written response to this report within 30 days. The response should provide information on actions taken or planned to address the recommendations, as well as target dates and title(s) of the official(s) responsible for implementation. Please send your response to:

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The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit, inspection, and evaluation reports issued; actions taken to implement our recommendations; and recommendations that have not been implemented.

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Results in Brief

We conducted an inspection of the Cherokee Central Schools to determine the quality of safety measures in place to prevent violence against students and staff from internal and external threats. We found Cherokee Central Schools' safety measures to be adequate.

Specifically, the Cherokee Central Schools' comprehensive emergency plan adequately covered all five topics we chose to review. Training, however, was not provided to staff and students on several violence prevention and emergency preparedness topics we evaluated, including conflict resolution and anger management. We were unable to determine the impact of limited training on the schools' ability to effectively run evacuations or lock-downs because the schools were closed during our visit as a result of adverse weather.

Finally, of the 18 safety measures we checked for, Cherokee Central Schools did not have 2 in place. While no single safety measure is so critical that its absence at an educational facility is cause for immediate concern, we found that the more safety measures not in place, the less prepared schools are to respond to an incident.

This is the eighth in a series of 16 inspections regarding violence prevention at schools funded by the Bureau of Indian Education. We issued reports in 2008 and 2010 on this same topic where we concluded that schools were not prepared to prevent violence and ensure the safety of students and staff. Cherokee Central Schools, located on the Cherokee Reservation in Cherokee, NC, was not among the schools previously visited.

We provide four recommendations to help Cherokee Central Schools improve their safety measures.

Introduction

Objective

Our objective was to determine the quality of safety measures in place to prevent violence against students and staff from internal and external threats at schools funded by the Bureau of Indian Education (BIE). The scope and methodology for this inspection are included in Appendix 1.

Background

In this current series of inspections, we assessed safety measures and procedures at a non-statistical selection of 16 Indian schools: 7 BIE-operated, 8 grant-operated, and 1 contract-operated (see Appendix 2). We visited 6 of the 16 schools in previous evaluations (see Appendix 3). Specifically, we visited 28 BIE-funded schools in 2 previous evaluations:

- Controls to Prevent Violence at Bureau of Indian Education Operated Education Facilities (Report No. NM-EV-BIE-0001-2008) issued August 2008; and
- School Violence Prevention (Report No. NM-EV-BIE-0003-2008) issued February 2010.

The Cherokee Central Schools were not among the schools previously visited.

In the 2013/2014 school year, BIE funded 185 schools in 23 states, including 119 day schools, 52 boarding schools, and 14 peripheral dormitories. Of these schools, 131 were grant- or contract-operated schools funded through grant agreements or contracts with BIE and operated by the respected tribes. The remaining 54 were operated directly by BIE. The Cherokee Central Schools are grant-operated day schools for students in kindergarten through twelfth grade on the Cherokee Reservation in Cherokee, NC.

Findings

The quality of safety measures in place at Cherokee Central Schools was adequate to prevent violence against both students and staff, from internal and external threats. Specifically, we found the schools—

- had an adequate comprehensive emergency plan in place;
- did not provide adequate training in basic violence prevention; and
- was missing 2 of the 18 safety measures we inspected (see Appendix 6).

Emergency Preparedness/Security Plans

In our prior evaluations (see Appendix 3), we reviewed school emergency plans against five key topic areas including bomb threats, shootings, fights, hostage situations, and off-campus emergencies. We evaluated the Cherokee Central Schools' emergency plan against the same key topic areas (see Appendix 4). We found that the emergency plan contained sections on, and adequately covered all five topic areas.

Training

We found that training in basic violence prevention during crisis situations (e.g., to address conflict resolution, as well as anger management, and to increase awareness of gang activity) was not provided (see Appendix 5). In our prior evaluations, we identified training topics that should be provided, to some degree, in all BIE-funded educational facilities to help reduce the risk of a violent incident. For staff, the six training topics include crisis/emergency plans, conflict resolution, anger management, suicide prevention, and drugs; for students, the six training topics include gangs, conflict resolution, anger management, bully prevention, and drugs (see Appendix 5). Since this was a follow-up review, we chose to evaluate the training provided at the Cherokee Central Schools against these same topics. We found that—

- two of the six training topics had not been provided to staff; and
- four of the six training topics had not been provided to students.

In addition, while the schools reported running routine evacuation drills, we were unable to determine if school officials performed the evacuation drills effectively or safely. Specifically, school officials were unable to run any lock-down or evacuation drills during our visit because the schools closed for adverse weather and students were not present. School officials informed us that they run standard evacuation drills monthly and full off-site evacuation drills annually. The schools did not routinely run lock-down drills, however. Further, school officials could not tell us when they performed the last lock-down drill.

