

**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF THE INSPECTOR GENERAL**

**AUDIT OF PHYSICAL SECURITY  
AT THE DISTRICT OF  
COLUMBIA PUBLIC SCHOOLS**



**AUSTIN A. ANDERSEN  
INTERIM INSPECTOR GENERAL**

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Office of the Inspector General

Inspector General



September 10, 2004

Dr. Robert C. Rice  
Interim Superintendent  
District of Columbia Public Schools  
825 North Capitol Street, N.E., 9<sup>th</sup> Floor  
Washington, D.C. 20001

Dear Dr. Rice:

Enclosed is our final audit report summarizing the results of the Office of the Inspector General's (OIG) Audit of Physical Security at the District of Columbia Public Schools (DCPS) (OIG No. 03-2-14GA(b)).

Our report contains seven recommendations for necessary actions to correct the described deficiencies. We received a response dated September 3, 2004, to the draft report from the Superintendent of DCPS. The DCPS comments set forth specific corrective actions relative to improving school security. We consider actions taken and planned by DCPS to be responsive to our recommendations. The full text of DCPS response is included at Exhibit C.

We appreciate the cooperation and courtesies extended to our staff during the audit. If you have questions, please contact William J. DiVello, Assistant Inspector General for Audits, at (202) 727-2540.

Sincerely,

A handwritten signature in blue ink that reads "Austin A. Andersen". The signature is fluid and cursive.

Austin A. Andersen  
Interim Inspector General

AAA/cf

cc: See Distribution List

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**AUDIT OF PHYSICAL SECURITY AT  
DISTRICT OF COLUMBIA PUBLIC SCHOOLS**

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## EXECUTIVE DIGEST

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### OVERVIEW

This report is the fifth in a series of audits by the District of Columbia Office of the Inspector General (OIG) that evaluates District of Columbia Public Schools' (DCPS) management and operation of its school safety and security program. The report summarizes the results of our review of internal controls over physical security at DCPS. Other planned audits in this series will focus on issues such as the adequacy of training and background investigations for school security personnel, and a comparison of best practices relating to school security within the DCPS and in comparison to similar municipal public school districts.

### CONCLUSION

Our report contains one finding which addresses the conditions we observed and documented based on visits to 15 selected public schools. In summary, we found three main problem areas: (1) insufficient door security; (2) inoperable surveillance equipment; and (3) an inadequate security guard force. Each of these problems, individually, or as combined conditions, contributed to the degradation of physical security at the visited schools. Additionally, we found that DCPS had not developed adequate security procedures to ensure the security and safety of students, staff, and facilities. As a result, we believe the District's schools remain vulnerable to random acts of violence that could otherwise be reduced through improved physical security measures and sound security policy guidelines. In the section of this report entitled "Other Matters of Interest" we discuss the development and implementation by DCPS of a student accountability system and the potential availability of an alternative system.

### CORRECTIVE ACTIONS

We addressed seven recommendations to the Interim Superintendent, DCPS, that represent actions considered necessary to address the concerns described above. The recommendations, in part, center on:

1. developing a comprehensive school safety and security plan that encompasses all D.C. public schools;
2. developing a risk assessment and performing physical security reviews for each D.C. public school to establish the necessary level of security;
3. collaborating with the D.C. Fire and Emergency Medical Services to develop measures to adequately address the security problems involving the preponderance of entry doors, especially at high-risk schools;

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## EXECUTIVE DIGEST

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4. identifying and replacing inoperable camera equipment and equipment that provides inadequate surveillance coverage;
5. identifying areas within the schools that are not covered by surveillance cameras and taking appropriate actions to provide coverage;
6. taking actions to upgrade closed-circuit television equipment, train personnel in use of the equipment, and improve monitoring functions; and
7. pending performance of a risk assessment, evaluating the assignments of school security personnel to determine if sufficient personnel are assigned to D.C. Public Schools.

### MANAGEMENT RESPONSE

On September 3, 2004, DCPS provided a response to the recommendations in the draft report. DCPS concurred with the report, its conclusions, and its recommendations, and set forth corrective actions to improve physical security at DCPS. We consider DCPS' comments to be fully responsive to the audit recommendations. The complete text of DCPS' response is at Exhibit C.

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## INTRODUCTION

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### BACKGROUND

For approximately 25 years, DCPS maintained in-house security personnel and programs. Since 1996, DCPS has contracted with a security service firm to provide staff and security services in the approximately 167 DCPS sites (schools and other school administrative facilities). In this capacity, the contractor works with the DCPS Division of School Security to ensure that students and staff have a safe and productive educational environment.

The DCPS Division of School Security is responsible for preventing, detecting, and investigating criminal and other illegal activity on DCPS property, or at DCPS events, committed by and/or against DCPS students and employees. Illegal activities include, but are not limited to, assault, corporal punishment, abuse, fraud, theft, possession of contraband, and waste of school resources. The Division of School Security also facilitates, as appropriate, background checks for DCPS employees and assists local school principals, administrators, and staff with the maintenance and restoration of order and discipline within DCPS.

The organizational structure of the Division of School Security consists of an administrative section and an investigative section. The administrative section manages and oversees the daily security operations that include the contract security personnel. The investigative section's specific functions and procedures are not delineated in the Division of School Security's Standard Operating Procedures. During our audit, the Division of School Security was headed by the Interim Executive Director of School Security, who reported to the Superintendent of Schools.

### OBJECTIVES, SCOPE, AND METHODOLOGY

Our announced audit objectives were to: (1) evaluate the adequacy of the internal controls over physical security; (2) determine whether laws, policies, regulations, and directives were correctly interpreted and applied in the administration of the security function; and (3) evaluate the operation's performance with regard to economy, efficiency, and effectiveness in accomplishing the security function. Our review of physical security operations covered the last quarter of the 2002-2003 school year through the middle of the 2003-2004 school year. To accomplish our objectives, we conducted audit work at 15 schools, which consisted of elementary and secondary schools. We received suggestions from the D.C. Council and DCPS administrators regarding which schools to include in the site visits. We examined physical facilities to determine if effective security measures were applied to cover a school's physical security vulnerabilities. We reviewed DCPS security and safety standard operating policies and procedures as well as applicable provisions of the D.C. Code. We also reviewed management controls to ensure compliance with internal policies and procedures pertaining to security initiatives. We conducted interviews with the DCPS Division of School Security management, principals, employees, Parent and Teacher Associations (PTA), civic organizations, and contractors.

