

# **Columbus City Schools Office of Internal Audit**



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## **Safety & Security**

### **Audit Report**

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**Report Date: January 25, 2024**

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**Executive Summary**

The Office of Internal Audit (OIA) of the Columbus City Schools (District) has recently concluded an audit of the Department of Safety & Security. This general audit evaluated objectives selected by OIA to assess the activities surrounding Safety & Security taking place on District premises.

OIA’s audit work focused on gaining an understanding of the District’s Safety & Security process and the governance and internal controls applicable to this process. Based on the results of our work, we identified six areas where improvements can be made. Implementing the recommendations presented in this report will strengthen the Department of Safety & Security internal control environment and increase efficiency of its processes.

As a result of the audit work performed by OIA, we noted six issues and developed ten associated recommendations. OIA rated the risk associated with the six issues as follows:

<b>High</b>	<b>Moderate</b>	<b>Low</b>
1	5	0

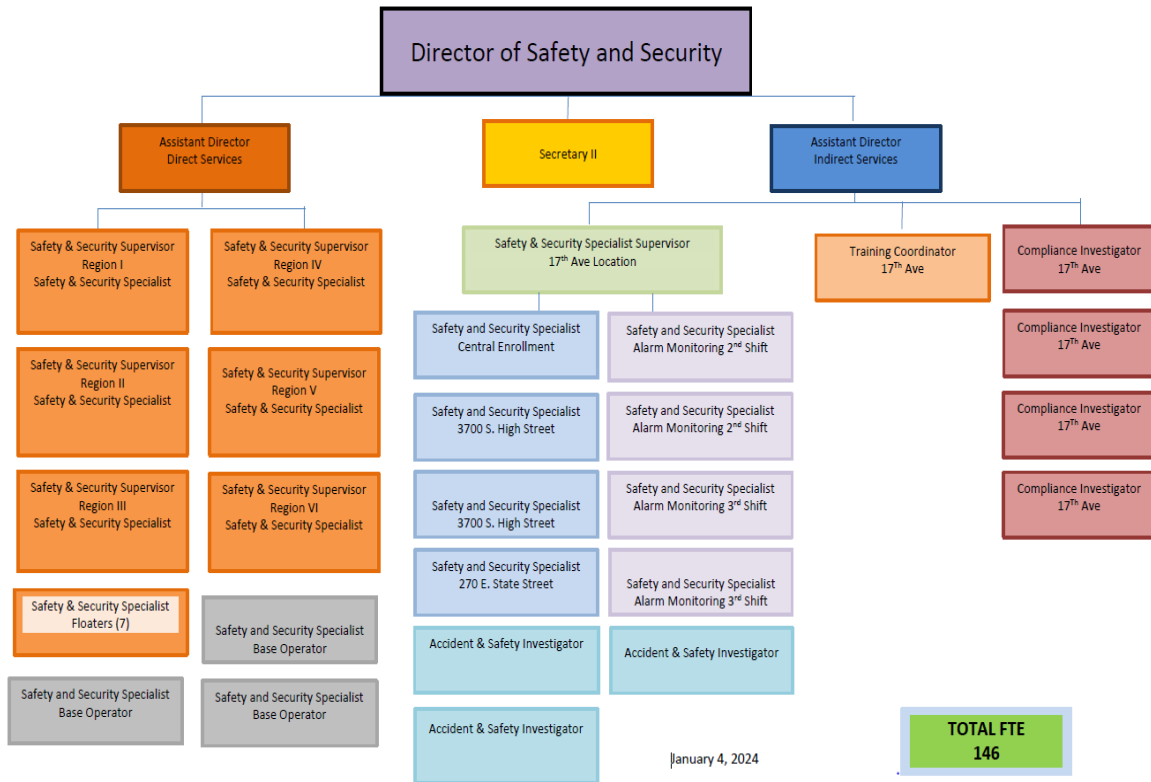
During the course of the audit, we made the Department of Safety & Security management aware of our issues and recommendations for improvement. Good discussion took place regarding the recommendations. OIA appreciates the cooperation extended to us and the assistance of all staff we interacted with as we performed our audit.

**Background**

The Safety & Security (S&S) staff serves as a source of information, assistance and guidance to students, parents, teachers, and staff as well as a link to support services within the community. The department’s ultimate goal is to ensure school safety.

