

THE ROLE OF DISTRICTS IN DEVELOPING HIGH-QUALITY SCHOOL EMERGENCY OPERATIONS PLANS

A COMPANION TO THE
SCHOOL GUIDE



The Role of Districts in Developing High-Quality School Emergency Operations Plans

A Companion to the *School Guide*

U.S. Department of Education

U.S. Department of Justice

U.S. Department of Health and Human Services

U.S. Department of Homeland Security

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September 2019

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Background

From the time of the horrific February 14, 2018 shooting at Marjory Stoneman Douglas High School through the present, the Trump Administration has committed considerable time and resources to determine the best practices and policies to prevent future tragedies and keep our students safe. Consisting of the Secretaries of Education, Health and Human Services, Homeland Security and the Attorney General, the Federal Commission on School Safety presented its final report of best practices and policies to President Trump in December 2018. The report acknowledges that the problem of school violence is long-standing and complex, that each state is different, and that there are certain limits to what the federal government can do. Indeed, the report recognizes there is “no universal school safety plan that will work for every school across the country” and that “[s]uch a prescriptive approach by the federal government would be inappropriate, imprudent, and ineffective.” See Final Report of the Federal Commission on School Safety at 1.

In the pages that follow, this guide complements the work of the Commission and builds upon the insights, experiences, and expertise of a wide range of individuals.

The Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center offers a free online course on the *School Guide*, “Developing Emergency Operations Plans (EOPs) 101,” accessible at http://rem.s.ed.gov/trainings/course_k12.aspx.

Every American has a role to play in improving the safety of our students and the security of our schools. Only by working together can we help prevent future tragedies, and when those incidents do occur, mitigate their effects and learn from them. Together, this Administration and states and local communities have made steady progress in strengthening our schools. We must continue to press ahead.

Introduction and Purpose

When our nation’s 55 million K–12 students¹ head to class each day, they should find safe havens for learning, free from threats and hazards. Indeed, a safe and healthy environment is vital to student learning, and necessary for maintaining public trust in our educational system.

Creating such an atmosphere requires collaboration between school officials and their community partners to prepare for and to respond to a **threat** (a human-caused emergency, such as a crime or violence) or a **hazard** (a natural disaster, disease outbreak, or accident). To this end, several federal agencies jointly produced the *Guide for Developing High-Quality School Emergency Operations Plans*² (*School Guide*) in 2013. The *School Guide* recommends schools undertake emergency management planning within the context of district, local, regional, state, tribal, and federal agency emergency planning. The *School Guide* sets forth planning principles

¹ Snyder, T.D., de Brey, C., and Dillow, S.A. (2016). *Digest of Education Statistics 2015* (NCES 2016-014). National Center for Education Statistics, Institute of Education Sciences, U.S. Department of Education. Washington, DC. Available at: <https://nces.ed.gov/pubs2016/2016014.pdf>.

² *Guide for Developing High-Quality School Emergency Operations Plans* (2013) was a collaborative effort of the U.S. Departments of Education; Homeland Security and its Federal Emergency Management Agency (FEMA); Justice and its Federal Bureau of Investigation; and Health and Human Services.

and sequential steps that schools can take to develop emergency operations plans (EOPs), which are critical to preventing emergencies from happening, reducing the impact (should a disaster occur), responding effectively, and facilitating rapid recovery efforts while continuing to protect the whole school community.

This guide, *The Role of Districts in Developing High-Quality School Emergency Operations Plans (District Guide)*, complements the earlier *School Guide* by recommending specific roles and responsibilities for district-level administrators and staffs. Districts' recommended responsibilities include the following:

- Coordinating with schools and community partners to make EOPs a collaborative effort and help ensure integration with district, local, regional, state, tribal, and federal agency EOPs;
- Providing planning parameters for use by schools throughout the entire district, e.g., minimum set of annexes, minimum set of prioritized hazards and threats; and
- Supporting schools at each step as they develop EOPs that address all types of emergencies and are tailored to fit each school's individual needs.

This guide recommends that districts apply the same planning principles; follow the same six-step process and complete the tasks associated with each step, that underlie the planning process described in the *School Guide*. The *District Guide*, however, provides more district-focused information.

This guide also contains a checklist of activities and responsibilities for districts that allows them to stay on course and track their progress.

We recommend that district-level representatives involved in emergency management familiarize themselves with the *School Guide* before turning to this *District Guide* to better understand how they can best assume their complementary role in planning and fulfilling their responsibilities. While diversity exists among school districts (e.g., large, small, urban, suburban, rural) and their resources (including staff size and skills), the process this guide describes is intended to be flexible enough to accommodate this diversity. A summary of the *School Guide* is provided in Appendix A: Elements of the *School Guide*.

National Preparedness

In planning for school emergencies, educators and their community partners (e.g., law enforcement, fire official, local mental and public health authority) become one small but significant part of the national planning community, which must manage a myriad of safety challenges. For a vision to guide their work, educators, including those at the district level, can look to the National Preparedness System,³ which outlines a process by which we all can achieve

³ U.S. Department of Homeland Security, Federal Emergency Management Agency. (2011). *National Preparedness System, 2011*. Washington, DC. Available at https://www.fema.gov/media-library-data/20130726-1855-25045-8110/national_preparedness_system_final.pdf.

preparedness. As a reflection of the National Preparedness System, the *School Guide* presents the following preparedness mission areas:

- **Prevention**, 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 districts and schools take to prevent a threatened or actual incident from occurring.
- **Protection** means the capabilities to secure districts and schools against acts of violence and man-made 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; to establish a safe and secure environment; to save lives and property; and to facilitate the transition to recovery.
- **Recovery** means the capabilities necessary to assist districts and schools affected by an event or emergency in restoring the learning environment.

Emergency management officials and emergency responders who engage with districts and schools are familiar with this terminology. Although the mission areas are not strictly sequential, they generally align with one or more of the three time frames associated with an incident: before, during, and after.

Most prevention, protection, and mitigation activities occur before an incident, although these three mission areas 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 to allow for ease of reference, this guide uses “before,” “during,” and “after.”

As districts and schools plan for and execute response and recovery activities through their EOPs, they should use the concepts and principles outlined in the National Incident Management System (NIMS). NIMS is the United States’ single, comprehensive system for managing domestic incidents, which enables the seamless transition and integration of additional response agencies during an incident.⁴ One element 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, districts and schools are able to work more effectively with their community partners (e.g., first responders). For more information on ICS and NIMS, please visit <https://rem.s.ed.gov/k12nimsimplementation.aspx>.

⁴ U.S. Department of Homeland Security, Federal Emergency Management Agency, National Incident Management System, Available at <http://www.fema.gov/national-incident-management-system>. Additional information on NIMS and ICS can be found here: <http://www.rems.ed.gov/K12NIMSImplementation.aspx>.

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 do everything possible to keep children safe. If a district and its schools have an existing plan, revising and adapting the plan using the principles and process described in this guide will help ensure alignment with the terminology and approaches used across the nation.

Terminology

Throughout this guide, references are made to the school district or district taking action. In most instances, these are references to the district core planning team. The following definitions provide clarification:

- The **district core planning team** is a group of representatives that can include administrators; instructional and support staff; food services, maintenance, building, and grounds personnel; community partners; community organizations; and parents and guardians, who together organize and administer the process of EOP development and maintenance at the district level.
- **The term school district or district** may also include representatives who provide occasional support to the district core planning team and who may be considered ad hoc district planning team members.
- **School** refers to the **school core planning team** as described on the following pages in Step 1 (unless otherwise specified).
- **Policies** refers to district-established expectations or requirements.
- **Procedures** refers to the steps to implement a particular district policy.

A more complete list of emergency terms and acronyms used in this guide is provided in pag: Glossary.

All websites listed in this guide were last accessed September 2019.

Using the *District Guide*

Connecting the *School Guide* and the *District Guide*

As the introduction indicates, the *School Guide* contains information and resources on topics that may help districts support individual schools in their EOP planning and development. This *District Guide* provides references to specific sections and pages of the earlier guide that are particularly relevant for district-level work. However, the *School Guide* does not discuss some of these topics at length or in a context that is most useful for district-level educators; this *District Guide* fills in needed information and serves as a companion to the *School Guide*.

Additionally, the six steps described in this guide, as well as the principles underlying these six steps, are the same for both school-level and district-level planning teams.

An Overview of the Six-Step Planning Process

Figure 1 shows the six steps and the key tasks that should be accomplished under each step of the planning process. These six steps were originally developed by the Federal Emergency Management Agency (FEMA) and today are used by emergency management professionals throughout the country. Beginning with the *School Guide*, this process has been customized to educational entities for use with their community partners.

The six steps serve multiple purposes, which include guiding the creation of new EOPs as well as supporting continual maintenance, expansion, and improvement of existing EOPs. The process may be used to develop a plan, perform a comprehensive review of a plan, and conduct periodic and incremental reviews of a plan's components. The six-step planning process is flexible and can be adapted to accommodate the unique characteristics and situation of a school or school district.

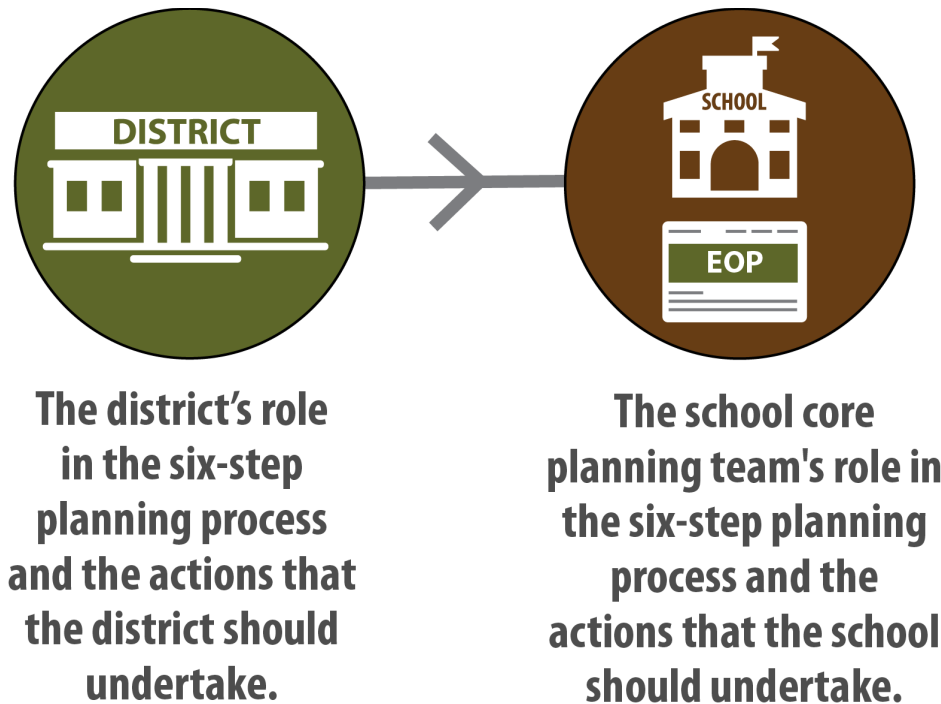
Figure 1: Steps in the planning process



Using the six-step planning process from the *School Guide* as a framework, this *District Guide* recommends actions that districts can take to develop districtwide policies and procedures to guide schools in developing their individual EOPs. The district's work regulates the schools' planning activities and helps schools develop customized plans by providing each of them with a master list of threats, hazards, functions, goals, and objectives.

Ideally, the district would complete its work before its schools begin their planning, but whether or not this is the case, districts should develop policies and procedures for use by the schools. A district plan conveys to schools the vital importance of planning activities — for example, forming a district core planning team and guiding schools to complete their own planning can be conveyed as an expectation through district policy. To gain the most benefit from this guide, districts should read it in its entirety prior to initiating their planning and then refer back to relevant portions as they proceed. (For a snapshot of recommended district policies and procedures, see the task-by-task checklist for districts on pages 10 to 12.)

