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Management Advisory



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MAR 16 2026

Memorandum Report

To: William Kirkland
Assistant Secretary – Indian Affairs

Tony Dearman
Director, Bureau of Indian Education

From: Nicki Miller *Nicki Miller*
Assistant Inspector General for Audits, Inspections, and Evaluations

Subject: Final Management Advisory – *BIE and Indian Schools Need To Ensure Deficiencies That Could Cause Imminent and Immediate Danger Are Addressed and Resolved Timely*
Report No. 2024-ISP-040-A

Over the past decade, we have identified that the Bureau of Indian Education (BIE) has faced challenges correcting safety and health deficiencies at BIE-funded Indian schools; the U.S. Government Accountability Office has also identified similar issues (see Attachment 1 for a list of relevant prior reports). For example, in a 2024 report, we found that more than half of sampled deferred maintenance work orders at schools had inaccurate completion data, potentially affecting project prioritization or funding decisions. Our recent work related to Indian schools has focused on the status of deficiencies, which are sorted and prioritized by severity category (or the potential consequence of the identified deficiency).¹ The most serious severity category is “catastrophic deficiency,” which poses immediate danger of death or permanent disability to staff and students.

This management advisory was prompted by a recent inspection of Riverside Indian School—specifically, during our 2024 inspection of its safety and health practices, we found that a previously identified catastrophic deficiency² BIE reported in January 2024 for an inoperative fire detection alarm system had not been addressed. Neither the school nor BIE corrected the deficiency, and the school did not implement mitigating measures until after our site visit in October 2024. As part of that report, we recommended that BIE develop a strategy to monitor future catastrophic deficiencies until corrected. Due to the serious nature of this finding and its potential for harm if the same issue is occurring at other schools, we reviewed additional data for all deficiencies identified as catastrophic across all BIE schools. We identified and reviewed 12 open catastrophic deficiencies reported at 10 schools as of March 2025³ to determine (1) what steps schools were taking to correct the deficiencies, and (2) for those deficiencies that were not corrected, what mitigating measures were implemented. BIE safety and health inspectors identified these deficiencies between October 2014 and January 2025 (see Attachment 2 for detailed deficiency information).

¹ Generally, safety and health deficiencies are categorized based on the worst credible consequence that can occur as the result of a hazard. According to the *Departmental Manual, 485 DM 6*, the severity categories are (in order): catastrophic (imminent and immediate danger of death or permanent disability), critical (permanent partial disability, temporary total disability), significant (hospitalized minor injury, reversible illness), and minor (first aid or minor medical treatment). BIE identifies deficiencies using Risk Assessment Codes that include the severity category as well as information about the probability of the harm occurring. We focused our review on catastrophic safety and health deficiencies based on the severity determination of “immediate danger” regardless of the probability of occurrence; using the deficiency severity enabled us to effectively communicate the scale of each problem and its potential to harm students and staff.

² For our inspection at Riverside Indian School, we focused on the severity categories, such as catastrophic, that reflect the potential consequence of an identified deficiency.

³ These numbers are based on BIE’s facility management system work order data as of March 4, 2025. One school had three catastrophic deficiencies identified.

We found that BIE did not ensure that the 12 catastrophic deficiencies were addressed or resolved timely—7 of the 12 deficiencies remained uncorrected, with 4 exceeding their BIE-established abatement periods⁴ by more than a year. Six of the seven uncorrected deficiencies were related to fire systems. For example, in addition to the inoperative fire detection system at Riverside Indian School, there were inoperative fire systems at Ch’ooshgai Community School and Nazlini Community School. We also found that most schools in our review did not consistently implement mitigating measures when fire system-related deficiencies were identified. In addition, the five deficiencies that had been corrected also exceeded their abatement periods at the time of correction, and the schools did not close the work orders in the facility management system once they were corrected. Delays in correcting catastrophic deficiencies pose the threat of serious injury or death to staff and students. Moreover, in the absence of corrective measures, BIE’s inconsistent mitigating measures related to these deficiencies may leave BIE school sites vulnerable to property damage, injury, and loss of life. Finally, failure to close out catastrophic work orders may present an inaccurate picture of school conditions to BIE decision makers and other stakeholders and could affect BIE’s ability to prioritize and efficiently address catastrophic deficiencies.

We are issuing this management advisory to notify Indian Affairs’ Division of Facilities Management and Construction (DFMC) and BIE of these concerns so they can take appropriate action to ensure the safety and health of students and staff. As discussed in more detail subsequently, we granted multiple requests for extensions of the response deadline. Even with these extensions, the combined Indian Affairs and BIE response was submitted after the last deadline we provided. We exercised our discretion to include the response nonetheless because of the seriousness of the issues and the importance of obtaining information about the U.S. Department of the Interior’s (DOI’s) plans to address our recommendations.

Background

DOI’s mission includes fulfilling trust responsibilities or special commitments to American Indians, which we have consistently identified as a major management challenge for DOI. The Bureau of Indian Affairs (BIA) and BIE report directly to the Assistant Secretary for Indian Affairs, who assists and supports the Secretary of the Interior in fulfilling this mission. BIE’s mission includes providing quality education opportunities for children, and it supports and oversees a total of 183 schools—128 schools are tribally controlled under BIE contracts or grants, and 55 schools are BIE-operated.

Federal regulations⁵ require annual inspections for safety and health compliance at all BIE-operated or -funded schools. BIE’s Branch of Safety Management performs these inspections at each Indian school to identify deficiencies that need to be addressed as required by Federal regulations⁶ and DOI policy.⁷ Safety and health inspections review compliance with requirements related to accessibility, hazardous materials, environmental conditions, fire protection, and electrical and standby power systems, among others. BIE uses a standardized checklist to complete each inspection, and the abatement period is defined for each type of deficiency identified in the inspection. School officials are required to create an abatement plan to document planned corrective measures and track the status of each identified deficiency.