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## **INTRODUCTION**

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Our audit was conducted in accordance with generally accepted auditing standards and included such tests as were considered necessary under the circumstances. Further, we did not use or rely on computer-processed data to form the basis of reported results during our audit engagement.

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## FINDING AND RECOMMENDATIONS

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### FINDING: PHYSICAL SECURITY

#### SYNOPSIS

We identified serious security weaknesses at all of the 15 District elementary, middle, and high schools we visited. The three security weaknesses that posed the greatest problems at all of the schools visited included: (a) insufficient door security; (b) broken surveillance equipment; and (c) the inadequacy of contracted security personnel. These conditions existed because DCPS has not established a comprehensive plan to address the safety and security issues within the District’s school system and has not conducted risk assessments to address the unique safety and physical security concerns at District schools. As a result, the District’s schools remain vulnerable to planned or random acts of violence that could otherwise be reduced through improved security measures and the implementation of sound policy guidelines.

#### DISCUSSION

We reviewed physical security at the 15 school locations, and determined that the three security areas that posed the greatest problems at many of the schools visited were: (a) insufficient door security; (b) broken surveillance equipment; and (c) inadequacy of the security personnel. We made our determination based on observations and discussions with DCPS school administrators, security personnel, civic organizations, and Parent and Teacher Associations (PTA). Table 1 below represents physical security deficiencies observed at each school visited.

**Table 1. Physical Security Deficiencies**

D.C. Public Schools <sup>1</sup>	Insufficient Access Control (Egress of the Building)	Insufficient/ Inoperable Surveillance Equipment	Inadequacy of Security Coverage
Anacostia Senior High School (SHS)	✓	✓	✓
Cardozo SHS	✓		✓
Roosevelt SHS	✓		✓
Banneker SHS	✓	✓	✓
Wilson SHS	✓	✓	✓
Coolidge SHS	✓	✓	✓

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<sup>1</sup> Checkmarks indicate school officials’ acknowledgement of safety and security deficiencies within each respective school.

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## FINDING AND RECOMMENDATIONS

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**Table 1. Physical Security Deficiencies (con't.)**

D.C. Public Schools <sup>2</sup>	Insufficient Access Control (Egress of the Building)	Insufficient/ Inoperable Surveillance Equipment	Inadequacy of Security Coverage
Ballou SHS	✓	✓	✓
Spingarn SHS	✓		✓
Woodson SHS	✓	✓	✓
Johnson Junior High School (JHS)	✓	✓	✓
Deal JHS	✓		✓
Francis JHS		✓	
Lincoln Middle School (MS)	✓	✓	
Hart MS	✓	✓	✓
Key Elementary School (ES)		✓	

Exhibit B of this report displays the responses to questions posed to school principals of the 15 schools we reviewed. These responses support the observations contained in this report.

**Door Security** - The major security problem identified was the inability to adequately secure the school doors from the inside. This problem was evident at 13 of the 15 schools we visited. We also observed that many of the school entry and exit points were not guarded, not equipped with audible alarms, or not monitored by surveillance cameras.

***A Preponderance of Doors, Unguarded and/or Unalarmed*** - The following paragraphs describe the conditions we found at Wilson, Hart, Coolidge, and Ballou Senior High Schools and Johnson Junior High School. Wilson SHS is one of the largest high schools in the District and consists of 2 school buildings with 32 entrances with up to 60 or more doors on the ground and basement levels. We observed and were informed that the majority of the entrances were neither guarded nor monitored by the School Resource Officers (SROs). In addition, most of the entrances lacked an audible alarm that could assist the officers in controlling the entry of unauthorized persons or trespassers, and detecting and seizing contraband drugs or concealed weapons at the point of entry into the schools.

Additionally, virtually all DCPS principals and officials stated that the SROs were needed at the egress points of their school buildings and that most of the school doors were extremely

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<sup>2</sup> Checkmarks indicate school officials' acknowledgement of safety and security deficiencies within each respective school.

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## FINDING AND RECOMMENDATIONS

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old or in poor condition, and needed repair. One of the school administrators at Johnson JHS informed us that the doors were in such poor condition that, with a little effort, anyone could compromise them. These conditions ultimately prevent SROs and administrators from effectively monitoring traffic in and out of school buildings.

Coolidge SHS also represents a specific example of a school with inadequate physical security. Coolidge SHS is another large high school within the DCPS system, with a total student population of approximately 900 students. The building has 25 exterior doors that pose significant risks to the security of the building because the doors are unsecured and unguarded for the majority of the school day. The school principal stated that, based on the design and structure of the building, there were insufficient assigned security guard resources available to adequately secure the school building and grounds.

We found that Hart MS, a facility with 12 exit doors to secure, also suffered door security problems. Despite the roving patrol conducted by the SROs at Hart MS, the doors remain unsecured and unsupervised because only two SROs are assigned to the school to provide security coverage for four floors. The Hart MS principal stated that the security of the doors continues to be his major concern.

We noted that most of the schools lacked doors that were fully integrated with an alarm system and/or sensors that would emit an audible alarm indicating an intrusion or attempted exit at a specific door. School principals informed us that trespassing by prior year alumni and neighboring school students continues to be a long-standing problem. At Ballou SHS, we observed that door-alarm mechanisms were installed on the back interior entrances leading to the parking lot; however, the Senior SRO informed us that the students became aware of the alarms and tampered with the wiring connected to the doors, thereby disabling the alarm mechanism.

The school principal at Johnson JHS informed us that some of the door entrances have alarms; however, the alarms only function as a part of the school's night security system and are not operational during the day. Further, discussions with school officials and administrators regarding door sensors and/or audible alarm systems revealed that they were not given much information about the availability of these devices but would support their usage to improve school access controls.

***Door Security and Fire Code Compliance*** - School principals, administrators, and security personnel attributed some difficulties with door security to provisions of the D.C. Fire Code, which prohibit schools from locking doors, and the requirements of Superintendent's Directive-661.10 found in the DCPS Security Procedures Manual. The Superintendent's Directive states in Section 3: "It shall be unlawful for any person to have any exit door in any public building locked in such manner as would necessitate a key to unlock from the inside or requires more than thirty (30) seconds to unlock, while the area or floor served by such door is occupied." District of Columbia Public Schools Division of School Security, Standard Operating Procedures App. C at D-25.