Figure 2: Icons used in the *District Guide* to indicate district and school roles in the emergency operations plan (EOP) development process



An Overview of Planning Principles

In addition to describing the six-step planning process, the *School Guide* presents planning principles, which are key to developing a comprehensive school EOP that addresses a range of threats and hazards. It is important that schools and districts alike keep these planning principles in mind as they proceed through the planning:

- Planning must be **supported by leadership**.
- Planning **uses assessments** to customize plans to the building level.

- Planning **considers all threats and hazards.**
- Planning **provides for the access and functional needs of the whole school community.**
- Planning **considers all settings and all times.**
- Creating and revising a model EOP is done by following a **collaborative process.**

School districts have a role in implementing these principles at the district level by (1) establishing policies and procedures, (2) providing training and technical assistance related to these principles, and (3) assisting schools in applying these principles within each building.

School and District Roles in Developing Emergency Operations Plans (EOPs)

The roles and responsibilities of the school district in developing and implementing school EOPs can vary depending upon the step of the planning process. In all the steps, both the school and district assume some roles and responsibilities. In some steps, the districts may play a primary role; in others, the school may do so. For example, in Step 3 the district has a primary role in developing goals and objectives, while in Step 4 the school core planning team takes the goals and objectives created by the district, develops relevant courses of action, and customizes them for the school.

There are also steps in which the district and its schools share primary roles. For example, in Step 2 the district identifies all the threats and hazards that could affect any school in the district, after which the school core planning team, using that list as a starting point, conducts school-based assessments and identifies the list of threats and hazards unique to its school. The final school list included in the school's EOP might not include all the threats and hazards included on the district's master list.

Figure 3 illustrates this guide's recommendations as to whether the school, the district, or both should play a primary role in accomplishing actions for each of the six steps. The icon of the building with the flag represents the school, and the icon of the building with columns and four windows represents the district. At each step throughout this guide, we summarize the school's role and elaborate on the role of the district. Districts may take a different approach to supporting schools, but regardless of a district's choice, it is critically important that the district impart its expectations to the school core planning team.

Figure 3: Recommended primary roles of school and district at each step of planning



Table 1: A checklist for districts to guide schools through the planning process, by steps and tasks

The six steps in this checklist lay out the broad responsibilities of districts in helping individual schools plan for emergencies. The tasks listed under each step indicate the work of schools in developing their emergency operations plans (EOPs). The bullets under each task indicate what school districts can do to help the schools complete each task. Information in the checklist is arranged in the same order as corresponding information in this District Guide, to which district administrators can turn for more details on and examples of each step, task, and bullet.

<p>Step 1: </p> <p>Help Schools Form Collaborative Planning Teams</p>	<p>Task 1: Form a School Core Planning Team</p> <ul style="list-style-type: none"> Establish a district-level core planning team to support the work of individual school core planning teams. Develop policies and procedures to guide schools in forming their teams (for example, consider a districtwide policy that helps schools determine which school personnel, students, families, organizations, and community partners should be represented on the team). <p>Task 2: Develop a Common Framework</p> <ul style="list-style-type: none"> Work with school core planning teams to help ensure that members learn each other's vocabulary, command structure, and culture, all critical to effective planning. <p>Task 3: Define and Assign Roles and Responsibilities</p> <ul style="list-style-type: none"> Develop policies and procedures to ensure that each person involved in developing and refining the school EOP knows his or her roles and responsibilities. <p>Task 4: Determine a Regular Schedule of Meetings</p> <ul style="list-style-type: none"> Set districtwide expectations for holding regular but flexible planning meetings within each school. Develop policies and procedures that will assist school teams in scheduling and conducting their meetings.
<p>Step 2: </p> <p>Help Schools Understand the Situation</p>	<p>Task 1: Identify Threats and Hazards</p> <ul style="list-style-type: none"> Develop districtwide master list of threats and hazards and share with all schools. Develop policies and procedures to guide all schools in identifying site-specific threats and hazards (for example, a policy that indicates the type of training school teams need to identify threats and hazards). Confirm which assessments are required and/or optional, and determine which assessment tool(s) the school should use. Collaborate with the schools to conduct assessments that can identify site-specific threats and hazards. <p>Task 2: Evaluate the Risks and Vulnerabilities Posed by Threats and Hazards</p> <ul style="list-style-type: none"> Guide schools in evaluating risks and vulnerabilities posed by their identified threats and hazards. <p>Task 3: Prioritize Threats and Hazards</p> <ul style="list-style-type: none"> Help schools categorize each threat and hazard as posing a high, medium, or low risk — as determined by the evaluation of risks and vulnerabilities.
<p>Step 3: </p> <p>Help Schools Determine Goals and Objectives</p>	<p>Task 1: Select Threats and Hazards to Address in School EOPs</p> <ul style="list-style-type: none"> Guide schools in deciding which threats and hazards identified, evaluated, and prioritized in Step 2 to include in their EOPs. <p>Task 2: Develop Goals and Objectives for Selected Threats and Hazards</p> <ul style="list-style-type: none"> Create a list of goals and objectives for each threat and hazard on the district's master list. <p>Task 3: Identify Cross-Cutting Functions</p> <ul style="list-style-type: none"> Develop policies and procedures to identify cross-cutting functions. <p>Task 4: Develop Goals and Objectives for Cross-cutting Functions</p> <ul style="list-style-type: none"> Develop at least three goals to indicate the desired outcome before, during, and after each function has been executed.

Step 4:

Help Schools Develop Plans (Identify Courses of Action)

Task 1: Develop Courses of Action

- Support schools in their development of customized, site-specific courses of action that address goals and objectives selected from the district's master list of threats and hazards.

Task 2: Select Preferred Courses of Action

- Develop policies and procedures to guide schools in selecting courses of action for threats, hazards, and functions.
- Work with school teams to match available resources to requirements.
- Work with school teams to help with the acquisition, storage, and distribution of the resources, materials, and equipment needed to complete the courses of action selected by the school.
- Help school teams establish official partnerships that are necessary for specific courses of action by developing partnership agreements, such as memoranda of understanding (MOUs) or memoranda of agreement (MOAs).

Task 3: Finalize and Format the Functional and Threat- and Hazard-Specific Annexes

- Provide a recommended format that school core planning teams can use to create the Functional Annexes section of their EOP.
- Provide a recommended format that school core planning teams can use to create the Threat- and Hazard-Specific Annexes section of their EOP.

Step 5:

Help Schools Prepare, Review, and Approve Plans

Task 1: Develop the Basic Plan

1.1 Work With Schools to Create an Exercise Program

- Recommend to schools that they involve community partners (including law enforcement officers, EMS practitioners, and fire department personnel) and local emergency management staff.
- Encourage schools to communicate information in advance of drill/exercise dates to avoid confusion and concern.
- Suggest conducting exercises under different and nonideal conditions (e.g., during different times of day and points in the academic calendar, with the absence of key personnel, at various school events, and under different weather conditions).
- Work with schools and community partners to ensure consistency with common emergency management terminology.
- Recommend that schools debrief and develop an after-action report that evaluates results, identifies gaps or shortfalls, and documents lessons learned.

1.2 Work With Schools to Establish a Process for Plan Review and Revision

- Discuss with schools how their EOPs and related procedures will be modified, if needed, and specify who is responsible for reviews and revisions.
- Work with schools to establish a process for reviewing and revising plans using state and local requirements as a guide.
- Work with schools to review and revise a portion of their EOP each month, or at a natural break in the calendar, as opposed to reviewing the entire plan at once.
- Consider providing guidance or requirements to schools on the way in which and how often school EOPs should be developed and updated.

Task 2: Format the Plan

- Work with schools and community partners to determine a common school EOP format for use districtwide.

Task 3: Revise the Formatted Draft

- Work with schools to insert the plan content developed thus far into each appropriate section, and revise the formatted plan according to writing conventions, adding necessary tables, charts, and other supporting graphics.
- Provide comments on the draft and help facilitate connections between school core planning teams and stakeholders, including those with a responsibility for implementing the plan.

Task 4: Review the Plan for Quality

- Develop a framework for reviewing and approving the plan.

Task 5: Approve and Share the Plan

- Develop a framework outlining the process for officially approving school EOPs.
- Approve the EOP.
- Work with schools to share the plan with community partners and additional stakeholders who have a responsibility for or a role in the EOP.
- Work with schools to protect their plans from those unauthorized to have them.
- Establish a system for sharing secure documents electronically.
- Work with schools to maintain a record of people and organizations that receive a copy of the plan.

Step 6:

Help Schools Implement and Maintain the Plan

Task 1: Train and Inform Stakeholders

- Train and inform stakeholders on the plan and their roles and responsibilities in it.

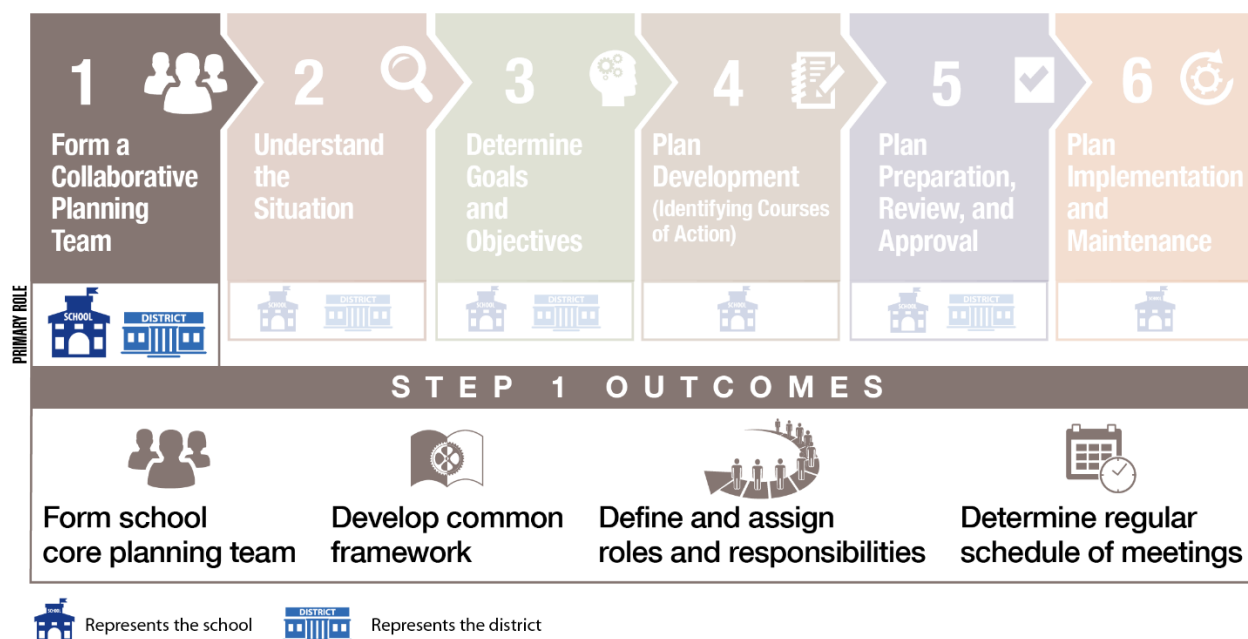
Task 2: Exercise the Plan

- Establish policies and procedures for conducting exercises of the plan.
- Help schools coordinate drills and exercises.
- Encourage schools to conduct exercises under different and nonideal conditions.
- Work with schools to develop an exercise schedule.
- Work with schools to evaluate and improve exercises.

Task 3: Review, Revise, and Maintain the Plan

- Ensure that school core planning teams review, revise, and maintain their EOPs according to, at a minimum, the district's approved cycle.

Step 1: Help Schools Form Collaborative Planning Teams



In Step 1, the school (1) forms a core planning team with representatives from all necessary stakeholders; (2) takes initial steps to form a common framework; (3) defines and assigns roles and responsibilities in the six-step planning process; and (4) determines a regular schedule of planning meetings. The school can best complete these tasks when the district shares the primary role by supporting schools as detailed in the sections that follow.