The Department of Safety and Security consists of the Director, two Assistant Directors, and other staff that make up 146 men and women who provide professional safety and security services to over 45,945 diverse students within the Columbus City Schools (CCS) District. The department is dedicated to ensuring a safe, secure and effective learning environment for students, staff and community.

2023 Department of Safety and Security Organizational Chart



The Department of Safety & Security utilizes Navigate360 emergency management system as its system of record for the management of emergency operations plans and documentation including when safety drills are scheduled and logged into the system of record (Navigate360). The system allows the District the capability to schedule all safety drills for the entire school year and send automatic reminders to staff and appropriate State and Local Officials.

Navigate360 is a system of record school safety and wellness platform that helps Columbus City Schools streamline training, compliance tracking, and communication management operations.

### **Audit Objectives**

OIA established the following objectives for the audit:

- To determine that the Department of Safety & Security has business objectives/goals that align with District Goals, Guardrails and Strategic Priorities.
- To determine that the Department of Safety & Security has metrics in place to measure the success of the operations.
- To determine the Department of Safety & Security performs periodic Safety & Security risk assessments of the District.
- To determine the Department of Safety & Security has established a succession planning process for leadership roles.
- To determine safety drills are recorded in the system of record (Navigate 360) documenting they were performed timely, properly documented, and compliant with laws, rules, and regulations.
- To determine timely recording of school's emergency management plans in the system of record (Navigate 360).
- To determine whether the administrative guideline procedures for metal detector searches are in place and operating as intended by management.
- To determine the number of generated work orders for the Department of Safety & Security and managements' process to minimize the significance of open work orders.

### **Audit Scope**

The OIA established the scope of the audit to include a review of basic operational aspects of the processes and evaluation of internal control environments as they relate to the noted objectives. The period of time for the audit included all activity relating to the Department of Safety & Security processes from July 1, 2022 through December 31, 2022, except for review of work orders (January 1, 2022 through December 31, 2022). We also performed some monitoring testing for the period October through December 2023.

### **Methodologies**

To accomplish the audit objectives, OIA generally used inquiry, observation, and document/record examination and the following tasks as they relate to those objectives:

- Reviewed various relevant authoritative literature;
- Reviewed applicable laws and regulations;
- Reviewed relevant District Board of Education (BOE) policies and administrative guidelines related to Safety & Security;
- Obtained and reviewed relevant Safety & Security procedures;
- Reviewed best practices in Safety & Security utilized by other school districts;
- Reviewed prior relevant OIA audits;
- Inquired with various State and Local Officials concerning compliance;
- Interviewed Safety & Security management procedures and processes; and
- Performed limited data analysis of Safety & Security work orders.

**Results of the Safety & Security Audit - Issues and Recommendations:**

**Issue 1 – The Department of Safety & Security has not established written business objectives/goals, metrics, or risk analysis. (Risk Rating: Moderate)**

A sound business practice is to establish business objectives that correspond to the District's goals for the Safety & Security function. Setting goals, objectives, and metrics is key to the success of the Department of Safety & Security.

The Department of Safety & Security function does not have business objectives, metrics, or perform risk analysis to guide the Safety & Security activities.

Without business objectives/goals, metrics, and risk analysis management has no assurance its activities align with CCS strategic objectives and goals, and no method to measure and monitor its progress toward achieving business objectives and ultimately CCS strategic objectives.

**Recommendations:**

1. OIA recommends written business objectives and goals should be established for the CCS Safety & Security function that corresponds/aligns with the CCS strategic objectives.
2. We recommend Safety & Security management identify relevant metrics to measure progress toward achieving the established business objectives.

**Management Response:**

*Recommendation #1*

*Business objectives for the Department of Safety and Security have been developed.*

*Recommendation #2*

*This recommendation will be addressed after review of a process that will align with management response #1.*

**Implementation Date:** TBA

**Process Owner:** Chris Baker, Director of Safety & Security

**Issue 2 – Inconsistent compliance with Ohio Revised Code section 3737.73 (2)(a)(1) which requires keeping a written record of the date and time each safety drill was conducted. The District uses Navigate360 as its system of record for the recording of safety drills. (Risk Rating: Moderate)**

Ohio Revised Code Section 3737.73 requires the District to perform school emergency evacuation drills and safety drills. Board of Education policy 8420 directs that fire, tornado, and school safety drills be conducted during the school year in accordance with State law.