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At the schools we visited, school administrators told us that they have expressed concerns about door security and other security issues to the DCPS Office of the Superintendent and the Division of School Security on numerous occasions. However, no corrective actions were taken. Further, during interviews with the D.C. Fire Marshall and the D.C. Department of Consumer Regulatory Affairs (DCRA), we were informed that school officials could have safely secured certain doors throughout their school facilities consistent with the D.C. Fire Code.

According to the D.C. Fire Marshall, on previous occasions DCPS, the D.C. Fire Department, and the DCRA have all previously tried to coordinate efforts to seek solutions or devise strategies to resolve the door weaknesses at the schools. However, those efforts were not formalized, fully resourced, or tasked with a formal reporting requirement to advise the DCPS Superintendent, the Board of Education, the D.C. Council, or the Mayor of security problems identified and recommended courses of action to deal expeditiously with the problems.

Discussions with the Senior High Alliance of Parents, Principals, and Educators (SHAPPE) revealed that a coordinated approach between DCPS and the D.C. Fire Department is needed to address the door security problems. We agree that a coordinated approach must be taken to resolve the door security problems. Further, we believe that door security problems should be vigorously addressed and resolved before scarce school resources are spent on additional guards and surveillance equipment. Less costly alternatives are available such as the installation of door alarm systems, intrusion detection devices, and pressure door bars equipped with a 15-second delay function that would require more force to open. Presently, the implementation of magnetic-delayed doors is being piloted at Cardozo SHS. High schools such as Roosevelt, Ballou, and Wilson have all expressed interest in acquiring magnetic-delayed doors.

Until the door security problem is properly addressed, DCPS will not have adequate security mechanisms in place to prevent unauthorized access into school buildings. At present, trespassers have relatively easy access to many District schools, student truancy continues, and concealed weapons can often be brought inside the schools undetected. DCPS principals at Wilson SHS and Cardoza SHS expressed concern that, without an alternative approach to securing the school doors, the need for additional security guards and surveillance cameras at nearly all of the schools' egress points would continue. However, according to the school principals, the cost associated with this option limits the assignment of any additional officers or resources.

***Surveillance Equipment*** - In 2002, DCPS transferred responsibility for the operation and administration of the closed circuit television (CCTV) monitors and surveillance system to a District-wide digital desktop and video surveillance service contractor. DCPS officials stated that CCTV monitors and surveillance cameras are quite helpful in alerting school administrators, police, and the SRO to the need for an operational response, as well as providing evidence for subsequent criminal investigations. In the DCPS system, CCTV monitors and video surveillance were used extensively to monitor hallways, stairwells, and

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numerous other locations throughout the school system. The CCTV monitors we observed were positioned at each of the schools main entrances, the SRO's designated post, and in the principal's office. The surveillance video cameras were installed in the hallways, entrances, and exterior sections of the buildings as well as in other locations throughout the school that administrators considered high-risk areas.

School officials informed us that 153 schools and 8 facilities used surveillance equipment. DCPS had approximately 232 CCTV monitors and about 2,923 surveillance cameras. By the end of July 2004, DCPS officials estimate that DCPS will have a total of 3,045 surveillance cameras in the schools.

We noted that 11 of the 15 schools we visited had closed circuit televisions (CCTV) that were not functioning or had been inoperable for weeks. Additionally, we noted that surveillance cameras lacked zoom lens capabilities and could not provide sufficient camera coverage in long hallways and stairwells within the schools. As a result of these deficiencies, security personnel's ability to monitor the school premises electronically and detect security breaches was significantly limited. Further, we noted that DCPS did not require or assign a SRO or DCPS employee to monitor the installed camera surveillance system continuously. A full-time monitor could enable a person the ability to view many areas at once (hallways, means of egress, and other problem areas) from a central location without having to be physically present. In addition, assigning a person to monitor the cameras continuously would allow DCPS, administrators, and security personnel the ability to more efficiently allocate limited resources and provide a proactive deterrent to potentially violent and other undesirable behavior. The absence of a full-time monitor diminishes the overall effectiveness of the current camera surveillance systems in use at these 15 public schools.

***Inoperable Surveillance Equipment*** - At Johnson JHS, Hart MS, and Banneker SHS, we found that the CCTV monitors were inoperable and were in need of repair for several weeks. According to the school principals, the service and support provided by the service contractor had been inconsistent. One school principal informed us that the CCTV monitors had not been operational for 34 days, and at another school the principal told us that the CCTV monitors had been in need of repair for approximately 3 weeks. Several school principals we spoke with indicated that the problems with the monitors were a result of their system's server not functioning properly.

We discussed these problems with the DCPS Technology Security Specialist whose duties include the oversight of the contractors who install and maintain surveillance equipment within the schools. We were told that the maintenance and installation of the surveillance equipment is taking place concurrently to mitigate some of the system's server failures. He attributed some of the delays in service to difficulties in receiving parts and equipment, as well as damage caused to the wiring as a result of thunderstorms.

***Surveillance Camera Capabilities*** - We also found that the surveillance cameras lacked certain capabilities to enable school officials to effectively monitor specific areas throughout the schools. School principals informed us that there are numerous "dead spots" in the

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hallways and in the stairwells that lack adequate security coverage. As a result, the school surveillance systems are unable to detect, or deter, acts of misconduct committed by students or other persons in those areas. They stated that students are acutely aware of the areas that have camera coverage and avoid these areas when performing inappropriate activities, such as skipping class, smoking, eating, and other undesirable behaviors. We observed food, trash, and cigarettes in the stairwells, as well as a large congregation of students assembled in these areas during class periods. Without camera coverage in the stairwells and in the absence of assigned security patrols, neither local school administrators nor security personnel can account for student activity within the stairwells.

DCPS administrators at Coolidge, Wilson, and Hart stated that the surveillance cameras lacked the zoom technology needed to provide sufficient camera coverage for hallways and parking lots. For example, at Wilson and Coolidge, school officials stated that the camera coverage could only capture images midway through the hallways. Because the cameras could not provide full coverage of the hallways, it was difficult for the school to identify students who commit illegal acts, such as breaking into other students' lockers in the hallways.

