



Office of Internal Audit

Audit at a Glance

The Department of Safety & Security Audit

(Audit Scope: 7/1/22 - 12/31/22 & 10/1/23 – 12/31/23)

Why We Did This Audit

This audit was included as part of the FY23 Audit Plan approved by the Audit & Accountability Committee and the Board of Education. The Safety & Security (S&S) audit was focused on processes relating to:

- Determining that appropriate guidance was documented and easily accessible;
- Ensuring that management is consulting with other external subject matter experts as it relates to emerging trends, new technologies and best practices; and
- Evaluating the effectiveness of current monitoring procedures.

Risk Drivers

- Significant leadership turnover (Director [June 2022] & Asst. Director [February 2022]);
- Weapons being seized at multiple locations during the SY2021-22;
- Implementation of metal detectors (SY2021-22) and EVOLV AI security scanning technology (February 2023);
- HB 123 Threat Assessments;
- No business objectives or key performance Indicators in place; and
- Prior issues that remain open (updating and testing COOP Plan, and establishing a COOP oversight Committee).

Background

- The 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.

WHAT WE FOUND

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

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 Navigate 360 as its system of record for the recording of safety drills. (Risk Rating: Moderate)

- See Appendix I for details

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)

Issue 4 – Emergency Management Plans (school safety plans) are not consistently submitted to the system of record (Navigate360) in a timely manner. (Risk Rating: Moderate)

Issue 5 – Emergency Management Test (Tabletop Exercise) information is not consistently posted to the system of record (Navigate360) in a timely manner. (Risk Rating: Moderate)

Issue 6 - No written operating procedures or metrics exist relating to the Safety & Security work order process. (Risk Rating: Moderate)

WHAT WE RECOMMENDED MANAGEMENT DO

Issue 1 – The creation of written business objectives and goals should be established for the CCS Safety & Security function that corresponds/aligns with the CCS strategic objectives. Furthermore, Safety & Security management should identify relevant metrics to measure progress toward achieving the established business objectives. **(Closed)**

Issue 2 - The Department of Safety & Security should improve their monitoring process with schools timely documenting drills in the system of record (Navigate360). The Department of Safety & Security should instruct schools to enter their Active Shooter drills as an "Active Shooter" drill and not a Level 3 Lockdown drill.

Issue 3 – The Department of Safety & Security management should develop a process for notifying state and local officials of required drills. Safety & Security management should develop a monitoring process to ensure drills are timely scheduled and documented in the system of record (Navigate360).

Issue 4 – The Department of Safety & Security should improve their monitoring process with timely review and submission of school emergency operation plans (school safety plans) in the system of record (Navigate 360).

Issue 5 – The Department of Safety & Security management should develop a monitoring process utilizing the system of record (Navigate360) to assist with ensuring compliance with mandatory drills/test. Also, Safety & Security management should 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.

Issue 6 – The Department of Safety & Security should develop, document and implement standard operating procedures and metrics associated with the work order process.

Appendix I

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 (Navigate 360);
- 52 of 116 (45%) schools failed to record five required emergency evacuation drills in the system of record (Navigate 360); and
- 75 of 116 (65%) schools failed to record five required Lockdown drills in the system of record (Navigate 360).

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; and
- 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 management, 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.

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). Population total is 116 schools.

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). Population schools is 116 schools.

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).