Guide for Developing High-Quality School Emergency Operations Plans

FEMA

GUIDE FOR DEVELOPING HIGH-QUALITY SCHOOL EMERGENCY OPERATIONS PLANS

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INTRODUCTION AND PURPOSE

Each school day, our nation's schools are entrusted to provide a safe and healthy learning environment for approximately 55 million elementary and secondary school students[1] in public and nonpublic schools. Families and communities expect schools to keep their children and youths safe from threats (human-caused emergencies such as crime and violence) and hazards (natural disasters, disease outbreaks, and accidents). In collaboration with their local government and community partners, schools can take steps to plan for these potential emergencies through the creation of a school Emergency Operations Plan (school EOP).

Lessons learned from school emergencies highlight the importance of preparing school officials and first responders to implement emergency operations plans. By having plans in place to keep students and staff safe, schools play a key role in taking preventative and protective measures to stop an emergency from occurring or reduce the impact of an incident. Although schools are not traditional response organizations, when a school-based emergency occurs, school personnel respond immediately. They provide first aid, notify response partners, and provide instructions before first responders arrive. They also work with their community partners, i.e., governmental organizations that have a responsibility in the school emergency operations plan to provide a cohesive, coordinated response. Community partners include first responders (law enforcement officers, fire officials, and emergency medical services personnel) as well as public and mental health entities.

We recommend that planning teams responsible for developing and revising school EOPs use this document to guide their efforts. It is recommended that districts and individual schools compare existing plans and processes against the content and processes outlined in this guide. To gain the most from it, users should read through the entire document prior to initiating their planning efforts and then refer back to it throughout the planning process.

The guide is organized in four sections:

1. The principles of school emergency management planning.

2. A process for developing, implementing, and continually refining a school EOP with community partners (e.g., first responders and emergency management personnel) at the school building level.

3. A discussion of the form, function, and content of school EOPs.

4. "A Closer Look," which considers key topics that support school emergency planning, including addressing an *active shooter*, school climate, psychological first aid, and information-sharing.

As the team that developed this guide began its work to respond to the president's call for model emergency management plans for schools, it became clear that there is a need to help ensure that

[1] U.S. Department of Education, National Center for Education Statistics, *Digest of Education Statistics 2011*.Washington, DC: Author, 2012. Available at http://nces.ed.gov/programs/digest/d11/index.asp.

our schools' emergency planning efforts are aligned with the emergency planning practices at the national, state, and local levels. Recent developments have put a new emphasis on the process for developing EOPs.

National preparedness efforts, including planning, are now informed by *Presidential Policy Directive (PPD) 8*, which was signed by the president in March 2011 and describes the nation's approach to preparedness. This directive represents an evolution in our collective understanding of national preparedness, based on the lessons learned from terrorist attacks, hurricanes, school incidents, and other experiences.

PPD-8 defines preparedness around five mission areas: Prevention, Protection, Mitigation, Response, and Recovery.

- **Prevention,**[2] for the purposes of this guide, means the capabilities necessary to avoid, deter, or stop an imminent crime or threatened or actual mass casualty incident. Prevention is the action schools take to prevent a threatened or actual incident from occurring.

- **Protection** means the capabilities to secure schools against acts of violence and manmade or natural disasters. Protection focuses on ongoing actions that protect students, teachers, staff, visitors, networks, and property from a threat or hazard.

- **Mitigation** means the capabilities necessary to eliminate or reduce the loss of life and property damage by lessening the impact of an event or emergency. In this document, "mitigation" also means reducing the likelihood that threats and hazards will happen.

- **Response** means the capabilities necessary to stabilize an emergency once it has already happened or is certain to happen in an unpreventable way; establish a safe and secure environment; save lives and property; and facilitate the transition to recovery.

- **Recovery** means the capabilities necessary to assist schools affected by an event or emergency in restoring the learning environment.

Emergency management officials and emergency responders engaging with schools are familiar with this terminology. These mission areas generally align with the three timeframes associated with an incident: before, during, and after.

The majority of Prevention, Protection, and Mitigation activities generally occur before an incident, although these three mission areas do have ongoing activities that can occur throughout an incident. Response activities occur during an incident, and Recovery activities can begin during an incident and occur after an incident. To help avoid confusion over terms and allow for ease of reference, this guide uses "before," "during," and "after."

[2] In the broader *PPD-8* construct, the term "prevention" refers to those capabilities necessary to avoid, prevent, or stop a threatened or actual act of terrorism. The term "prevention" also refers to preventing imminent threats.

As schools plan for and execute response and recovery activities through the emergency operations plan, they should use the concepts and principles of the National Incident Management System (NIMS). One component of NIMS is the Incident Command System (ICS), which provides a standardized approach for *incident management*, regardless of cause, size, location, or complexity. By using ICS during an incident, schools will be able to more effectively work with the responders in their communities. For more information on ICS and NIMS, please see the Resources section.

While some of the vocabulary, processes, and approaches discussed in this guide may be new to the education community, they are critical. The vocabulary, processes, and approaches are critical to the creation of emergency management practices and plans that are integrated with the efforts of first responders and other key stakeholders, and that incorporate everything possible to keep children safe. If a school system has an existing plan, revising and adapting that plan using the principles and process described in this guide will help ensure alignment with the terminology and approaches used across the nation.

The Departments issuing this guidance are providing examples of good practices and matters to consider for planning and implementation purposes. The guidance does not create any requirements beyond those included in applicable law and regulations, or create any additional rights for any person, entity, or organization. The information presented in this document generally constitutes informal guidance and provides examples that may be helpful. The inclusion of certain references does not imply any endorsement of any documents, products, or approaches. There may be other resources that may be equally helpful.

This guide replaces *"Practical Information on Crisis Planning: A Guide for Schools and Communities"* (January 2007), which is rescinded.

All websites listed in this guide were last accessed on May 30, 2013.

PLANNING PRINCIPLES

The following principles are key to developing a comprehensive school emergency operations plan (school EOP) that addresses a range of threats and hazards:

Planning must be supported by leadership. At the district and school levels, senior-level officials can help the planning process by demonstrating strong support for the planning team.

Planning uses assessment to customize plans to the building level. Effective planning is built around comprehensive, ongoing assessment of the school community. Information gathered through assessment is used to customize plans to the building level, taking into consideration the school's unique circumstances and resources.

Planning considers all threats and hazards. The planning process must take into account a wide range of possible threats and hazards that may impact the school. Comprehensive school emergency management planning considers all threats and hazards throughout the planning process, addressing safety needs before, during, and after an incident.

Planning provides for the access and functional needs of the whole school community. The "whole school community" includes children, individuals with disabilities and others with access and functional needs, those from religiously, racially, and ethnically diverse backgrounds, and people with limited English proficiency.

Planning considers all settings and all times. School EOPs must account for incidents that may occur during and outside the school day as well as on and off campus (e.g., sporting events, field trips).

Creating and revising a model emergency operations plans is done by following a collaborative process. This guide provides a process, plan format, and content guidance that are flexible enough for use by all school emergency planning teams. If a planning team also uses templates, it must first evaluate their usefulness to ensure the tools do not undermine the collaborative initiative and collectively shared plan. There are some jurisdictions that provide templates to schools, and these will reflect state and local mandates, as applicable.

THE PLANNING PROCESS

There are many ways to develop a school EOP. The planning process discussed in this section is flexible and can be adapted to accommodate a school's unique characteristics and situation.

Effective school emergency management planning and development of a school EOP are not done in isolation. It is critical that schools work with their district staff and community partners—local emergency management staff, first responders, and public and mental health officials—during the planning process, as an effective school EOP is supported at the district level and integrated with district, community, regional, and state plans. This collaboration makes more resources available and helps to ensure the seamless integration of all responders.

Schools can use the process outlined below to develop a plan, do a comprehensive review of their entire plan, or conduct periodic and incremental reviews of the plan's components. While this guide is designed for schools, districts may use this planning process as well.

Figure 1 depicts the six steps in the planning process.[3] At each step, schools should consider the impact of their decisions on ongoing activities such as training and exercises as well as on equipment and resources.

Figure 1: Steps in the Planning Process

Step 1: Form a Collaborative Planning Team

Lessons learned from experience indicate that operational planning is best performed by a team. Case studies reinforce this concept by pointing out that the common thread found in successful operations is that participating organizations have understood and accepted their roles. Close

[3] U.S. Department of Homeland Security, Federal Emergency Management Agency. *Developing and Maintaining Emergency Operations Plans: Comprehensive Preparedness Guide 101, Version 2.0*. Washington, DC: Author, November 2010. Available at http://www.fema.gov/pdf/about/divisions/npd/CPG_101_V2.pdf.

collaboration between schools and community partners ensures the coordination of efforts and the integration of emergency management plans.

Identify Core Planning Team: The core planning team should include representatives from a wide range of school personnel, including, but not limited to, administrators, educators, school psychologists, nurses, facilities managers, transportation managers, food personnel, and family services representatives. It should also include student and parent representatives, and individuals and organizations that serve and represent the interests of students, staff, and parents with disabilities, and others with access and functional needs, as well as racial minorities and religious organizations, so that specific concerns are included in the early stages of planning. In addition, the core planning team should include community partners such as first responders, local emergency management staff, and others who have roles and responsibilities in school emergency management before, during, and after an incident. This includes local law enforcement officers, emergency medical services (EMS) personnel, school resource officers, fire officials, public and mental health practitioners, and local emergency managers. Their expertise will inform the development, implementation, and refinement of the school EOP.

The planning team should be small enough to permit close collaboration with first responders and other community partners, yet large enough to be representative of the school, its families, and its community. It should also be large enough as to not place an undue burden on any single person.

Connecting the Planning Team to District, Local or Regional, State, Tribal, and Federal Emergency Planning

Schools undertake emergency operations planning within the context of district, local or regional, state, tribal, and federal agency emergency planning. School districts serve as the liaison between the school and these broader agencies. In order to promote coordination between these entities, the planning team is strongly encouraged to include a district representative. The local school district's emergency planning policies, procedures, and training activities will inform and enhance the school's planning to a significant degree.

In addition, from the onset, the planning team should be aware of any local or state requirements that may apply to the school EOP.

Form a Common Framework: A shared approach facilitates mutual understanding, coordination, and execution of the emergency management strategies as well as works from a common command structure. All team members need to take time to learn each other's vocabulary, command structure, and culture in order to facilitate effective planning.

Define and Assign Roles and Responsibilities: Each person involved in the development and refinement of the plan should know her or his roles and responsibilities in the planning process.

Determine a Regular Schedule of Meetings: School emergency management planning is an ongoing effort that is reinforced through regularly scheduled planning meetings. Establishing a

flexible but regular schedule of meeting times will facilitate greater collaboration, coordination, and communication among team members and will help solidify crucial relationships.

Step 1 Outcome

After completing Step 1, the school has formed a planning team with representatives from all necessary stakeholders. The planning team has taken initial steps to form a common framework, define and assign roles and responsibilities in the planning process, and set a schedule of planning meetings.

Step 2: Understand the Situation

In Step 2, the planning team identifies possible threats and hazards, and assesses the risk and vulnerabilities posed by those threats and hazards.

Effective school planning depends on a consistent analysis and comparison of the threats and hazards a particular school faces. This is typically performed through a threat and hazard identification and risk assessment process that collects information about threats and hazards, and assigns values to risk for the purposes of deciding which threats or hazards the plan should prioritize and subsequently address.

Identify Threats and Hazards

The planning team first needs to understand the threats and hazards faced by the school and the surrounding community.

The planning team can draw upon a wealth of existing information to identify the range of threats and hazards that may be faced by the school. First, the planning team members should share their own knowledge of threats and hazards the school and surrounding community have faced in the past or may face in the future. The planning team should then reach out to local, state, and federal agencies for data about historical threats and hazards faced by the surrounding community. Local and county agencies that have a knowledge of threats and hazards include, but are not limited to, emergency management offices, fire and police departments, as well as local organizations and community groups (e.g., local chapter of the American Red Cross, Community Emergency Response Team), utilities, and other businesses that can provide helpful information.

Assess the Risk Posed by the Identified Threats and Hazards

Once an initial set of threats and hazards have been identified through the process described in the previous section, the planning team should select suitable assessment tools to evaluate the risk posed by the identified threats and hazards.[4] Evaluating risk entails understanding the probability that the specific threat or hazard will occur; the effects it will likely have, including

[4] For more information on the threat and hazard identification and risk assessment process, please see FEMA's *Threat and Hazard Identification and Risk Assessment Guide (CPG 201)* at http://www.fema.gov/plan.

the severity of the impact; the time the school will have to warn students and staff about the threat or hazard; and how long it may last. The local and county emergency management staff should be able to provide information on some of the risks posed by threats and hazards common to the school and surrounding community. This enables the planning team to focus its assessment efforts on threats and hazards unique to the school community, as well as on the particular vulnerabilities of the building and its occupants.

"Vulnerabilities" refers to the characteristics of the school (e.g., structure, equipment, information technology (IT) or electrical systems, grounds, surrounding area) that could make it more susceptible to the identified threats and hazards. Assessing risk and vulnerability enables the planning team to focus its efforts on prioritized threats and hazards.

There are numerous assessments that the planning team may use, including site assessments, culture and climate assessments, school behavioral threat assessments, and capacity assessments. These assessments will help the planning team not only assess risk but also identify resources and issues that the plan may need to address. Through the assessment process, the planning team may also identify additional threats and hazards.

The most successful assessments are conducted by a broad array of individuals, including support staff and first responders. Students and parents, including students and parents with disabilities, and others with access and functional needs, should be included to the maximum extent appropriate. The assessment also has to be strategic: If the school is in an isolated region of a county and the response times for law enforcement officers or fire officials and EMS practitioners are lengthy, that may alter the calculus of the assessment. If response time is lengthy, other security measures may need to be enacted to compensate for lengthy response times.

Assessments will be used not only to develop the initial plan but also to inform updates and revisions to the plan on an ongoing basis. The following table provides more information about some of the most essential assessments the planning team should undertake.[5]

[5] For more information on assessments and schools, see the Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center's *A Guide to School Vulnerability Assessments* at http://rems.ed.gov/display.aspx?page=publications_General.

Table 1: Assessment

Type of Assessment	Description	Purpose and Results
Site Assessment	A site assessment examines the safety, accessibility, and emergency preparedness of the school's buildings and grounds. This assessment includes, but is not limited to, a review of building access and egress control measures, visibility around the exterior of the building, structural integrity of the building, compliance with applicable architectural standards for individuals with disabilities and others with functional and access needs, and emergency vehicle access.	• Increased understanding of the potential impact of threats and hazards on the school buildings and grounds. • Increased understanding of risk and vulnerabilities of the school buildings and grounds when developing the plan. • Knowledge of which facilities are physically accessible to students, staff, parents, volunteer workers, and emergency response personnel with disabilities and can be used in compliance with the law.
Culture and Climate Assessment	In schools with positive climates, students are more likely to feel connected to adults and their peers. This fosters a nurturing environment where students are more likely to succeed, feel safe, and report threats. A school culture and climate assessment evaluates student and staff connectedness to the school and problem behaviors. For example, this assessment may reveal a high number of bullying incidents, indicating a need to implement an anti-bullying program. If a student survey is used to assess culture and climate, student privacy must be protected. A range of school personnel can assist in the assessment of culture and school climate, including school counselors and mental health staff.	• Knowledge of students' and staff's perceptions of their safety. • Knowledge of problem behaviors that need to be addressed to improve school climate.