DCPS administrators at Hart stated that the cameras covering the parking lot area, located on the exterior sections of the building, did not provide full coverage of the lot. As a result, students have vandalized teachers' vehicles. These equipment limitations and problems prevented school administrators and officials from effectively monitoring activities and hindered their ability to respond and reduce incidents occurring on school grounds.

***PTA Officials and School Administrators Voice Concern*** - PTA officials and school administrators both agreed that the deployment of additional surveillance cameras are needed to assist the security guard force and school administrators in responding promptly and effectively to security incidents, given the physical and logistical challenges of the schools' infrastructures. PTA officials stated that the location of the cameras in high-risk schools should be re-evaluated to provide for supplementary coverage throughout the hallways and school facility areas. School principals also stated that additional cameras, with improved technological features, strategically positioned throughout the school, would greatly improve overall security; accordingly, requests have been made for additional cameras. However, there has been little or no feedback or action taken on the requests for additional surveillance equipment. The Division of School Security stated that there were funding issues surrounding the deployment of additional surveillance equipment, but plans to increase CCTVs and cameras were forthcoming.

***Weaknesses Exist but the Surveillance Systems Perform Well Overall*** - Despite the conditions noted, we concluded that, overall, the school video surveillance system was well-designed with several notable qualities. According to DCPS officials and administrators, the surveillance system is browser based, which makes the system's functional characteristics user-friendly. In addition, the system maintains a 14-day archive system that allows school officials and administrators to retrieve past images. School administrators have confirmed that this feature is critical because there are not enough security personnel to constantly

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monitor the cameras. Additionally, using the archive system, school administrators can download a picture, print it and e-mail it from any computer with an Internet connection. The archive system is also useful in identifying alleged perpetrators of illegal activities.

For example, at Deal JHS, a Multi-Camera Split Screen Display has been installed, which, according to school administrators, allows viewing and monitoring of all areas throughout the school that are equipped with cameras as opposed to viewing snapshots of the school at split second intervals. Overall, the feedback received by school administrators on the benefits provided by the surveillance equipment has been positive. However, there are areas where improvements can be made.

***Security Guard Coverage*** - Our work at 15 schools disclosed that the security guard coverage appeared to be irregularly distributed at all 15 schools. The number of guards assigned appeared to be disproportionate given the number of students and square footage of the facilities (see Table 2). The DCPS Security Division, which is responsible for administering the security service contract, could not provide us with any risk assessments or security assessments that were used to determine the number of security guards that are assigned to a particular school.

**Table 2. DCPS Student-to-Security Guard Ratio**

DCPS Schools	Student Population	School Resource Officers	Square Footage Area	Number of Students to each SRO	Amount of Square Footage to each SRO
Anacostia SHS	664	5	247,900	133	49,580
Cardoza SHS	780	5	355,400	156	71,080
Roosevelt SHS	652	4	331,900	163	82,975
Banneker SHS	412	2	180,000	206	90,000
Wilson SHS	1500	6	271,300	250	45,217
Coolidge SHS	900	5	271,300	180	54,260
Woodson SHS	920	6	251,100	153	41,850
Ballou SHS	1270	6 <sup>3</sup>	271,300	212	45,217
Spingarn SHS	600	6	225,000	100	37,500
Johnson JHS	650	4	182,500	163	45,625
Deal JHS	931	2	143,700	466	71,850
Francis JHS	398	2	95,100	199	47,550
Lincoln MS <sup>4</sup>	392	4	185,000	98	46,250
Hart MS	582	2	210,700	291	105,350
Key ES	240	1	50,000	240	50,000

<sup>3</sup> Security Guard Force was increased to 18 SROs after a homicide occurred when an armed student entered the school facility through an unsecured door.

<sup>4</sup> Lincoln Middle School closed in July 2002.

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***Assessing Security Guard Service Needs*** - School principals voiced concerns about security guard coverage and performance. All principals interviewed stated that security guard coverage was insufficient given the number of students and square footage of the facilities. Several principals believed that some of the guards were too young and inexperienced for a school setting. Disproportionate assignment of guards exists because DCPS has not established a formal, comprehensive plan that would assess the specific security needs of each school and assigned guards accordingly. Further, no system of accountability has been established by DCPS to account for SROs' daily performance. Consequently, security coverage at most schools is inadequate and not commensurate with individual security needs, creating an environment where DCPS reacts by assigning additional security resources when a crisis has already occurred rather than proactively assigning security resources based on established security risk.

A risk assessment performed in conjunction with a trend analysis could afford DCPS other security prevention strategies, such as examining and managing the sources or causes of school violence.

***Risk Assessment and Security Surveys*** - Our review of the contract files and documentation provided by the Division of School Security did not disclose any information demonstrating that DCPS has directed that risk assessments, surveys, and trend analyses be conducted to determine the unique and specific needs of each school within the District. A risk assessment is a strategic evaluation and can be used to identify emerging and potential school safety and security problems. DCPS would benefit from performing a risk assessment to enhance their existing security program. A risk assessment would also help DCPS allocate limited security resources commensurate with the security needs of specific schools. Risk assessments provide a more proactive method for placing security forces and may foster the prevention of security incidents.

In addition, we found that the DCPS Security Division did not instruct the contractor to perform the security surveys as set forth in Section C.2.1.4 of the Security Related Services Contract. Section C.2.1.4 requires the school security contractor to: "Conduct security surveys of schools and administrative buildings, as directed by the Contracting Officer's Technical Representative (COTR)." SECURITY AND RELATED SERVICES, CONTRACT NO. GAGA-2002-C-0012, Sec. C.2.1.4 (2003). The Interim Director, Division of School Security, indicated that DCPS had not instructed the contractor to conduct security surveys because the Division needed to focus on ensuring that an operational guard force was in place for the start of the school year in September 2003. During discussions with DCPS principals, and PTA organizations, we found that one of their main concerns was the disproportionate number of security guards providing security in contrast to the schools' student population. They also felt that the guard/student ratio was inadequate and not conducive to providing a safe and secure learning environment for the students.

In virtually every school we visited, DCPS principals and senior security personnel unanimously voiced concerns regarding the need for additional security guards. Generally, school principals opined that they would like to see the security staffs double in size.

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Another principal stated that if the schools had adequate surveillance coverage, the deployment of additional security officers could be used more efficiently to monitor the points of entry and exit as well as provide exterior perimeter sweeps.