Task 1: Form a School Core Planning Team

To provide support for and guide all building-level school core planning teams, district administrators should first establish a district-level core planning team. Like a school's core planning team, a school district's core planning team includes a comprehensive, multidisciplinary team of educational officials and community partners. In addition to having its members serve on school planning teams, districts often have core planning team members serve as the single point of contact (POC) to individual community partners' agencies to facilitate the relationship on behalf of the district and its schools. In this role, the district representative may be responsible for sharing common information with all schools and working in partnership with an individual school POC and the partners on a unique issue.

District's Role

The work of the district-level core planning team is best done *before* individual schools begin their emergency planning. District administrators can jumpstart the planning by developing policies and procedures to guide individual schools in creating their own EOPs. The parameters should provide consistent expectations for schools throughout the district as well as some continuity for all district EOPs. However, the district parameters must also provide enough flexibility for each school to develop emergency plans that address their specific needs.

The district's core planning team can include administrators; instructional and support staff; food, maintenance, building, and grounds staff; community partners; community organizations; and parents and guardians. Because a district core planning team and a school core planning team are closely intertwined, it is recommended that a member of the district team serve on each school planning team.

The district's policies and procedures should allow for representatives from a wide range of personnel who also serve on school core planning teams, including (but not limited to) administrators, educators, school psychologists, nurses, facility managers, transportation managers, food service personnel, family services representatives, and representatives from the school district. To ensure that specific concerns are addressed in the early stages of planning, districts should ensure school teams involve student and parent representatives; individuals and organizations that serve and represent the interests of persons in the school community with limited English proficiency; who have disabilities, access and functional needs; and representatives from racial, ethnic, and religious communities.

Key community partners should be represented on both school and district-level planning teams. School teams should include first responders, local emergency management staff, and others with 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 (SROs), fire officials, public and mental health practitioners, and local emergency managers. Key partners on the districts' planning teams may include agency heads or managers, and regional entity representatives or other senior staff (such as directors of community mental health programs, or fire services, or law enforcement entities).

Other representatives on school teams may also be needed on an ad-hoc basis to contribute their expertise or resources, develop courses of action, or review certain components of the plan. Examples of school core planning team and ad-hoc members are included in Figure 4.

To facilitate ongoing communication, it is advisable for the district to establish a process for conveying essential planning information between and among the district, its schools, and partners. One possible approach is to establish district-level POCs for each community partner, which streamlines the process and decreases the burden for community partners. A variation of this approach is for a district official to coordinate, facilitate, and participate in school-based planning. Another option is for the district to serve as a liaison between its schools and the community partners by connecting the entities to participate on the school core planning team.

District and school core planning teams also may need to coordinate their representatives with community partners. For example, a district core planning team may include agency heads or managers, regional entity representatives, or other senior staff. These can include directors of community public and mental health agencies, fire services, or law enforcement entities. The school core planning team may include program officials from those same agencies. These might be social workers and mental health counselors, public health practitioners, SROs, and city fire personnel. Using this framework, agencies would develop internal communications systems to ensure leadership and program personnel are apprised of one another's work.

Step 1: Help Schools Form Collaborative Planning Teams

The district should consider the following when developing policies and procedures:

- Which district representative to assign to each school core planning team
- The nature and extent of a district representative's participation on each school core planning team
- The recommended size of the school core planning team (small enough to permit close collaboration with first responders and other community partners, yet large enough not to place an undue burden on any single person and to represent the school, its families, and the community)
- Which groups of school personnel, students, families, organizations, and community partners should be represented on the school core planning team
- How appropriate community partners can be connected to each school core planning team
- How school core planning team members, particularly community partners, will be recruited, selected, and represented (districts may want to provide schools with a list of established POCs for organizations relevant to the planning team — for example, the fire department, law enforcement, emergency medical service, and utility companies)
- Establishing formal agreements with community partners (e.g., memorandums of understanding)
- What can be defined as a realistic level of participation by community partners on school core planning teams
- Which local or state community partners should or may be invited to participate on the ad-hoc planning team

Figure 4: Sample representation on school core planning teams and ad-hoc planning teams.



School's Role

The district's established policies and procedures should enable each of its schools to form a core planning team with a diverse range of members, including school personnel, student and parent representatives, individuals and organizations that serve and represent the interests of the whole school community, and community partners. Additionally, each school should be able to invite additional representatives to participate on the ad-hoc planning team, as needed.

Task 2: Develop a Common Framework

It is essential for the district planning team to establish a framework (e.g., common concepts, principles, approach, terminology) for use by all members — the educational personnel as well

as the community partners with shared roles and responsibilities in school preparedness (e.g., in the areas of school safety, security, and emergency management). This common framework is designed to facilitate mutual understanding, coordination, and execution of the emergency management strategies, as well as the use of a common command structure of the group, its authorities, and working procedures. To support the six-step planning process, the district should work with school core planning teams to help ensure that all team members learn each other's vocabulary and culture as they move toward the common goal of implementing a comprehensive school EOP.

District's Role

The district develops policies and procedures that inform the common framework that the school core planning team uses. In developing these policies and procedures, the district should consider the extent to which it should provide each school planning team with the following:

- Training on the six-step planning process
- A common set of terms and definitions
- Training on NIMS
- Training on ICS

School's Role

Based on the district's policies and procedures, each school core planning team should establish a common framework that facilitates effective team planning.

Task 3: Define and Assign Roles and Responsibilities

District's Role

The district establishes policies and procedures to help ensure that each person involved in developing and refining the school EOP knows her or his roles and responsibilities.

The district should consider the following:

- Who will chair the school core planning team
- Who from the district will serve on the school core planning team, and who will provide details about roles and responsibilities
- What the key roles and responsibilities are of a school core planning team
- To what degree the district should train members of the school core planning team on their roles and responsibilities in the planning
- How the school core planning team will assign and document roles and responsibilities

Step 1: Help Schools Form Collaborative Planning Teams

- Who will be accountable for the outcomes of the school core planning team
- Who will be accountable for managing the school core planning team's operations.

School's Role

Based on the district's policies and procedures, each school core planning team should understand the role of the planning team and its members, and be able to effectively define and assign roles and responsibilities.

Task 4: Determine a Regular Schedule of Meetings

School emergency management planning is an ongoing effort that is reinforced through regularly scheduled meetings.

District's Role

The district plays an important role in setting districtwide expectations and requirements for holding regular but flexible planning meetings within each school. Regular meetings facilitate greater collaboration, coordination, and communication among school core planning team members. They also help to solidify critical relationships and ensure that all school teams across the district are adequately committed to their respective planning efforts.

The district should consider the following when developing its policies and procedures:

- How long it should take to develop the school EOP
- How frequently the school core planning team should meet during the EOP development process
- How frequently the school core planning team should meet after the EOP has been developed (see Step 6 for more information on reviewing, revising, and updating the plan after development)

School's Role

Based on the district's established policies and procedures, each school core planning team should be able to determine a regular schedule of team meetings.

Step 1 Outcomes

After completing Step 1, the district has supported the school in (1) forming a school planning team, (2) forming a common framework, (3) defining and assigning roles and responsibilities, and (4) determining a regular schedule of meetings.

Step 2: Help Schools Understand the Situation

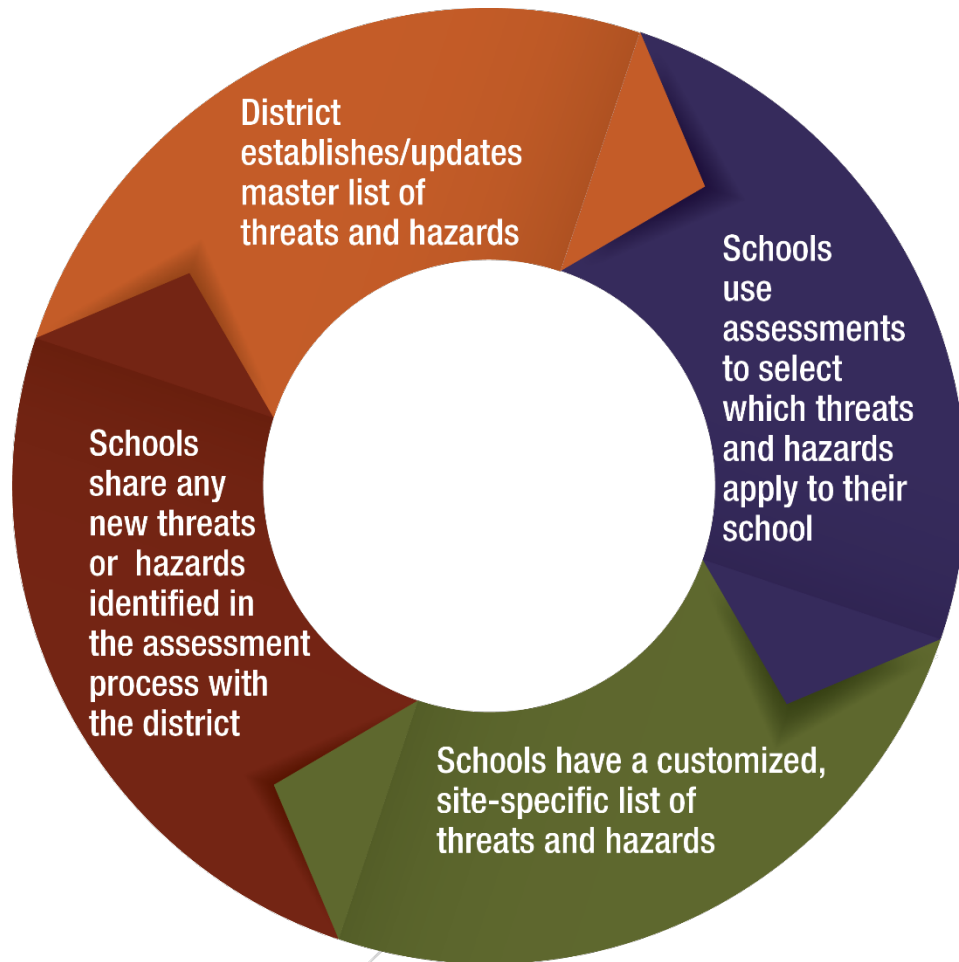


A major order of business in planning at both the district and school levels is to understand the unique situation of each school and the surrounding community so that a customized plan can be developed for each school. For example, only one school in the district may be near a highly trafficked commercial area; only one school may be near train tracks; or one school may be in a tsunami zone. The district can provide guidance, as explained in Step 2. It begins by identifying the universe of possible threats and hazards that schools throughout the district might face. Then, the district needs to support each school planning team as it (1) receives the master list of threats and hazards from the district, identifies those to go on the school's individualized list, and conducts assessments to determine the threats and hazards on the district's master list that could impact the school; (2) evaluates the level of risk and vulnerability posed by the identified threats and hazards; and (3) prioritizes the threats and hazards.

Task 1: Identify Threats and Hazards

Figure 5 illustrates the collaborative process for identifying threats and hazards utilized by the district and school core planning teams at schools throughout the district. The process begins with the district establishing a master list of threats and hazards, which is continually updated and maintained. This list includes those that it requires to be part of every school's EOP.

Figure 5: The collaborative process used by schools and districts to identify threats and hazards at schools



Threats and hazards fall into four general categories: natural hazards; technological hazards; biological hazards; and adversarial, incidental, and human-caused threats. Table 2 lists threats and hazards for each of the four categories. Those listed are just examples; there are many others not included.