Type of Assessment	Description	Purpose and Results
School Threat Assessment	A school threat assessment analyzes communication and behaviors to determine whether or not a student, staff, or other person may pose a threat. These assessments must be based on fact, must comply with applicable privacy, civil rights, and other applicable laws, and are often conducted by multidisciplinary threat assessment teams. While a planning team may include the creation of a threat assessment team in its plan, the assessment team is a separate entity from the planning team and meets on its own regular schedule.	• Students, staff, or other persons that may pose a threat are identified before a threat develops into an incident and are referred for services, if appropriate.
Capacity Assessment	The planning team needs to know what resources will be at their disposal. A capacity assessment examines the capabilities of students and staff as well as the services and material resources of community partners. This assessment is used to identify people in the building with applicable skills (e.g., first aid certification, search and rescue training, counseling and mental health expertise, ability to assist individuals with disabilities and others with access and functional needs). Equipment and supplies should also be inventoried. The inventory should include an evaluation of equipment and supplies uniquely for individuals with disabilities, such as evacuation chairs, the availability of sign language interpreters and technology used for effective communication, accessible transportation, and consumable medical supplies and durable medical equipment that may be necessary during a shelter-in-place or evacuation.	• An increased understanding of the resources available. • Information about staff capabilities will help planners assign roles and responsibilities in the plan.

After conducting these assessments, the planning team should consolidate all of the information it has obtained into a format that is usable for comparing the risks posed by the identified threats and hazards. This information will then be used to assess and compare the threats and hazards and their likely consequences. This is referred to as a "risk and vulnerability assessment." One effective method for organizing information is to create a table with a range of information about each possible threat and hazard, including any new threats or hazards identified through the assessment process. The table should include:

- Probability or frequency of occurrence (i.e., how often a threat or hazard may occur);
- Magnitude (i.e., the extent of expected damage);
- Time available to warn staff, students, and visitors;
- Duration (i.e., for how long the hazard or threat will be occurring); and
- Follow-on and cascading effects of threat or hazard.

While some of the information collected will directly feed into this table, other information, for example details on school climate challenges, will have to be organized differently. The most important outcome is that information is clearly presented so that it can be easily used to inform the plan's development.

Prioritize Threats and Hazards

Next, the planning team should use the information it has organized to compare and prioritize risks posed by threats and hazards. This will allow the team to decide which threats or hazards it will directly address in the plan. The team must consider multiple factors when developing an indicator of risk to the institution. One option is a mathematical approach, which assigns index numbers (e.g., a 1-to-4, 1-to-5, or 1-to-10 scale) for different categories of information used in the ranking scheme. Using this approach, the planning team will categorize threats and hazards as posing a relatively high, medium, or low risk. The following table, "Table 2: Sample Risk Assessment Worksheet" (separate from Table 1, above) provides a sample risk assessment worksheet for comparing and prioritizing threats and hazards.

Table 2: Sample Risk Assessment Worksheet

Hazard	Probability	Magnitude	Warning	Duration	Risk Priority
Fire	4. Highly likely 3. Likely 2. Possible 1. Unlikely	4. Catastrophic 3. Critical 2. Limited 1. Negligible	4. Minimal 3. 6–12 hrs. 2. 12–24 hrs. 1. 24+ hrs.	4. 12+ hrs. 3. 6–12 hrs. 2. 3–6 hrs. 1. < 3 Hours	❑ High ❑ Medium ❑ Low
Hazmat spill outside the school	4. Highly likely 3. Likely 2. Possible 1. Unlikely	4. Catastrophic 3. Critical 2. Limited 1. Negligible	4. Minimal 3. 6–12 hrs. 2. 12–4 hrs. 1. 24+ hrs.	4. 12+ hrs. 3. 6–12 hrs. 2. 3–6 hrs. 1. < 3 hrs.	❑ High ❑ Medium ❑ Low

Step 2 Outcome

After completing Step 2, the planning team has a prioritized (high, medium, or low risk) list of threats and hazards based on the results of the risk assessment.

Step 3: Determine Goals and Objectives

In Step 3, the planning team decides which of the threats and hazards identified in Step 2 will be addressed in the school EOP. The planning team may decide to address only those threats and hazards that rank "high" in risk priority, or they may decide to also address some of the threats and hazards that rank "medium." This is a critical decision point in the planning process that is left up to the planning team. It is recommended that the team address more than just the "high" risk priority threats and hazards.

Once the planning team has decided which threats and hazards will be addressed in the school EOP, it develops *goals* and *objectives* for each.

Develop Goals and Objectives

Goals are broad, general statements that indicate the desired outcome in response to the threat or hazard identified by planners in the previous step. They are what personnel and other resources are supposed to achieve. They also help identify when major activities are complete and what defines a successful outcome.

The planning team should develop at least *three goals* for addressing each threat or hazard (though the planning team may want to identify more). Those three goals should indicate the

desired outcome for (1) before, (2) during, and (3) after the threat or hazard. For a fire, for instance, three possible goals include

- Hazard Goal Example 1 (before): Prevent a fire from occurring on school grounds.
- Hazard Goal Example 2 (during): Protect all persons from injury and property from damage by the fire.
- Hazard Goal Example 3 (after): Provide necessary medical attention to those in need.

Objectives are specific, measurable actions that are necessary to achieve the goals. Often, planners will need to identify multiple objectives in support of a single goal.

Using the goal in Example 1 of preventing a fire on or near school grounds, possible objectives include

- Objective 1.1: Provide fire prevention training to all students and staff who use combustible materials or equipment.
- Objective 1.2: Store combustible materials in fireproof containers or rooms.

Using the goal in Example 2 of protecting all persons from injury by the fire, possible objectives include

- Objective 2.1: Evacuate all persons from the building immediately.
- Objective 2.2: Account for all persons.

Using the goal in Example 3 of providing necessary medical attention to those in need, possible objectives include

- Objective 3.1: Immediately notify fire department officials and EMS personnel of any fire on schools grounds via 911.
- Objective 3.2: Immediately begin to provide first aid.

After the team has finished compiling the objectives for the prioritized threats and hazards, it will find that certain critical "*functions*" or activities apply to more than one threat or hazard. Examples of these cross-cutting functions include evacuating, providing medical care, and accounting for all students, staff, and guests.

After identifying these functions, the planning team should develop three goals for each function. As with the goals already identified for threats and hazards, the three goals should indicate the desired outcome for (1) before, (2) during, and (3) after the function has been executed. These commonly occurring functions will be contained in a "*Functional Annex*" within the school EOP. More details on these functions are included in the Plan Content section of this guide, including issues to consider as you develop goals and objectives for these functions.

For an evacuation function, three possible goals are

- Function Goal Example 1 (before): Ensure all students and staff know their evacuation route.
- Function Goal Example 2 (during): Evacuate the school immediately.
- Function Goal Example 3 (after): Confirm that all individuals have left the building.

Once the goals for a function are identified, possible supporting objectives are identified. For the evacuation goals above, objectives could include

- Objective 1.1 (before): Assess, identify, and communicate the location of rally points to be used during an evacuation.
- Objective 2.1 (during): Evacuate all students, staff, and guests from the school using assigned routes.
- Objective 3.1 (after): Safely sweep the building.

Step 3 Outcome

After completing Step 3, the planning team has at least three goals (i.e., before, during, and after) for each threat or hazard and function, as well as objectives for each goal.

Step 4: Plan Development (Identifying Courses of Action)

In Step 4, the planning team develops courses of action for accomplishing each of the objectives identified in Step 3 (for threats, hazards, and functions). Courses of action address the what, who, when, where, why, and how for each threat, hazard, and function. The planning team should examine each course of action to determine whether it is feasible and whether the stakeholders necessary to implement it find it acceptable. For additional issues to consider as you develop courses of action for functions, please see the Plan Content section.

Identify Courses of Action

Courses of action include criteria for determining how and when each response will be implemented under a variety of circumstances. Subsequently, the planning team develops response protocols and procedures to support these efforts.

Possible courses of action are typically developed using the following steps:

1. **Depict the scenario.** Create a potential scenario based on the threats and hazards identified and prioritized in Step 2.

2. **Determine the amount of time available to respond.** This will vary based on the type of threat or hazard and the particular scenario. For example, in the case of a hurricane, the school might have days or hours to respond before the storm makes landfall, while the school may have to respond in minutes to an *active shooter*.

3. **Identify decision points.** Decision points indicate the place in time, as threats or hazards unfold, when leaders anticipate making decisions about a course of action. Walking through each scenario in detail will help identify the relevant decision points for each one, such as whether or not to evacuate, shelter in place, or lockdown.

4. **Develop courses of action.** Planners develop courses of action to achieve their goals and objectives by answering the following questions:

    - What is the action?
    - Who is responsible for the action?
    - When does the action take place?
    - How long does the action take and how much time is actually available?
    - What has to happen before?
    - What happens after?
    - What resources are needed to perform the action?
    - How will this action affect specific populations, such as individuals with disabilities and others with access and functional needs who may require medication, wayfinding, evacuation assistance, or personal assistance services, or who may experience severe anxiety during traumatic events?

PLANS MUST COMPLY WITH THE AMERICANS WITH DISABILITIES ACT

Plans must comply with the *Americans with Disabilities Act*, among other prohibitions on disability discrimination, across the spectrum of emergency management services, programs, and activities, including preparation, testing, notification and alerts, evacuation, transportation, sheltering, emergency medical care and services, transitioning back, recovery, and repairing and rebuilding. Plans should include students, staff, and parents with disabilities. Among other things, school emergency plans must address the provision of appropriate auxiliary aids and services to ensure effective communication with individuals with disabilities (e.g., interpreters, captioning, and accessible information technology); ensure individuals with disabilities are not separated from service animals and assistive devices, and can receive disability-related assistance throughout emergencies (e.g., assistance with activities of daily living, administration of medications); and comply with the law's architectural and other requirements. (Information and technical assistance about the *Americans with Disabilities Act (ADA)* is available at http://www.ada.gov.)

PLANS MUST ADDRESS LANGUAGE ACCESS

Effective communication with individuals with limited English proficiency (LEP), including students and parents, is an essential component of emergency planning and response. Plans must comply with applicable legal requirements on language access, including *Title VI* of the *Civil Rights Act of 1964* (available at http://www.justice.gov/crt/about/cor/coord/titlevi.php) and the *Title VI* regulation of the *Civil Rights Act of 1964* (available at http://www.justice.gov/crt/about/cor/fedagencies.php).

Select Courses of Action

After developing courses of action, planners compare the costs and benefits of each proposed course of action against the goals and objectives. Based on this comparison, planners select the preferred course or courses of action to move forward in the planning process. Plans often include multiple courses of action for a given scenario to reflect the different ways it could unfold.

After selecting courses of action, the planning team identifies resources necessary to accomplish each course of action without regard to resource availability. Once the planning team identifies all of the requirements, it begins matching available resources to requirements. This step provides planners an opportunity to identify resource gaps or shortfalls that must be taken into account.

Step 4 Outcome

After completing Step 4, the planning team will have identified goals, objectives, and courses of action for before, during, and after threats and hazards, as well as functions.

Goals, objectives, and courses of action for threats and hazards will go into the "Threat- and Hazard-Specific Annexes" section of the school EOP.

Goals, objectives, and courses of action for functions will be contained in the "Functional Annexes" section of the school EOP.

Step 5: Plan Preparation, Review, and Approval

In Step 5, the planning team develops a draft of the school EOP using the courses of action developed in Step 4. In addition, the team reviews the plan, obtains official approval, and shares the plan with community partners such as first responders, local emergency management officials, staff, and stakeholders.

Format the Plan

An effective school EOP is presented in a way that makes it easy for users to find the information they need and that is compatible with local and state plans. This may include using

plain language and providing pictures and/or visual cues for key action steps. This guide presents a traditional format that can be tailored to meet individual school needs. This format has three major sections: the Basic Plan, Functional Annexes, and Threat- and Hazard-Specific Annexes.

The *Basic Plan* section of the school EOP provides an overview of the school's approach to emergency operations. Although the Basic Plan section guides the development of the more operationally oriented annexes, its primary audiences consist of the school, local emergency officials, and the community (as appropriate). The elements listed in this section should meet the needs of these audiences while providing a solid foundation for the development of supporting annexes.

The *Functional Annexes* section details the goals, objectives, and courses of action of functions (e.g., evacuation, communications, recovery) that apply across multiple threats or hazards. Functional annexes set forth how the school manages a function before, during, and after an emergency.

The *Threat- and Hazard-Specific Annexes* section specifies the goals, objectives, and courses of action that a school will follow to address a particular type of threat or hazard (e.g., hurricane, *active shooter*). Threat- and hazard-specific annexes, like functional annexes, set forth how the school manages a function before, during, and after an emergency.

The following functional format can be used for the Functional Annexes as well as for the Threat- and Hazard-Specific Annexes sections. Using the format below and the work the planning team did in Step 4, each function, threat, and hazard will have at least three goals, with one or more objectives for each goal and a course of action for each of the objectives.

- Title (the function, threat, or hazard)
- Goal(s)
- Objective(s)
- Courses of Action (Describe the courses of action you developed in Step 4 in the sequence in which they will occur.)

Figure 2 below outlines the different components of each of these three sections. This guide details the contents of these three sections under Plan Content.[6]

[6] The term *annex* is used throughout this guide to refer to functional, hazard- or threat-specific, or other supplements to the basic plan. Some plans may use the term *appendix* in the same fashion (e.g., hazard-specific appendix).

Figure 2: Traditional EOP Format

School EOP Format

Basic Plan

1. Introductory Material
1.1. Promulgation Document and Signatures
1.2. Approval and Implementation
1.3. Record and Changes
1.4. Record of Distribution
1.5. Table of Contents
2. Purpose, Scope, Situation Overview, and Assumptions
2.1. Purpose
2.2. Scope
2.3. Situation Overview
2.4. Planning Assumptions
3. Concept of Operations
4. Organization and Assignment of Responsibilities
5. Direction, Control, and Coordination
6. Information Collection, Analysis, and Dissemination
7. Training and Exercises
8. Administration, Finance, and Logistics
9. Plan Development and Maintenance
10. Authorities and References

Functional Annexes

NOTE: This is not a complete list, but it is recommended that all EOPs include at least the following functional annexes:

1. Communications
2. Evacuation
3. Shelter-in-Place
4. Lockdown
5. Accounting for All Persons
6. Reunification
7. Continuity of Operations (COOP)
8. Security
9. Recovery
10. Health and Medical

Threat- or Hazard-Specific Annexes

NOTE: This is not a complete list. Each school's annexes will vary based on its hazard analysis.

1. Hurricane or Severe Storm
2. Earthquake
3. Tornado
4. Hazardous Materials Incident
5. Mass Casualty Incident
6. *Active Shooter*
7. Pandemic or Disease Outbreak

Write the Plan

As the planning team works through the draft, the members add necessary tables, charts, and other supporting graphics. The planning team circulates a draft to obtain the comments of stakeholders that have responsibilities for implementing the plan. Successful plans are written according to the following simple rules.

1. Summarize important information with checklists and visual aids, such as maps and flowcharts.

2. Write clearly, using plain language, avoiding jargon, minimizing the use of abbreviations, and using short sentences and the active voice. Qualifiers and vague wording only add to confusion.

3. Use a logical, consistent structure that makes it easy for readers to grasp the rationale for the sequence of the information and to scan for the information they need.

4. Provide enough detail to convey an easily understood plan that is actionable. For example, classroom teachers may have a one-page document that covers what they will need to know and do during an emergency, or create flip-charts, posters, or signs giving simple directions. Organize the contents in a way that helps users quickly identify solutions and options. Plans should provide guidance for carrying out common courses of action, through the functional and threat- and hazard-specific annexes, while also staying out of the weeds.

5. Develop accessible tools and documents. Use appropriate auxiliary aids and services necessary for effective communication, such as accessible websites, digital text that can be converted to audio or Braille, text equivalents for images, and captioning of any audio and audio description of any video content.