***Requests for Additional Guard Services*** - We were informed that on numerous occasions requests have been made by school officials to the Security Division and the Office of the Superintendent for additional security guards. Generally, these requests went unanswered. One school principal wrote a memorandum on February 2, 2004, which contained the following:

This building is too large for a two-member team.... With 210,700 square feet of building space and 576 students we are over-working our two security officers. Their walking is never done, and I would have more time during the school day to devote to other duties if I did not assume security duties so frequently myself.

In addition, several school administrators stated that they could benefit from additional security guard coverage particularly after normal school hours by preventing the students from re-entering the buildings once school has officially ended. At present, the SROs work on shifts that begin at 8:00 a.m. and end at 4:30 p.m. School administrators said that once school has ended for the day, and the officer's shift is officially over, the students have the opportunity to re-enter the building undetected, with no restrictions.

School administrators also informed us that some teachers are often in the building as late as 7:30 p.m., which would afford students who loiter, access to the building during these hours. The Division of School Security officials informed us that unless there is an after-school activity, the school facilities are not protected with an after-school resource officer. The Division of School Security officials stated that it is the responsibility of the school administrators to prevent access to the building once the normal school day has ended.

After 4:30 p.m., we found that the likelihood of detecting and intercepting drugs and weapons brought onto school facilities is greatly diminished, especially if doors can be breached and camera surveillance eluded. As a result, students and unauthorized individuals have the opportunity to bring contraband and weapons into the school, after normal school hours, often without fear of being apprehended.

***Performance Problems*** - Some school officials also informed us that they experienced performance problems with their SROs. For example, school administrators at Coolidge informed us that some of the SROs do not follow school administrator's orders, and at times exhibit disorderly conduct by using profanity in the presence of students. Several principals believed that some of the SROs employed by the contractor were too young and inexperienced for a high school setting and engaged in excessive fraternization with the students. Senior security personnel informed us that too much fraternization occurs and noted that some guards lack the discipline, maturity, motivation, and the will to provide the necessary level of security in the schools. Fraternization with students inhibits the security

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## FINDING AND RECOMMENDATIONS

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guard force from effectively responding to inappropriate conduct exhibited by the students and affects the guards' ability to enforce the school's physical security measures.

Additionally, DCPS administrators have expressed concerns that a contentious atmosphere exists between the SROs and themselves. Many of the administrators expressed dissatisfaction with security guard performance. We interviewed several DCPS school officials who questioned the overall effectiveness of the contracted security services. Certain school officials stated that there is an apparent overall lack of professionalism amongst the SROs, demonstrated by both their appearance and their interaction with the students. Also, some school officials adamantly stated that "you get what you pay for," believing that the SROs did not possess the skills, knowledge, and experience to work with the students.

We discussed this problem with members of the PTA, who also stated that the SROs assigned to their school displayed an unprofessional demeanor, which was characterized by their appearance and interaction with students. Some principals stated that at times they formally requested changes in their school security guard detail. According to the Interim Director, Division of School Security, most of the SROs who have conflicts with the administration at the schools are reassigned to another school.

Section C3.1.2 of the Security and Related Services contract provides that:

The contractor shall be responsible for maintaining the highest standards of employee competency, conduct, cleanliness, appearance, and integrity, and shall be responsible for taking disciplinary action with respect to its employees as may be necessary. Each officer is expected to adhere to standards of behavior that reflect credit on himself/herself, the Contractor, the Federal, and District Government.

***School Security Policies and Procedures*** - Our review of DCPS security procedures revealed that DCPS has not developed adequate security procedures to ensure the physical security and safety of its students, staff, and facilities. Additionally, we found that existing DCPS security policies, directives, and plans often contained incomplete and outdated information, and a comprehensive safety and security plan had not been developed. According to a report published by the U.S. Department of Education and the Department of Justice in October 1998, "*Annual Report on School Safety*", "preparing a comprehensive [security] plan is a key component of increasing school safety."

The Superintendent's Directive (unnumbered, undated) provides that "The Division of School Security develop, implement, and administer a comprehensive safety and security program for the DCPS..." In response to the Superintendent's Directive, the Division of School Security developed a "Zero Tolerance Plan" that provides DCPS with strategies that include effectively utilizing resources of existing agencies and organizations in an effort to create a security program, which functions proactively rather than reactively. However, this

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document has not been updated since 1995 and contains several violence reduction initiatives that were never implemented. These initiatives include:

- Implement community security concept;
- Effectively utilize resources of existing agencies and organizations in an effort to create a security program which functions proactively rather than reactively;
- Train all staff to recognize and respond to certain behaviors in younger children. Also train and [certified]all school staff and administration in peer mediation and conflict resolution;
- Develop and teach youth gang intervention policy;
- In-house training, analytical and intelligence capabilities;
- Enhance information sharing capabilities; and
- Work with alternative programs for handling student behavioral transgressions and habitual truants.

JANSEN W. ROBINSON, ZERO TOLERANCE A COMPREHENSIVE VIOLENCE REDUCTION PLAN 1 (1994).

The Interim Director, Division of School Security, informed us that DCPS has begun to take steps to develop several comprehensive safety and security programs, but he was unable to provide us with draft copies of the proposed security initiatives at the time of our review. According to the Interim Director, the proposed security initiative will include emergency response plans, crisis management plans, seminars, as well as a comprehensive safety and security plan for the upcoming school year. The development and implementation of effective comprehensive safety and security programs is essential in order to provide students, staff, and administrators with a safe learning environment.

***District of Columbia Municipal Regulations (DCMR) Regarding Student Discipline*** - In order to foster an effective, safe, and secure environment, SROs, school officials, and administrators should collectively adhere to and enforce the student discipline rules and guidelines outlined in Title 5 DCMR, Chapter 25 (Student Discipline), commonly referred to as the “Board Rules.” The Board Rules provide disciplinary measures for intervention, remediation, and rehabilitation to enable students to complete their instructional program. Section 2500.1 provides:

It is the policy of the Board of Education that a safe environment conducive to learning shall be maintained in the D.C. Public Schools (DCPS) in order to provide an equal and appropriate educational opportunity for all students. The Board shall provide a fair and consistent approach to student discipline, within the context of students’ rights and responsibilities, as further articulated in [the] Board Rules.