Table 2: Threats and hazards by type, and examples

Threat and Hazard Type	Examples
Natural Hazards	<ul style="list-style-type: none"> • Animals • Earthquakes • Extreme temperature • Fire, including wildfires • Floods • Hurricanes • Landslides or mudslides • Lightning • Severe wind • Tornadoes • Tsunamis • Volcanic eruptions • Winter precipitation
Technological Hazards	<ul style="list-style-type: none"> • Accidental release of hazardous materials from within the school, such as gas leaks or laboratory spills • Dam failure • Explosions or accidental release of toxins from industrial plants • Hazardous material releases from major highways or railroads • Power failure • Radiological releases from nuclear power stations • Water failure
Biological Hazards	<ul style="list-style-type: none"> • Contaminated food outbreaks, including <i>Salmonella</i>, botulism, and <i>E. coli</i> • Infectious diseases, such as pandemic influenza, extensively drug-resistant tuberculosis, <i>Staphylococcus aureus</i>, and meningitis • Toxic materials present in school laboratories
Adversarial, Incidental, and Human-caused Threats	<ul style="list-style-type: none"> • Active shooters/aggressors • Bomb threats • Bullying • Criminal threats or actions (e.g., kidnapping) • Cyberattacks • Domestic violence or abuse • Fire • Gang violence • Human trafficking • Suicide • Violent extremism

District's Role

Identifying threats and hazards facing a school is a large task, and as such, the district shares this key responsibility with schools. By drawing upon sources of historical information and forecasts from local, state, and federal agencies, the district is well positioned to identify the universe of threats and hazards that may face any district school.

The district may designate some threats and hazards as mandatory for every school to include on its list and therefore address in its plan. Examples include fires, cyber incidents, severe weather, and active shooter/aggressor situations. A district may also require that all schools include a threat or hazard unique to its geographical location, such as dam failure, if the entire district is vulnerable to this hazard. Districts also should consult state mandates when determining what threats and hazards are mandatory. For example, if a state requires schools to conduct lockdown drills, then schools should have plans in place for every situation that would trigger a lockdown, such as the presence of active shooters/aggressors.

Table 3 provides examples of (1) a district's master list of all potential threats and hazards that any school in the district could experience; and (2) a school's customized list of threats and hazards (drawn from the district's master list), which it will include in its EOP based on its assessed needs. Both lists include those threats and hazards that the district requires as a matter of policy to be part of every school's EOP.

The district should consider the following when developing policies and procedures:

- What type of training the district should provide to school core planning teams on the process of identifying threats and hazards
- How the district will identify the universe of all possible threats and hazards faced by any schools in the district (this includes what data should be collected at the district level)
- The extent to which the district will require certain threats and hazards to be addressed in EOPs for all schools in the district
- How regularly the district's or school's list of threats and hazards should be updated
- The process for identifying, over time, new or emerging threats and hazards for the district or an individual school

School's Role

Based on the district's master list of threats and hazards and the district's policies and procedures governing threats, hazards, and school-specific assessments, the school core planning team identifies the threats and hazards to include in the school EOP. This list will include those threats and hazards required by the district, as well as any others identified through the school's assessments.

Table 3: An example of a school’s customized list of threats and hazards for its emergency operations plan based on its district’s master list of threats and hazards

School District Master List of Threats and Hazards	School Customized List of Threats and Hazards
<ul style="list-style-type: none"> Earthquakes* Tornadoes* Lightning* Severe wind* Hazardous materials releases from major highways or railroads Radiological releases from nuclear power stations Dam failure Infectious diseases* Contaminated food outbreaks* Toxic materials in laboratories Fire* Active shooters/aggressors* Criminal threats or actions* Gang violence Bomb threats* 	<ul style="list-style-type: none"> Earthquakes Tornadoes Lightning Severe wind Hazardous materials releases from major highways or railroads Infectious diseases Contaminated food outbreaks Fire Active shooters/aggressors Criminal threats or actions Gang violence Bomb threats
<p>* Threats and hazards that the district requires to be part of every school’s EOP</p>	

Conduct Assessments to Identify Site-Specific Threats and Hazards

High-quality assessments can be an important way for schools to identify existing or new threats and hazards. Critical information and data can be gathered by assessing many of a school’s defining elements—for example, its site, culture and climate, capacity, and history of school threats. Districts play an important role in guiding schools in carrying out assessments and using the information gathered from them effectively.

District’s Role

After the district has established a master list of threats and hazards facing all its schools, it should work with each of its schools to develop a site-specific list of threats and hazards based on individual school assessments. To support numerous efforts, including corrective actions, it is recommended that a district representative participate in school site assessments. (For more information about different types of assessments, see Appendix A: Elements of the *School Guide*.) Toward that end, the district must (1) create policies and procedures that identify the

roles of districts and schools in conducting assessments, and (2) determine what measurements tools should be used.

Districts should consider the following when developing goals and procedures:

- Which assessments are required, which assessments are optional, and which assessment tools the school should use
- Which assessments require the presence or involvement of district personnel and which assessments are conducted by schools without the presence or involvement of district personnel
- The frequency at which the assessments are required
- How schools should conduct assessments (for example, certain school or district personnel may be required to participate in a walk-through of the school's building and/or campus for site assessments)
- Which community partners will participate, and how
- How assessment data will be used to inform a school's customized list of threats and hazards
- The type of training that will be required to conduct assessments

School's Role

After completing assessments, each school should create a customized, site-specific list of threats and hazards that it will address in its school EOP. If a school core planning team identifies any threats and hazards that may impact the school but that are not on the district's master list, it should include those on the school's list and alert the district that additional threats and hazards should be included on its master list. The next time the district updates its master list, the new threats and hazards should be included.

Task 2: Evaluate the Risks and Vulnerabilities Posed by Threats and Hazards

To evaluate each hazard and threat, schools must consider them in terms of the risk criteria: magnitude, duration, probability or frequency of occurrence; warning time; and the potential cascading effects of a threat or hazard. Additionally, schools should imagine the many ways an incident could unfold, i.e., how different variables could affect the different risk criteria.



District's Role

Districts can guide and support schools in evaluating the risks and vulnerabilities posed by the threats and hazards that each school has identified. This involves consolidating information from assessments gathered by each school into a usable format. Below are two strategies for evaluating a threat or hazard, which districts may wish to share with school core planning teams.

Scenario-based planning is one strategy that the district may wish to share with its school core planning teams. Using this approach, planning teams depict scenarios of each threat and hazard and the many ways a possible incident could unfold. In planning for each threat or hazard, the school planning teams should be instructed to apply the planning principles. For example, when applying the principle of “all settings, all times,” the team should plan for the threat as it relates to multiple settings (e.g., in classrooms, nonacademic settings, athletic fields, school buses, or field trips). More specifically, the plan should provide for the whole school community, which includes those with access and functional needs. (See additional details on “scenario-based planning” in Step 4, Task 1 of this guide, as well as in Appendix A: Elements of the *School Guide*.)

Using a **mathematical approach**, schools assign a number (e.g., on a scale of 1 to 4) to different categories of information for each of the risk criteria used in the ranking scheme. The Table 4 worksheet may be used to evaluate threats and hazards using this mathematical approach.

Table 4: 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 hrs.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> 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. 12–24 hrs. 1. 24+ hrs.	4. 12+ hrs. 3. 6–12 hrs. 2. 3–6 hrs. 1. < 3 hrs.	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low

At this stage of planning, we suggest districts encourage school core planning teams to err on the side of caution in evaluating risks and identifying vulnerabilities. As teams hypothesize the possible effects and impacts, there will be a variety of possible outcomes. To increase preparedness and to help ensure safety, teams should evaluate and plan for a threat’s worst possible outcome.

Districts should consider the following when developing their policies and procedures:

- To what degree the district will support and/or train schools on evaluating risks and vulnerabilities of the identified threats and hazards
- The extent to which schools or the district will assume the responsibility for evaluating the risks and vulnerabilities of the identified threats and hazards
- To what degree the district will contribute information and guidance on factors to help evaluate the risks and vulnerabilities of the identified threats and hazards

Step 2: Help Schools Understand the Situation

- The type, format, and content of the strategy (e.g., scenario-based planning or mathematical model) used to evaluate risks and vulnerabilities posed by the identified threats and hazards
- The extent to which all schools in the district will use the same strategy for evaluating risks and vulnerabilities of the identified threats and hazards

School's Role

Based on the policies and procedures established by the district, schools should be able to evaluate their risks and vulnerabilities associated with specific threats and hazards.

Task 3: Prioritize Threats and Hazards

District's Role

The district should help school planning teams categorize each threat and hazard as relatively high, medium, or low risk, after an evaluation of its risks and vulnerabilities. This prioritization will allow schools to determine which threats or hazards to directly address in their EOPs.

The district should consider the following when developing its policies and procedures:

- To what degree the district will support and/or train schools on prioritizing threats and hazards
- How the school planning team or the district defines “high risk,” “medium risk,” and “low risk,” as well as the implications of each category
- The extent to which the district will require that certain threats and hazards be considered high, medium, or low risk, and require that they be addressed within a school EOP, as discussed in Step 3
- The extent to which school planning teams and/or the district will assume the responsibility for prioritizing threats and hazards

School's Role

Based on the policies and procedures established by the district, each school core planning team should be able to prioritize threats and hazards.

Step 2 Outcomes

After completing Step 2, the school core planning team has (1) received a master list of threats and hazards from the district and conducted assessments to determine which of them are applicable at the school, (2) evaluated the risk posed by identified threats and hazards, and (3) prioritized threats and hazards.

Step 3: Help Schools Determine Goals and Objectives



In Step 3, the district plays the primary role. The district (1) develops goals and objectives for each of the threats and hazards included on its master list, (2) develops a master list of “cross-cutting functions” that apply to its master list of threats and hazards, and (3) develops goals and objectives for each of its cross-cutting functions. (These functions, described in detail in Step 3, Task 3, are critical activities that apply to more than one threat or hazard.)

In Step 3, the school core planning team (1) uses the district’s master list of threats and hazards to select which threats and hazards will be addressed in the school EOP, (2) uses the district’s goals and objectives to develop corresponding goals and objectives for each selected threat and hazard in the school EOP, and (3) uses the district’s master list of cross-cutting functions to select goals and objectives for those it selects for the school EOP.

Task 1: Select Threats and Hazards to Address in School EOPs

District’s Role

The school district should guide its school core planning teams in deciding which of the threats and hazards that were identified, evaluated, and prioritized in Step 2 will be addressed in each school EOP.

This is a critical decision point in the planning, one in which the district plays a particularly important role. *The district must guide the teams to ensure that they address more than threats and risks deemed the “high-risk” priorities.*

Step 3: Help Schools Determine Goals and Objectives

The district should consider the following when developing policies and procedures:

- How the district will train school core planning teams on the process of selecting threats and hazards for inclusion in school EOPs
- Whether there are state or local requirements, recommendations, priorities, or lessons learned regarding specific threats and hazards that school EOPs should address
- The extent to which the district will require or recommend that school EOPS should address certain threats and hazards
- The extent to which the district will determine guidelines for selecting threats and hazards for school EOPs, according to the risk priority of each of them
- The extent to which the district will provide training and technical assistance to schools on the prioritized hazards and threats

School's Role

Based on the policies and procedures established by the district, the school core planning team should be able to make a prioritized list of threats and hazards to be addressed in the school EOP.

Task 2: Develop Goals and Objectives for Selected Threats and Hazards

To ensure consistency and promote efficiency, the district can have the primary role in this step by developing a master list of goals and objectives for each of the threats and hazards included on the district's master list.

Goals are broad, general statements that indicate the desired outcome in response to a threat or hazard (e.g., prevent a fire from occurring on school grounds). Goals identify 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 district plays a primary role in developing districtwide goals for the threats and hazards facing schools for two key reasons: (1) It has a broader view about how schools should address threats and hazards — before, during, and after an emergency; and (2) the district will likely mandate the inclusion of specific threats and hazards into each school plan.

The district should develop at least three goals for a threat or hazard — one for before, one for during, and one for after a threat or hazard has ended. For gang violence, for instance, three possible goals include the following:

- Threat Goal Example 1 (before) — Prevent gang violence from occurring on school grounds
- Threat Goal Example 2 (during) — Protect all persons from injury and property from damage by gang violence

Step 3: Help Schools Determine Goals and Objectives

- Threat Goal Example 3 (after) — Restore the learning environment to its pre-incident state following gang violence

Objectives are specific, measurable actions required to achieve the goals; they are specific strategies or procedures designed to reach the goal. Objectives are often informed by federal, state, and local emergency management requirements, recommendations, and guidance, as well as lessons learned. Because the development of objectives is based on a broad understanding of their context, the district should play a large role in developing districtwide objectives for all the possible threats and hazards faced by any district school. District planners will likely need to identify multiple objectives that support each goal.