The Department of Safety & Security has developed a monthly schedule of required drills in accordance with Ohio law. The schedule requires All drills to be entered and logged into the system of record (Navigate360).

Navigate360, is utilized by the Department of Safety & Security as the system of record to manage documentation and emergency operations plans, including the scheduling and logging of safety exercises.

Upon reviewing the Columbus City Schools (CCS) Schedule of required drills by month for School year 2022-2023, it was determined that from August 2022 to December 2022, each school should have completed a minimum of 11 drills: five drills for evacuation, five drills for lockdown, and one drill for reverse evacuation. OIA examined 100% of the school population in the system of record (Navigate 360); the results are as follows:

- Between August 2022 and December 2022, 34 of 116 (29%) CCS schools failed to record 11 required safety drills in the system of record (Navigate360);
- 52 of 116 (45%) schools failed to record 5 required emergency evacuation drills in the system of record (Navigate360); and
- 75 of 116 (65%) schools failed to record 5 required Lockdown drills in the system of record (Navigate360).

Schools are required by Ohio law to conduct a lockdown drill, reverse evacuation drill, and evacuation drill within the first ten days of the new academic year. OIA examined 100% of the school population in the system of record (Navigate 360); the results are as follows:

- Two schools of 116 (1.7%) were identified by OIA as having conducted fewer than three required exercises within the first ten days of the academic year.
- OIA identified two schools (1.7%) of 116 that failed to conduct mandatory exercises during the first ten days of the academic year.

In addition to the drills above, the principal or person in charge must conduct a theoretical school safety drill once during the school year to provide faculty and staff employed by the school with instruction in the procedures to follow in such situation.

There is no requirement for student participation in this exercise. OIA tested 100% of the school population in the system of record (Navigate 360), with the following results:

- As of December 31, 2022, 48 of 116 (41%) schools had not yet entered and documented training for the Theoretical (Safety Team Training) drill in the system of record (Navigate360). A total of five schools conducted their Theoretical drill subsequent to the stipulated deadline of October 21, 2022.

During our review, OIA noted 113 of 116 (97%) schools did not post their “Active Shooter” drills properly into the system of record (Navigate360). Based on feedback from Safety & Security, the Level 3 “Lockdown” drill is the full-scale “Active Shooter” scenario conducted in schools. Further inquiry with consultant from Navigate360, it was recommended the “Active Shooter” drill has more clarity of what is being done during the drill such as doors locked, lights off, door barricaded, etc.

Without emergency training and posting drills in the system of record (Navigate360) the District cannot ensure that employees and students are prepared for the worst and students' knowledge of how to respond to an emergency or violence. These drills help prepare individuals to respond quickly, calmly, confidently, and safely should an actual critical incident take place.

**Recommendations:**

3. OIA recommends the Department of Safety & Security improve their monitoring process with schools timely documenting drills in the system of record (Navigate360).
4. OIA recommends the Department of Safety & Security instruct schools to enter their Active Shooter drills as an “Active Shooter” drill and not a Level 3 Lockdown drill.

**Management Response:**

*3. The Department of Safety and Security will improve the monitoring process with Columbus City Schools by reviewing two times per month with regional supervisors through Navigate360 the timely documenting of the drills in the Navigate360 system. This process will allow consent review and eliminate the possibility of a school failing to properly enter drills as required by a specific deadline.*

*4. The Department of Safety and Security agrees with the assessment of the OIA and with regards to “Active Shooter” drills only listed as a Level 3 Lockdown drill. Communication and instructions will be provided to Columbus City Schools to assure this drill is logged correctly.*

**Implementation Date:** January 01, 2024

**Process Owner:** Edward Greene, Assistant Director of Safety and Security



**Issue 3 – Non-Compliance with Ohio Revised Code section 3737.73(2)(a) which requires notification of Safety Drills to appropriate State and Local Officials. (Risk Rating: High)**

Ohio Revised Code Section 3737.73 requires the District to notify the appropriate Local Officials in advance of school emergency evacuation drills and safety drills. Board of Education policy 8420 directs District management to notify the appropriate Officials each safety drill.

The principal must provide to the police chief advance written notice of each school safety drill and shall keep a written record of the date and time of each drill conducted. The advance notice shall be provided not later than **seventy-two hours prior** to the date the drill will be conducted and shall include the **date and time** the drill will be conducted and the **address of the school**. The notice shall be provided by mail, facsimile, or electronic submission.