Indian Affairs’ DFMC is responsible for ensuring the efficient and effective stewardship of resources from planning and design to construction and renovation; it is also responsible for operations, maintenance, improvements, and decommissioning of real property assets. BIE’s Branch of Facility Management (BFM) maintains a facility management system to monitor school operations and maintenance, which includes tracking safety and health inspection abatement plans and corresponding work orders to correct identified deficiencies (a work order is generated for each deficiency). Generally, school facility and maintenance staff are responsible for entering work order data in the facility management system—specifically, creating new work orders, monitoring and updating status for open work orders, and closing completed work orders. Schools

⁴ The abatement period is the designated number of days during which a deficiency should be corrected. A fire system-related catastrophic deficiency has a one-day abatement period.

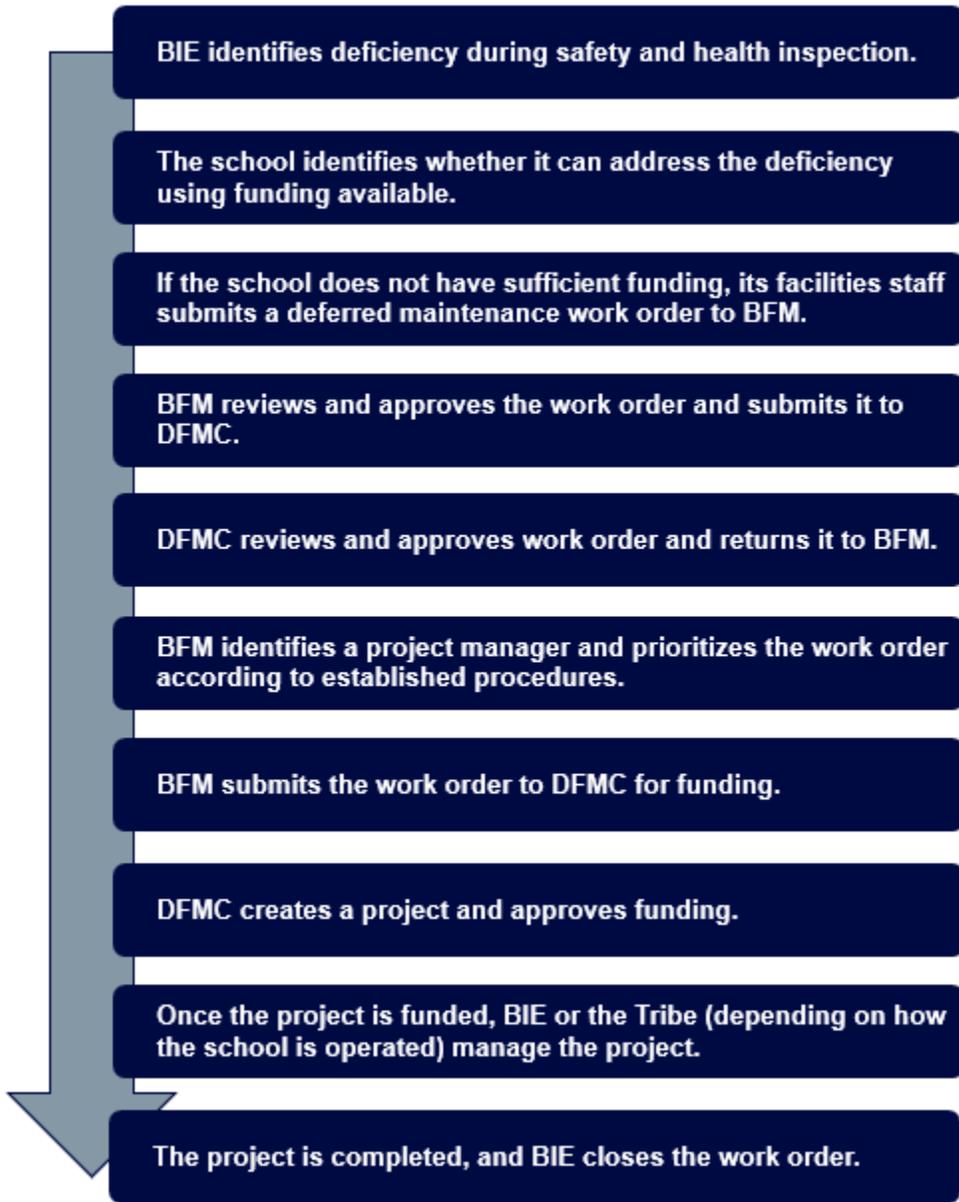
⁵ 29 C.F.R. Part 1960, Subpart D—Inspection and Abatement.

⁶ *Id.*

⁷ 485 DM 6, “Inspections and Abatement.”

also use the facility management system to request Facilities Improvement and Repair funding to address more costly deficiencies that are beyond the scope of their school operations and maintenance funding. The schools, BFM, and DFMC all have roles in the Facilities Improvement and Repair funding process (referred to as the deferred maintenance work order process in our report).⁸ These roles include reporting deficiencies; reviewing, submitting, and approving work orders for funding; managing projects; correcting deficiencies; and closing work orders in the facility management system (see Figure 1).

Figure 1: Simplified Chart of Indian Affairs and BIE Deferred Maintenance Work Order Process



Source: OIG chart developed from BIE process information.

⁸ Typically, any projects above \$10,000 are subject to the deferred maintenance work order process; however, schools may initiate this process for projects under that threshold.

Results

BIE Did Not Ensure Catastrophic Deficiencies Were Addressed or Resolved Timely and Did Not Consistently Implement Mitigating Measures

Of the 12 open catastrophic deficiencies we reviewed—10 fire system-related and 2 security-related—7 had not been corrected. Six of the seven uncorrected deficiencies were related to fire systems and had exceeded the one-day abatement period: one by over two years and four by over one year. For example:

- Ch'ooshgai Community School staff told us that they submitted a deferred maintenance work order funding request to address issues with the school's fire system in 2022—before the January 2023 safety and health inspection first reported a catastrophic deficiency for an “inoperative fire detection alarm system.” The safety and health inspections identified this same catastrophic deficiency again in January 2024 and February 2025. The school told us that it implemented a “fire watch”⁹ as a mitigating measure when the fire alarm system was first identified as an inoperative deficiency; however, staff later requested and received BIE approval to stop the fire watch. According to school staff, they requested this approval because the fire alarm system was functioning—the heat and smoke detectors and sprinklers were operational, but the system did not communicate with other buildings and did not automatically notify local authorities. This project is currently in the source selection phase of the deferred maintenance work order process—approximately three years after the school submitted its request.
- Riverside Indian School's catastrophic deficiency for an “inoperative fire detection alarm system” was first identified in January 2024 with no action until our site visit in October 2024. The fire detection alarm system was not functioning correctly and had multiple error codes that could not be reset, which could lead to the system malfunctioning and not properly alerting students and staff. After our site visit in October 2024, the school implemented a fire watch on the affected buildings as a mitigating measure. BFM created a new deferred maintenance work order to update the school's fire systems in December 2024 with an estimated cost of \$189,000. This work order was approved in May 2025—five months after it was submitted—but is waiting for funding approval. On July 30, 2025, we published our inspection report on Riverside Indian School in which we recommended that BIE ensure the school has a fully functioning fire detection alarm system. BIE concurred with our recommendation and stated that it was scheduling the necessary upgrades and maintenance; this recommendation remained open as of September 22, 2025.
- Nazlini Community School's three catastrophic deficiencies related to fire alarm system trouble codes that cannot be reset were identified in December 2024 and January 2025. In addition, the Facilities Manager at the school told us that he considered the system obsolete. School staff stated that BIE told them a fire watch was not required because the system was functioning and to instead check the system monthly. The school's Facilities Manager stated that he researched replacement costs for the entire system in 2024, prior to the deficiencies being reported, and estimated costs ranged from \$500,000 to \$1,000,000. He stated that he needed the building's floor plans to obtain more accurate estimates from an outside firm in order to complete the scope of work for the work order. The Facilities Manager said he requested that BIE provide these plans; however, he has not yet received them. He stated that the school will use the 2024 estimates to complete the work order.

⁹ “Fire watch” is the assignment of a person or persons to an area for the express purpose of notifying the fire department and the building occupants of an emergency, preventing a fire from occurring, extinguishing small fires, or protecting the public from fire or life safety dangers.

The remaining uncorrected deficiency was related to security and exceeded its 360-day abatement period by more than six months.¹⁰ Specifically, at Mandaree Day School:

- The catastrophic deficiency for classroom glass panels was reported in November 2023 and had a 360-day abatement period. The safety and health report further elaborated that the interior glass panels “need to be replaced with a solution to prevent [unauthorized] entry.” School staff told us they did not realize the deficiency was categorized as catastrophic until we approached them in March 2025. As a mitigating measure, the school added blinds to the classroom glass panels. Due to the high cost of replacing the glass, the school researched other options to address the deficiency and found an option with an estimated cost of \$26,000 that involved installing a tinted security blast film to delay or prevent entry.
- We also learned that, although the new school building was completed in 2022, it is not in the facility management system. The safety inspector continued to report deficiencies identified in safety and health inspections under the old building because it was the only data available in the facility management system. The school’s Facility Manager told us that the school stopped using the facility management system because the information in the system pertained only to the old school building that is out of use. Therefore, the school did not submit a deferred maintenance work order in the facility management system, and the Tribal district used its own funding to install the security blast film in May 2024. The school is currently seeking reimbursement from BIE for these costs.¹¹

The complex and inefficient deferred maintenance work order process was a contributing factor to timeliness issues at Ch’ooshgai Community School and Riverside Indian School. Specifically, the deferred maintenance work order process has up to 34 steps involving multiple inputs and approvals from the school, BFM, DFMC, and others. Moreover, the process starts over if DFMC sends work orders back for “rework” (e.g., adding missing information or new cost estimates) in the facility management system. In addition, if school staff do not track work orders returned for rework, the questions may go unanswered, and the deficiencies may remain unaddressed. These work order process issues have the potential to negatively impact Nazlini Community School because the school will need to request funding to correct its deficiencies, and this inefficient process (as currently implemented) could prolong correcting those catastrophic deficiencies.

BFM stated that inconsistent communication from DFMC on what is required for deficiency work order approval and funding has been a challenge for both BFM and the schools when trying to address safety deficiencies. DFMC, in turn, stated it has no written policies or procedures for its deferred maintenance work order process responsibilities, including its role in evaluating the quality of the work orders. As a result, BFM and the schools have not received clear guidance on DFMC’s expectations and how to properly prepare work orders for approval in the facility management system.

For the five catastrophic deficiencies that had been corrected, none were addressed within their abatement periods—two of which had one-day abatement periods and took more than a year to correct. We discuss these deficiencies in more detail below.

BIE Did Not Consistently Implement Fire Watch Mitigating Measures

DOI requires officials to immediately initiate corrective and protective actions if there is an imminent danger or high threat to life, health, or property.¹² This can include implementing a fire watch as a mitigating measure for fire system-related deficiencies. Although DOI Indian Affairs has issued fire watch guidelines,¹³ these

¹⁰ Abatement periods are based on severity and probability. Although the security deficiency for Mandaree Day School was identified as catastrophic, it was also given a lower probability, allowing a longer abatement period than the other catastrophic deficiencies that were given one day.

¹¹ Although Mandaree Day School corrected the deficiency using Tribal funding, the school will still need to go through the deferred maintenance process for reimbursement.

¹² 485 DM 6.6, “Requirements.”

¹³ DOI Indian Affairs, *Fire Watch Guidelines*, dated October 2014, state, “Where a required fire alarm system is out of service for more than 4 hours in a 24 hour period, the authority having jurisdiction shall be notified, and the building shall be evacuated or an approved fire watch shall be provided for all parties left unprotected by the shutdown until the fire alarm system has been returned to service.”

guidelines do not provide written guidance or policies and procedures that clearly define which deficiencies related to impaired fire systems require a fire watch and who makes the determination to put a school on fire watch.