Drills and exercises, when properly run and evaluated, can help identify gaps and weaknesses in the emergency plan so that they can be corrected before an actual

emergency situation arises. There are different levels of emergency plan exercises that require different amounts of planning, time, and resources to perform, including—

- tabletop exercises involving only a small number of high-level school officials;
- drills and functional exercises; and
- full-scale exercises involving multiple agencies and community resources such as fire response, law enforcement, or emergency medical services.

Before making a decision about how many of which types of exercises to implement, a school should consider the costs and benefits of each type. Ideally, schools should use a combination of exercise types since each have advantages and will allow school administrators to identify different plan strengths and weaknesses.

Recommendations
<p>We recommend that Cherokee Central Schools:</p> <ol style="list-style-type: none">1. Implement training in those areas listed in Appendix 5 where training has not occurred;2. Develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type; and3. Document the results of the evacuation and lock-down drills.

Physical Security Features

In our prior evaluations, we found no guidance for required safety measures for BIE-funded education facilities. Therefore, we used several public sources to compile a list of 18 safety measures we considered to be critical in areas such as physical access and communication. We found that 2 of the 18 critical safety measures we inspected were absent (see Appendix 6).

When we arrived on campus on February 11, 2014, all doors to the building were locked and the schools closed due to adverse weather. While we were unable to observe the schools during normal operations, we still identified several weaknesses. Specifically, the central office, located at the end of the high school building, leaves the door unlocked during business hours even without a staff presence in the secretary’s office. The glass partition is left open also, allowing someone to reach over and push the door release for the second door, or jump through the opening (see Figure 1).



Figure 1: Open glass partition at vacant secretary's desk in central office at Cherokee Central Schools. Source: OIG

A school official told us that one of the resource officers entered through the unlocked central office door and walked through every hall in all three schools without a key or ID card. During our visit, we observed that the gate leading to the parking area directly outside the central office was left open and unmonitored during school business hours, allowing anyone access to the campus. The road from that gate leads directly to the kitchen parking area. The exterior kitchen door is left unlocked so students can access the cafeteria from the elementary and high school buildings, which are also left unlocked.

As we mentioned in our prior report, we recognize that no individual safety measure is so critical that its absence is cause for immediate concern. The fewer safety measures used at an educational facility, however, the less likely a school is prepared to respond adequately to an incident, ensuring the safety of students and staff from internal or external threats.

Recommendation

We recommend that Cherokee Central Schools:

4. Evaluate the 18 safety measures in Appendix 6 and determine the correct combination of safety measures for the campus necessary to ensure the safety of staff and students from internal and external threats. Once determined, work to put the selected safety measures in place.

Conclusion and Recommendations

Conclusion

The quality of safety measures in place at Cherokee Central Schools was adequate to prevent violence against both students and staff, from internal and external threats.

Recommendations Summary

We recommend that Cherokee Central Schools:

1. Implement training in those areas listed in Appendix 5 where training has not occurred.
2. Develop an emergency plan exercise schedule that includes the different types of plan exercises and the frequency of each exercise type.
3. Document the results of the evacuation and lock-down drills.
4. Evaluate the 18 safety measures in Appendix 6 and determine the correct combination of safety measures for the campus necessary to ensure the safety of staff and students from internal and external threats. Once determined, work to put the selected safety measures in place.

Appendix I: Scope and Methodology

Scope

The scope of this inspection was limited to violence prevention programs in place at the Cherokee Central Schools, located on the Cherokee Reservation in Cherokee, NC. We performed the same inspection at 15 other schools funded by the Bureau of Indian Education (BIE), which are listed in Appendix 2.

We also performed separate reviews at the Cherokee Central Schools to evaluate the programs in place at schools funded by BIE to improve academic achievement and the condition of educational facilities. The results of those reviews will be presented in separate reports.

Methodology

We conducted this review from February 2014 to August 2014 in accordance with the Quality Standards for Inspections and Evaluations as put forth by the Council of the Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our conclusions.

To address our objective, we:

- reviewed the following items—
 - criteria (including laws, regulations, policies, and procedures),
 - studies,
 - prior reports, and
 - school documentation;
- interviewed officials at Cherokee Central Schools; and
- visited Cherokee Central Schools on February 11, 2014.

We did not extensively review training records and materials, but relied on information provided to us through our interviews with school officials.