Using the goal in example 1 of preventing gang violence on or near school grounds, possible objectives include the following:

- Objective 1.1 — Institute student anti-gang prevention programs.
- Objective 1.2 — Provide gang awareness training to all staff so that they recognize signs of gang behavior (e.g., graffiti, colors, tattoos, hand signs).

Using the goal in example 2 of protecting all persons from injury and property from damage by gang violence, possible objectives include the following:

- Objective 2.1 — Initiate lockdown procedures at the school.
- Objective 2.2 — Initiate security protocols with law enforcement partners.

Using the goal in example 3 of restoring the learning environment following gang violence, possible objectives include the following:

- Objective 3.1 — Provide counseling to students who were traumatized by the violence.
- Objective 3.2 — Conduct student conflict mediation if there are any outstanding conflicts.

If a school identifies a unique threat or hazard not on the district's master list (see Step 2), it should be reported to the district for incorporation into the master list so the district can write relevant goals and objectives.

The district should consider the following when creating policies and procedures:

- What federal, state, and local laws should be considered in developing goals or objectives for different threats and hazards (for example, county fire codes may have requirements related to how to store combustible materials, which should be reflected in the objective(s) related to storing those materials; or, states may have mandated policies and procedures for earthquake response, which should be reflected in the objective(s) related to response protocols)

Step 3: Help Schools Determine Goals and Objectives

- What federal, state, and local guidance, recommendations, and lessons learned the district will utilize when developing districtwide goals and objectives
- To what degree the district will work with representatives from school core planning teams in developing districtwide goals and objectives

After the district has developed districtwide goals and objectives for the threats and hazards, it should share them with school core planning teams for inclusion in their respective school EOPs. These will serve as a foundation to each school core planning team's efforts in Step 4, while facilitating continuity and consistency. Additionally, this can be a meaningful exercise for the district, as it will help to illustrate the common needs for resources at schools throughout the district.

School's Role

Based on the policies and procedures established by the district and selections from the district's master list, each school core planning team will select the goals and objectives corresponding to their selected threats and hazards for inclusion in their school EOPs.

Task 3: Identify Cross-Cutting Functions

After the district has completed objectives for all the district's possible threats and hazards, it will find that certain critical cross-cutting functions or emergency-related activities apply to more than one threat or hazard. Cross-cutting functions include evacuating; sheltering in place; providing medical care; accounting for all students, staff, and visitors; and communicating with school staff, students, families, and the general public. For example, whether the threat is an active shooter/aggressor or a bomb threat, schools need to develop communications plans that address alerts and notifications.

District's Role

The district should compile a list of the cross-cutting functions that appear in the goals and objectives contained in the district's master list of threats and hazards, and add to the list, as needed, according to federal, state, and local policies. These will become functional annexes, which are sections of the plan that detail goals, objectives, and courses of action to protect the school community before, during, and after a possible incident.

The district should consider the following when developing policies and procedures related to identifying cross-cutting functions:

- How often the list should be updated based on federal, state, and local recommendations, priorities, and lessons learned
- What functions are the most likely to support more than one type of emergency incident
- What functions should be addressed, at a minimum, by school core planning teams

Note, for example, that the *School Guide* recommends that school EOPs should address, at a minimum, the functions listed below. See Appendix A: Elements of the *School Guide* for more information on each of these functional annexes, including the policies and procedures that the district should consider for developing each annex.

- evacuation
- shelter-in-place
- accounting for all persons
- communications and warning
- family reunification
- continuity of operations (COOP)
- recovery
- public health, medical, and mental health
- security
- behavioral threat assessment

After the district has developed a list of districtwide functions, such as those listed above, it should share them with schools for inclusion in their respective school EOPs.

School's Role

The goals, objectives, and courses of action for functions will become functional annexes that are placed within each school EOP in the district. Using communications as an example, the goals, objectives and courses of action designed to help ensure information sharing will become a portion of the outline for the Communications and Warnings Annex. The goals and objectives that are developed during Task 4 will serve as the starting point for creation of those functional annexes, as the school core planning team begins developing customized, site-specific courses of action for enacting each function.

Task 4: Develop Goals and Objectives for Cross-cutting Functions

District's Role

After the district has identified a master list of districtwide functions to be addressed in school EOPs, the district will develop at least three common goals and objectives for each cross-cutting function to be used by the schools. This will guide the school planning team's work as it develops courses of action. For a reunification function, three possible goals include the following:

Step 3: Help Schools Determine Goals and Objectives

- Function Goal Example 1 (before): Equip the school community to carry out an orderly reunification protocol under potentially high-stress conditions and/or in the aftermath of a disaster.
- Function Goal Example 2 (during): Safely reunify students with verified and authorized families and/or guardians.
- Function Goal Example 3 (after): Use lessons learned from administering reunification procedures to improve long-term planning efforts.

Once the district develops goals for functions, it should then develop objectives. For the evacuation goals above, objectives could include the following:

- Objective 1.1 (before): Train staff, students, and other stakeholders on reunification procedures.
- Objective 2.1 (during): Initiate a systematic release of students to families and/or guardians once verified by student records.
- Objective 3.1 (after): Complete an after-action report following the completion of reunification procedures that documents all issues encountered and appropriate updates to be made to the EOP, as needed.

After the district has developed districtwide goals and objectives for the districtwide list of functions, it should share these goals and objectives with school core planning teams for inclusion in their respective school EOPs.

The district should consider the following when creating policies and procedures:

- What federal, state, and local laws might govern in developing goals or objectives for functions
- What federal, state, and local guidance, recommendations, priorities, and lessons learned the district will consider and/or adhere to when developing districtwide goals and objectives for functions
- To what degree, if any, the district will work with school core planning teams in developing districtwide goals and objectives for functions

School's Role

Based on the policies and procedures established by the district, each school core planning team across the district should have goals and objectives for addressing each function.

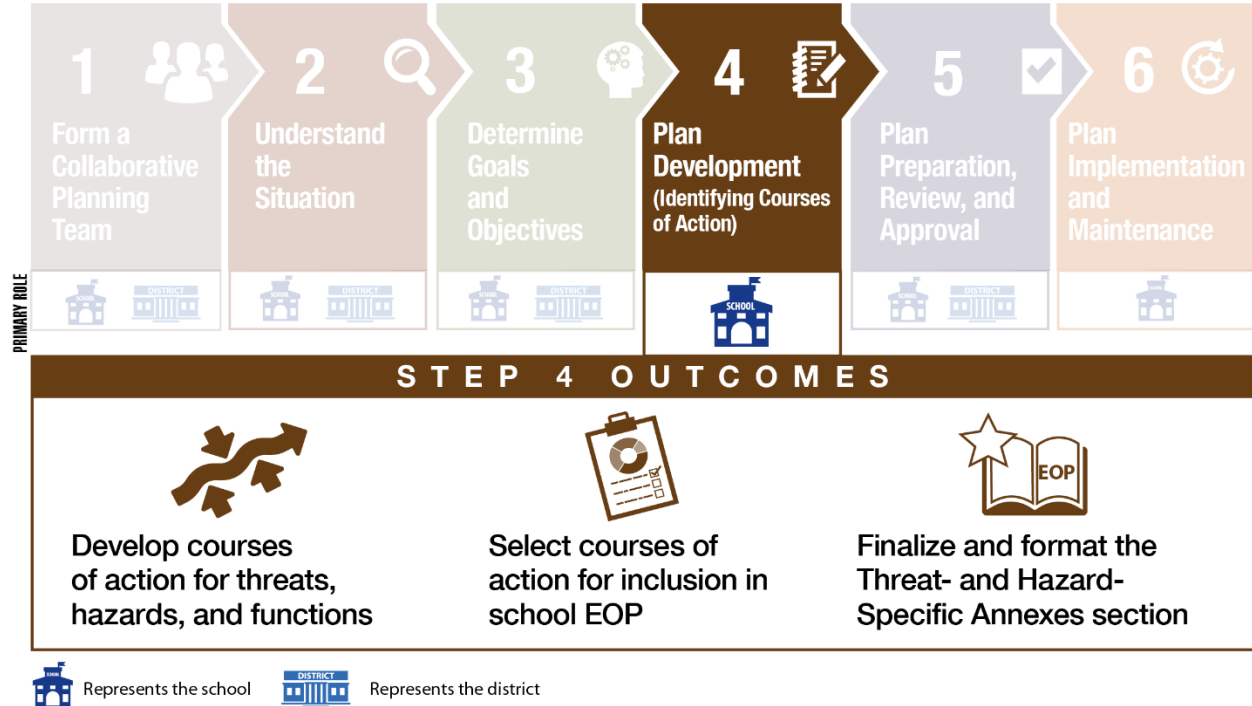
Step 3 Outcomes

After completing Step 3, the school core planning team has (1) selected threats and hazards from the district's master list to address in the school EOP; (2) using the district's corresponding goals

Step 3: Help Schools Determine Goals and Objectives

and objectives, included the goals and objectives for its selected threats and hazards in the school EOP; and (3) using the district's master list of cross-cutting functions, included the goals and objectives for them in the school EOP.

Step 4: Help Schools Develop Plans (Identify Courses of Action)



In Step 4, the school core planning team develops courses of action to accomplish each objective identified in Step 3 for threats, hazards, and functions. In this step, the school core planning team plays a primary role in using the goals and objectives created by the district in Step 3 to develop site-specific courses of action that are customized to its school building(s). The district plays a secondary role in supporting schools in this process, which is detailed below.

Task 1: Develop Courses of Action

The school planning team will need to decide how it will respond to each threat and hazard in varying circumstances — what course of action(s) it will take. Courses of action are protocols and procedures that address the what, who, when, where, why, and how for each threat, hazard, and function. Courses of action include criteria for determining how and when each response will be implemented under a variety of circumstances. For example, courses of action will provide detailed instructions for the many evacuation routes for all classrooms.

The goals, objectives, and courses of action developed for specific threats and hazards will eventually go into the Threat- and Hazard-Specific Annexes section of the EOP, which outlines the specific goals, objectives, and courses of action for protecting the school community before, during, and after a possible natural hazard or threatening event. While the goals, objectives, and courses of action developed for functions may be activated for many different threats and hazards, those will eventually go into the Functional Annexes section of the school EOP.

District's Role

The school district should work with schools to develop customized courses of action at each school. Additionally, the school district elaborates on and describes how the district-provided goals and objectives are to be used and customized by the school core planning team.

Because courses of action should be customized for each school, the primary responsibility for developing them resides with school core planning teams. However, districts can support the school planning teams' efforts in three key ways:

1. Districts can create a model set of goals, objectives, and courses of action. Alternatively, districts can provide schools with a minimum set of courses of action, along with information related to the feasibility, capabilities, and limitations of those actions.
2. They can work with school core planning teams to help ensure that each school's courses of action are coordinated with other schools across the district. For example, the district may be required to coordinate specific family reunification sites for schools, especially if multiple schools identify the same location as their respective site, which might overrun the site if all convene at once during a districtwide emergency.
3. Districts can contribute to developing courses of action by informing schools of what support, services, and functions the district will provide in certain scenarios. For example, in the event of an emergency, the district may always coordinate school buses. In any threat, hazard, or function that may require transportation using school buses, districts can let schools know how they will support any school bus transportation needs.

Courses of action are typically developed using "scenario-based planning." This approach prompts planning teams to consider different scenarios for how incidents involving threats or hazards may unfold to develop a comprehensive set of courses of action. (See Appendix B for an example of a type of scenario that may be used in scenario-based planning.)