We found that schools did not consistently implement fire watches when fire system-related deficiencies were identified. For example, as noted above, Riverside Indian School was put on fire watch after our visit, but Nazlini Community School (which had three catastrophic deficiencies) was instructed to check the system monthly and was not required to implement a fire watch—even though both schools’ deficiencies were related to similar error code issues. Officials at other schools with fire system-related deficiencies told us that they did not implement a fire watch because either (1) BIE did not tell them it was required or (2) BIE, the school, or both did not deem fire watches necessary because the fire systems, although needing repairs, were functioning.¹⁴

A fully functioning fire alarm system ensures that students and staff are quickly alerted to any potential fire and that emergency responders can be notified immediately. Otherwise, a fire may go undiscovered, delaying a response that could minimize property damage and preventing timely evacuation that could avoid harm to students and staff.

BIE Did Not Ensure Catastrophic Deficiency Work Orders Were Closed After Correction

For 5 of 12 of the deficiencies we reviewed, the schools reported that they had completed the work to correct the deficiencies but had not closed the work orders. For example:

- Crazy Horse School’s safety and health report identified the fire alarm system as “inoperative” in October 2014 and then again, each year, from April 2019 to January 2024. School staff stated the fire detection alarm system for one building was corrected in 2014 and for another building in 2019; however, the deficiency remained open in the facility management system. The Crazy Horse School’s safety inspector told us that the school’s fire alarm system has been functional since he started inspecting the school in 2021, explaining that he continued the practice of reporting any deficiency still open in the facility management system (including those that had been corrected) as a repeat deficiency to encourage schools to close corrected deficiencies, as the safety inspectors cannot close deficiencies themselves. As of June 30, 2025, the work order remained open in the facility management system.¹⁵
- Turtle Mountain Middle School’s safety and health report identified the fire alarm system as a catastrophic deficiency in October 2014, and it was still listed in an open status as of June 30, 2025. School staff told us, however, that the system was replaced in 2015. Safety and health inspections in April 2019, February 2023, and November 2023 reported the fire alarm system for a panel display issue; school staff told us the deficiency was corrected in October 2024. According to staff, the school incorrectly canceled the work order and needed higher approval to change the status to “rework” to properly close the work order.

According to Indian Affairs policy, school-level facility management is responsible for managing work orders.¹⁶ Although all the schools stated they had at least one person with facility management system access,¹⁷ some schools stated they had access issues (e.g., being locked out of the system or not having access to the correct school), and half of the schools’ system users stated that they did not receive training on its use. BFM, however, stated that training is consistently available. In addition, BFM told us that the system is time

¹⁴ “Functioning” was a general term used by safety and school officials, and we were told that a system could be functional even if parts of the fire system needed repairs. For example, a fire alarm system could be considered functioning if components, such as pull stations and smoke detectors, were working and could alert building occupants in case of a fire.

¹⁵ The deficiency status listed for each school is based on the facility management system’s work order data as of June 30, 2025.

¹⁶ 80 IAM 1, 3. These chapters apply to staff at all BIE-owned or -funded real property assets.

¹⁷ Although White Shield School’s Facilities Manager had access to the facility management system, at some point he was given access to the wrong school, which had been recently corrected.

consuming and that it is difficult for staff who also have other responsibilities. We observed that there appears to be little incentive for facilities managers to consistently close out work orders in the facility management system due to other job responsibilities taking priority.

In our oversight work related to BIE schools, we have consistently identified inaccuracies in BIE's facility management system. For example, in our safety and health reviews of Riverside Indian School, Tate Topa Tribal School, and Havasupai Elementary School, we found data inaccuracies in the facility management system in which safety and health deficiency work orders did not have accurate completion statuses. These inaccuracies include a number of examples of resolved deficiencies that were incorrectly labeled as "open" in the facility management system. In all three reports, we recommended that BIE ensure the schools review work orders and correct any work orders with inaccurate statuses. In addition, in a report on BIE schools' deferred maintenance, we noted similar issues with inaccuracies in the facility management system and recommended that BIE assess and update the status of all open work orders. We also identified lack of training as an issue in these reports and recommended that BIE provide training on the facility management system. BIE concurred with our previous recommendations related to work order accuracy and facility management system training and committed to implementing corrections. As of September 22, 2025, these recommendations remained open.¹⁸

Failure to close out catastrophic work orders may portray an inaccurate picture of school conditions to BIE decision makers and other stakeholders, could potentially affect metrics such as the facility condition index (which influences school funding), and may moreover affect BIE's ability to prioritize and efficiently address remaining catastrophic deficiencies.

Conclusion

Delays in correcting obsolete or inoperable fire detection alarm systems could result in serious injury or death to staff and students. BIE's inconsistent mitigating measures in the absence of corrective actions related to these deficiencies could also leave BIE school sites vulnerable to property damage, injury, and loss of life. In addition, inaccurate information about fire system-related safety and health conditions at schools may affect policy or other initiatives such as resource prioritization for these potentially life-threatening deficiencies.

We make five recommendations that, if implemented, will help Indian Affairs and BIE ensure the safety and health of students and staff.

Recommendations

We provided a draft of this management advisory to Indian Affairs and BIE for review. Indian Affairs and BIE missed multiple established deadlines for their responses.¹⁹ We exercised our discretion to incorporate this response because of the significance of the safety concerns detailed in our report and the importance of considering all information available.

Indian Affairs and BIE submitted a combined response and ultimately expressed concurrence with all recommendations.²⁰ We consider Recommendations 1 and 2 implemented, Recommendation 3 unresolved, and Recommendations 4 and 5 resolved. We determined that Recommendation 4 is significant, and we will

¹⁸ For more updated information, visit our Recommendations Dashboard at <https://www.doi.gov/reports/recommendations-dashboard-tracker>.

¹⁹ The issuance of this report was initially delayed because of the lapse in DOI's appropriations that occurred from October 1, 2025, through November 12, 2025. We issued the draft report to Indian Affairs and BIE on October 9, 2025, and requested written comments by November 10, 2025. Once the lapse in appropriations was resolved, we extended the deadline for response to December 19, 2025. After that date, we granted multiple additional extensions—January 9, 2026, January 12, 2026, and January 23, 2026—with the final due date of January 27, 2026. We did not receive a formal, signed response from Indian Affairs until January 28, 2026. Given the factors noted above—namely, the significant safety and related issues—we determined that incorporating and addressing the response was warranted even though it delayed finalization of the report.