Review the Plan

Planners should check the written plan for compliance with applicable laws and for its usefulness in practice. Commonly used criteria can help determine the effectiveness and efficiency of the plan. The following measures can help determine if a plan is of high quality:

- A plan is *adequate* if the plan identifies and addresses critical courses of action effectively; the plan can accomplish the assigned function; and the plan's assumptions are valid and reasonable.

- A plan is *feasible* if the school can accomplish the assigned function and critical tasks by using available resources within the time contemplated by the plan.

- A plan is *acceptable* if it meets the requirements driven by a threat or hazard, meets cost and time limitations, and is consistent with the law.

- A plan is *complete* if it

  - Incorporates all courses of action to be accomplished for all selected threats and hazards and identified functions;

  - Integrates the needs of the whole school community;

  - Provides a complete picture of what should happen, when, and at whose direction;

  - Estimates time for achieving objectives, with safety remaining as the utmost priority;

  - Identifies success criteria and a desired end state; and

  - Conforms with the planning principles outlined in this guide.

- The plan must *comply* with applicable state and local requirements because these provide a baseline that facilitates both planning and execution.

Additionally, when reviewing the plan, the planning team does not have to provide all of the resources needed to execute a course of action or meet a requirement established during the

planning effort. However, the plan should explain where or how the district and school will obtain the resources to support those requirements.

Approve and Share the Plan

After finalizing the plan, the planning team should present it to the appropriate leadership and obtain official approval of the plan. The team should then share the plan with its community partners who have a responsibility in the plan (e.g., first responders, local emergency management staff) and additional stakeholders that have a role in the plan, including relevant district, local, regional, and/or state agencies with which the plan will be coordinated. The plan should also be shared with other organizations that may use the school building(s).

Schools should be careful to protect the plan from those who are not authorized to have it and should consider how they will secure documents shared electronically. Law enforcement agencies and first responders have a secured, Web-accessible site available to house copies of plans, building schematics, phone contact sheets, and other important details that round out planning. Schools must comply with state and local open records laws in storing and protecting the plan.

The team should maintain a record of the people and organizations that receive a copy of the plan.

Step 5 Outcome

After completing Step 5, the planning team will have a final school EOP.

Step 6: Plan Implementation and Maintenance

Train Stakeholders on the Plan and Their Roles

Everyone involved in the plan needs to know her or his roles and responsibilities before, during, and after an emergency. Key training components include:

Hold a meeting. At least once a year, hold a meeting to educate all parties on the plan. Go through the plan to familiarize these stakeholders with it.

Visit evacuation sites. Show involved parties not only where evacuation sites are located but also where specific areas, such as reunification areas, media areas, and triage areas will be located.

Give involved parties appropriate and relevant literature on the plan, policies, and procedures. It may also be helpful to provide all parties with quick reference guides that remind them of key courses of action.

Post key information throughout the building. It is important that students and staff are familiar with and have easy access to information such as evacuation routes and shelter-in-place procedures and locations. Ensure that information concerning evacuation routes and shelter-in-

place procedures and locations is effectively communicated to students, staff, and parents with disabilities as well as others with access and functional needs, such as by distributing the materials by e-mail in an accessible format.

Familiarize students and staff with the plan and community partners. Bringing community partners (e.g., law enforcement officers, fire officials, and EMS personnel) that have a role into the school to talk about the plan will make students and staff feel more comfortable working with these partners.

Train staff on the skills necessary to fulfill their roles. Staff will be assigned specific roles in the plan and positions supporting the Incident Command System (ICS) that will require special skills, such as first aid, threat assessment, and provision of personal assistance services for students with disabilities, and others with access and functional needs. Also, substitute teachers must be trained on the plan and their roles in the plan.

Exercise the Plan

The more a plan is practiced and stakeholders are trained on the plan, the more effectively they will be able to act before, during, and after an emergency to lessen the impact on life and property. Exercises provide opportunities to practice with community partners (e.g., first responders, local emergency management personnel), as well as to identify gaps and weaknesses in the plan. The exercises below require increasing amounts of planning, time, and resources. Ideally, schools will create an exercise program, building from a tabletop exercise up to a more advanced exercise, like a functional exercise:

- **Tabletop exercises**: Tabletop exercises are small-group discussions that walk through a scenario and the courses of action a school will need to take before, during, and after an emergency to lessen the impact on the school community. This activity helps assess the plan and resources, and facilitates an understanding of emergency management and planning concepts.

- **Drills:** During drills, school personnel and community partners (e.g., first responders, local emergency management staff) use the actual school grounds and buildings to practice responding to a scenario.

- **Functional exercises:** Functional exercises are similar to drills but involve multiple partners; some may be conducted district-wide. Participants react to realistic simulated events (e.g., a bomb threat, or an intruder with a gun in a classroom), and implement the plan and procedures using the ICS.

- **Full-scale exercises**: These exercises are the most time-consuming activity in the exercise continuum and are multiagency, multijurisdictional efforts in which all resources are deployed. This type of exercise tests collaboration among the agencies and participants, public information systems, communications systems, and equipment. An Emergency Operations Center (EOC) is established by either law enforcement or fire services, and the ICS is activated.

Before making a decision about how many and which types of exercises to implement, a school should consider the costs and benefits of each, as well as any state or local requirements. For

example, while a tabletop exercise may be less costly and less time-consuming to run, a full-scale exercise provides a more realistic context for the simulated response to an emergency situation, thus providing more constructive feedback to improve the plans. If students are involved, the school should also consider the age of the student population when selecting the appropriate exercise. Schools should also consider whether to include parents and should take into account the cultural diversity of their populations when designing exercises and training.

It is up to the planning team to decide how often exercises should be conducted. While frequent exercise is important, it is imperative that exercises are of high quality.

To effectively execute an exercise

- Include community partners such as first responders (law enforcement officers, EMS practitioners, and fire department personnel) and local emergency management staff;
- Communicate information in advance to avoid confusion and concern;
- Exercise under different and non-ideal conditions (e.g., times of day, weather conditions, points in the academic calendar, absence of key personnel, and various school events);
- Be consistent with common emergency management terminology;
- Debrief and develop an after-action report that evaluates results, identifies gaps or shortfalls, and documents lessons learned; and
- Discuss how the school EOP and procedures will be modified, if needed, and specify who has the responsibility for modifying the plan.

For additional information on conducting exercises, please see the *Homeland Security Exercise and Evaluation Program Guide* at https://hseep.dhs.gov/pages/1001_HSEEP10.aspx.

Review, Revise, and Maintain the Plan

This step closes the loop in the planning process. It focuses on adding the information gained from exercising the plan to the research collected in Step 2, starting the planning cycle over again. Remember, planning is a continuous process even after the plan is published. Plans should evolve as the school and planning team learn lessons, obtain new information and insights, and update priorities.

Reviews should be a recurring activity. Planning teams should establish a process for reviewing and revising the plan. Many schools review their plans on an annual basis. In no case should any part of a plan go for more than two years without being reviewed and revised.

Some schools have found it useful to review and revise portions instead of reviewing the entire plan at once. Schools may consider reviewing a portion each month or at natural breaks in the academic calendar. Certain events will also provide new information that will be used to inform the plan. Schools should consider reviewing and updating their plans or sections of their plans after

- Actual emergencies;
- Changes have been made in policy, personnel, organizational structures, processes, facilities, or equipment;
- Formal updates of planning guidance or standards have been finalized;
- Formal exercises have taken place;
- Changes in the school and surrounding community have occurred;
- Threats or hazards change or new ones emerge; or
- Ongoing assessments generate new information.

The planning team should ensure that all community partners (e.g., first responders, local emergency management staff) have the most current version of the school EOP.

PLAN CONTENT

Step 5 of the planning process in this guide introduced a format with three sections for schools to follow in developing a school EOP. This section provides greater detail about what each of the three sections should include and some key considerations in developing the content.

The Basic Plan

The Basic Plan section of the school EOP provides an overview of the school's approach to operations before, during, and after an emergency. This section addresses the overarching activities the school undertakes regardless of the function, threat, or hazard. The content in this section provides a solid foundation for the school's operations. The information in this section should not duplicate information contained in other parts of the plan. Almost all of the information contained in the basic plan should be able to come from the planning team. If the planning team finds that it has to go outside its members for a significant amount of information, it may be an indication that the planning team membership needs to be expanded.

Introductory Material

Introductory material can enhance accountability with community partners, including first responders, local emergency managers, and public and mental health officials, and make a school EOP easier to use. Typical introductory material includes:

- **Cover Page.** The cover page includes the title of the plan, a date, and the school(s) covered by the plan.
- **Promulgation Documentor Signature Page.** This document or page contains a signed statement formally recognizing and adopting the school EOP. It gives both the authority and the responsibility to school officials to perform their tasks before, during, or after an incident, and therefore should be signed by the school administrator or another authorizing official.

- **Approval and Implementation Page.** The approval and implementation page introduces the plan, outlines its applicability, and indicates that it supersedes all previous plans. It includes a delegation of authority for specific modifications that can be made to the plan and by whom they can be made without the school administrator's signature. It also includes a date and should be signed by the authorized school administrator.

- **Record of Changes.** Each update or change to the plan should be tracked. The record of changes, usually in table format, contains, at a minimum, a change number, the date of the change, the name of the person who made the change, and a summary of the change.

- **Record of Distribution.** The record of distribution, usually in table format, indicates the title and the name of the person receiving the plan, the agency to which the recipient belongs (either the school office or, if from outside the school, the name of the appropriate government agency or private-sector entity), the date of delivery, and the number of copies delivered. Other relevant information could be considered. The record of distribution can be used to prove that individuals and organizations with specified roles have acknowledged their receipt, review, and/or acceptance of the plan. Copies of the plan can be made available to the public and media without sensitive information, in accordance with public records laws.

- **Table of Contents.** The table of contents is a logically ordered, clearly identified layout of the major sections and subsections of the plan that will make finding information within the plan easier.

Purpose and Situation Overview

The Purpose and Situation Overview section includes the following components:

- **Purpose.** The purpose sets the foundation for the rest of the school EOP. The basic plan's purpose is a general statement of what the school EOP is meant to do. The statement should be supported by a brief synopsis of the basic plan and annexes.

- **Situation Overview.** The situation section explains why a school EOP is necessary. The situation section covers a general discussion of

  - The threats and hazards that pose a risk to the school and would result in a need to use this plan; and

  - Dependencies on parties outside the school for critical resources.

Concept of Operations

The Concept of Operations section explains in broad terms the school administrator's intent with regard to an operation.

This section is designed to give an overall picture of how the school will protect the students, staff, and visitors, and should

- Identify those with authority to activate the plan (e.g., school administrators, department heads);
- Describe the process by which the school coordinates with all appropriate agencies, boards, or divisions within the jurisdiction;
- Describe how plans take into account the architectural, programmatic, and communication rights of individuals with disabilities and others with access and functional needs;
- Identify other response and support agency plans that directly support the implementation of this plan (e.g., city or county EOP, school EOPs from schools co-located on the campus);
- Explain that the primary purpose of actions taken before an emergency is to prevent, protect from, and mitigate the impact on life or property;
- Explain that the primary purpose of actions taken during an emergency is to respond to the emergency and minimize its impact on life or property; and
- Explain that the primary purpose of actions taken after an emergency is to recover from its impact on life or property.

Organization and Assignment of Responsibilities

This section provides an overview of the broad roles and responsibilities of school staff, families, guardians, and community partners (e.g., first responders, local emergency managers, public and mental health personnel), and of organizational functions *during* all emergencies. It

- Describes the broad roles and responsibilities of individuals that apply *during*[7] all emergencies.
  - Individuals that the planning team may wish to include in this section of the plan are principals and other school administrative leaders, teachers, support personnel (e.g., instructional aides, counselors, social workers, psychologists, nurses, maintenance staff, school resource officers [SROs], cafeteria workers, bus drivers), and parents and guardians.
  - The planning team may also wish to include community-based organizations represented in the EOP.

[7] If the planning team considers the information critical to the successful implementation of the plan, it may identify roles and responsibilities of one or more of these individuals before and after an emergency in addition to during an emergency.

- The following is an example of the type of information that would be included in the plan to describe the broad roles and responsibilities of teachers during all emergencies.
    - Teachers will be responsible for the supervision of students and shall remain with students until directed otherwise. Teachers' responsibilities include:
        - ✓ directing students to inside or outside assembly areas according to instructions provided by the Incident Commander or designee;
        - ✓ accounting for students when class relocates to an outside or inside assembly area or evacuates to another location;
        - ✓ reporting missing students to the Incident Commander or designee;
        - ✓ obtaining first-aid services for injured students; and if trained and certified in first aid, rendering first aid, if necessary.

❖ Describes informal and formal agreements in place for the quick activation and sharing of resources during an emergency (e.g., evacuation locations to a nearby business' parking lot). Agreements may be between the school and response groups (e.g., fire department, police department), neighboring schools, organizations, and businesses.

Direction, Control, and Coordination

This section describes the framework for all direction, control, and coordination activities. It should explain

❖ The ICS structure as used by the school;

❖ The relationship between the school EOP and the district, or the broader community's emergency management system; and

❖ Who has control of the equipment, resources, and supplies needed to support the school EOP.

Information Collection, Analysis, and Dissemination

This section addresses the role of information in the successful implementation of the activities that occur before, during, and after an emergency.

❖ Identify the type of information that will be helpful in the successful implementation of the activities that occur before, during, and after an emergency, such as

- Before and during: weather reports, law enforcement alerts, National Oceanic and Atmospheric Administration radio alerts, crime reports.
- After: mental health agencies' websites and hotlines, and emergency management and relief agencies websites and hotlines assisting in all aspects of recovery.

- For each of the identified types of information, provide answers to the following questions:
  - What is the source of the information?
  - Who analyzes and uses the information?
  - How is the information collected and shared?
  - What is the format for providing the information to those who will use it?
  - When should the information be collected and shared?

Training and Exercises

This section describes the critical training and exercise activities the school will use in support of the plan. This includes the core training objectives and frequency to ensure that staff, students, faculty, parents, and community representatives understand roles, responsibilities, and expectations. This section also establishes the expected frequency of exercises to be conducted by the school. Content may be influenced based on similar requirements at the district and/or local jurisdiction level(s). Exercises may range from basic fire and shelter-in-place drills to full-scale communitywide drills that realistically portray a crisis and show the role the school plays in school district and municipal planning.

Administration, Finance, and Logistics

This section covers general support requirements and the availability of services and support for all types of emergencies, as well as general policies for managing resources. It should identify and reference policies and procedures that exist outside the plan. This section should

- Identify administrative controls (e.g., budget and acquisition policies and procedures) and requirements that will be used to provide resource and expenditure accountability;
- Briefly describe how the school will maintain accurate logs of key activities;
- Briefly describe how vital records (e.g., student records) will be preserved (details may be contained in a Continuity of Operations [COOP] functional annex); and
- Identify general policies for keeping financial records, tracking resource needs, tracking the source and use of resources, acquiring ownership of resources, and compensating the owners of private property used by the school.

Plan Development and Maintenance

This section discusses the overall approach to planning and the assignment of plan development and maintenance responsibilities. This section

- Describes the planning process, participants in that process, and how development and revision of different sections of the school EOP (basic plan and annexes) are coordinated before an emergency;

- Assigns responsibility for the overall planning and coordination to a specific position or person; and
- Provides for a regular cycle of training, evaluating, reviewing, and updating of the school EOP.

Authorities and References

This section provides the legal basis for emergency operations and activities, and includes

- Lists of laws, statutes, ordinances, executive orders, regulations, and formal agreements relevant to emergencies; and
- Provisions for the succession of decision-making authority and operational control to ensure that critical emergency functions can be performed in the absence of the school administrator.