Scenario-based planning, described briefly in Step 2, Task 2, typically includes these four 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 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 during an active shooter/aggressor situation.
3. **Identify decision points.** Decision points indicate the place in time line, 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 threat or hazard, such as whether 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:

Step 4: Help Schools Develop Plans (Identify Courses of Action)

- 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 to perform the action before the school is confronting the hazard?
- What must happen before a potential emergency?
- What happens after a potential emergency?
- What resources are needed to perform the action?
- How will this action affect specific populations, such as individuals from religiously, racially, and ethnically diverse backgrounds; individuals with limited English proficiency; individuals with cognitive and/or physical disabilities; individuals with mental health needs; and, individuals with other access or functional needs. What resources are needed to best support these individuals?” The district should work with school core planning teams to develop customized, site-specific courses of action for addressing the goals and objectives that the schools have selected from the district’s master list of threats, hazards, and functions.

The district should consider the following when developing policies and procedures for courses of action for threats, hazards, and functions:

- The degree to which the district will provide guidance, training, and support to school planning teams regarding the development of courses of action
- How the district will help ensure that the courses of action developed by school core planning teams contain enough site-specific details
- The extent to which the district will provide examples or minimum requirements for schools to consider while developing courses of action
- How the district will help to ensure that courses of action for different schools are coordinated with one another
- The extent to which the district will provide courses of action for the support, services, and functions that the district will provide to a school in any given scenario (for example, the district will always take over business processes and payroll if a school is incapacitated and must activate its COOP Annex, as described in Appendix A)

School's Role

Based on the policies and procedures established by the district, each school core planning team should be able to develop customized and site-specific courses of action that address each threat, hazard, and function.

Task 2: Select Preferred Courses of Action

District's Role

In the previous task, school core planning teams develop possible courses of action for identified hazards and threats. During this task, they will use policies and procedures developed by the district to compare and then select the most feasible courses of action based on a variety of factors, including, but not necessarily limited to, the capacity and the limitations of the school, the district, and community partners.

The district should consider the following when developing policies and procedures:

- The degree to which the district will provide guidance, training, and support to school planning teams on how to select courses of action
- The capacity and limitations of schools, the district, and community partners
- The type and amount of resources available to schools for accomplishing courses of action
- The federal, state, and local laws regarding resources that may be required to support individuals with disabilities and others with access and functional needs, or to effectively communicate with individuals with limited English proficiency in the event of an emergency

(For example, the *Americans with Disabilities Act [ADA]* and *Section 504* of the *Rehabilitation Act* prohibit discrimination, based on disability, across the spectrum of emergency management services, programs, and activities. Among other things, school EOPs 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; and comply with the law's architectural and other requirements. Examples of resources that may be required to support individuals with disabilities and others with access and functional needs include evacuation chairs, feeding equipment, oxygen tanks and masks, wheelchairs, and communication boards.)

- The degree to which districts will exercise control over the resources available to school core planning teams to accomplish courses of action
- How official partnerships, through the establishment of partnership agreements, may expand available resources to schools and the district

Step 4: Help Schools Develop Plans (Identify Courses of Action)

The district's policies and procedures are meant to guide schools in comparing the costs and benefits of each possible course of action against its goals and objectives. Additionally, they are intended to help schools identify and find resources necessary to accomplish each course of action. As the schools identify the resources they need, the districts should work with them to make certain they can acquire, store, and distribute all of the resources, along with any other materials, and equipment needed to carry out courses of action before, during, and after an emergency.

Step 4 may also prompt the district to conduct a comprehensive review of the resources needed by all its schools to determine whether existing resources among its schools are sufficient to prepare for, recovery from, respond to emergencies. If not, the district can consider the following approaches:

- Work with school core planning teams to develop alternative strategies to carry out the courses of action with the resources available;
- Take steps to acquire additional resources for the schools within an agreed-upon time frame;
- Support school core planning teams in asking community partners for help in identifying strategies and/or opportunities for sharing resources; and/or
- Help school core planning teams establish official partnerships necessary to carry out specific courses of action by developing partnership agreements, such as memoranda of understanding (MOUs) or memoranda of agreement (MOAs).

School's Role

Based on the policies, procedures, and capacity of the district and its partners, each school core planning team should select courses of action that are feasible, considering both the capacity and the limitations of the school, the district, and community partners.

Task 3: Finalize and Format the Functional and Threat- and Hazard-Specific Annexes

Once courses of action have been selected, the annexes will be finalized. The district should recommend a format that school core planning teams can use to create the Functional Annexes and the Threat- and Hazard-Specific Annexes sections of school EOPs. The following format is an example that can be used for the both sections. Using the following format, each function, threat, and hazard will have at least three goals, with one or more objective for each goal, and courses of action for each of the objectives:

- Title (the function, threat, or hazard)
- Goal(s)
 - Objective(s)

■ Courses of Action

Table 5: Sample format for functional annexes and threat- and hazard-specific annexes of the school emergency operations plan

Function: Shelter-in-Place			
GOAL: DURING: Protect Students and Staff from Exposure to the Contaminant			
OBJECTIVE Notify all students and staff to follow shelter-in-place protocol	OBJECTIVE Provide immediate medical support before rooms are sealed	OBJECTIVE Seal rooms within 3 minutes of notification	OBJECTIVE Turn off HVAC system within 3 minutes of notification
COURSES OF ACTION Make announcement on PA/intercom system Contact classes meeting outside using two-way radio Send runner to gym and music rooms to verify notification Call transportation to divert buses away from the area	COURSES OF ACTION Deliver inhalers to designated students Move medically fragile students to health room Discreetly remind teachers of medical protocols	COURSES OF ACTION Close all windows and doors Seal gaps with wet towels Cover all openings to outdoors with plastic sheeting and tape	COURSES OF ACTION Shut down master HVAC system for main building Shut down auxiliary HVAC system for gymnasium Close individual unit ventilators in portable classrooms

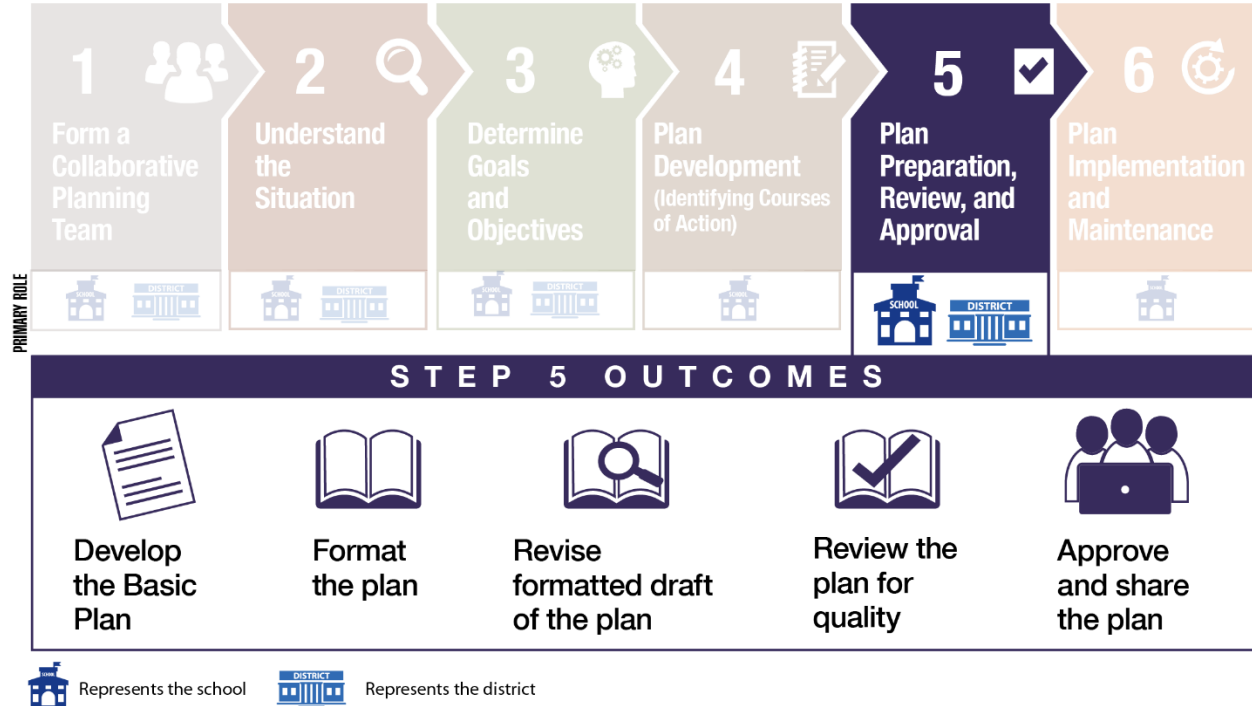
Courses of action already outlined in a functional annex need not be repeated in a hazard-specific annex. If there is a functional annex that applies to one of the threat- or hazard-specific annexes, the latter will include it by reference. For example, if a “during” course of action for a fire hazard involves evacuation, and there is an Evacuation Annex section, the Fire Annex section would indicate “see Evacuation Annex” in the “during” course of action section rather than repeat the evacuation courses of action in the Fire Annex. Descriptions of these are contained in Appendix A.

Based on the policies and procedures established by the district, each school core planning team should be able to select courses of action that address each threat, hazard, and function for inclusion in the school EOP.

Step 4 Outcomes

After completing Step 4, the school core planning team has (1) developed courses of action for threats, hazards, and functions; (2) selected courses of action for inclusion in the school EOP; and (3) finalized and formatted the Threat- and Hazard-Specific Annexes section of the school EOP.

Step 5: Help Schools Prepare, Review, and Approve Plans



In Step 5, schools play the primary role for the first three tasks, and the district assumes the primary role for tasks 4 and 5. In Step 5, the school team is tasked with (1) developing the Basic Plan section content; (2) formatting the plan; and (3) revising the formatted draft of the plan. The district has the primary role for the last two tasks: (4) reviewing the school(s)' plan for quality and (5) approving and sharing the plan. The district's role in Step 5 is detailed below.

Task 1: Develop 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. The content in this section provides a solid foundation for the school's operations. See Table 6: The 10 elements of the Basic Plan section of the school emergency operations plan on page 45 for details on the elements recommended for inclusion in the Basic Plan, and Appendix A: Elements of the *School Guide* for a full breakdown of what sections and subsections are recommended for inclusion.

District's Role

Since at least one district representative serves on a school planning team, almost all the information contained in the Basic Plan should be able to come from the planning team. If the planning team finds that it must go outside its members for a significant amount of information, it may indicate that the planning team membership needs to be expanded.

School's Role

Each school is responsible for developing the Basic Plan section of the school EOP, which addresses the overarching activities the school should undertake regardless of the function, threat, or hazard.

Work With Schools to Create an Exercise Program

District's Role

Ideally, the district will work with school core planning teams to create an exercise program, which allows all stakeholders to become familiar with the plans and be prepared in the event of an actual emergency. 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. Additionally, exercises offer planners information as to where there are gaps in the planning or training.

Exercises may range from basic fire and shelter-in-place drills to full-scale community-wide drills that realistically portray a crisis and show the role the school plays in school district and municipal planning. Examples of exercises include

- seminars;
- workshops;
- tabletop exercises;
- drills;
- functional exercises; and
- full-scale exercises.

See Appendix A: Elements of the *School Guide* for more information on training and exercises and detailed descriptions of these examples.

Districts should recommend that school core planning teams work with and involve community partners and local emergency management staff when planning, implementing and reporting on the results of drills and exercises. Community partners may include law enforcement officers, EMS practitioners, fire department personnel, neighboring schools or districts, and other external partners, depending on the type of drill. Districts can also work with schools and community partners to ensure consistency with common emergency management terminology.

To ensure that both internal and external stakeholders (students, faculty, staff, and community partners) are not confused or concerned when a drill or exercise takes place, the district should encourage schools to communicate information in advance, including dates, locations, and times, with everyone involved and impacted. In some cases, that may include conveying information to families and the surrounding school or district community. If students are involved, the district

should work with schools to consider the age of the student population when selecting the appropriate exercise. When families and surrounding community members are involved, the district and its schools should include participants reflecting the area's cultural makeup.