²⁰ Indian Affairs did not expressly state whether it concurred with Recommendations 1 and 2 in its formal response, but, as discussed subsequently, its comments reflect concurrence. Moreover, Indian Affairs stated via an email dated December 17, 2025, that it concurred with all draft management advisory recommendations.

report it as such in our semiannual report to Congress in accordance with the Inspector General Act.²¹ Below we summarize Indian Affairs' and BIE's response to our recommendations, as well as our comments on their response. See Attachment 3 for the full text of Indian Affairs' and BIE's response.

We recommend that Division of Facilities Management and Construction:

1. Assess the deferred maintenance work order workflow and implement updates as appropriate to enhance efficiency and timely resolution of work order and project approval.

Indian Affairs Response: Although its formal response did not expressly concur with the recommendation, Indian Affairs stated that it “collaborated [with BIE’s BFM] in assessing the [deferred maintenance work order (DMWO)] workflow” and “developed and published Standard Operating Procedures and mapped processes to enhance the efficiency and timely resolution of work order and project approval.” Indian Affairs provided DFMC’s April 2025 Standard Operating Procedure (SOP) for DMWO and project requirements, which describes minimum work order standards and how to link work orders to project requests. Indian Affairs also provided DFMC’s August 2025 SOP on the DMWO funding process, intended to ensure that requests for funding are “submitted with all necessary information” for prioritized and expedited funding approval. This document describes BIE, BIA, and DFMC requirements to enter, approve, and create project requirements for DMWOs. Indian Affairs also provided an undated DMWO workflow chart and two BIE documents on improving DMWO quality to help with timeliness.

Status: Implemented. No action is required. Closed under Recommendation No. 2024-ISP-040-A-01.²²

OIG Comment: We consider this recommendation implemented based on (1) Indian Affairs’ statement that DFMC and BIE assessed the DMWO workflow and (2) the SOPs and documents describing the work order workflow processes and quality requirements provided in the response. The August SOP specifically states that BFM is now the approval authority for all BIE DMWOs and that BFM continues to have the authority to create and manage project requests that are less than \$5 million. We agree that the change to BIE’s authority to approve DMWOs will increase BIE’s direct involvement and decrease DFMC’s role in BIE’s DMWO workflow processes.

2. Create standard operating procedures that establish criteria for preparing, approving, and funding work orders.

Indian Affairs Response: Although its formal response did not expressly concur with the recommendation, Indian Affairs stated it published an SOP in April 2025, which “included the minimum standards for creating DMWOs,” and that it developed and published another SOP in August 2025 “to ensure that requests for the Education Facility Improvement and Repair (FI&R) funding would be submitted with all necessary information” to prioritize and expedite funding approval. Indian Affairs also stated that BFM published minimum DMWO quality standards in January 2026. Indian Affairs provided copies of these documents.

Status: Implemented. No action is required. Closed under Recommendation No. 2024-ISP-040-A-02.

OIG Comment: We consider this recommendation implemented based on DFMC’s SOPs—which describe the minimum requirements to enter, approve, and create project requirements for DMWOs—and BIE’s DMWO minimum quality standards instructions. Specifically, both DFMC and BIE identified minimum standards for DMWOs that will standardize the process.

²¹ The Inspector General Act of 1978, 5 U.S.C. § 405(b), requires inspectors general to prepare semiannual reports summarizing OIG activities during the immediately preceding six-month periods ending March 31 and September 30. It also states that these semiannual reports shall include an identification of each “significant recommendation” described in previous semiannual reports on which corrective action has not been completed.

²² The numbering convention we use to track recommendations is the report number followed by sequential recommendation digits.

3. Update the facility management system with new school building information identified in this report.

Indian Affairs Response: Indian Affairs concurred with the recommendation and stated that its DFMC will coordinate to ensure that DMWOs listed in this report are entered into the facility management system. In addition, Indian Affairs stated it has “conducted a facility data validation initiative in preparation of implementing a new Operations and Maintenance (O&M) Needs and Allocation Formula.”

Indian Affairs provided a March 31, 2026 target implementation date.

Status: Unresolved. We will follow up with Indian Affairs regarding resolution of Recommendation No. 2024-ISP-040-A-03.

OIG Comment: Although Indian Affairs described positive steps that, when fully implemented, should be beneficial, we treat this recommendation as unresolved because Indian Affairs’ response focuses on DMWOs, which are distinct from the new school building identified in the report. More specifically, our report discusses the Mandaree Day School, and the recommendation accordingly seeks to ensure that this new building is added to the facility management system to allow accurate reporting of safety and health deficiencies and other facility work orders. Indian Affairs did not provide any documentation showing that Mandaree Day School’s new building has been added to the facility management system, nor did it state the intent to do so. Rather, in its response, Indian Affairs committed to ensuring that DMWOs listed in the report are entered into the facility management system, but it did not address adding the new school building at Mandaree Day School to the system. As set forth in the report, without adding the new building itself, the DMWOs will not be linked appropriately to the school and appropriate funding sources may not be used. Accordingly, this recommendation will be resolved when Indian Affairs agrees to add Mandaree Day School’s new building to the facility management system. It will be implemented when Indian Affairs provides documentation demonstrating it has added Mandaree Day School’s new building to the facility management system.

We recommend that BIE:

4. Develop policies and procedures that clearly communicate which fire system-related deficiencies require fire watches, to include roles and responsibilities.

Indian Affairs and BIE Response: Indian Affairs and BIE concurred with the recommendation and stated that BIE’s Branch of Safety Management “will strengthen the implementation of the existing fire watch policy by delivering training and increasing communication that ensures all facility and safety personnel understand when a fire watch is required, who has authority, and how to document and report fire watch activities properly.” BIE reported that, in October 2025, it delivered training to safety and facilities staff and held one training session for schools; BIE also stated that it had committed to offering another training session for schools by the end of March 2026. BIE provided a copy of its training, which included information and requirements for fire alarms, fire sprinkler systems, and fire watches. In addition, the response stated that “BIE schools operate under established governing policy issued by the Office of Facilities, Property and Safety Management (OFPSM), Division of Safety and Risk Management (DSRM), which serves as the Authority Having Jurisdiction (AHJ) for all Indian Affairs fire protection programs,” and that BIE “will distribute all policies and relevant information to the schools” within 30 days of this recommendation’s approval.