Functional Annexes Content

Functional annexes focus on critical operational functions and the courses of action developed to carry them out. This section of the guide describes functional annexes that schools should address in developing a comprehensive, high-quality school EOP. As the planning team assesses the school's needs, it may need to prepare additional or different annexes. Also included in this section are issues the planning team should consider as it develops goals, objectives, and courses of action for these functions. While these are some of the most important issues, they are not meant to constitute an exhaustive list.

While these functions should be described separately, it is important to remember that many functions will occur consecutively. For example, a shelter-in-place during an emergency may be implemented but, if the building is damaged, the school may then initiate an evacuation.

Often, multiple functions will also be performed concurrently. For example, during an evacuation, once students are safely out of the building, the accounting for students, staff, and guests function will begin. The evacuation function, however, will still be in effect as staff or first responders work to locate and evacuate any persons not accounted for.

While functions build upon one another and overlap, it is not necessary to repeat a course of action in one functional annex if it appears in a second functional annex. For example, though an evacuation may lead to reunification, it is not necessary to list a course of action for reunification within the Evacuation Annex.

Evacuation Annex

This annex focuses on the courses of action that schools will execute to evacuate school buildings and grounds.

The planning team should consider the following when developing their goals, objectives, and courses of action:

- How to safely move students and visitors to designated assembly areas from classrooms, outside areas, cafeterias, and other school locations.

- How to evacuate when the primary evacuation route is unusable.
- How to evacuate students who are not with a teacher or staff member.
- How to evacuate individuals with disabilities (along with service animals and assistive devices, e.g., wheelchairs) and others with access and functional needs, including language, transportation, and medical needs.

Lockdown Annex

This annex focuses on the courses of action schools will execute to secure school buildings and grounds during incidents that pose an immediate threat of violence in or around the school. The primary objective of a lockdown is to quickly ensure all school staff, students, and visitors are secured in the rooms away from immediate danger.

The planning team should consider the following when developing its goals, objectives, and courses of action:

- How to lock all exterior doors, and when it may or may not be safe to do so.
- How particular classroom and building characteristics (i.e., windows, doors) impact possible lockdown courses of action.
- What to do when a threat materializes inside the school.
- When to use the different variations of a lockdown (e.g., when outside activities are curtailed, doors are locked, and visitors are closely monitored, but all other school activities continue as normal).

Shelter-in-Place Annex

A Shelter-in-Place annex focuses on courses of action when students and staff are required to remain indoors, perhaps for an extended period of time, because it is safer inside the building or a room than outside. Depending on the threat or hazard, students and staff may be required to move to rooms that can be sealed (such as in the event of a chemical or biological hazard) or without windows, or to a weather shelter (such as in the event of a tornado).

The planning team should consider the following when developing its goals, objectives, and courses of action:

- What supplies will be needed to seal the room and to provide for the needs of students and staff (e.g., water).
- How a shelter-in-place can affect individuals with disabilities and others with access and functional needs, such as students who require the regular administration of medication, durable medical equipment, and personal assistant services.
- How to move students when the primary route is unusable.
- How to locate and move students who are not with a teacher or staff member.

- Consider the need for and integration of "safe rooms" for protection against extreme wind hazards (such as a tornado or hurricane) in order to provide immediate life-safety protection when evacuation is not an option.

Accounting for All Persons Annex

This annex focuses on developing courses of action for accounting for the whereabouts and well-being of students, staff, and visitors, and identifying those who may be missing.

The planning team should consider the following when developing its goals, objectives, and courses of action:

- How staff will determine who is in attendance at the assembly area.
- What to do when a student, staff member, or guest cannot be located.
- How staff will report to the assembly supervisor.
- How and when students will be dismissed or released.

Communications and Warning Annex

The Communications and Warning annex includes communication and coordination during emergencies and disasters (both internal communication and communication with external stakeholders), as well as the communication of emergency protocols before an emergency and communication after an emergency.

The planning team should consider the following when developing its goals, objectives, and courses of action:

- How the school's communications system integrates into the local disaster and response law enforcement communication networks (e.g., fire department and law enforcement staff).
- How to ensure relevant staff members can operate communications equipment.
- How the school will communicate with students, families, and the broader community before, during, and after an emergency.
- How to account for technology barriers faced by students, staff, parents, and guardians.
- How to effectively address language access barriers faced by students, staff, parents, and guardians.
- How the school will handle the media (e.g., district or school Public Information Officer [PIO]).
- How impacts on students will be communicated to the community, including the impact on activities related to the school but not necessarily at the school or during regular school hours (i.e., church use of school property and athletic events).

- How the school will ensure effective communication with individuals with disabilities and others with access and functional needs (e.g., coordinating with first responders and local emergency managers to provide sign language interpreters for use during press conferences, publishing only accessible documents, ensuring information on websites is accessible).

Family Reunification Annex

The Family Reunification annex details how students will be reunited with their families or guardians.

The planning team should consider the following when developing its goals, objectives, and courses of action:

- How to inform families and guardians about the reunification process in advance, and how to clearly describe their roles and responsibilities in reunification.
- How to verify that an adult is authorized to take custody of a student.
- How to facilitate communication between the parent check-in and the student assembly and reunion areas.
- How to ensure students do not leave on their own.
- How to protect the privacy of students and parents from the media.
- How to reduce confusion during the reunification process.
- How frequently families will be updated.
- How to account for technology barriers faced by students, staff, parents, and guardians.
- How to effectively address language access barriers faced by students, staff, parents, and guardians.

Telling Family Members That Their Loved One Is Missing, Injured, or Killed

When reunification is not possible because a child is missing, injured, or killed, how and when this information is provided to families is critical. Before an emergency, the planning team must determine how, when, and by whom loved ones will be informed if their loved one is missing or has been injured or killed. Law enforcement typically takes the lead on death notifications, but all parties must understand their roles and responsibilities. This will ensure that parents and loved ones receive accurate and timely information in a compassionate manner.

While law enforcement and medical examiner procedures must be followed, families should receive accurate information as soon as possible. Having trained personnel on hand or immediately available to talk to loved ones about death and injury can ensure the notification is provided to family members with clarity and compassion. Counselors should be on hand to immediately assist family members.

The school EOP should include pre-identified points of contact (e.g., counselors, police officers) to work with and support family members. These points of contact should be connected to families as early in the process as possible, including while children are still missing but also before any victims have been positively identified. After an incident, it is critical to confirm that each family is getting the support it needs, including over the long-term.

The school EOP should consider printed and age-appropriate resources to help families recognize and seek help in regard to a variety of reactions that they or their loved ones can experience during and after an emergency. Often, a family that has lost a child may have other children or another child in the school. It is critical that these families and loved ones are supported as they both grieve their loss and support their surviving child(ren).

The school EOP also should explicitly address how impacted families and children will be supported if they prefer not to engage with the media. This includes strategies for keeping the media separate from families and students while the emergency is ongoing and support for families that may experience unwanted media attention at their homes.

Continuity of Operations (COOP) Annex

This annex describes how a school and district will help ensure that essential functions continue during an emergency and its immediate aftermath. Essential functions include business services (payroll and purchasing), communication (internal and external), computer and systems support, facilities maintenance, safety and security, and continuity of teaching and learning.

The planning team should consider the following when developing its goals, objectives, and courses of action:

- How the COOP annex will be designed so that it can be activated at any time and sustained for up to 30 days.

- How the COOP annex will set priorities for re-establishing essential functions, such as restoration of school operations, and maintaining the safety and well-being of students and the learning environment.

- How the COOP annex will ensure students receive applicable related services in the event of a prolonged closure.

Recovery Annex

This annex describes how schools will recover from an emergency. The four most fundamental kinds of recovery are academic recovery, physical recovery, fiscal recovery, and psychological and emotional recovery.

The planning team should consider the following when developing its goals, objectives, and courses of action:

- Academic recovery
  - When the school should be closed and reopened, and who has the authority to do so.
  - What temporary space(s) the school may use if school buildings cannot be immediately reopened.
  - How to provide alternate educational programming in the event that students cannot physically reconvene.
- Physical recovery
  - How to document school assets, including physically accessible facilities, in case of damage.
  - Which personnel have expert knowledge of the schools' assets, and how and where they will access records to verify current assets after disaster strikes.
  - How the school will work with utility and insurance companies before an emergency to support a quicker recovery.
- Fiscal recovery
  - How district leadership will be included (e.g., superintendent, chief business officer, personnel director, and risk manager).
  - How staff will receive timely and factual information regarding returning to work.
  - What sources the school may access for emergency relief funding.
- Psychological and emotional recovery
  - Who will serve as the team leader.

- Where counseling and psychological first aid will be provided.
- How teachers will create a calm and supportive environment for the students, share basic information about the incident, provide psychological first aid (if trained), and identify students and staff who may need immediate crisis counseling.
- Who will provide trained counselors.
- How to address the immediate, short-, and long-term counseling needs of students, staff, and families.
- How to handle commemorations, memorial activities, or permanent markers and/or memorial structures (if any will be allowed). This includes concerns such as when a commemoration site will be closed, what will be done with notes and tributes, and how students will be informed in advance.
- How memorial activities will strike a balance among honoring the loss, resuming school and class routines and schedules, and maintaining hope for the future.
- How the Public Health, Medical and Mental Health annex will inform the actions and plans of the Recovery annex.

Public Health, Medical, and Mental Health Annex

This annex describes the courses of action that the school will implement to address emergency medical (e.g., first aid), public health, and mental health counseling issues. Schools should coordinate these efforts with the appropriate emergency medical services, public health, mental health, law enforcement, fire department, and emergency management representatives. Mental health needs after an emergency will be addressed in the Recovery annex.

The planning team should consider the following when developing its goals, objectives, and courses of action:

- What the role of staff members is in providing first aid during an emergency.
- Where emergency medical supplies (e.g., first aid kits, AEDs) will be located and who is responsible for purchasing and maintaining those materials.
- Which staff have relevant training or experience, such as in first aid or CPR.
- How the school will secure a sufficient number of counselors in the event of an emergency.
- How the school will promptly share and report information about outbreaks or epidemics or other unusual medical situations to the local health department.
- How the school will support the needs of students identified by the threat assessment team.

Security Annex

This annex focuses on the courses of action that schools will implement on a routine, ongoing basis to secure the school from criminal threats originating from both inside and outside the school. This includes efforts done in conjunction with law enforcement personnel.

The planning team should consider the following when developing its goals, objectives, and courses of action:

- How agreements with law enforcement agencies address the daily role of law enforcement officers in and around school.
- How to make sure the building is physically secure (including implementation of Crime Prevention Through Environmental Design [CPTED]).

CPTED Principles

Natural surveillance – arranging physical features to maximize visibility

Natural access control – guiding people with signage, well-marked entrances and exits, and landscaping while limiting access to certain areas by using real or symbolic barriers

Territoriality reinforcement – clearly delineating space, expressing pride and ownership, and creating a welcoming environment

Management and maintenance – ensuring building services function properly and safely, and the exterior is properly maintained and organized with landscaping and plantings maintained and trimmed

The American Clearinghouse on Educational Facilities, available at http://www.acefacilities.org, provides additional information describing how CPTED can be applied in the school environment.

- How to get students to and from school safely (including traffic control and pedestrian safety).
- How to keep prohibited items out of school.
- How to respond to threats identified by the behavioral threat assessment team.
- How information will be shared with law enforcement officers or other responders (keeping in mind any requirements or limitations of applicable privacy laws, including the *Family Educational Rights and Privacy Act of 1974 [FERPA],* the *Health Insurance Portability and Accountability Act of 1996 [HIPAA]*, and civil rights and other laws. More information on *FERPA* and *HIPAA* can be found in "A Closer Look, Information Sharing".)

Threat- and Hazard-Specific Annexes

The Threat- and Hazard-specific annexes describe the courses of action unique to particular threats and hazards. Courses of action already outlined in a Functional annex need not be

repeated in a Hazard-Specific annex. Schools will develop these based on the prioritized list of hazards determined in the assessment process. As planning teams develop courses of action for threats and hazards, they should consider the federal, state, and local regulations or mandates that often apply to specific hazards.

If there is a Functional annex that applies to one of the threat or hazard annexes, the latter will include it by reference. For example, if a "during" course of action for a fire hazard involves evacuation, and there is an evacuation annex, the Fire annex would indicate "see Evacuation annex" in the "during" course of action section rather than repeat the evacuation courses of action in the Fire annex.

Table 3: Threat and Hazard Types and Examples

Threat and Hazard Type	Examples
Natural Hazards	• Earthquakes • Tornadoes • Lightning • Severe wind • Hurricanes • Floods • Wildfires • Extreme temperatures • Landslides or mudslides • Tsunamis • Volcanic eruptions • Winter precipitation
Technological Hazards	• Explosions or accidental release of toxins from industrial plants • Accidental release of hazardous materials from within the school, such as gas leaks or laboratory spills • Hazardous materials releases from major highways or railroads • Radiological releases from nuclear power stations • Dam failure • Power failure • Water failure
Biological Hazards	• Infectious diseases, such as pandemic influenza, extensively drug-resistant tuberculosis, *Staphylococcus aureus*, and meningitis • Contaminated food outbreaks, including *Salmonella*, botulism, and *E. coli* • Toxic materials present in school laboratories
Adversarial, Incidental, and Human-caused Threats	• Fire • *Active shooters* • Criminal threats or actions • Gang violence • Bomb threats • Domestic violence and abuse • Cyber attacks • Suicide

A CLOSER LOOK

This section of the guide provides users with information on four key topics to enhance the implementation of their Emergency Operations Plans (EOP). These topics are described in the following chapters:

- "Information Sharing" provides an overview of the *Family Educational Rights and Privacy Act*, the *Health Insurance Portability and Accountability Act*, and the implications that these federal statutes may have for information-sharing in the emergency planning process.
- "Psychological First Aid for Schools" (PFA-S) describes this type of aid and how schools can use it to help students, staff, and families during and immediately after a traumatic incident.
- "School Climate and Emergencies" describes how a positive school climate provides students with ready access to emotional and behavioral supports that can affect the capacity of students and staff to prevent, respond to, and recover from emergencies.
- "*Active Shooter Situations*" describes unique challenges involved in preparing for, responding to, and recovering from a school-based shooting.

1. Information Sharing

This section of "A Closer Look" provides an overview of the *Family Educational Rights and Privacy Act* (*FERPA*) and the implications that this and other federal statutes have for information-sharing in the emergency planning process. This section also provides a brief overview of the more limited circumstances when the *Health Insurance Portability and Accountability Act (HIPAA*) may apply to impact information-sharing in the school setting.

While it is critical that schools comply with these laws, there is often confusion about their applicability, which results in schools sharing less than allowed with law enforcement officers or the appropriate authorities even when there is appropriate cause for sharing information. If schools understand when and how these laws apply, they can both ensure public safety and protect student privacy.