Before deciding how many and which types of exercises to implement, the district should work with school core planning teams to consider the costs and benefits of each exercise, 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 is more like a real emergency, thus providing more constructive feedback to improve the plans. The district should also suggest that school core planning teams conduct exercises under different and nonideal conditions (e.g. during different times of day and points in the academic calendar, with the absence of key personnel, at various school events, and under different weather conditions). After drills and exercises are complete, the district should recommend that schools debrief and develop an after-action report that evaluates results, identifies gaps or shortfalls, and documents lessons learned.

Districts should address the following when developing policies and procedures:

- The extent to which there are federal, state and local laws, requirements, or recommendations regarding the type and frequency of exercises
- How an ideal exercise program is defined for the district, based on the threats, hazards, and functions addressed in school EOPs across the district
- How much time and how many resources are available for exercises
- The feasibility of conducting certain exercises
- Which community partners should be involved in different exercises

Work With Schools to Establish a Process for Plan Review and Revision

District's Role

The district should work with school core planning teams to establish a process for recurring reviews and revisions of the plans by the school planning teams. Many states have their own requirements related to the frequency of EOP updates, which districts should use as a guide when determining requirements for the schools. This *District Guide* recommends that no part of the plan go for more than two years without being updated.

Instead of reviewing the entire plan at once, the district should work with schools to periodically review and revise portions of the school EOP. Some schools find this approach useful. For example, the district can establish a system for schools to review a portion each month or at natural breaks in the academic calendar. Certain events will also provide new information that can be used to inform the plan. The district should consider having the school core planning teams review and update school EOPs — or sections of their EOPs — after the following:

- Actual emergencies

Step 5: Help Schools Prepare, Review, and Approve Plans

- Changes in policy, personnel, organizational structures, processes, facilities, or equipment
- Formal and final updates to planning guidance or standards
- Formal exercises
- Changes in the school, district, and surrounding community
- A change in threats or hazards or the emergence of a new threat or hazard
- Ongoing assessments that generate new information

The district should also consider providing guidance or requirements to school core planning teams regarding the way in which school EOPs should be developed and updated. This guidance should align with all applicable federal, state, and local laws.

Table 6: The 10 elements of the Basic Plan section of the school emergency operations plan

1. Introductory Material <input type="checkbox"/> This section should include a cover page, as well as individual pages for promulgation document signature(s), approval and implementation, record of changes, record of distribution, and table of contents.	2. Purpose and Situation Overview <input type="checkbox"/> The first parts of this section set 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 achieve. The statement should be supported by a brief synopsis of the basic plan and annexes. The situation overview section explains why a school EOP is necessary.	3. Concept of Operations <input type="checkbox"/> The Concept of Operations section explains in broad terms the school administrator's intent with regard to an operation.
4. Organization and Assignment of Responsibilities <input type="checkbox"/> 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.	5. Direction, Control, and Coordination <input type="checkbox"/> This section describes the framework for all direction, control, and coordination activities.	6. Information Collection, Analysis, and Dissemination <input type="checkbox"/> This section addresses the role of information in the successful implementation of the activities that occur before, during, and after an emergency.
7. 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 training frequency to ensure that staff, students, faculty, parents, and community representatives understand roles, responsibilities, and expectations. <input type="checkbox"/> Hold a meeting <input type="checkbox"/> Visit evacuation sites <input type="checkbox"/> Give involved parties appropriate and relevant literature on the plan, policies, and procedures <input type="checkbox"/> Post key information throughout the building <input type="checkbox"/> Familiarize students, staff, and families and guardians with the plan and community partners <input type="checkbox"/> Train staff on the skills necessary to fulfill their roles	8. Administration, Finance, and Logistics <input type="checkbox"/> 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.	9. Plan Development and Maintenance This section discusses the overall approach to planning and the assignment of plan development and maintenance responsibilities. This section should do the following: <input type="checkbox"/> Describe 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 <input type="checkbox"/> Assign responsibility for the overall planning and coordination to a specific position or person <input type="checkbox"/> Provide for a regular cycle to train on, evaluate, review, and update the school EOP
10. Authorities and References This section provides the legal basis for emergency operations and activities. <input type="checkbox"/> Lists of laws, statutes, ordinances, executive orders, regulations, and formal agreements relevant to emergencies <input type="checkbox"/> 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		

For more information about the Basic Plan, see Appendix A: Elements of the *School Guide*.

Task 2: Format the Plan

An effective school EOP allows users to find the information they need easily and is compatible with local and state plans. The EOP must use plain language and may include pictures and/or visual cues to illuminate key steps.

District's Role

Districts should work with school core planning teams and community partners to determine a common school EOP format for use districtwide. This will help to promote integration and coordination across the district and with community partners. There are many different plan formats from which to choose. The traditional school EOP format can be tailored to meet individual school needs. This format includes three major sections: the Basic Plan, Functional Annexes, and Threat- and Hazard-Specific Annexes. The elements of each EOP section are illustrated in detail in Table 7: Traditional school emergency operations plan format, by sections.

The district should consider the following when developing policies and procedures that guide each school core planning team's EOP formatting:

- The extent to which the district will provide tools, resources, or other forms of guidance to school core planning teams developing school EOPs
- The extent to which the district will require, recommend, or suggest a school EOP format to be used by all schools in the district
- The components that the district's preferred school EOP format will include, and how those components will be structured and ordered

School's Role

Based on the policies and procedures established by the district, each school core planning team should be able to format its EOP.

Table 7: Traditional school emergency operations plan format, by sections

<h2>Basic Plan</h2> <ol style="list-style-type: none"> Introductory Material <ol style="list-style-type: none"> Cover Page Promulgation Document and Signatures Approval and Implementation Record and Changes Record of Distribution Table of Contents Purpose and Situation Overview <ol style="list-style-type: none"> Purpose Situation Overview Concept of Operations Organization and Assignment of Responsibilities Direction, Control, and Coordination Information Collection, Analysis, and Dissemination Training and Exercises Administration, Finance, and Logistics Plan Development and Maintenance Authorities and References 	
<h2>Functional Annexes</h2> <p>NOTE: This is not a complete list, but it is recommended that all EOPs include at least the following functional annexes:</p> <ol style="list-style-type: none"> Communications Evacuation Shelter-in-Place Lockdown Accounting for All Persons Reunification Continuity of Operations (COOP) Security Recovery Health and Medical 	
<h2>Threat- and Hazard-Specific Annexes</h2> <p>NOTE: This is not a complete list. Each school's annexes will vary based on its hazard analysis.</p> <ol style="list-style-type: none"> Hurricane or Severe Storm Earthquake Tornado Hazardous Materials Incident Mass Casualty Incident Active Shooter Pandemic or Disease Outbreak 	

Task 3: Revise the Formatted Draft

District's Role

Once a school has determined its EOP format, the district will work with school core planning teams to insert the school plan's content developed thus far into each appropriate section. After that, the district will work with school core planning teams to revise the formatted plan according to writing conventions and to add necessary tables, charts, and other supporting graphics. The district may (1) assist with technical writing, including but not limited to providing any district

policies and procedures for inclusion of sections in a school EOP; (2) contribute important information summarized with checklists and visual aids, such as maps, tables, flowcharts, and other supporting graphics; and (3) provide a list of POCs for coordination efforts. In the early stages of planning, the district should provide comments on the draft and help facilitate connections between school core planning teams and plan stakeholders, including those who have a responsibility in implementing the plan.

The district should consider the following when developing policies and procedures:

- The degree to which the district will provide assistance, training, and guidance on how to write the school EOP
- The extent to which the school core planning teams will receive districtwide plan content for inclusion in their EOPs
- The degree to which the district will provide feedback on early drafts of the school EOP and how it will be done
- The extent to which the district will help school core planning teams connect with school EOP stakeholders to receive feedback on early drafts
- The required accessible formats and languages in which the draft school EOP should be made available (for example, making online documents compliant with *Section 508* of the *Rehabilitation Act of 1973*, as amended [*Rehabilitation Act*]; offering hard-copy documents in Braille; and translating all plan documents into languages used by community stakeholders).

School's Role

Based on the policies and procedures established by the district, each school core planning team should be able to write a draft of the school EOP.

Task 4: Review the Plan for Quality

District's Role

The district is often charged with reviewing school EOPs, and therefore plays a primary role in Task 4. We recommend districts develop a framework for reviewing and approving plans. This framework should identify who from the district will review plans, how plans will be reviewed, and what criteria will be used to review plans. There are many different criteria that the district may use when reviewing school EOPs. For example, the district 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 all school EOPs within the district. See Table 8: Criteria for evaluating a school emergency operations plan for an outline of measures a district can use to help determine if a plan is “high-quality.”

Table 8: Criteria for evaluating a school emergency operations plan

✓ The plan is adequate if it
<ul style="list-style-type: none"> • identifies and addresses critical courses of action; • accomplishes the assigned function; and • includes valid assumptions.
✓ The plan is feasible if
<ul style="list-style-type: none"> • the school can accomplish the assigned function and critical tasks.
✓ The plan is acceptable if it
<ul style="list-style-type: none"> • meets the requirements driven by a threat or hazard; • meets costs and time limitations; and • is consistent with the law.
✓ The plan is complete if it
<ul style="list-style-type: none"> • incorporates all needed courses of action; • integrates the needs of the whole school community; • provides a complete picture of what should happen, when, and at whose direction; • estimates times for achieving objectives; • identifies success criteria; and • conforms to the planning principles in this guide.
✓ The plan is compliant if it
<ul style="list-style-type: none"> • adheres to applicable state and local laws.

The district should consider the following when developing policies and procedures:

- How the district will provide training to each school core planning team on the characteristics of high-quality plans
- What the process is for reviewing school EOPs
- When the district will review school EOPs
- Who from the district will review school EOPs
- Which community partners will review and evaluate school EOPs
- The role of community partners who will participate in the review and evaluation of school EOPs

- What criteria the district will use to review school EOPs, and the extent to which certain criteria will be used
- The extent to which the district will use any tools, rubrics, or assessments to review school EOPs
- What applicable federal, state, and local laws must be considered when reviewing the school EOPs

School's Role

Based on the policies and procedures established by the district, the school core planning team should have a reviewed draft of the school EOP.

Task 5: Approve and Share the Plan

Districts play a primary role in Task 5 because they are typically responsible for approving school plans. After school core planning teams finalize their plans following the district's initial review, the plans should be presented to the appropriate district leadership to obtain official approval.

District's Role

Districts are encouraged to develop a framework outlining the process for officially approving school EOPs. Once approved, the district should work with the schools to share the plan (in accessible formats, as necessary) with (1) community partners with a responsibility in the plan (e.g., first responders, local emergency management staff); and (2) 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).

EOP EVALUATE

An HTML-based tool designed to help schools and districts evaluate an established EOP is accessible at <http://rems.ed.gov/EOPinteractivetools.aspx>. Using the *School Guide* as a foundation, tool users are prompted through the six-step planning process recommended in the *School Guide* to determine if there are areas where an existing EOP can be improved.

Districts should work with schools to protect their plans from those unauthorized to have them, and should establish a system for sharing secure documents electronically. For example, law enforcement agencies and first responders should have a secured, web-accessible site available to house copies of plans, building schematics, phone-contact sheets, and other important planning details. Additionally, district officials may recommend that certain plan content be redacted before it is shared, or they may develop policies regarding what plan content can and cannot be shared. Districts and schools must comply with state and local open-records laws in storing and protecting the plan.

In addition, the district should work with the school core planning teams to maintain a record of the people and organizations that receive a copy of the plan.