Indian Affairs and BIE provided a March 31, 2026 target implementation date.

Status: Resolved. We will track implementation under Recommendation No. 2024-ISP-040-A-04.

OIG Comment: Although the current training specifies when a fire watch is necessary, it does not state who has the responsibility to make that determination, which is a significant inconsistency we identified in this report. The recommendation will be implemented when BIE provides documentation demonstrating that (1) training sessions of the existing fire watch policy have been completed at the

schools and (2) either through the distribution of the existing policy, or through a new policy, it has clearly identified who has the responsibility to make a fire watch determination. We determined this recommendation is significant and will report it as such in our semiannual report to Congress.

5. Ensure facilities managers are held accountable for timeliness and accuracy of information in the facility management system.

Indian Affairs and BIE Response: Indian Affairs and BIE concurred with the recommendation and stated, “BIE has issued multiple directives and guidance documents to improve accountability and data quality” in the facility management system. The response also stated that BIE “will update and redistribute a directive memo outlining expectations” on the facility management system use and reporting to school superintendents, principals, and facility managers as well as BIE associate deputy directors and educational program administrators. In addition, BIE’s BFM incorporated facility management system “quality control elements into Employee Performance Appraisal Plans” for facility managers, “ensuring measurable standards for data accuracy and timeliness.” BFM also conducted two in-person training sessions in July 2025 as well as monthly training sessions covering various facility management system topics. BIE provided copies of its two memoranda on DMWO prioritization.

Indian Affairs and BIE provided a June 30, 2026 target implementation date.

Status: Resolved. We will track implementation under Recommendation No. 2024-ISP-040-A-05.

OIG Comment: This recommendation will be implemented when BIE provides (1) documentation demonstrating it has updated and distributed the memorandum outlining the facility management system expectations of use and reporting and (2) a generic copy of the facility management system employee performance quality control elements.

We will track open recommendations for resolution and implementation. We will notify Congress of our findings, and we will report semiannually, as required by law, on actions you have taken to implement the recommendations and on recommendations that have not been implemented. We will also post a public version of this report on our website.

If you have any questions about this management advisory, please contact me at aie_reports@doioig.gov.

We conducted our inspection in accordance with the *Quality of Standards for Inspection and Evaluation* as put forth by the Council of the Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our conclusions and recommendations.

Attachments (3)

Attachment 1: Relevant Prior Reporting

Report No.	Report Title	Issued Date
Report No. GAO-16-313	<i>Indian Affairs: Key Actions Needed to Ensure Safety and Health at Indian School Facilities</i>	March 2016
Report No. C-EV-BIE-0023-2014	<i>Condition of Indian School Facilities</i>	September 2016
Report No. 2022-CR-036	<i>Indian Affairs Is Unable To Effectively Manage Deferred Maintenance of School Facilities</i>	March 2024
Report No. 2023-ISP-040	<i>The Bureau of Indian Education Must Correct Safety and Health Deficiencies and Improve Emergency Preparedness and Security at Havasupai Elementary School</i>	October 2024
Report No. 2024-ISP-014	<i>The Bureau of Indian Education Must Correct Safety and Health Deficiencies and Improve Facility Management System Accuracy at Tate Topa Tribal School</i>	December 2024
Report No. 2024-ISP-040	<i>The Bureau of Indian Education Must Correct Safety and Health Deficiencies and Improve Emergency Preparedness, Security, and Facility Management System Accuracy at Riverside Indian School</i>	July 2025

Attachment 2: Schools Reviewed With Open Catastrophic Deficiencies

School	Operated By	Deficiency Issue ²³	Inspection Report Deficiency	Reported Dates	Deficiency/ Work Order Status ²⁴
Cheyenne-Eagle Butte School	BIE	Fire Detection Alarm System	Inoperative fire detection alarm system.	May 2023 May 2024	Corrected Aug 2024. <i>Closed</i> Apr 2025.
Ch'ooshgai Community School	Navajo Tribal	Fire Detection Alarm System	Inoperative fire detection alarm system.	Jan 2023 Jan 2024 Feb 2025	In source selection. <i>Open</i> .
Crazy Horse School	Tribal	Fire Detection Alarm System	Inoperative fire detection alarm system.	Oct 2014 Apr 2019 Oct 2020 May 2021 Mar 2022 Mar 2023 Jan 2024	Corrected June 2014 and Mar 2019. <i>Open</i> .
Jemez Day School	BIE	Fire Sprinkler System	No evidence of required testing or system is not operational.	Dec 2024	Corrected Mar 2025. <i>Open</i> .
Kin Dah Lichi'i Olta ²⁵	Navajo Tribal	Fire Detection Alarm System	Safeguards designed to protect employees during an emergency.	Mar 2024	In progress. <i>Open</i> .
Mandaree School District	Tribal	Security	Interior glass panel next to classroom doors need to be replaced with a solution to prevent entry.	Nov 2023	Requires funding. <i>Open</i> .
Nazlini Community School	Navajo Tribal	Fire Detection Alarm System	Three catastrophic deficiencies: two identifying that an alarm panel has a trouble code on that will not reset and one identifying safeguards designed to protect employees during an emergency.	Dec 2024 (2) Jan 2025	Requires funding. <i>Open</i> .
Riverside Indian School	BIE	Fire Detection Alarm System	Inoperative fire detection alarm system.	Dec 2024	In process for funding. <i>Open</i> .
Turtle Mountain Middle School	BIE	Fire Detection Alarm System	Fire Alarm System - Tested fire alarm system. Existing is obsolete making it difficult to obtain.	Oct 2014 Apr 2019 Feb 2023 Nov 2023	Corrected 2015 and Oct 2024. <i>Open</i> .
White Shield School	Tribal	Security	Multiple classroom doors are left open throughout the day, resulting in unnecessary security concerns.	Nov 2023	Corrected. ²⁶ <i>Open</i> .

²³ All fire system-related deficiencies had a one-day abatement period. The deficiency at White Shield School had a seven-day abatement period, and the deficiency at Mandaree School had a 360-day abatement period. None of the deficiencies were corrected within the abatement periods.