While this section of the guide focuses on *FERPA,* and to a lesser extent *HIPAA,* there may be federal and state civil rights and other laws that place restrictions on when and with whom schools may share information. At the federal level, for instance, public elementary and secondary schools are subject to federal civil rights laws, including laws that prohibit discrimination based on disability (the *Americans with Disabilities Act [ADA]*), and *Section 504 of the Rehabilitation Act of 1973*); race, color, and national origin (*Titles IV and VI of the Civil Rights Act of 1964*); sex (*Title IX of the Education Amendments of 1972 and Title IV of the Civil Rights Act of 1964*); and religion (*Title IV of the Civil Rights Act of 1964*). For example, *Section 504* and *Title II of the ADA*[8] prohibit discrimination on the basis of disability, and generally would prohibit unnecessary disclosures of disability status or information related to that disability, to third parties.[9] Disclosures may be necessary when the student presents a significant, articulable threat to others.[10]

Schools are strongly urged to take the time to review these laws, as well as others that apply in their jurisdictions, when working with their community partners to ensure that all parties have a strong understanding of applicable laws when deciding whether to disclose information. In particular, it is critical to train school employees, including contractors, on applicable laws to ensure that schools, school officials, or employees do not release information inappropriately or make decisions about students or release of records based upon myths, fears, or stereotypes related to race, color, national origin, sex, religion, disability, sexual orientation, or gender identity.[11]

[8] *Title II of the ADA* prohibits discrimination based on disability by public entities, including public schools.
[9] See 34 CFR § 104.4; 28 CFR § 35.130; "Dear Colleague Letter" and "Frequently Asked Questions on Report Cards and Transcripts for Students with Disabilities Attending Public Elementary and Secondary Schools," October 2008. Available at http://www2.ed.gov/about/offices/list/ocr/letters/colleague-20081017.pdf.
[10] See 28 CFR 35.139.
[11] For more information about applicable civil rights statutes, please visit www.justice.gov/crt, www.ed.gov/ocr or www.ada.gov. Information about appropriate training and management for school resource officers and law enforcement officials in schools may be found at www.cops.usdoj.gov.

Family Educational Rights and Privacy Act (FERPA)

In this section:

- What Is *FERPA*?
- What Are "Education Records?"
- Who May Access *FERPA*-Protected Education Records?
- Balancing Safety and Privacy
  - The Health and Safety Emergency Exception to the Consent Requirement
  - The Law Enforcement Unit Record Exception to the Definition of Education Records
  - Common *FERPA* Misunderstandings
  - Additional Situations With *FERPA* Considerations
- Incorporating *FERPA* Into Your Emergency Planning Process
  - What Information Is FERPA-Protected, and When May the School Share It?
  - What Information Is Not FERPA-Protected, and When May the School Share It?
- Frequently Asked Questions Pertaining to *FERPA*
- *FERPA* Guidance and Resources

What Is *FERPA*?

FERPA is a federal law that protects the privacy of student *education records.* The law applies to all educational agencies and institutions that receive funds under any U.S. Department of Education program (termed "schools" below). *FERPA* gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are "eligible students." The Family Policy Compliance Office at the U.S. Department of Education administers *FERPA*.

FERPA protects the rights of parents or eligible students to

- Inspect and review education records;
- Seek to amend education records; and
- Consent to the disclosure of personally identifiable information (PII) from education records, except as specified by law.

For a thorough review of *FERPA*, in addition to what is provided in this document, please see the implementing regulations for *FERPA,* found in Title 34 of the Code of Federal Regulations (CFR), part 99, and the resources and guidance documents listed at the end of this section.

What Are "Education Records?"

Different types of records and information may be protected by *FERPA* if determined to be "education records." Education records are protected by *FERPA* and are broadly defined as records that are directly related to a student and maintained by an educational agency or institution, or by a party acting for the agency or institution.

The non-exhaustive chart below shows several examples of what types of records generally *are* and *are not* considered to be education records.

Education Records	Not Education Records
Transcripts	Records that are kept in the sole possession of the maker and used only as personal memory aids
Disciplinary records	Law enforcement unit records
Standardized test results	Grades on peer-graded papers before they are collected and recorded by a teacher
Health (including mental health) and family history records	Records created or received by a school after an individual is no longer in attendance and that are not directly related to the individual's attendance at the school
Records on services provided to students under the *Individuals with Disabilities Education Act* (*IDEA*)	Employee records that relate exclusively to an individual in that individual's capacity as an employee
Records on services and accommodations provided to students under *Section 504 of the Rehabilitation Act of 1973* and *Title II* of the *ADA*[12]	Information obtained through a school official's personal knowledge or observation and not from the student's education records

See the discussion under "Balancing Safety and Privacy" below for more detail on law enforcement units under *FERPA*, what constitutes a law enforcement unit record, and how these records may be used.

Who May Access *FERPA*-Protected Education Records?

"School officials with a legitimate educational interest" may access *FERPA*-protected education records. Schools determine the criteria for who is considered a school official with a legitimate

[12] Schools should also consider carefully whether information they are requiring for student enrollment in services, including special education services, will tend to identify a student as a person with a disability and determine to what extent laws other than *FERPA* should be considered before release of that information without consent. In addition, release of details about some disabilities or accommodations that permit the student to be identified could constitute discrimination on the basis of disability pursuant to the *ADA* or the *Rehabilitation Act* or other civil rights statutes.

educational interest under *FERPA* regulations, and it generally includes teachers, counselors, school administrators, and other school staff.

The term "school official with a legitimate educational interest" may also include contractors, consultants, volunteers, and other parties if those individuals

- Perform an institutional service or function for which the agency or institution would otherwise use employees;
- Are under the direct control of the agency or institution with respect to the use and maintenance of education records; and
- Are subject to the requirements of 34 CFR § 99.33(a), which specifies that individuals who receive information from education records may use the information only for the purposes for which the disclosure was made and which generally prohibits the redisclosure of PII from education records to any other party without the prior consent of the parent or eligible student. There are, however, exceptions to this prohibition.

In addition, schools must annually notify parents and eligible students of their rights under *FERPA*, and must include in this notification the criteria for who constitutes a school official and what constitutes a legitimate educational interest. The U.S. Department of Education provides model notification statements on its website at http://www2.ed.gov/policy/gen/guid/fpco/FERPA/lea-officials.html.[13]

This means that if a school wishes to consider non-employee members of its threat assessment team (TAT), its contracted counseling, nursing, service, or security staff, its school resource officers (SROs), and other non-employees as "school officials" who may have access to education records, the school must ensure that these individuals meet the criteria in the bullets above and the criteria in the school's annual notification of *FERPA* rights. Schools are encouraged to train all school officials who may have access to education records, including contractors, on *FERPA* as well as other applicable laws.

Balancing Safety and Privacy

School officials must balance safety interests and student privacy interests. *FERPA* contains exceptions to the general consent requirement, including the "health or safety emergency exception," and exceptions to the definition of education records, including "law enforcement unit records," which provide school officials with tools to support this goal.

The Health or Safety Emergency Exception to the Consent Requirement

FERPA generally requires written consent before disclosing PII from a student's education records to individuals other than his or her parents. However, the *FERPA* regulations permit school officials to disclose PII from education records without consent to appropriate parties only when there is an actual, impending, or imminent emergency, such as an articulable and

[13] See 34 CFR § 99.7(a)(3)(iii) for further information. Available at http://www2.ed.gov/policy/gen/reg/ferpa/index.html.

significant threat. Information may be disclosed only to protect the health or safety of students or other individuals. In applying the health and safety exception, note that:

- Schools have discretion to determine what constitutes a health or safety emergency.
- "Appropriate parties" typically include law enforcement officials, first responders, public health officials, trained medical personnel, and parents. This *FERPA* exception is temporally limited to the period of the emergency and does not allow for a blanket release of PII. It does not allow disclosures to address emergencies that *might* occur, such as would be the case in emergency preparedness activities.
- The information that may be disclosed is limited to only PII from an education record that is needed based on the type of emergency.
- Disclosures based on this exception must be documented in the student's education records to memorialize the
  - Emergency that formed the basis for the disclosure; and
  - Parties with whom the school shared the PII.

The U.S. Department of Education would not find a school in violation of *FERPA* for disclosing *FERPA*-protected information under the health or safety exception as long as the school had a rational basis, based on the information available at the time, for making its determination that there was an articulable and significant threat to the health or safety of the student or other individuals.

For more information on the health or safety exception, see: "Addressing Emergencies on Campus," June 2011, available at http://www2.ed.gov/policy/gen/guid/fpco/pdf/emergency-guidance.pdf and 34 CFR §§ 99.31(a)(10) and 99.36.

The Law Enforcement Unit Record Exemption to the Definition of Education Records

FERPA defines a "law enforcement unit" as any individual, office, department, division, or other component of an educational agency or institution, such as a unit of commissioned police officers or non-commissioned security guards, that is officially authorized or designated by that agency or institution to

(i) Enforce any local, state, or federal law, or refer to appropriate authorities a matter for enforcement of any local, state, or federal law against any individual or organization other than the agency or institution itself; or

(ii) Maintain the physical security and safety of the agency or institution.

Significantly, to be considered a "law enforcement unit" under this definition, an individual or component must be officially authorized or designated to carry out the functions listed above by the school. Schools may designate a traditional law enforcement entity (such as school security staff, school resource officers [SROs], school safety officers, school police, or other school

security personnel) as a law enforcement unit, or opt to designate another non-law enforcement school official to serve as their law enforcement unit, such as a vice principal or another school official.

FERPA does not prevent schools from disclosing information from records maintained by law enforcement that were created for law enforcement purposes by the law enforcement unit to anyone, subject to state law, including outside law enforcement authorities, without the consent of the parent or eligible student during an emergency or otherwise.

Law enforcement unit records, which are not subject to the *FERPA* consent requirements, are defined as records that are

- Created by a law enforcement unit;
- Created for a law enforcement purpose; and
- Maintained by the law enforcement unit.

Law enforcement unit records *do not* include

- Records created by a law enforcement unit for a law enforcement purpose that are maintained by a component of the school other than the law enforcement unit, such as a principal or guidance counselor;
- Health records or PII collected about or related to the disability of a student, including information about providing an accommodation; and
- Records created and maintained by a law enforcement unit exclusively for a non-law enforcement purpose, such as a school disciplinary action or proceeding.

In designating a law enforcement unit and using law enforcement unit records, note that

- To be given access to PII from a student's education records, law enforcement unit officials who are employed by the school must meet the criteria set forth in the school's *FERPA* notification for school officials with a legitimate educational interest. While law enforcement unit officials are not required to be school officials under *FERPA*, many schools have found that it is useful for them to be school officials so that they may access education records that may be necessary to ensure school safety. For instance, if a student has been suspended for a period of time (a fact that would be recorded in the student's education records), the law enforcement unit could need to know this in case the student attempts to enter the building when not permitted to do so.
- A school's law enforcement unit officials must protect the privacy of education records they receive and may disclose them only in compliance with *FERPA*. For that reason, we recommend that law enforcement unit records be maintained separately from education records.

For more information on law enforcement unit records and *FERPA*, refer to the following sources:

- "Addressing Emergencies on Campus," June 2011 http://www2.ed.gov/policy/gen/guid/fpco/pdf/emergency-guidance.pdf
- The discussion in the preamble to the final rule in the Federal Register published Dec. 9, 2008, starting on page 74836 http://www2.ed.gov/legislation/FedRegister/finrule/2008-4/120908a.pdf
- Family Policy Compliance Office website http://www.ed.gov/policy/gen/guid/fpco/index.html
- The regulatory definition of "Law Enforcement Unit" under *FERPA* in 34 CFR § 99.8(a) available at http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=ae535d41f8bb03bedfef79634883360f&n=34y1.1.1.1.33&r=PART&ty=HTML#34:1.1.1.1.33.1.132.8

Common *FERPA* Misunderstandings

School administrators and their partner organizations must understand *FERPA* and its implications, because misinterpretations of the law and subsequent delays in information-sharing can hinder first responders' efforts to provide necessary assistance in a health or safety emergency.

Sharing Personal Observation or Knowledge

Misinterpreting *FERPA* can lead school administrators to miss opportunities to share crucial information that could prevent an emergency situation. For instance, some schools incorrectly believe that information obtained from a school official's personal observations or knowledge is protected by *FERPA*. In fact, personal observation or knowledge is generally not considered to be part of the student's education records (see "What Are 'Education Records'" above) and therefore may be disclosed. For example, if a teacher overhears a student making threatening remarks to other students, the teacher is not prohibited from sharing that information with appropriate authorities, including the parents of the students who were threatened.

However, if a school official learns of information about a student through his or her official role in creating or maintaining an education record, then that information would be covered by *FERPA*. For instance, if a principal suspends a student, the principal would not be permitted to non-consensually disclose that information (unless the disclosure met one of the exceptions in *FERPA* to consent) because he or she gained personal knowledge of that information in making that disciplinary determination.

Releasing Directory Information

In some circumstances, schools may be able to disclose "directory information" to prevent an emergency situation. Directory information means information contained in a student's education record that would not generally be considered harmful or an invasion of privacy if disclosed. Some examples of directory information include a student's name, address, telephone number, or e-mail address. Schools must follow certain requirements in publicly designating "directory information," and they may not disclose directory information from a student's

education record if the parent or eligible student has opted out of allowing that disclosure. For example, assuming that the parents' cell phone numbers have been properly designated as "directory information," what if the parents have not opted out of the disclosure of such "directory information," and a flood displaced families from their homes and these children are brought to a shelter? The school may disclose those parents' cell phone numbers to an emergency management agency that is trying to locate the parents.

Additional Situations With *FERPA* Considerations

FERPA has implications in a variety of different situations, and new questions arise as schools become more creative and innovative in developing their campus safety plans. In many cases, however, it is helpful to review the *FERPA* basics to help you clearly think through each scenario. The following are some scenarios that may arise.

- **Infectious Disease**

  Under the health or safety emergency exception, school officials may, without consent, disclose PII from education records to appropriate parties in connection with an emergency. In the case of an influenza outbreak, for instance, if school officials determine that an emergency exists, they may share immunization records with parties such as state and local public health officials whose knowledge of the information is necessary to protect the health or safety of students or others in the school community. Under this exception, schools may share information only during the limited period of time connected with the emergency. A blanket release of information is not allowed. You must instead determine what information to disclose on a case-by-case basis depending on the particular threat.

- **Threat Assessment Teams**

  Some educational agencies and institutions may need assistance in determining whether a health or safety emergency exists for purposes of complying with *FERPA*. Federal agencies encourage schools to implement a threat assessment program, including the establishment of a multidisciplinary threat assessment team that utilizes the expertise of representatives from mental health service providers, persons familiar with emergency procedures, and law enforcement agencies in the community.

  The threat assessment team must comply with applicable civil rights and other federal and state laws. Under a properly implemented threat assessment program, schools can respond to student behavior that raises safety concerns that are not based on assumptions, stereotypes, or myths about people with disabilities (including mental health-related disabilities) or people of a particular race, color, ethnicity, national origin, religion, or sex.

  If a threat assessment team member meets the definition of a school official (as a party to whom the school has outsourced administrative functions or services) with a legitimate educational interest under *FERPA*, (see "Who May Access *FERPA*-Protected Education Records" above), then he or she would be able to access students' education records in which he or she has legitimate educational interests. A threat assessment team member who is appropriately designated as a school official, however, may not disclose PII from

education records to anyone without consent or unless one of the exceptions to consent under *FERPA*, such as the health or safety emergency exception, applies.

- **Security Videos**

  Schools are increasingly using security cameras as a tool to monitor and improve student safety. Images of students captured on security videotapes that are created and maintained by the school's law enforcement unit for a law enforcement purpose are not considered education records under *FERPA*. Accordingly, these videotapes may be shared with parents of students whose images are on the video and with outside law enforcement authorities, as appropriate.

Incorporating *FERPA* Into Your Emergency Planning Process

Below are critical questions and concepts that schools should discuss with their community partners while in the process of developing or revising an emergency management plan. While building partnerships is critical, in gathering information to support these partnerships, schools must also take steps to consider student privacy and civil rights and other laws as well as their mission of safety. Be sure to refer to the sections elsewhere in this guidance to review any concepts with which you are unfamiliar.

What Information Is *FERPA*-Protected, and When May the School Share It?

Education records are protected by *FERPA*, and schools may generally only PII from those records only with written consent from a parent or eligible student, unless a *FERPA* exception to consent applies. (See "What Are 'Education Records'" above.) The following are examples of such exceptions.