***Adhering to Board Rules*** - We found that school administrators and principals did not always adhere to the student disciplinary regulations or uniformly apply its rules. Senior

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security personnel indicated that school administrators should assist the security officers in enforcing the security rules. When students are disruptive and disrespectful of authority figures (such as guards and administrators) or seen repeatedly with contraband (e.g., cell phones and radios) senior security personnel stated that the administration shifts these problems onto the security force rather than taking action as provided in the Board Rules. This has been a long-standing problem as evidenced by Superintendent's Directive-200.19, dated April 29, 1986, which provides additional guidance to educators regarding disciplinary actions. The Directive states:

It has come to the attention of this office that there is a persistent and growing problem of students, especially those in senior high school, bringing beepers, walkie-talkies, and other similar electronic communication devices to school.

Please advise all students that, effective immediately, all such items are subject to be confiscated and will only be returned when the student's parent appears in person to receive the item. Please also advise students and their parents that repeated violation of this directive may result in suspension pursuant to section 2501.11 of the Rules of the D.C. Board of Education.

District of Columbia Public Schools Division of School Security, Standard Operating Procedures App. C at D-20.

School officials informed us that students frequently bring cell phones to class and attempt to send and receive phone calls during class or between classes. We observed students in a few schools with cellular phones and intentionally taking excessive time to report to their next class, thereby disrupting or delaying the start of the next class. We also observed a student in a classroom that appeared to be listening to a compact disc (CD) player while class was in session.

One school security officer informed us that this behavior contributes to a disruptive environment because the well-mannered students notice this behavior and notice that this behavior goes unpunished. In addition, left unchecked, continuous and uncontrolled student misconduct becomes a systemic problem throughout the schools, often leading to more serious behavioral problems. We believe that the principals and school educators should counter this behavior by adhering to the policies set forth in the Board Rules and enforcing disciplinary action for rule violations.

We discussed the aforementioned safety and security problems noted within the physical security areas with DCPS school administrators, parent and teachers organizations, and school principals. Virtually all acknowledged that DCPS should take more aggressive action to develop a sound and consistent methodology in dealing with misbehavior and improving school safety and security.

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## FINDING AND RECOMMENDATIONS

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### RECOMMENDATIONS

We recommend that the Interim Superintendent, District of Columbia Public Schools:

1. Develop a comprehensive school safety and security plan that covers all major threats to D.C. Public Schools. This plan must be reviewed, updated, and approved annually or more frequently if needed.
2. In order to improve the allocation and use of limited security resources:
  - a. Develop school security risk assessments;
  - b. Ensure that the security service contractor performs physical security studies or reviews at each school in accordance with the contract terms;
  - c. Incorporate the results of these studies into the comprehensive safety and security plan;
  - d. Use these physical security studies to acquire and assign resources to address known problems and at-risk schools.
3. In coordination with the D.C. Department of Fire and Emergency Medical Services (DCFEMS), develop and implement a program to identify appropriate strategies to address problem doors in public school buildings that include:
  - a. Identification of doors that need repair;
  - b. Determination of the number of doors that need to be operative, given the student population in an emergency situation;
  - c. Actions to eliminate doors found to be unneeded in emergencies;
  - d. Reviews of door security technologies to identify and acquire leading edge technology to upgrade security and safety measures;
  - e. Designation of doors to be equipped with electromagnetic delayed egress doors; and;
  - f. Designation of doors to be under surveillance of cameras.
4. Identify and replace all camera equipment that is inoperable or that provides inadequate surveillance coverage and versatility to identify illicit acts and the perpetrators of those acts.
5. Identify areas in and outside of school buildings, especially in high-risk schools, that are not monitored by cameras, such as hallways, stairwells, and parking lots and take remedial actions to provide such coverage.
6. Identify schools having problems with CCTV and surveillance cameras and take actions needed to upgrade equipment, train personnel in the use of the equipment, and take action to improve monitoring functions.

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## FINDING AND RECOMMENDATIONS

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7. In conjunction with the security surveys, evaluate the adequacy of the security guard force in high-risk schools to determine if sufficient and competent security personnel are assigned to these locations, and revise guard force assignments as necessary.

### **DCPS RESPONSE (RECOMMENDATIONS 1 - 7)**

The Interim Superintendent, DCPS concurred with the recommendations and has planned and taken actions to correct the noted deficiencies. The full text of DCPS's response is included at Exhibit C.

### **OIG COMMENTS**

We consider actions taken and planned by DCPS to be fully responsive to our recommendations.

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## OTHER MATTERS OF INTEREST

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### SYNOPSIS

There are many challenges facing the DCPS today in its efforts to improve physical security throughout the school system. In addition to the efforts that may be initiated on what might be viewed as more traditional physical security improvements, a less costly and efficient improvement in physical security lies in the ability to control and account for the student body present for school on any given day. One means of achieving this result is by implementing a computerized student accountability system, specifically designed to aid school administrators and teachers in the control and accounting of their student population.

### DISCUSSION

We observed an effective system in use at Wilson Senior High School and in other municipalities such as Philadelphia's Public School System, that greatly assisted in identifying students, recording which students were in the school for that day, which ones were tardy, and which students were in class. The Wilson SHS principal, acting independently and using funds from his own high school budget, leased this computerized student control and accounting system for approximately \$15,000 per year. This cost includes hardware, software updates, and system maintenance. This system is capable of achieving total student accountability for greater control of traffic in the hallways and stairwell environments, and reducing absenteeism and truancy while allowing guards and administrators to focus on more urgent security issues. The principal advised us that he installed this system because he was forced to wait over 4 years for an in-house developed student accountability system that has yet to reach full development and implementation stages.

We discussed this computerized system with DCPS officials from the Office of Information Technology and found that the prolonged system development period (over 4 years) was attributable to budget issues in recent years, which cut available funds and halted the system development process. We were informed that DCPS has spent over \$4.5 million in developing a computerized student information system (the DCPS Student Information System) that will be used as a tool to aid in the management aspects of student activities and school operations. In addition, we were told that DCPS officials now recognize the value of a control and accountability system, and have taken steps to implement these features by incorporating certain off-the-shelf modules into its system. While the DCPS plans to implement the control and accountability features into its system, we believe that the inclusion of these enhancements should be accelerated and incorporated into an overall physical security plan for DCPS.