Appendix 2: Schools Visited

Facility Name	Type	Location	Grades	Date Visited
Tonalea Day School	BIE	Tonalea, AZ	K-8	January 14, 2014
Lukachukai Community School	Grant	Lukachukai, AZ	K-8	January 15, 2014
Tuba City Boarding School	BIE	Tuba City, AZ	K-8	January 16, 2014
Moencopi Day School	Grant	Tuba City, AZ	K-6	January 17, 2014
Flandreau Indian School	BIE	Flandreau, SD	9-12	January 28, 2014
Sicangu Owayawa Oti (Rosebud Dorm)	Grant	Mission, SD	1-12	January 29, 2014
Pierre Indian Learning Center	Grant	Pierre, SD	1-8	January 30, 2014
Cherokee Central Schools	Grant	Cherokee, NC	K-12	February 11, 2014
Ahfachkee Indian School	Grant	Clewiston, FL	PreK-12	February 13, 2014
Miccosukee Indian School	Contract	Miami, FL	K-12	February 14, 2014
Chemawa Indian School*	BIE	Salem, OR	9-12	April 28, 2014
Yakama Nation Tribal School*	Grant	Toppenish, WA	9-12	April 30, 2014
Paschal Sherman Indian School*	Grant	Omak, WA	K-9	May 1, 2014
Ojo Encino Day School*	BIE	Cuba, NM	K-8	May 20, 2014
Te Tsu Geh Oweenge Day School*	BIE	Santa Fe, NM	K-6	May 21, 2014
San Ildefonso Day School*	BIE	Santa Fe, NM	K-6	May 22, 2014

* We revisited these six campuses from our prior reviews (see Appendix 3) to determine whether conditions noted had been corrected.

Appendix 3: Prior Coverage

Project NM-EV-BIE-0001-2008

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

Project NM-EV-BIE-0003-2008

Facility Name	Type	Location	Grades	Date Visited
Tohono O'odham High School^	BIE	Sells, AZ	9-12	February 11, 2009
Pine Ridge School^	BIE	Pine Ridge, SD	K-12	February 5, 2009
Chemawa Indian School^#*	BIE	Salem, OR	9-12	February 10, 2009 January 11, 2010
White Shield School	Grant	Roseglen, ND	K-12	September 16, 2008

Facility Name	Type	Location	Grades	Date Visited
Mandaree Day School	Grant	Mandaree, ND	K-12	September 17, 2008
Twin Buttes Day School	Grant	Halliday, ND	K-8	September 18, 2008
Red Water Elementary School	Grant	Carthage, MS	K-8	September 30, 2008
Tucker Elementary School	Grant	Philadelphia, MS	K-8	October 1, 2008
Choctaw Central High School	Grant	Choctaw, MS	9-12	October 2, 2008
Conehatta Elementary School	Grant	Conehatta, MS	K-8	October 3, 2008
Two Eagle River School	Grant	Pablo, MT	K-12	October 7, 2008
Northern Cheyenne Tribal School	Grant	Busby, MT	K-12	October 9, 2008
Chief Leschi School	Grant	Puyallup, WA	K-12	October 20, 2008
Muckleshoot Tribal School#	Grant	Auburn, WA	K-12	October 20, 2008 January 13, 2010
Yakama Nation Tribal School*	Grant	Yakima, WA	9-12	October 21, 2008
Paschal Sherman Indian School*	Grant	Omak, WA	K-9	October 23, 2008
St. Stephens Indian School	Grant	St. Stephens, WY	K-12	October 30, 2008
Dunseith Day School	BIE	Dunseith, ND	K-8	February 18, 2009
Ojibwa Indian School	BIE	Belcourt, ND	K-8	February 19, 2009
Sherman Indian High School#	BIE	Riverside, CA	9-12	February 23, 2009 January 15, 2010
Gila Crossing Day School	Grant	Laveen, AZ	K-8	February 25, 2009
Salt River Elementary School	Grant	Scottsdale, AZ	K-6	February 26, 2009

^ We visited these schools in both Project NM-EV-BIE-0001-2008 and Project NM-EV-BIE-0003-2008.

We revisited these three campuses during Project NM-EV-BIE-0003-2008 to determine whether conditions noted had been corrected in the time between visits.

* We revisited these six campuses in our current reviews (see Appendix 2) to determine whether conditions noted had been corrected.

Appendix 4: Review of Major Components of Emergency Plans

Preparedness Plan Components	YES	NO
Adequately Covered Bomb Threats	✓	
Adequately Covered Shootings	✓	
Adequately Covered Fights	✓	
Adequately Covered Hostage Situations	✓	
Adequately Covered Off-Campus Emergencies	✓	
Plan Less Than A Year Old	✓	

Appendix 5: Training at Education Facility

Training	YES	NO
STAFF:		
Crisis/emergency plans	✓	
Conflict resolution		X
Anger management		X
Bully prevention	✓	
Suicide prevention	✓	
Drugs	✓	
STUDENTS:		
Gangs		X
Conflict resolution		X
Anger management		X
Bully prevention	✓	
Suicide prevention		X
Drugs	✓	

Appendix 6: Matrix of Safety Measures

Safety Measures (Summary)	YES	NO
Adequate security fencing*	✓	
Secured exterior doors	✓	
Designated visitors' entrance	✓	
Visitors' entrance that prevented unobserved entering	✓	
Visitors required to sign in or show identification	✓	
Visitors required to wear a visitors' badge	✓	
Security camera(s)	✓	
Metal detector		X
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		X

* We defined “adequate fencing” as security fencing (such as chain link versus boundary fencing, such as split rail), at least 6 feet high, and in good repair.

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