Example: At the start of flu season, your local public health agency requests the names of those students showing influenza-like symptoms, as well as their parents' contact information. You know that you may not disclose PII from a student's education records without consent if there is not a health or safety emergency or another exception to consent under *FERPA* that applies. So, to facilitate this sharing of information, you opt to develop a consent form that identifies students' names and parent contact information as specific PII from student education records. And you would like to share the form with the local public health agency, as well as the purpose of the disclosure. The form gives parents and eligible students the option to allow or to not allow this sharing of information. After collecting the signed and dated consent forms, for the students for whom you received consent you begin to share with the local health agency the names of students who are showing influenza-like symptoms and their parents' contact information. Your purpose of this sharing of PII is to help so the health agency is able to conduct real-time surveillance to prevent the spread of the illness. (See "What Is *FERPA*" above.)

Example: Your school's threat assessment team includes representatives from your community partners, and you have properly designated them as "school officials with a legitimate educational interest." (See "Who May Access *FERPA*-Protected Records" above.) The local law enforcement representative on your team does not share with his police chief or other law enforcement official the PII that he obtains from a student's

education records in his capacity as a threat assessment team member while working to identify possible threats because he knows that this is not permitted. Several months after the threat assessment team initially convened to review a collection of behaviors and communications concerning a particular student and determined that there was not sufficient information demonstrating that the student posed a threat, the team learns that the student has now communicated his intent to harm the school principal. At this juncture, the law enforcement representative (and other members of the threat assessment team) shares pertinent PII from education records with appropriate parties so they can take steps, such as consulting with a police agency, to protect the health or safety of the principal (in this case). (See also the discussion of threat assessment teams under "Additional Situations With *FERPA* Considerations" above.)

Example: At the beginning of the school year, your school notified parents and eligible students that you had designated students' names, phone numbers, and e-mail addresses as "directory information," explaining to them that you would disclose this information upon request to anyone contacting the school. In your notice, you explained how and by when they could opt out. When a reporter contacts your institution requesting the directory information about a student who is under 18, you check to see whether the student's parents opted out of the disclosure of directory information. Because the student's parents did not opt out of the school's directory information policy, you provide that directory information to the reporter. (See "Common *FERPA* Misunderstandings" above.)

Example: A student has a severe allergic reaction to peanuts during lunch. The school nurse administers epinephrine and then calls an ambulance in accordance with applicable federal and state laws. When the emergency medical technicians (EMTs) arrive, the nurse discloses PII from the student's education record to the EMTs without obtaining parental consent under the health or safety emergency exception. (See "Balancing Safety and Privacy" above.)

What Information Is Not *FERPA*-Protected and When May the School Share It?

Records that are created and maintained by a school's law enforcement unit for a law enforcement purpose are not protected by *FERPA*, and there are no *FERPA* restrictions on the sharing of information in law enforcement unit records. (See "What Are 'Education Records'" and "Balancing Safety and Privacy" above.)

Example: Your school contracts with the law enforcement agency in your county to bring in an SRO and you properly designate the officer as a "school official with a legitimate educational interest." (See "Who May Access *FERPA*-Protected Records?" above.) You also properly designate the SRO as your school's law enforcement unit. (See "Balancing Safety and Privacy" above.) The SRO knows that she may not redisclose to her home agency PII that she obtains from a student's education records while serving in her SRO capacity, unless there is a health or safety emergency or another *FERPA* exception to consent that would apply. However, she shares her law enforcement unit records about a student who was arrested for smoking marijuana on campus with other law enforcement officials because she knows that law enforcement unit records are not protected by *FERPA*.

Are Processes and Protocols, Including Memoranda of Understanding (MOUs), in Place for Information Sharing and Record Keeping That Comply With *FERPA*?

It is important for schools to consider entering into MOUs with law enforcement and their other community partners to formalize roles, responsibilities, and protocols. MOUs can be tailored to the needs of the individual schools in the jurisdiction. Any policies regarding information sharing between the school and the law enforcement agency, however, must comply with applicable federal, state, and local laws, including *FERPA*. While information-sharing MOUs should be developed regarding what information can be shared between departments and what information is protected, no provision in an MOU can override a school's obligations under *FERPA*.

Frequently Asked Questions Pertaining to *FERPA*

Q: To what entities does *FERPA* apply?

A: *FERPA* applies to educational agencies and institutions that receive funds under any program administered by the U.S. Department of Education. This includes virtually all public schools and school districts, and most private and public postsecondary institutions, including medical and other professional schools.

Private and religious schools at the elementary and secondary school levels generally do not receive funds from the U.S. Department of Education and, therefore, are not subject to *FERPA*.

Q: Does an interagency agreement with partners such as the state or local health department enable a school to non-consensually disclose education records?

A: No. Interagency agreements do not supersede the consent requirements under *FERPA*. Although an interagency agreement would be a helpful tool for planning purposes, schools must comply with *FERPA*'s requirements regarding the disclosure of PII from students' education records.

Q: Under the health or safety emergency exception, may a school non-consensually disclose PII from a student's education records to the media?

A: No, you generally may not disclose *FERPA*-protected information to the media. While the media play a role in alerting the community of a health epidemic or a violent incident outbreak, they generally do not have a role in protecting the health or safety of individual students or others at the school.

Q: When would the health or safety exception apply?

A: Under *FERPA*, an emergency means a situation in which there is an articulable and significant threat to the health or safety of students or other individuals. This determination must be made by the school.

Q: Do I need to tell parents and eligible students or otherwise document when I have disclosed PII from their education records without consent under a health or safety emergency?

A: Within a reasonable period of time after a disclosure is made under the health or safety exception, a school must record in the student's education records the articulable and significant threat that formed the basis for the disclosure, and the parties to whom the information was disclosed. Parents and eligible students have a right to inspect and review the record of disclosure, but do not need to be proactively informed that records have been disclosed.

Q: Can members of our threat assessment team have access to student education records?

A: School officials with legitimate educational interests may have access to a student's education records. Members of a threat assessment team who are not school employees may be designated as such if they are under the direct control of the school with respect to the maintenance and use of PII from education records; are subject to the requirements of 34 CFR § 99.33(a) governing the use and redisclosure of PII from education records; and otherwise meet the school's criteria for being school officials with legitimate educational interests.

Members of a threat assessment team who are considered school officials with a legitimate educational interest generally cannot non-consensually redisclose PII from a student's education records to which he or she was privy as part of the team. However, if a threat assessment team determines that a health or safety emergency exists, members may non-consensually redisclose PII from a student's education records on behalf of the school to appropriate officials under the health or safety emergency exception.

For example, a representative from the city police who serves on a school's threat assessment team generally could not redisclose, without consent, PII from a student's education records to the city police during the initial discussions about a particular student. However, once the threat assessment team determines that a health or safety emergency exists, as defined under *FERPA,* the representative may redisclose, without consent, PII from a student's education records on behalf of the school to appropriate officials. (See the discussion under "Additional Situations with *FERPA* Considerations" above.)

Q: How does *FERPA* interact with the *Health Insurance Portability and Accountability Act of 1996 (HIPAA)*?

A: The U.S. Department of Education and the U.S. Department of Health and Human Services jointly developed guidance on the application of *FERPA* and *HIPAA.* This guidance explains that records that are protected by *FERPA* are exempt from the *HIPAA* Privacy Rule. Accordingly, school officials must follow the requirements of *FERPA* with regard to the disclosure of records protected by *FERPA*. Please see the guidance at http://www2.ed.gov/policy/gen/guid/fpco/doc/ferpa-hipaa-guidance.pdf for more information, as well as the *HIPAA* guidance in this "A Closer Look" section.

Q: Who should I contact for more information related to *FERPA*?

A: The U.S. Department of Education's Family Policy Compliance Office is available to respond to any questions about *FERPA*. For quick responses to routine questions, please e-mail the Department of Education at FERPA@ed.gov. For more in-depth technical assistance or a more formal response, you may call the Family Policy Compliance Office at 202-260-3887 or write to them at

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202-8520

Q: What are some of the other federal and state laws relating to emergency management planning that are relevant to access to and sharing of information about students?

A: As noted in the introduction to this "A Closer Look" section, schools may also be subject to federal and state civil rights laws that protect the disclosure of information about students. Schools and their community partners should review guidance from the U.S. Departments of Education and Justice on any applicable civil rights or other statutes governing privacy and information sharing and discuss their implications for emergency management and related planning processes. At a minimum, in determining what constitutes an "emergency," schools and their partners must base their decisions on actual risks and not on assumptions, stereotypes, fears, or myths about people with disabilities (including mental health-related disabilities) or people of a particular race, color, ethnicity, national origin, religion, or sex.[14, 15]

FERPA Guidance and Resources

The Family Policy Compliance Office (FPCO) at the U.S. Department of Education administers *FERPA*. FPCO has developed, and continues to develop, extensive guidance pertaining to the implementation of *FERPA* and emergency situations. For more detailed information or additional guidance, please see the documents below and the FPCO website at www.ed.gov/fpco.

[14] See Title 28 of the Code of Federal Regulations, Section 35.139.

[15] In enacting the *Americans with Disabilities Act*, Congress relied on School Board of Nassau County, Florida v. Arline, 480 U.S. 273, (1987) to "acknowledge[] that society's accumulated myths and fears about disability and disease are as handicapping as are the physical limitations that flow from actual impairment." As explained in the preamble to the Justice Department's 1991 *ADA* regulation, codification of the Arline standard was deemed essential if the *ADA* is to achieve its goal of protecting disabled individuals from discrimination based on prejudice, stereotypes, or unfounded fear, while giving appropriate weight to legitimate concerns, such as the need to avoid exposing others to significant health and safety risks. See 28 C.F.R. pt. 36, app. C, sec. 36.208. This rationale applies with equal force to making determinations based on stereotypes about other characteristics protected by *Titles IV and VI* of the *Civil Rights Act of 1964*.

Health Insurance Portability and Accountability Act of 1996 (HIPAA)

In this section:

- What Is *HIPAA*?
- How Does *HIPAA* Apply in Schools?
- *HIPAA* Guidance and Resources

What Is *HIPAA*?

The *Health Insurance Portability and Accountability Act of 1996* (*HIPAA*) and its implementing regulations, commonly known as the *HIPAA* Privacy Rule and the *HIPAA* Security Rule, protect the privacy and security of individually identifiable health information, called protected health information or PHI, held by health plans, health care clearinghouses, and most health care providers, collectively known as covered entities, and their business associates (entities that have access to individuals' health information to perform work on behalf of a covered entity).

The Privacy Rule, or *Standards for Privacy of Individually Identifiable Health Information*, establishes national standards to protect the privacy of individuals' identifiable health information. In doing so, the Privacy Rule sets forth the circumstances under which covered entities and their business associates may use or disclose an individual's health information, requires safeguards to protect the information, and gives individuals rights, including rights to examine and obtain a copy of their health records and to request corrections.

A major goal of the Privacy Rule is to ensure that individuals' health information is properly protected while allowing the flow of health information needed to provide and promote high quality health care and to protect the public's health and well-being. Given that the health care marketplace is diverse, the Privacy Rule is designed to be flexible and comprehensive to cover the variety of uses and disclosures that need to be addressed.

The *Security Rule*, or *Security Standards for the Protection of Electronic Protected Health Information*, establishes a national set of security standards for protecting health information that is held or transferred in electronic form. The Security Rule sets out the technical, administrative, and physical safeguards that covered entities and business associates must put in place to secure individuals' electronic health information. The Security Rule is designed to be flexible and scalable, and technology neutral, so a covered entity or business associate can implement policies, procedures, and technologies that are appropriate for the entity's particular size, organizational structure, and risks to consumers' electronic health information.

The HHS Office for Civil Rights (OCR) has responsibility for administering and enforcing the Privacy and Security Rules.

How Does *HIPAA* Apply in Schools?

Generally, *HIPAA* does not apply to student health information maintained by a school. While schools and school districts may maintain student health records, these records are in most cases not protected by *HIPAA*. Rather, student health information maintained at a school would be considered education records protected by the *Family Educational Rights and Privacy Act* (*FERPA*).

HIPAA may apply however to patient records at a university hospital, which may include records on students and non-students, or to the health records of non-students at a university health clinic.

During the emergency planning process, if you believe health information to which access may be needed is covered by *HIPAA*, you should consult the guidance and resources below for further information about how *HIPAA* applies.

HIPAA Guidance and Resources

The U.S. Department of Health and Human Services Office for Civil Rights (OCR) has developed, and continues to develop, extensive guidance pertaining to the implementation of *HIPAA* Privacy Rule and emergency situations. The OCR website has guidance about the intersection between *HIPAA* and *FERPA* and the release of PHI for common emergency preparedness issues and public health purposes, such as terrorism preparedness and outbreak investigations. For more detailed information or additional guidance, please see the HHS OCR website at http://www.hhs.gov/ocr/privacy/index.html and the U.S. Department of Health and Human Services/U.S. Department of Education *HIPAA*/*FERPA* guide at http://www.hhs.gov/ocr/privacy/hipaa/understanding/coveredentities/hipaaferpajointguide.pdf

2. Psychological First Aid for Schools (PFA-S)

Psychological First Aid for Schools (PFA-S) is an evidence-informed intervention model to assist students, staff, and families in the immediate aftermath of an emergency and can be used by any trained staff member or community partner. Trauma-related distress can have a long-term impact. PFA-S uses brief interventions to produce positive results that last. PFA-S is designed to reduce the initial distress caused by emergencies, allows for the expression of difficult feelings and assists students in developing coping strategies and constructive actions to deal with fear and anxiety. A growing body of research shows that there are brief, effective interventions that have a long-lasting positive influence on trauma-related distress.

PFA-S is intended for students, school personnel, and families who have been exposed to a disaster or other emergency. Whether an emergency occurs on school grounds or in the community at large, schools serve as a central location for professionals to assist children, families, school personnel, and school partners.

PFA-S is most effective immediately following or even during an incident. In some circumstances, assuming the safety of students and staff has been ensured, PFA-S can be initiated while an incident is still occurring, such as in shelter-in-place or lockdown situations.

Students and staff may experience a broad range of reactions (e.g., physical, cognitive, psychological, behavioral, spiritual) to an emergency. Some of these reactions can cause distress

that interferes with adaptive coping. Support from informed, compassionate, and caring professionals can help students and staff members recover from these reactions. PFA-S has the potential to decrease the likelihood of mental health problems or long-term difficulties by identifying individuals who may need additional services and linking them to such services as needed.[16]

PFA-S assists students, staff, and families by

- Establishing a positive connection in a non-intrusive, compassionate manner;
- Enhancing immediate and ongoing safety and providing physical and emotional comfort;
- Calming and orienting those who are emotionally overwhelmed or distraught;
- Helping to identify their immediate needs and concerns and offering practical assistance and information to help address these needs and concerns;
- Empowering individuals to take an active role in their recovery, by acknowledging their coping efforts and strengths, and supporting adaptive coping; and,
- When appropriate, linking those in need to other relevant school or community resources such as school counseling services, peer support programs, afterschool activities, tutoring, primary care physicians, local recovery systems, mental health services, employee assistance programs, public-sector services, and other relief organizations.

Training School Staff

Because PFA-S is not psychotherapy, an extended "treatment," or a stand-alone mental health intervention, any trained staff member, regardless of whether he or she has had formal mental health training, can deliver aspects of PFA-S and can contribute to the school recovery by functioning within the PFA framework. Schools can find training resources including the PFA-S Field Operations Guide, at http://www.nctsn.org/content/psychological-first-aid-schoolspfa. Similarly, trained members of community emergency response agencies and mental health professionals may provide PFA-S. During and after an emergency, teachers and other staff are a critical link in promoting resilience, in recognizing the signs of traumatic stress, and in helping students and their families regain a sense of normalcy.