**EXHIBIT A – SUMMARY OF POTENTIAL BENEFITS  
RESULTING FROM AUDIT**

<b>Recommendation</b>	<b>Description of Benefit</b>	<b>Amount and/or Type of Monetary Benefit</b>	<b>Status<sup>1</sup></b>
1	Internal Control and Compliance. Establishes policies and procedures that provide for the safety and security of students and educators and addresses both short and long-term safety measures to eliminate violent attitudes and behaviors in the school.	Nonmonetary	Open
2	Internal Control and Compliance. Establishes policies and procedures that will provide school officials with a useful strategic planning tool to identify the existing security conditions and unique needs of elementary and secondary schools along with their differences from other environments in addressing school safety and security risks.	Nonmonetary	Open
3	Economy and Efficiency and Internal Control. Ensures that the District has taken proactive steps to address egress locations within the schools to ensure sufficient door security.	Nonmonetary	Open
4	Economy and Efficiency and Internal Control. Ensures the District will identify and rectify physical security equipment to ensure adequate coverage and surveillance of school facilities.	Nonmonetary	Open
5	Economy and Efficiency and Internal Control. Ensures the District will review the installation and operations of surveillance cameras to ensure adequate surveillance of school facilities.	Nonmonetary	Open
6	Economy and Efficiency and Internal Control. Ensures the replacement of camera equipment that is insufficient and the training of school personnel to improve overall coverage of school facilities.	Nonmonetary	Open
7	Compliance and Internal Control. Assures the District that the school security personnel are competent and adequately performing operational security functions as required.	Nonmonetary	Open

<sup>1</sup> This column provides the status of a recommendation as of the report date. For final reports, “Open” means management and the OIG are in agreement on the action to be taken, but action is not complete. “Closed” means management has advised that the action necessary to correct the condition is complete. “Unresolved” means that management has neither agreed to take the recommended action nor proposed satisfactory alternative actions to correct the condition.

**EXHIBIT B**

**RESPONSES TO QUESTIONNAIRES SUBMITTED TO 15 DISTRICT SCHOOLS**

<b>Survey Questions</b>	<b>Ballou Senior High School (SHS)</b>	<b>Anacostia SHS</b>	<b>Banneker SHS</b>	<b>Cardozo SHS</b>	<b>Roosevelt SHS</b>
What is your number one school security problem?	Doors	Doors	Doors	Doors	Doors
Are you satisfied or dissatisfied with your School Resource Officers?	Satisfied	Dissatisfied	Satisfied	Dissatisfied	Dissatisfied
Are there sufficient surveillance cameras?	No	No	No	Yes	No
What other school issues adversely impact your responsibility to provide a safe atmosphere conducive to learning?	Student traffic control	Lack of resource officers and doors	Lack of resource officers for after school events	Lack of resource officers	Lack of resource officers
What assistance have you received from the DCPS Security Division and security contractor?	Received additional officers	Received additional officers	None requested	Received assistance with magnetic delay doors.	None
Where are school resource officers most needed in your school?	Doors	Hallways and Doors	Hallways	Hallways and Doors	Doors
With whom have you discussed security force issues?	Security Division and Superintendent	Security Division	N/A	Security Division and the Security Contractor	Superintendent
How many school resource officers do you need to ensure student safety and protect your educational environment?	6	8	N/A	10-12	8-10

N/A-Questions school officials were unable to answer.

**EXHIBIT B**

**RESPONSES TO QUESTIONNAIRES SUBMITTED TO 15 DISTRICT SCHOOLS (Cont.)**

<b>Survey Questions</b>	<b>HD Woodson SHS</b>	<b>Wilson SHS</b>	<b>Coolidge SHS</b>	<b>Spingarn SHS</b>	<b>Lincoln Middle School (MS)</b>
What is your number one school security problem?	Insufficient number of cameras	Doors	Insufficient number of officers	Doors	Doors
Are you satisfied or dissatisfied with your School Resource Officers?	Satisfied	Satisfied	Dissatisfied	Dissatisfied	Satisfied
Are there sufficient surveillance cameras?	No	No	No	No	No
What other school issues adversely impact your responsibility to provide a safe atmosphere conducive to learning?	Doors, no exterior lighting, and lack of resource officers	Lack of resource officers	Doors/Cameras	No exterior lighting	Lack of equipment (walkie talkies)
What assistance have you received from the DCPS Security Division and security contractor?	Received additional officers	Received additional officers	N/A	Minimal	None
Where are school resource officers most needed in your school?	Hallways and Doors	Hallways, Doors, and Upper Floors	Hallways	Upper Floors	Hallways
With whom have you discussed security force issues?	Superintendent	Superintendent	Security Division and Superintendent	Superintendent	Security Division
How many school resource officers do you need to ensure student safety and protect your educational environment?	10	6 to 10	2 to 10	4	3

N/A-Questions school officials were unable to answer.

**EXHIBIT B**

**RESPONSES TO QUESTIONNAIRES SUBMITTED TO 15 DISTRICT SCHOOLS (Cont.)**

Survey Questions	Hart MS	Johnson Junior High School (JHS)	Deal JHS	Francis JHS	Key Elementary School (ES)
	What is your Number One school security problem?	Doors	Doors	Insufficient number of officers	None
Are you satisfied or dissatisfied with your School Resource Officers?	Satisfied	Satisfied	Satisfied	Satisfied	Satisfied
Are there sufficient surveillance cameras?	No	No	No	No	Yes
What other school issues adversely impact your responsibility to provide a safe atmosphere conducive to learning?	Lack of resource officers/cameras	Potential theft of school property	Doors and the lack of resource officers and cameras	Lack of resource officers and cameras	Inoperable camera equipment
What assistance have you received from the DCPS Security Division and security contractor?	Minimal	Received additional equipment	Received additional officers and equipment	None	Additional cameras were installed
Where are school resource officers most needed in your school?	Hallways and Upper Floors	Hallways	Upper Floors	Upper Floors and Front Desk	Security Force sufficient
With whom have you discussed security force issues?	Security Division	Security Division	Superintendent	Superintendent	Security Force sufficient
How many school resource officers do you need to ensure student safety and protect your educational environment?	3	3-4	6	1	Security Force sufficient

N/A-Questions school officials were unable to answer.