²⁴ We relied on school staff to provide us the dates the deficiencies were corrected; multiple dates indicate different times the deficiency was reportedly corrected.

²⁵ When updating our sample, we observed that a recent safety and health inspection identified this deficiency again in May 2025 and reclassified it from catastrophic to critical. It is no longer listed as a catastrophic deficiency in the system.

²⁶ White Shield School did not provide a correction date.

Attachment 3: Response to Draft Management Advisory

Indian Affairs' and BIE's response to our draft report follows on page 14.



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

JAN 28 2026

Memorandum

To: Nicki Miller
Assistant Inspector General for Audits, Inspections, and Evaluations

Through: William H. Kirkland
Assistant Secretary – Indian Affairs

From: Tony L. Dearman *Tony L. Dearman*
Director, Bureau of Indian Education

Jason M. Bruno *Jason Bruno*
Deputy Assistant Secretary – Management, Indian Affairs

Subject: Management Response to Recommendations in Draft Management Advisory, Report No. 2024-ISP-040-A, *BIE and Indian Schools Need to Ensure Deficiencies That Could Cause Imminent and Immediate Danger Are Addressed and Resolved Timely.*

Indian Affairs (IA) appreciates the opportunity to comment on the U.S. Department of the Interior Office of Inspector General (OIG) Draft Management Advisory – *BIE and Indian Schools Need to Ensure Deficiencies That Could Cause Imminent and Immediate Danger Are Addressed and Resolved Timely.*

This memorandum transmits IA management's response to each of the audit recommendations, plans for corrective actions, and documentation of corrective actions taken thus far. IA management is committed to addressing safety and health deficiencies at BIE-funded Indian schools and improving the tracking and accuracy of work order status and the security and emergency preparedness at BIE schools. Our responses are listed below:

IA acknowledges that the severity of certain Deferred Maintenance Work Orders (DMWOs) have been categorized inaccurately. For example, there were multiple deficiencies related to an "inoperative" fire suppression and/or detection systems and security systems that were categorized as "Catastrophic" which did not actually pose an immediate danger of death or permanent disability to staff and students.

In accordance with Department of the Interior safety standards, applicable Indian Affairs (IA) policy, Occupational Safety and Health Administration (OSHA) requirements, and nationally recognized fire protection standards, deficiencies of this nature do not automatically meet the threshold for a "Catastrophic" condition when appropriate interim risk-mitigation measures are implemented. For example, the establishment of a fire watch is an accepted compensatory measure that can reduce risk to an acceptable level until permanent corrective action is completed. When such mitigations are in place, the condition should be reclassified to the next lower severity category consistent with risk-based assessment principles.

IA is reviewing and updating relevant policies, processes, and conducting training to ensure that facilities managers and safety and occupational health specialists are held accountable for the timeliness and accuracy of the data entered into the Indian Affairs - Facility Management System (IA-FMS), also known as Maximo. This includes entering and categorizing DMWOs correctly.

Recommendation #1: Assess the deferred maintenance work order workflow and implement updates as appropriate to enhance efficiency and timely resolution of work order and project approval.

Actions Taken:

The Division of Facilities Management and Construction (DFMC) and the BIE Branch of Facilities Management (BFM) have collaborated in assessing the DMWO workflow and have developed and published Standard Operating Procedures and mapped processes to enhance the efficiency and timely resolution of work order and project approval. See attachments 1, 2, 3, 4, and 5.

Responsible Party: DAS-M, OFPSM, DFMC, and BIE BFM

Recommendation #2: Create standard operating procedures that establish criteria for preparing, approving, and funding work orders.

Actions Taken:

On April 18, 2025, DFMC published a Standard Operating Procedure (SOP) that included the minimum standards for creating DMWOs that would be included in a future project. On August 15, 2025, DFMC developed and published an SOP to ensure that requests for the Education Facility Improvement and Repair (FI&R) funding would be submitted with all necessary information and so that approval for funding could be prioritized and expedited. On January 6, 2026, BIE BFM published the minimum quality standards for DMWOs. See attachments 1, 2, and 5.

Responsible Party: DAS-M, OFPSM, and DFMC

Recommendation #3: Update the facility management system with new school building information identified in this report.

Actions Planned: IA management concurs with the recommendation. DFMC will coordinate with BIE BFM to ensure that DMWOs listed in this report are entered into IA-FMS for the following buildings: Riverside Indian School, Ch'ooshgai Community School, Nazlini Community School, Crazy Horse School, Turtle Mountain Middle School, Tate Topa Tribal School, Havasupai Elementary School, Cheyenne-Eagle Butte School, Ch'ooshgai Community School, Jemez Day School, Kin Dah Lichi'i Olta, White Shield School, and Mandaree Day School.

Actions Taken:

Over the last year, DFMC, in coordination with BIE BFM, have conducted a facility data validation initiative in preparation of implementing a new Operations and Maintenance (O&M) Needs and Allocation Formula.

Responsible Party: DAS-M, OFPSM, DFMC, and BIE BFM

Target Date: March 31, 2026

Recommendation #4: Develop policies and procedures that clearly communicate which fire system-related deficiencies require fire watches, to include roles and responsibilities.

Actions Planned: IA management concurs with the recommendation. The Bureau of Indian's (BIE) Branch of Safety Management (BSM) will strengthen the implementation of the existing fire watch policy by delivering training and increasing communication that ensures all facility and safety personnel understand when a fire watch is required, who has authority, and how to document and report fire watch activities properly.

BIE schools operate under established governing policy issued by the Office of Facilities, Property and Safety Management (OFPSM), Division of Safety and Risk Management (DSRM), which serves as the Authority Having Jurisdiction (AHJ) for all Indian Affairs fire protection programs. Relevant policies include:

- Indian Affairs Fire Watch Guidelines issued by the OFPSM/DSRM, which designate the Chief of DSRM as the AHJ for all IA fire watch policies and procedures.
- Indian Affairs Fire Protection and Life Safety Systems Inspection, Testing, and Maintenance Guidelines (July 2022).
- Indian Affairs Manual (IAM) Part 25, Chapter 3 Guidance, which mandates compliance with National Fire Protection Association (NFPA) codes.