3. School Climate and Emergencies

"School climate" describes a range of campus conditions, including safety, relationships and engagement, and the environment, that may influence student learning and well-being. Positive school climates that promote student learning and well-being often feature:

- Safe environments free of violence, bullying, harassment, and substance use;

[16] Melissa Brymer, Matt Taylor, Pia Escudero, Anne Jacobs, Mindy Kronenberg, Robert Macy, Lou Ann Mock, Linda Payne, Robert Pynoos, and Juliet Vogel, *Psychological First Aid For Schools: Field Operations Guide, 2nd Edition*. Los Angeles: National Child Traumatic Stress Network, 2012.

- Appropriate facilities and physical surroundings;
- Supportive academic settings;
- Clear and fair disciplinary policies;
- Respectful, trusting, and caring relationships throughout the school community; and
- Available social, emotional, and behavioral supports.

Positive school climates are inclusive of and responsive to students of all backgrounds, regardless of race, color, national origin, language, disability, religion, sex, sexual orientation, or gender identity.

Research shows that creating positive school climates can help districts, schools, and teachers meet key goals, including: boosting student achievement and closing achievement gaps; increasing high school graduation rates; decreasing teacher turnover and increasing teacher satisfaction; and turning around low-performing schools. Positive school climates also enhance safety in the school and community by increasing communication between students, families, and faculty. At the same time, schools reduce various forms of harm to students that can stem from negative school climates, including violence, bullying, and even suicide.

A positive school climate that provides students with ready access to emotional and behavioral supports can affect the capacity of students and staff to prevent, respond to, and recover from emergencies.

Prevention

A positive school climate can help to prevent emergencies because it can reduce the incidence of behaviors that can contribute to crisis (e.g., violence, bullying, harassment, substance abuse). Further, schools with positive school climates engage students in developing strong relationships with staff and peers, increasing the likelihood that students will quickly report potential threats to trusted adults within the school.

Response

Schools with positive school climates teach students the social and emotional competencies that enable them to develop persistence, tolerance of frustration, and ability to manage their emotions during an emergency. The teachers, counselors, school resources officers, and other staff who create positive school climates train regularly on child and adolescent development, and on how to respond appropriately to a variety of student behaviors so they are able to de-escalate aggressive behavior before it becomes a threat to school safety.

Recovery

A positive school climate can help in the recovery from an emergency because it represents a commitment, even prior to an emergency, to providing emotional and mental health services and supports to all members of the community. Schools with such a climate create an environment that recognizes the importance of social and emotional health, and so support the recovery of all members of the school community and promote an understanding that individual needs will vary in a post-emergency situation.

The following steps when implemented as part of a single, comprehensive, and integrated strategy for improving student health and safety will help schools promote a positive school climate.

Conduct a Comprehensive Needs Assessment

School communities are complex systems that include multiple stakeholders and interconnecting environmental factors that influence student health and safety. As such, comprehensive needs assessments of school climate including school engagement, school safety, and the school environment as elements to be evaluated can provide schools with the data support needed to pursue comprehensive approaches to improving school climate. A comprehensive picture of school health and safety can be created by utilizing needs assessments that include student perceptions and, where appropriate, parent and staff perceptions, to help schools identify key issues in need of attention. By monitoring indicators such as the frequency and severity of student risk behaviors, and perceptions of their safety, schools may identify threats to school safety and then use this information to implement the appropriate intervention or program to improve school safety. These data can be most effective when they are used regularly for decision-making and are disaggregated by different groups to determine how they experience the school environment. If a student survey is used to assess culture and climate, student privacy must be protected, including in accordance with the *Protection of Pupil Rights Amendment*, 20 U.S.C. 1232, if applicable.

A number of these surveys are in the compendium of school climate measures on the National Center on Safe Supportive Learning Environments' website at http://safesupportiveschools.ed.gov/index.php?id=133.

The center also houses archived webinars that provide information on how to use these surveys and the data that they collect. Visit at http://safesupportiveschools.ed.gov/index.php?id=65.

Use Multi-Tiered Interventions and Supports

School climate can be enhanced by a data-driven, multi-tiered framework that provides a continuum of behavioral supports and interventions to improve student behavior and achievement. A three-tiered framework would comprise the following:

1. School wide or universal interventions and supports focus both on developing expected behaviors and social-emotional competence, and on preventing problem behavior.

2. A second tier of interventions targets groups of students who are at elevated levels of risk or exhibiting problem behavior (such as bullying). These groups of students can be identified more easily, and their needs or behavior can be addressed more effectively when a school wide foundation is in place.

3. A third tier of interventions targets individual students, including traumatized youths, who are at even more elevated levels of academic and social-emotional behavioral need and risk.

While interventions for students who are at elevated levels of risk address their needs and problem behaviors, they should also build the skills that support thriving in life and resiliency in crisis. Using an evidence-based, multi-tiered behavioral framework has been found to improve

school climate by reducing problem behaviors like bullying, drug abuse, and poor attendance, while making students feel safer and improving academic performance. Implementation of a school-wide framework provides a structure for schools in which to customize and organize the varied practices and programs they need to provide to their students based on data on student needs and local resources. Further, such a framework may help schools to better identify students struggling with trauma post-event, and select appropriate interventions to help them to recover. For more information about a multi-tiered behavioral framework, visit the Technical Assistance Center on Positive Behavioral Interventions and Supports available at http://www.pbis.org.

Promote Social and Emotional Competencies

Social and emotional learning is important to enable individuals to learn to understand and manage their emotions and relationships, and to make good decisions. Social-emotional learning can help individuals stop and think before they react, control their response to stress, develop supportive and caring relationships, persist through challenge, seek help, and pay attention to theirs and others' needs and feelings. These and other social and emotional competencies can help individuals prepare for and respond to emergencies. Students are more likely to develop such competencies when they have good relationships with adults, and when the adults model these competencies.

For more information about teaching social and emotional competencies, visit http://safesupportivelearning.ed.gov. For additional information on how social and emotional learning may be integrated into a multi-tiered framework, visit http://www.pbis.org.

4. *Active Shooter Situations*

Police officers, firefighters, and emergency medical services technicians (first responders) who come to a school because of a 911 call involving gunfire face a daunting task. Though the objective remains the same – protect students and staff – the threat of an "*active shooter*" incident is different than responding to a natural disaster or many other emergencies.

Emergency calls can involve actual or future threats of physical violence. This violence might be directed not only in or at the school building, students, staff, and campus but also at nearby buildings on or off school grounds.

"*Active shooter situations*" are defined[17] as those where an individual is "actively engaged in killing or attempting to kill people in a confined and populated area."[18] Unfortunately, schools face *active shooter situations* as well.

The better first responders and school personnel are able to discern these threats and react swiftly, the more lives can be saved. This is particularly true in an *active shooter situation* at a school where law enforcement responds to a 911 call of shots fired. Many young and innocent lives are at risk in such a concentrated space. This is why it is critical that schools work with first

[17] Other gun-related incidents that may occur in a school environment are not defined as *active shooter* incidents because they do not meet this definition. Instead, they may involve a single shot fired, accidental discharge of a weapon, or incidents that are not ongoing.

[18] U.S. Department of Homeland Security, *Active Shooter*, *How to Respond*. Washington, DC: Author, October 2008. Available at http://www.dhs.gov/xlibrary/assets/active_shooter_booklet.pdf.

responders, emergency management staff, and all community partners to identify, prepare, prevent, and effectively respond to an *active shooter situation* in a coordinated fashion.

Active shooter situations are unpredictable and evolve quickly. Because of this, individuals must be prepared to deal with an *active shooter situation* before law enforcement officer arrive on the scene.

Preparing for an *Active Shooter Situation*

Planning

As with any threat or hazard that is included in a school's EOP, the planning team will establish goals, objectives, and courses of action for an annex. These plans will be impacted by the assessments conducted at the outset of the planning process and updated as ongoing assessments occur. As courses of action are developed, the planning team should consider a number of issues, including, but not limited to:

- How to evacuate or lock down students, staff, and visitors, including those who are not with staff or in a classroom (e.g., in the hall, bathroom, break room). Personnel involved in such planning should pay attention to disability-related accessibility concerns when advising on shelter sites and evacuation routes.
- How to evacuate when the primary evacuation route is unusable.
- How to select effective shelter-in-place locations (optimal locations have thick walls, solid doors with locks, minimal interior windows, first-aid emergency kits, communication devices and duress alarms).
- How the school community will be notified that there is an *active shooter* on school grounds. This could be done through the use of familiar terms, sounds, lights, and electronic communications such as text messages. Include in the courses of action how to communicate with those who have language barriers or need other accommodations, such as visual signals or alarms to advise deaf students, staff, and parents about what is occurring. School wide "reverse 911-style" text messages sent to predetermined group distribution lists can be very helpful in this regard. Posting this protocol near locations where an all-school announcement can be broadcast (e.g., by the microphone used for the public announcement system) may save lives by preventing students and staff from stepping into harm's way.
- How students and staff will know when the building is safe.

The planning team may want to include functions in the *Active Shooter* annex that are also addressed in other functional annexes. For example, evacuation will be different during an *active shooter situation* than it would be for a fire.

Additional considerations are included in the "Responding to an *Active Shooter*" and "After an *Active Shooter Incident*" sections below.

Sharing Information With First Responders

The planning process is not complete until the school EOP is shared with first responders. The planning process must include preparing and making available to first responders an up-to-date and well-documented site assessment as well as any other information that would assist them. These materials should include building schematics and photos of both the inside and the outside, and include information about door and window locations, and locks and access controls. Emergency responders should also have advance information on where students, staff, and others with disabilities as well as those with access and functional needs are likely to be sheltering or escaping, generally in physically accessible locations, along accessible routes, or in specific classrooms. Building strong partnerships with law enforcement officers, fire officials, and EMS technician includes ensuring they also know the location of available public address systems, two-way communications systems, security cameras, and alarm controls. Equally important is information on access to utility controls, medical supplies, and fire extinguishers.

Providing the detailed information listed above to first responders allows them to rapidly move through a school during an emergency, to ensure areas are safe, and to tend people in need. It is critically important to share this information with law enforcement and other first responders before an emergency occurs. Law enforcement agencies have secure websites where this information is stored for many schools, businesses, public venues, and other locations. All of these can be provided to first responders and viewed in drills, exercises, and walk-throughs.

Technology and tools with the same information (e.g., a portable USB drive that is compatible with computers used by first responders) should be maintained at the front of the school, in a lock box, or other secured location from which school officials can immediately provide it to responding officials or first responders can directly access it. The location of these materials at the school should be known by and accessible to a number of individuals to ensure ready access in an emergency. Every building should have more than one individual charged with meeting first responders to provide them with the school site assessment, the school EOP and any other details about school safety and the facility.[19] All parties should know who these key contacts are.

Exercises

Most schools practice evacuation drills for fires and protective measures for tornadoes, but far fewer schools practice for *active shooter situations*. To be prepared for an *active shooter* incident, schools should train their staff, students, and families, as appropriate, in what to expect and how to react. If students are involved, to select the appropriate exercise the school should consider the ages of the students. In a study of 84 *active shooter* events that occurred between 2000 and 2010, 34 percent involved schools.[20]

Good planning includes conducting drills which must include first responders and school resource officers (where applicable). Exercises with these valuable partners are one of the most effective and efficient ways to ensure that everyone knows not only his or her roles, but also the

[19] See also, http://www.ready.gov.

[20] J. Pete Blair with M. Hunter Martaindale, *United States Active Shooter Events from 2000 to 2010: Training and Equipment Implications*. San Marcos, Texas: Texas State University, 2013. Available at http://policeforum.org/library/critical-issues-in-policing-series/Blair-UnitedStatesActiveShooterEventsfrom2000to2010Report-Final.pdf.

roles of others at the scene. These exercises should include walks through school buildings to allow law enforcement to provide input on shelter sites as well as familiarize first responders with the location.

Each person carries a threefold responsibility.

- First: Learn the signs of a potentially volatile situation and ways to prevent an incident.
- Second: Learn the best steps for survival when faced with an *active shooter situation*.
- Third: Be prepared to work with law enforcement during the response.

Preventing an *Active Shooter Situation*

Warning Signs

No profile exists for an *active shooter*; however, research indicates there may be signs or indicators. Schools should learn the signs of a potentially volatile situation that may develop into an *active shooter situation* and proactively seek ways to prevent an incident with internal resources, or additional external assistance.

In 2002, the Safe School Initiative (SSI) was completed by the U.S. Department of Education and the U.S. Secret Service, examining 41 K–12 student attackers involving 37 incidents in the United States from 1973 through May 2000.[21] These research results, though focused on targeted school violence and not on *active shooter situations*, remain highly useful as a guide for law enforcement officials, educators, and mental health practitioners.

The study identified 10 key findings for the development of strategies to address targeted school violence:

- There is no accurate or useful profile of students who have engaged in targeted school violence.
- Incidents of targeted violence at school are rarely sudden, impulsive acts.
- Prior to most incidents, other people knew about the attacker's idea and/or the plan to attack.
- Most attackers did not threaten their targets directly prior to advancing the attack.

[21] Robert Fein, Bryan Vossekuil, William Pollack, Randy Borum, William Modzeleski, and Marisa Reddy, *Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates*. Washington, DC: U.S. Department of Education and U.S. Secret Service, 2004. Available at http://www2.ed.gov/admins/lead/safety/threatassessmentguide.pdf.

- Most attackers engaged in some behavior prior to the incident that caused others concern or indicated a need for help.
- Most attackers had difficulty coping with significant loss or personal failures. Moreover, many had considered or attempted suicide.
- Many attackers felt bullied, persecuted, or injured by others prior to the attack.
- Most attackers had access to and had used weapons prior to the attack.
- In many cases, other students were involved in some capacity.
- Despite prompt law enforcement officer responses, most shooting incidents were stopped by means other than law enforcement intervention. [22]

By highlighting common pre-attack behaviors displayed by past offenders, federal researchers have sought to enhance the detection and prevention of tragic attacks of violence, including active shooting incidents. Several agencies within the federal government continue to explore incidents of targeted violence in the effort to identify these potential "warning signs." In 2002, the FBI published a monograph on workplace violence, including problematic behaviors of concern that may telegraph violent ideations and plans.[23] In 2007, the U.S. Secret Service, U.S. Department of Education, and the FBI collaborated to produce the report *Campus Attacks, Targeted Violence Affecting Institutions of Higher Learning*, which examined lethal or attempted lethal attacks at U.S. universities and colleges from 1900 to 2008. The report was published in 2010, and featured several key observations related to pre-attack behaviors, including the following:

- In only 13 percent of the cases did subjects make verbal and/or written threats to cause harm to the target. These threats were both veiled and direct, and were conveyed to the target or to a third party about the target.
- In 19 percent of the cases, stalking or harassing behavior was reported prior to the attack. These behaviors occurred within the context of a current or former romantic relationship, or in academic and other non-romantic settings. They took on various forms, including written communications (conventional and electronic), telephonic contact, and harassment of the target and/or the target's friends and/or family. Subjects also followed, visited, or damaged property belonging to target(s) or their families prior to the attack.
- In only 10 percent of the cases did the subject engage in physically aggressive acts toward the targets. These behaviors took the form of physical assaults, menacing actions with weapons, or repeated physical violence to intimate partners.

[22] Bryan Vossekuil, Robert Fein, Marisa Reddy, Randy Borum, and William Modzeleski, *The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States*. Washington, DC: U.S. Department of Education and U.S. Secret Service, 2004. Available at http://www2.ed.gov/admins/lead/safety/preventingattacksreport.pdf.

[23] U.S. Department of Justice FBI Academy, *Workplace Violence: Issues in Response*. Quantico, Va.: Author, 2002. Available at http://www.fbi.gov/stats-services/publications/workplace-violence.