Not later than **December 5<sup>th</sup>** each year, the principal must provide to the police chief written certification by mail, facsimile, or electronic submission of the date and time each school safety drill was conducted during the **previous school year**, as well as the **date and time** each drill will be conducted during the **current school year**.

In addition, Ohio Fire Code 405.1.2 requires schools to submit an email with drill log to the State Fire Marshall in **December** and **June**.

In order to demonstrate compliance with the aforementioned requirements, OIA was unable to obtain any evidence of notification or submission of scheduled exercises or drill logs to the appropriate State and Local Authorities during the audit.

The school safety system of record (Navigate360) has the capability to send email notifications of drill logs to the appropriate State and Local Officials, if Building Administrators timely schedule and post drills.

Without having a proper process in place to notify the appropriate Officials of scheduled drills and drill logs, the District will continue to be in non-compliance with Ohio law and BOE policy.

**Recommendations:**

5. OIA recommends Safety & Security management develop a process for notifying State and Local Officials of required drills.
6. OIA recommends Safety & Security management develop a monitoring process to ensure drills are timely scheduled and documented in the system of record (Navigate360).

**Management Response:**

5. *The Department of Safety and Security will assure notifications are sent to State and Local Officials by required dates, by using the Navigate360 software that tracks all drills. The Navigate360 systems will continue to send notifications to officials by email*

*when drills are scheduled. This proves to be the fastest and most efficient method of getting the notifications pushed out and will be documented. This is verified by the appropriate responders being selected to receive the notification through Navigate360.*

*6. The Department of Safety and Security will improve the monitoring process with Columbus City Schools by reviewing two times per month with regional supervisors through Navigate360 the timely documenting of the drills in the Navigate360 system. This process will allow consent review and eliminate the possibility of a school failing to properly enter drills as required by a specific deadline.*

**Implementation Date:** January 01, 2024

**Process Owner:** Edward Greene, Assistant Director of Safety and Security

**Issue 4 – Improvements could be made with the timely and complete submission of Emergency Management Plans (School safety plans) in the system of record (Navigate360). (Risk Rating: Moderate)**

Ohio Revised Code Section 5502.262 requires public schools to review their emergency operation plans (EMP) and certify the plan is current and accurate no later than July 1 of each year. Schools must submit an electronic copy of the plan to the Director of Public Safety every three (3) years, whenever a major modification to the building requires changes in the procedures outlined in the plan, and whenever information on the emergency contact information sheet changes.

OIA confirmed with Officials from the Ohio School Safety Center (OSSC) that the District is in compliance with submitting emergency management plans to the OSSC every three years and certifying plans.

The Department of Safety & Security annually requires school safety plans be reviewed and completed in the system of record (Navigate360) by November 14, 2022 for the 2023 fiscal year. School Administrators are reminded via annual memo to review areas that include key personnel, school population, functional needs population, and other pertinent areas.

During our audit, OIA identified:

- As of November 14, 2022, 94 of 116 schools (81%) had failed to submit their school emergency operation plans into the system of record (Navigate360);
- By November 21, 2022, 22 of 94 schools (23%) had submitted their School Safety Plans through the system of record (Navigate360). With the exception of one school, which submitted its plan in April 2023, all schools had submitted School Safety Plans by December 31, 2022; and
- OIA also examined a number of plans submitted in the system of record (Navigate 360) and discovered that a number of them lacked current information and contained incomplete sections.

Without having a timely systematic review of school emergency operation plans, could potentially increase the risk to prevent, prepare for, respond to and recover from a crisis situation.

**Recommendation:**

7. OIA recommends Safety & Security improve their monitoring process with timely review and submission of school emergency operation plans in the system of record (Navigate360).

**Management Response:**

*7. The Department of Safety and Security can improve the monitoring process by setting clear and defined review dates. In order to hold consistent accountability compliance section will work with the regional school supervisors to ensure school emergency operations plans are entered in a timely fashion.*

**Implementation Date:** January 01, 2024

**Process Owner:** Edward Greene, Assistant Director of Safety and Security

**Issue 5 – Improvements could be made with the timely posting and documenting Emergency Management Test (Tabletop Exercise) into the system of record (Navigate360). (Risk Rating: Moderate)**

Ohio Revised Code Section 5502.262 requires public schools to conduct at least one Emergency Management Test by December 31st of each year. The type of test shall be a tabletop, functional, or full-scale exercise, each type being used once every three years. For the School year 2022-2023 school year, the CCS Schools were required to perform a Tabletop exercise.