Collectively, these policies require fire watches when fire alarm or sprinkler systems are impaired. To improve consistency and awareness, BSM will take the following actions:

- Quarterly Training: BSM will deliver Fire Watch Awareness and Implementation Training (Attachment 6) covering identification of system impairments, proper notifications, recordkeeping in IA-FMS. One session has already been held in FY26 Q1 and a second session is planned for FY26 Q2.
- Policy Distribution: Within 30 days of this recommendation's approval, BSM will distribute all policies and relevant information to the schools.
- Ongoing Support: BSM will continue providing guidance on an as-needed basis.

Actions Taken:

- On October 23, 2025, BSM offered a fire watch training to all school locations, with 37 participants representing 13 schools.
- October 30, 2025, BSM provided fire-watch training to all BIE Safety and Facilities personnel, with 38 attendees.

Responsible Party: BIE Branch of Safety Management (BSM)

Target Date: March 31, 2026

Recommendation #5: Ensure facilities managers are held accountable for timeliness and accuracy of information in the facility management system.

Actions Planned: IA management concurs with the recommendation. BIE has issued multiple directives and guidance documents to improve accountability and data quality in IA-FMS including:

Per 25 IAM Part 80, Chapter 1, paragraph 1.5 F, site-level facility management personnel are responsible for:

- Using the IA-FMS to create, modify, and update Deferred Maintenance Work Orders (DMWOs), and
- Ensuring that site-specific facilities inventory data is accurate in IA-FMS. (Attachment 7 – IAM Section 80, Chapter 1)

Additionally, the Guidance Standards for Environmental, Safety, and Facilities (June 2, 2025), which apply to Tribally Controlled Schools require that:

- Each school designate at least one local employee to manage IA-FMS work orders.
- Within 30 calendar days of receiving the annual safety inspection report, schools must submit a Safety and Compliance Abatement Plan (S&CAP) using the Maximo template.
- Upon completion of corrective actions, schools must update Maximo with actual costs, change the work order status to “Completed,” and attach all relevant documentation within 60 calendar days.

This recommendation is further supported by a series of memoranda:

- A May 31, 2024, directive requiring school leadership to identify at least one local Maximo user. (Attachment 4 – DMWO Directive Memo)
- A May 8, 2025, memorandum outlining the FY26 project prioritization process, reiterating the need for local Maximo users, adherence to minimum standards, and proper project closeout. (Attachment 8 – FY26 Project Prioritization Memo)
- A May 30, 2025, memorandum emphasizing prioritization of Safety, Accessibility, and Fire (SA&F) issues and reinforcing minimum quality standards. (Attachment 9 – BFM SAF Memo)

In support of the existing policies and directives, BFM has provided training to facility managers and other school staff. DFSM will update and redistribute a directive memo outlining expectations for Maximo use and reporting. The memo will be distributed to all school superintendents, principals, Associate Deputy Directors (ADDs), Educational Program Administrators (EPAs), and school facility managers. Furthermore, BFM incorporated IA-FMS quality control elements into Employee Performance Appraisal Plans (EPAPs) for facility managers, ensuring measurable standards for data accuracy and timeliness.

Note on Maximo Asset Data Responsibility: According to 80 IAM 1, asset data is a joint responsibility between the Division of Facilities Management and Construction (DFMC) and applicable sites to maintain accurate Maximo location data. BIE fulfills this requirement in large part by funding the Facility Condition Assessment (FCA) contract that DFMC administers that includes validation of location and work order data. BIE BFM further supports cleanup efforts to ensure accurate data for Operations and Maintenance (O&M) distributions. Since DMWOs are tied to specific locations, incorrect location data compromises their accuracy. DFMC should be consulted regarding location data cleanup under the FCA contract.

ADDs and EPAs are responsible for ensuring that superintendents and principals enforce IA-FMS data accuracy, local facility management, and timely updates at their respective schools. BFM will continue to provide training and technical support to school personnel.

Actions Taken: In July 2025, BIE BFM conducted two in-person training sessions focused extensively on IA-FMS system usage and the management of MI&R and FI&R projects. Additionally, BIE BFM conducts monthly training sessions for facility managers and other school staff involved in facilities management. The table below outlines the topics covered in these sessions throughout the calendar year:

Training Date	Training Topics
2/19/2025	Updates to Maximo; Minimum DMWO Quality Standards; Work Order Creation
3/19/2025	Identifying Safety & Health Deficiencies in Maximo; Checking for Repeat Deficiencies; Maximo Locations
4/16/2025	Abatement Plans & Maximo Work Orders; DMWO Minimum Quality Standards
5/21/2025	Hot Topics in Maximo; Common Errors; DMWO Minimum Quality Standards
6/18/2025	Maximo Work Order Attachments and Naming Conventions
7/15–16/2025	Maximo Work Order Development from Start to Submission (per Minimum Quality Standards)
7/22–23/2025	Maximo Work Order Development (continued)
8/20/2025	DMWO Minimum Quality Standards; Cost Estimation in Maximo
9/17/2025	Using Maximo Effectively to Get Projects Funded
10/15/2025	DMWO Management and Closeout Procedures

Responsible Party: BIE Branch of Facilities Management, Associate Deputy Director Bureau Operated Schools

Target Date: June 30, 2026

If you have any questions, please contact Michael Shomper at michael.shomper@bia.gov.

List of Attachments:

- Attachment 1 - Maximo_WO_BPERM_PRQ_Requirements_4-18-2025
- Attachment 2 - SOP FI&R Funding Process 8.15.2025
- Attachment 3 - Basic Deferred Maintenance Work Order Flow 5.14.2024
- Attachment 4- DMWO Directive Memo_final signed
- Attachment 5 - BIE DMWO Minimum Quality Standards User Guide 1.05.2025
- Attachment 6 - Fire Sprinkler Systems & Alarms FY26 (BSM training)
- Attachment 7 - IAM section 80, chapter 1- Overview

- Attachment 8 - BFM FY26 Prioritization Process Memo_ (2025-05-08)
- Attachment 9 - BFM SAF Memo_ (2025-05-30)



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