- Concerning behaviors were observed by friends, family, associates, professors, or law enforcement officers in 31 percent of the cases. These behaviors included, but were not limited to paranoid ideas, delusional statements, changes in personality or performance, disciplinary problems on campus, depressed mood, suicidal ideation, non-specific threats of violence, increased isolation, "odd" or "bizarre" behavior, and interest in or acquisition of weapons.

Specialized units in the federal government (such as the FBI's Behavioral Analysis Unit) continue to support behaviorally based operational assessments of persons of concern in a variety of settings (e.g., schools, workplaces, places of worship) who appear be on a trajectory toward a violent act. A review of current research, threat assessment literature, and active shooting incidents, combined with the extensive case experience of the Behavioral Analysis Unit, suggest that there are observable pre-attack behaviors which, if recognized, could lead to the disruption of a planned attack.[24] While checklists of various warning signs are often of limited use in isolation, there are some behavioral indicators that should prompt further exploration and attention from law enforcement officers and/or school safety stakeholders. These behaviors often include

- Development of a personal grievance;
- Contextually inappropriate and recent acquisitions of multiple weapons;
- Contextually inappropriate and recent escalation in target practice and weapons training;
- Contextually inappropriate and recent interest in explosives;
- Contextually inappropriate and intense interest or fascination with previous shootings or mass attacks; and
- Experience of a significant real or perceived personal loss in the weeks and/or months leading up to the attack, such as a death, breakup, divorce or loss of a job.
- Few offenders had previous arrests for violent crimes.

[24] See Frederick Calhoun and Stephen Weston, *Contemporary Threat Management: A Practical Guide for Identifying, Assessing, and Managing Individuals of Violent Intent* (San Diego, CA: Specialized Training Services, 2003); Gene Deisinger, Marisa Randazzo, Daniel O'Neill, and Jenna Savage, *The Handbook for Campus Threat Assessment and Management Teams* (Stoneham, MA: Applied Risk Management, 2008); Robert Fein, Bryan Vossekuil, and Gwen Holden, *Threat Assessment: An Approach to Prevent Targeted Violence* (Washington, DC: U.S. Department of Justice, Office of Justice Programs, National Institute of Justice, 1995); John Monahan, Henry Steadman, Eric Silver, Paul Appelbaum, Pamela Robbins, Edward Mulvey, Loren Roth, Thomas Grisso, and Steven Banks, *Rethinking Risk Assessment: The MacArthur Study of Mental Disorder and Violence* (New York, NY: Oxford University Press, 2001); Bryan Vossekuil, Robert Fein, Marisa Reddy, Randy Borum, and William Modzeleski, *The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States*. (Washington D.C.: U.S. Department of Education and U.S. Secret Service, 2004).

Threat Assessment Teams

As described in the previous section, research shows that perpetrators of targeted acts of violence engage in both covert and overt behaviors preceding their attacks. They consider, plan, prepare, share, and, in some cases, move on to action.[25] One of the most useful tools a school can develop to identify, evaluate, and address these troubling signs is of a multidisciplinary school threat assessment team (TAT). A TAT with diverse representation often will operate more efficiently and effectively. TAT members should include school principals, counselors, employees, medical and mental health professionals, law enforcement personnel and school resource officers, where applicable.

The TAT serves as a central convening body, so that warning signs observed by multiple people are not considered isolated incidents that slip through the cracks, when they actually may represent escalating behavior that is a serious concern. School districts should keep in mind, however, the importance of relying on factual information (including observed behavior) and avoid unfair labeling or stereotyping of students, to remain in compliance with civil rights and other applicable federal and state laws.

For the purposes of consistency and efficiency, a school TAT should be developed and implemented in coordination with school district policy and practice. In addition, staff already working to identify student needs can be a critical source of information about troubling student behavior for a TAT.

The TAT reviews troubling or threatening behavior of current or former students, parents, school employees or other persons brought to its attention. The TAT contemplates a holistic assessment and management strategy that considers the many aspects of the person's life—academic, residential, work, and social. More than focusing on warning signs or threats alone, the TAT assessment involves a unique overall analysis of changing and relevant behaviors. The TAT takes into consideration, as appropriate, information about classroom behaviors, various kinds of communications, not-yet substantiated information, any threats made, security concerns, parenting issues, or relationship problems that might involve a troubled individual. The TAT may also identify any potential victims with whom the individual may interact. Once the TAT identifies an individual that may pose a threat, the team will identify a course of action for addressing the situation. The appropriate course of action—whether law enforcement intervention, counseling, or other actions —will depend on the specifics of the situation.

Although not as common as in the K–12 environment, TATs are increasingly common in university settings, pushed to the forefront of concern following the 2007 shooting at Virginia Polytechnic Institute and State University in Blacksburg, Va., where 32 individuals were killed. In some cases, state funding mandates that colleges and universities create threat assessment teams.[26]

[25] See http://www.fbi.gov/stats-services/publications/law-enforcement-bulletin/february-2010/threat-assessment-teams.
[26] See *Recommended Practices for Virginia Colleges Threat Assessments at* http://www.threatassessment.vt.edu/resources/tat_info/VArecommended_practices.pdf.

Even in a K–12 setting, where a designated TAT may not have been established, area law enforcement officials can help assess reported threats or troubling behavior, and reach out to available federal resources. The FBI's behavioral experts in its National Center for the Analysis of Violent Crimes (NCAVC) at Quantico, Va., are available on a 24/7 basis to join in any threat assessment analysis and develop threat mitigation strategies for persons of concern. The law enforcement member of the school TAT should contact the local FBI office for this behavioral analysis assistance.

Each FBI field office has a NCAVC representative available to work with school TATs and coordinate access to the FBI's Behavioral Analysis Unit (BAU), home to the NCAVC. They focus not on how to respond tactically to an *active shooter situation* but rather on how to prevent one. Early intervention can prevent a situation from escalating by identifying, assessing, and managing the threat. The TAT should consult with its district and develop a process to seek these additional resources.

Generally, *active shooter situations* are not motivated by other criminal-related concerns, such as monetary gain or gang affiliation. Often, situations may be prevented by identifying, assessing, and managing potential threats. Recognizing these pre-attack warning signs and indicators might help disrupt a potentially tragic event.

Responding to an *Active Shooter Situation*

School EOPs should include courses of action that will describe how students and staff can most effectively respond to an *active shooter situation* to minimize the loss of life, and teach and train on these practices, as deemed appropriate by the school.

Law enforcement officers may not be present when a shooting begins. The first law enforcement officers on the scene may arrive after the shooting has ended. Making sure staff know how to respond and instruct their students can help prevent and reduce the loss of life.

No single response fits all *active shooter situations*; however, making sure each individual knows his or her options for response and can react decisively will save valuable time. Depicting scenarios and considering response options in advance will assist individuals and groups in quickly selecting their best course of action.

Understandably, this is a sensitive topic. There is no single answer for what to do, but a survival mindset can increase the odds of surviving. As appropriate for your community, it may be valuable to schedule a time for an open conversation regarding this topic. Though some parents or personnel may find the conversation uncomfortable, they may also find it reassuring to know that, as a whole, their school is thinking about how best to deal with this situation.

During an *active shooter situation*, the natural human reaction, even if you are highly trained, is to be startled, feel fear and anxiety, and even experience initial disbelief and denial. You can expect to hear noise from alarms, gunfire and explosions, and people shouting and screaming. Training provides the means to regain your composure, recall at least some of what you have learned, and commit to action. There are three basic options: run, hide, or fight. You can run away from the shooter, seek a secure place where you can hide and/or deny the shooter access, or incapacitate the shooter to survive and protect others from harm.

As the situation develops, it is possible that students and staff will need to use more than one option. During an *active shooter situation*, staff will rarely have all of the information they need to make a fully informed decision about which option is best. While they should follow the plan and any instructions given during an incident, often they will have to rely on their own judgment to decide which option will best protect lives.[27]

Respond Immediately

It is not uncommon for people confronted with a threat to first deny the possible danger rather than respond. An investigation by the National Institute of Standards and Technology (2005) into the collapse of the World Trade Center towers on 9/11 found that people close to the floors impacted waited longer to start evacuating than those on unaffected floors.[28] Similarly, during the Virginia Tech shooting, individuals on campus responded to the shooting with varying degrees of urgency.[29] These studies highlight this delayed response or denial. For example, some people report hearing firecrackers when in fact they heard gunfire.

Train staff to overcome denial and to respond immediately, including fulfilling their responsibilities for individuals in their charge. For example, train staff to recognize the sounds of danger, act, and forcefully communicate the danger and necessary action (e.g., "Gun! Get out!") to those in their charge. In addition, those closest to the public address or other communications system, or otherwise able to alert others, should communicate the danger and necessary action. Repetition in training and preparedness shortens the time it takes to orient, observe, and act.

Upon recognizing the danger, as soon as it is safe to do so, staff or others must alert responders by contacting 911 with as clear and accurate information as possible.

Run

If it is safe to do so for yourself and those in your care, the first course of action that should be taken is to run out of the building and far away until you are in a safe location.

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[27] As part of its preparedness mission, *Ready Houston* produces "Run, Hide, Fight" videos, handouts, and trainings to promote preparedness among residents of the Houston region. These materials are not specific to a school setting but may still be helpful. These videos are not recommended for viewing by minors. All of these items are available free of charge, and many are available at http://www.readyhoustontx.gov/videos.html.

[28] Occupants of both towers delayed initiating their evacuation after World Trade Center 1 was hit. In World Trade Center 1, the median time to initiate evacuation was 3 minutes for occupants from the ground floor to floor 76, and 5 minutes for occupants near the impact region (floors 77 to 91). See National Institute of Standards and Technology, 2005. *Federal Building and Fire Safety Investigation of the World Trade Center Disaster Occupant Behavior, Egress, and Emergency Communications*. Available at http://www.mingerfoundation.org/downloads/mobility/nist%20world%20trade%20center.pdf.

[29] *Report of the Virginia Tech Review Team*, available at http://www.governor.virginia.gov/tempContent/techPanelReport-docs/FullReport.pdf and http://www.governor.virginia.gov/tempContent/techPanelReport-docs/12%20CHAPTER%20VIII%20MASS%20MURDER%20AT%20NORRIS%20HALL.pdf.

Students and staff should be trained to

- Leave personal belongings behind;
- Visualize possible escape routes, including physically accessible routes for students and staff with disabilities as well as persons with access and functional needs;
- Avoid escalators and elevators;
- Take others with them, but not to stay behind because others will not go;
- Call 911 when safe to do so; and
- Let a responsible adult know where they are.

Hide

If running is not a safe option, hide in as safe a place as possible.

Students and staff should be trained to hide in a location where the walls might be thicker and have fewer windows. In addition:

- Lock the doors;
- Barricade the doors with heavy furniture;
- Close and lock windows and close blinds or cover windows;
- Turn off lights;
- Silence all electronic devices;
- Remain silent;
- Hide along the wall closest to the exit but out of the view from the hallway (allowing for an ambush of the shooter and for possible escape if the shooter enters the room);
- Use strategies to silently communicate with first responders if possible, for example, in rooms with exterior windows make signs to silently signal law enforcement officers and emergency responders to indicate the status of the room's occupants; and
- Remain in place until given an all clear by identifiable law enforcement officers.

Fight

If neither running nor hiding is a safe option, as a last resort when confronted by the shooter, adults in immediate danger should consider trying to disrupt or incapacitate the shooter by using aggressive force and items in their environment, such as fire extinguishers, and chairs. In a study of 41 *active shooter* events that ended before law enforcement officers arrived, the potential

victims stopped the attacker themselves in 16 instances. In 13 of those cases they physically subdued the attacker.[30]

While talking to staff about confronting a shooter may be daunting and upsetting for some, they should know that they may be able to successfully take action to save lives. To be clear, confronting an *active shooter* should never be a requirement in any school employee's job description; how each staff member chooses to respond if directly confronted by an *active shooter* is up to him or her. Further, the possibility of an *active shooter* situation is not justification for the presence of firearms on campus in the hands of any personnel other than law enforcement officers.

Interacting With First Responders

Staff should be trained to understand and expect that a law enforcement officer's first priority must be to locate and stop the person(s) believed to be the shooter(s); all other actions are secondary. One comprehensive study determined that more than half of mass-shooting incidents—57 percent—still were under way when the first officer arrived; in 75 percent of those instances that solo officer had to confront the perpetrator to end the threat. In those cases, the officer was shot one-third of the time.[31]

Students and staff should be trained to cooperate and not to interfere with first responders. When law enforcement officer(s) arrives, students and staff must display empty hands with open palms. Law enforcement may instruct everyone to place their hands on their heads, or they may search individuals.

After an *Active Shooter* Incident[32]

Once the scene is secured, first responders will work with school officials and victims on a variety of matters. This will include transporting the injured, interviewing witnesses, and initiating the investigation.

The school EOP should identify trained personnel who will provide assistance to victims and their families. This should include establishing an incident response team (including local first responders and other community partners) that is trained to appropriately assess and triage an *active shooter situation* (as well as other emergencies), and provide emergency intervention services and victim assistance beginning immediately after the incident and throughout the recovery efforts. This team will integrate with state and federal resources when an emergency occurs.

Within an ongoing and/or evolving emergency, where the ***immediate reunification*** of loved ones *is not possible*, providing family members with timely, accurate, and relevant information is paramount. Having family members wait for long periods of time for information about their

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[30] J. Pete Blair with M. Hunter Martaindale, *United States Active Shooter Events from 2000 to 2010: Training and Equipment Implications*. San Marcos, Texas: Texas State University, 2013. Available at http://policeforum.org/library/critical-issues-in-policing-series/Blair-UnitedStatesActiveShooterEventsfrom2000to2010Report-Final.pdf.

[31] Ibid.

[32] Also see the "Functional Annexes Content" and "Recovery Annex" sections of this guide.

loved ones not only adds to their stress and frustration but can also escalate the emotions of the entire group. When families are reunited, it is critical that there be child release processes in place to ensure that no child is released to an unauthorized person, even if that person is well-meaning.

Essential steps to help establish trust and provide family members with a sense of control are

- Identifying a safe location separate from distractions and/or media and the general public, but close enough to allow family members to feel connected in proximity to their children and their loved ones;
- Scheduling periodic updates even if no additional information is available;
- being prepared to speak with family members about what to expect when reunified with their child and their loved ones; and
- Ensuring effective communication with those who have language barriers or need other accommodations, such as sign language interpreters for deaf family members.

When reunification is not possible because a child is missing, injured, or killed, how and when this information is provided to families is critical. Before an emergency, the planning team must determine how, when, and by whom loved ones will be informed if their child or loved one is missing or has been injured or killed. Law enforcement typically takes the lead on death notifications, but all parties must understand their roles and responsibilities. This will ensure that parents and loved ones receive accurate and timely information in a compassionate way.

While law enforcement and medical examiner procedures must be followed, families should receive accurate information as soon as possible. Having trained personnel on hand or immediately available to talk to loved ones about death and injury can ensure the notification is provided to family members with clarity and compassion. Counselors should be on hand to immediately assist family members.

The school EOP should include pre-identified points of contact (e.g., counselors, police officers) to work with and support family members. These points of contact should be connected to families as early in the process as possible, including while children are still missing but before any victims have been positively identified. After an incident, it is critical to confirm that each family is getting the support it needs, including over the long-term.

The school EOP should consider printed and age-appropriate resources to help families recognize and seek help with regard to a variety of reactions that they or their loved ones can experience during and after an emergency. Often, a family that has lost a child may have another child or other children in the school. It is critical that these families and loved ones be supported as they both grieve their loss and support their surviving child(ren).

The school EOP also should explicitly address how impacted families and children will be supported if they prefer not to engage with the media. This includes strategies for keeping the media separate from families and students while the emergency is ongoing and support for families that may experience unwanted media attention at their homes.