Tabletop exercises allow schools to discuss their plans, policies, and procedures in an emergency scenario. Drills provide everyone with the chance to practice the actions they will take before, during, and after an emergency. The test shall include at least one representative from any of the following: law enforcement, fire, emergency medical services (EMS), emergency management agency (EMA) or behavioral health.

Within 30 days of completion of the exercise, schools must complete an EMT After Action Report using the School Safety Portal. Based on confirmation from the Ohio School Safety Center, the District was in compliance with the submission of exercises using the School Safety Plans Portal by the Department of Safety & Security.

The Department of Safety & Security required schools to complete their Emergency Management Test (Tabletop Exercise) by Friday, October 28, 2022. During OIA's review, we noted the following:

- As of December 31, 2022, OIA noted 50 of 116 (43%) schools had not entered/posted their Emergency Management Test in the system of record (Navigate360);
- 65 Schools sites did enter/post their Emergency Management Test in the system of record (Navigate360) before or on October 28, 2022; and
- One school entered/posted their Emergency Management Test on November 8, 2022, after the October 28, 2022 deadline.

Management may be unable to timely identify required drills were not documented in the system of record (Navigate360).

**Recommendations:**

8. OIA recommends Safety & Security management develop monitoring process utilizing the system of record (Navigate360) to assist with ensuring compliance with mandatory drills/test.
9. OIA recommends Safety & Security management develop a process to ensure at least one representative from any of the following: law enforcement, fire, emergency medical services (EMS), emergency management agency (EMA) or behavioral health are included in the test in accordance with Ohio law.

**Management Response:**

*8.The Department of Safety and Security acknowledges the recommendation of the development, monitoring process and utilizing Navigate360. Again, we will partner with the regional supervisors to ensure that every school on a bi-weekly basis reviews and makes sure that each school within the assigned region is in compliance with mandatory drills/tests.*

*9.The Department of Safety and Security has consulted with the Ohio School Safety Center and determined based on the OIA's recommendation of at least (1) representative from law enforcement, fire, emergency medical services (EMS), emergency management agency (EMA) or behavioral health should be present however if they are unable to respond it still counts towards notification and use of their services. This has been approved by a-School Safety Planner for the Ohio School Safety Center.*

**Implementation Date:** #8-January 01, 2024 / #9 October 7, 2024

**Process Owner:** Edward Greene, Assistant Director of Safety and Security

**Issue 6 – Lack of Written Operating Procedures and Metrics – Safety & Security Work Orders. (Risk Rating: Moderate)**

Standard operating procedures consistent with BOE policies and Administrative Guidelines produce consistent results and make employees accountable. Major business transactions and related internal controls of a department's operations should be clearly documented, periodically reviewed and updated. Management can use this structure and framework to ensure the organization's objectives are being met. Well-

written procedures also help employees clearly understand their roles and responsibilities within predefined limits.

During our review, we noted that the Department of Safety & Security did not have written procedures in place for the consistent application of work order transactions. Furthermore, there are no metrics that are routinely obtained to identify success or how efficient and effective the management of the work order process is operating or risk analysis to identify areas where problems could occur.

Lack of formally documented procedures may lead to insufficient and inconsistent work order analysis.

**Recommendation:**

**10.** OIA recommends that Safety & Security develop, document and implement a standard operating procedures and metrics associated with the work order process. Also, see recommendation #2 – Metrics.