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## EXHIBIT C: AGENCY RESPONSE

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### **DISTRICT OF COLUMBIA PUBLIC SCHOOLS**

**OFFICE OF THE SUPERINTENDENT**  
825 North Capitol Street, NE, 9<sup>TH</sup> Floor  
Washington, D.C., 20002-1994  
(202) 442-5885 – fax: (202) 442-5026

September 3, 2004

Austin A. Anderson  
Interim Inspector General  
Office of the Inspector General  
717 14<sup>th</sup> Street, N.W.  
Washington, D. C. 20002

Dear Inspector General Austin:

This letter is written in response to your correspondence dated August 12, 2004, regarding the draft audit of physical security at the District of Columbia Public Schools (DCPS) (OIG No. 03-2-14GA(b)). In your correspondence, you requested that DCPS' response include:

1. Action taken or planned;
2. Target dates for completion of planned actions;
3. Reasons for any disagreements with the findings or recommendations.

Our responses to the findings and recommendations are set forth below:

1. **Develop a comprehensive school safety and security plan that covers all major threats to D.C. Public Schools. This plan must be reviewed, updated, and approved annually or more frequently if needed.**

The Office of the Superintendent, DCPS, will convene a task force of school officials to develop a comprehensive school safety and security plan that encompasses all D.C. Public Schools for implementation no later than the beginning of the second semester of the 2004-2005 school year.

2. **In order to improve the allocation and use of limited security resources:**
  - a. **Develop school security risk assessments;**
  - b. **Ensure that the security service contractor performs physical security studies or reviews at each school in accordance with the contract terms;**
  - c. **Incorporate the results of these studies into the comprehensive safety and security plan;**
  - d. **Develop these physical security studies to acquire and assign resources to address known problems and at-risk schools.**

In partnership with Metropolitan Police Department (MPD), school security risk assessments and physical security studies are ongoing, and corrective action is being taken in conjunction with contractor and supplemental MPD resources to address needs.

## EXHIBIT C: AGENCY RESPONSE

Response to OIG Report No. 03-2-14GA(b)  
Re: Physical Security at DCPS Draft Audit Report

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3. In coordination with the D.C. Department of Fire and Emergency Medical Services (DCFEMS), develop and implement a program to identify appropriate strategies to address problem doors in public school buildings that include:

- (a) Identification of doors that need repair;
- (b) Determination of the number of doors that need to be operative, given the student population in an emergency situation;
- (c) Actions to eliminate doors found to be unneeded in emergencies;
- (d) Reviews of door security technologies to identify and acquire leading edge technology to upgrade security and safety measures;
- (e) Designation of doors to be equipped with electromagnetic delayed egress doors; and
- (f) Designation of doors to be under surveillance of cameras.

In conjunction with the D.C. Regulatory Administration and the D.C. Department of Fire and Emergency Medical Services, the DC Public Schools Division of Facilities Management has acknowledged deficiencies throughout the school system related to doors that need repair. In cooperation with these departments and the MPD, an assessment as to emergency use doors and review of appropriate security for those and all other doors will be initiated. Measures are currently being taken to review door security technologies, e.g., "electromagnetic delayed egress" versus "alarm activated," in conjunction with the MPD. As funding is identified, exit doors will be prioritized for the installation of CCTV surveillance cameras.

4. Identify and replace all camera equipment that is inoperable or that provided inadequate surveillance coverage and versatility to identify illicit acts and the perpetrators of those acts.

DCPS identifies and replaces all camera equipment that is inoperable on a daily basis. The DCPS has purchased additional replacement cameras to be readily available for installation in the case of vandalism, storm damage, etc. DCPS also recognizes the need and benefits of additional cameras in all schools. When funding is identified, additional cameras will be installed in a priority fashion beginning with high-risk schools.

5. Identify areas in and outside of school buildings, especially in high-risk schools, that are not monitored by cameras, such as hallways, stairwells, and parking lots and take remedial actions to provide such coverage.

DCPS has identified areas in and outside of high-risk schools that need additional coverage. DCPS is in the process of installing Pan/Tilt Zoom Cameras in attempts to enhance surveillance capabilities.

6. Identify schools having problems with CCTV and surveillance cameras and take actions needed to upgrade equipment, train personnel in the use of equipment, and take action to improve monitoring functions.

DCPS identifies schools having problems with CCTV's on a daily basis. Each school's CCTV Server is pinged every 10 minutes to ensure that it is functioning properly. Equipment is upgraded as funds are identified. CCTV training is on-going with school personnel. Reported problems are responded to within 24 hours. Data captured on the CCTV system is archived for 14 days only.

7. In conjunction with the security surveys, evaluate the adequacy of the security guard force in high-risk schools to determine if sufficient and competent security personnel are assigned to these locations, and revise guard force assignments as necessary.

## EXHIBIT C: AGENCY RESPONSE

Response to OIG Report No. 03-2-14GA(b)  
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DCPS recognizes the need to maintain a sufficient and competent level of security personnel at all schools, with special emphasis on high-risk schools. In cooperation with MPD and utilizing ongoing security surveys, DCPS is evaluating the adequacy of the security guard force in high risk schools, and began making adjustments as needed in preparation for the current school year.

In conclusion, the DCPS accepts the recommendations of this draft audit and will initiate the appropriate corrective actions to include:

1. DCPS will convene a task force of school officials, and collaborate with other D.C. agencies, to develop a comprehensive school safety and security plan for implementation during the current school year;
2. Develop a risk assessment and perform physical security reviews for each D.C. Public School to establish the necessary base level of security, and accommodate temporary changes that may be required;
3. Collaborate with DCRA, D.C. Fire and EMS to develop measures to adequately address the security problems involving the preponderance of entry doors, especially at high-risk schools;
4. Identify and replace inoperable camera equipment and/or equipment that provides inadequate surveillance coverage;
5. Identify areas within the schools that are not covered by surveillance cameras and take appropriate action;
6. DCPS will evaluate the current system based on the needs of the school system, and when applicable, upgrade CCTV equipment, train personnel in the use of equipment and improve monitoring functions;
7. In response to findings of risk assessments, DCPS in cooperation with MPD is evaluating the assignments of school security personnel to determine if sufficient personnel are assigned to DCPS.

The District of Columbia Public Schools remains committed to the safety and security of our children, employees and visiting stakeholders.

Sincerely,



Robert C. Rice, Ph.D.  
Interim Superintendent

RCR/gbk