**Management Response:**

1.) *This recommendation will be addressed after review of a process that will align with management response #1 and #10 in collaboration with the OIA.*

**Implementation Date:** January 01, 2024

**Process Owner:** Edward Greene, Assistant Director of Safety and Security

**APPENDIX I – Audit Issues**

**Risk Ratings, defined:**

**1 – High/unacceptable risk requiring immediate corrective action;**

**2 – Moderate/undesirable risk requiring future corrective action; and**

**3 – Low/minor risk that management should assess for potential corrective action.**

Issues	Risk Rating		
	1	2	3
<b>Objective 1: To determine the Department of Safety &amp; Security has business objectives/goals that align with District Goals, Guardrails and Strategic Priorities.</b>			
Issue 1 – The Department of Safety & Security has not established written business objectives/goals, metrics, or risk analysis.		X	
<b>Objective 2: To determine the Department of Safety &amp; Security has metrics in place to measure the success of the operations.</b>			
See Issue 1			
<b>Objective 3: To determine the Department of Safety &amp; Security performs periodic Safety &amp; Security risk assessments of the District.</b>			
See Issue 1			
<b>Objective 4: To determine the Department of Safety &amp; Security has established a succession planning process for leadership roles.</b>			
No report comments.			
<b>Objective 5: To determine safety drill are performed timely, properly documented, and compliant with laws, rules, and regulations.</b>			
<b>Issue 2 – <u>Inconsistent compliance with Ohio Revised Code section 3737.73 (2)(a)(1) which requires keeping a written record of the date and</u></b>		X	

<b><u>time each safety drill was conducted. The District uses Navigate 360 as its system of record for the recording of safety drills</u></b>			
<b><u>Issue 3 – Non-Compliance with Ohio Revised Code section 3737.73(2)(a) which requires notification of Safety Drills to appropriate State and Local Officials.</u></b>	X		
<b>Objective 6: To determine timely completion of school’s emergency management plans utilizing proper standardized forms and the plans consist of four parts. Also, to determine emergency management tests occurred and are properly documented at each school.</b>			
<b><u>Issue 4 – Improvements could be made with the timely and complete submission of Emergency Management Plans (School safety plans) in the system of record (Navigate360).</u></b>		X	
<b><u>Issue 5 – Improvements could be made with the timely posting and documenting Emergency Management Test (Tabletop Exercise) into the system of record (Navigate360).</u></b>		X	
<b>Objective 7: To determine whether the administrative guideline procedures for metal detector searches are in place and operating as intended by management.</b>			
No report comments.			
<b>Objective 8: To determine the number of generated work orders (FAMIS) for the Department of Safety &amp; Security.</b>			
<b><u>Issue 6 – Lack of Written Operating Procedures and Metrics – Safety &amp; Security Work Orders.</u></b>		X	

**APPENDIX II – Follow-up Monitoring (Oct. – Dec. 2023)**

Purpose of Exhibit 1: To show the number of safety drills recorded in the system of record (Navigate360).

**Exhibit 1**

	Oct.		Nov.		Dec.	
	# of Schools	% of Total	# of Schools	% of Total	# of Schools	% of Total
Number of Schools that have not scheduled any drills for the upcoming month in Navigate 360.	76	66%	57	49%	23	20%
Number of Schools that have scheduled at least <u>one</u> drill for the upcoming month in Navigate 360.	39	34%	58	50%	93	80%
Number of Schools that <u>did not</u> schedule any drills in current month in Navigate 360.	4	3%	2	2%	3	3%
Number of Schools that did not complete at least one drill in current month in Navigate 360.	20	17%	14	12%	17	15%
Number of Schools that have successfully posted all scheduled drills for current month in Navigate 360.	92	79%	100	86%	97	84%

**Source:** Navigate360: Drill Logs Scheduled and Drill Logs Completed email notification (Oct., Nov., Dec.) **Note: Data excludes administrative sites.**

Purpose of Exhibit 2: To show the number of School Emergency Operation Plans completed and tested in the system of record (Navigate 360).

**Exhibit 2**

	# of Schools	% of Total
Number of Schools that have completed their School Emergency Operation Plans prior to the November 14, 2023 deadline in Navigate 360.	7	6%
Number of Schools that have completed their School Emergency Operation Plans as of December 2023 in Navigate 360.	17	15%
Number of Schools that have <u>not</u> completed their School Emergency Operation Plans as of December 2023 in Navigate 360.	99	85%
Number of Schools that posted their Emergency Management Test prior to the October 28, 2023 deadline in Navigate 360.	55	47%
Number of Schools that posted their Emergency Management Test posted between October 28, 2023 deadline and December 31, 2023 in Navigate 360.	5	4%
Number of Schools that have not posted their Emergency Management Test as of December 31, 2023 in Navigate 360.	56	48%

**Source:** Navigate360: Safety Plans Overview as of 1/8/2024 and Report of Emergency Management Testing (7/1/23 - 12/31/23).