Step 5: Help Schools Prepare, Review, and Approve Plans

The district should consider the following when developing policies and procedures:

- What the process is for officially approving school EOPs
- When, or how often, the district should approve school EOPs
- Which individuals and/or entities from the district are responsible for approving school EOPs
- The criteria that will be used to determine plan approval
- The individuals and entities with whom the approved school EOPs will be shared
- How the approved school EOPs will be securely shared
- Which parts of the approved school EOPs will be shared
- The process that will be used to document details about with whom, when, and how the plan will be shared
- What applicable federal, state, and local laws must be followed when approving and sharing the school EOPs

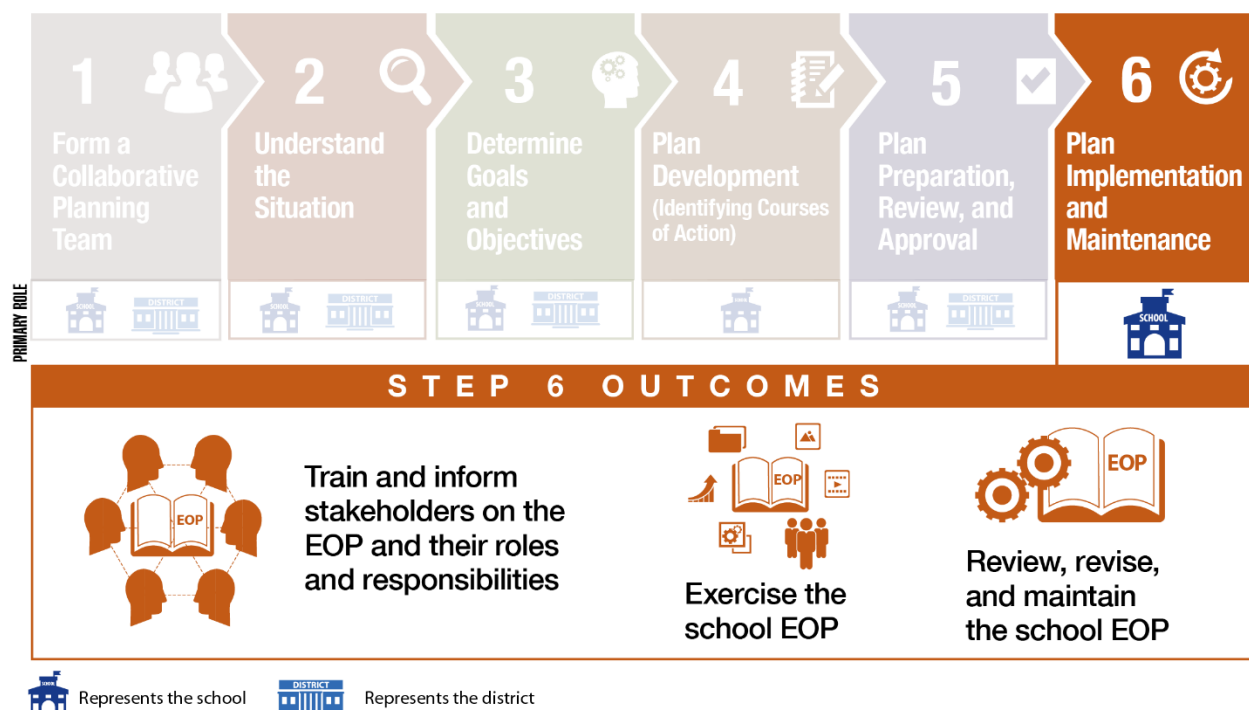
School's Role

Based on the policies and procedures established by the district, the school core planning team should have an approved school EOP that it can share with plan stakeholders.

Step 5 Outcomes

After completing Step 5, the school core planning team has (1) developed the Basic Plan, (2) formatted the plan, (3) revised the formatted draft of the plan, (4) received a review of the plan for quality, and (5) received approval of and shared the school EOP with stakeholders.

Step 6: Help Schools Implement and Maintain Plans



In Step 6, the school core planning team must implement the plan, which requires (1) training and informing stakeholders on the plan and their roles and responsibilities in it; (2) exercising the plan; and (3) reviewing, revising, and maintaining the plan. In Step 6, the school plays a primary role and the district plays a secondary role. The district's role in helping schools to complete Step 6 is detailed below.

Task 1: Train and Inform Stakeholders

District's Role

Everyone involved in the plan needs to know her or his roles and responsibilities before, during, and after an emergency. School districts can play an important role in helping to coordinate training on school EOPs by using the approved training programs included in the Basic Plan section of each school EOP in the district, and by developing policies and procedures to support and strengthen schools' training programs.

The district should consider the following when developing policies and procedures:

- What type of train-the-trainer guidance or training activities the district should provide to school core planning teams to help them implement their training programs
- Which stakeholders should be involved in different components of the training program

- Which formats and languages schools should use for plan materials (such formats may include electronic and hard-copy materials, flip charts or quick reference guides, and other relevant materials)
- The type of certification that is needed for trainings, if any

School's Role

Based on the policies and procedures established by the district, each school core planning team should be able to train stakeholders on the plan and their roles.

Task 2: Exercise the Plan

District's Role

The school district can play an important role in helping school core planning teams conduct exercises using the approved exercise programs in the Basic Plan section of each school EOP. The district can (1) establish policies and procedures for conducting exercises at schools, (2) help coordinate drills and exercises that are more complex, (3) work with schools to develop an exercise schedule, and (4) work with schools to both evaluate and improve exercises.

As previously illustrated in Table 6: The 10 elements of the Basic Plan section of a school emergency operations plan, Training and Exercises is included as a subsection within the Basic Plan. This subsection establishes the expected frequency of exercises to be conducted by the school, which may be influenced by district, state, or local requirements. A school's training program should be based on guidance or requirements from the district's policies and procedures. The district should consider the following when developing policies and procedures:

- What type of training or guidance the district should provide to school core planning teams to help them implement their exercise programs
- How the plan provides for the whole school community during exercises, including the needs of individual with disabilities or access and functional needs
- How exercises should be evaluated (e.g., evaluation team, roles, tools), and the criteria for evaluating exercises
- The minimum requirements for when and how trainings occur
- The extent of requirements or recommendations regarding the frequency of community meetings on the school EOP
- The extent of requirements for trainings on special skills, such as first aid or the provision of personal assistance services to individuals with disabilities and other access and functional needs
- The extent to which the district will share lessons learned with sister schools following school exercises and emergencies

- “How might the school anticipate, respond to, and mitigate any adverse impacts of an emergency exercise on students (for example, increased anxiety during an exercise for students who have previously experienced trauma)”

District officials should also encourage schools to conduct exercises under different and non-ideal conditions. In addition, to support the effective execution of an exercise, the district should work with school core planning teams to do the following:

- Include community partners, such as first responders (e.g., law enforcement officers, EMS, 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., during different times of day, points in the academic calendar, absence of key personnel, various school events, and under different weather conditions).
- Ensure consistency with common emergency management terminology.
- Debrief and develop an after-action report that evaluates results, identifies gaps or shortfalls, and documents lessons learned.
- Discuss how the school EOP and related procedures will be modified, if needed, and specify who is responsible for doing so.

School's Role

Based on the policies and procedures established by the district, each school core planning team should be able to conduct exercises of its school EOP. The more a plan is practiced and stakeholders are trained, the more effectively they will be able to act before, during, and after an emergency to lessen the impact on life and property.

Task 3: Review, Revise, and Maintain the Plan

District's Role

Reviewing, revising, and maintaining school EOPs is the last part of developing a plan. However, planning is a continuous process, even after the plan is published. The district should help to ensure that each school core planning team reviews, revises, and maintains the school EOP according to, at a minimum, the district's approved review cycle.

The district can also help school core planning teams review, revise, and maintain their plans by sharing updated assessment data, evaluation data from drills and full-scale exercises with community partners and equipment, lessons learned, new information and insights about threats and hazards, and information about updated priorities.

Step 6: Help Schools Implement and Maintain Plans

The district should ensure that all relevant community partners (e.g., first responders, local emergency management staff) have the most current version of all school EOPs in the district.

The district should consider the following when developing policies and procedures:

- The extent to which school core planning teams should revise parts of the school EOP at a particular time, or review the entire school EOP simultaneously
- Which community partners should be involved in reviewing and revising school EOPs
- The role of the district in reviewing, revising, and maintaining the plan

School's Role

Based on the policies and procedures established by the district, each school core planning team should be able to review, revise, and maintain its school EOP.

Step 6 Outcomes

After completing Step 6, the school core planning team has (1) trained and informed stakeholders on the school EOP and their roles and responsibilities in the plan; (2) conducted exercises of the school EOP; and (3) reviewed, revised, and maintained the school EOP.

Appendix A: Elements of the *School Guide*

Six-Step Planning Process

The *School Guide* presents a six-step planning process to develop school emergency operations plans (EOPs). The guide serves multiple purposes, which include supporting schools as they create new EOPs, as well as helping schools maintain, expand, and improve existing EOPs. Figure 1 below (identical to Figure 1 in this *District Guide*) depicts the six-step planning process first presented in the *School Guide* and shows tasks in developing school EOPs.

Figure 1: Steps in the planning process



Planning Principles

The planning principles listed below are key to developing comprehensive, high-quality school EOPs. Incorporating these principles throughout the planning process and during the plan's implementation will increase a school's ability to carry out effective preparedness activities, provide efficient responses to a variety of threats and hazards, and implement an effective plan that protects the whole school community. It will also improve safety for the entire school community.

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 consider 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 students, staff, and visitors 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 EOP is done by following a collaborative process. Lessons learned from experience indicate that operational planning is best performed by a team. Close collaboration and ongoing communication between and among schools, school districts, and community partners ensures the coordination of efforts and the integration of EOPs, including school, district, local, regional, and state plans.

These principles will facilitate the development of school EOPs, which can be organized into three sections: (1) The Basic Plan section outlines the main features of an EOP and the school’s general approach to an emergency, (2) the Functional Annexes section provides courses of action (such as details for evacuations and continuity of operations procedures) that may need to be used in a broad range of emergency situations, and (3) the Threat and Hazard-Specific Annexes section addresses responses to specific threats and hazards.

Basic Plan Section Format

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.

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 the following:

- **Cover Page.** The cover page includes the title of the plan, a date, and the school(s) covered by the plan.
- **Promulgation Documenter 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 achieve. The statement should be supported by a brief synopsis of the Basic Plan and annexes.
- **Situation Overview.** The situation overview section explains why a school EOP is necessary. It covers a general discussion of the following:
 - The threats and hazards that pose a risk to the school and would result in a need to use this plan
 - 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 regarding an operation. This section is designed to give an overall picture of how the school will protect students, staff, and visitors and should

- identify those with authority to activate the plan (e.g., school administrators);

- describe the process by which the school coordinates with all appropriate agencies, boards, or divisions within the jurisdiction;
- describe how plans consider 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 does the following:

- Describes the broad roles and responsibilities of individuals that apply during 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, cafeteria workers, bus drivers), and parents and guardians.
 - The planning team may also wish to include community-based organizations represented in the EOP.
 - 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; and
 - 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 or among the school or district, 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 following:

- The Incident Command System (ICS), as used by the school
- The relationship between the school EOP and the district, or the broader community's emergency management system
- Who has control of the equipment, resources, and supplies needed to support the school EOP information collection, analysis, and dissemination

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. It should do the following:

- 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 the following:
 - Before and during: weather reports, law enforcement alerts, National Oceanic and Atmospheric Administration radio alerts, crime reports; and
 - 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 training frequency to ensure that staff, students, faculty, parents, and community representatives understand roles, responsibilities, and expectations.

Key training components that districts should help schools develop are listed below. These activities may apply to some, but not all, of the plan's stakeholders:

- **Hold a meeting.** The district can encourage schools to meet at least once a year to educate all parties on the plan. Schools may hold a meeting for the whole school community, just teachers and staff, just parents, or any other stakeholder groups.
- **Visit evacuation sites.** The district can encourage schools to show involved parties (e.g., teachers and staff, community partners, others with a role or responsibility in the plan) not only where evacuation sites are located, but also where to find specific areas, such as reunification areas, media areas, and triage areas.
- **Give involved parties appropriate and relevant literature on the plan, policies, and procedures.** The district can create flip charts and other quick reference guides for schools based on school EOP content that is common across all schools in the district. It can also communicate common information about the plan on the school and district website(s); via emails and letters to students, staff, and families and guardians; and through the media or other communication outlets.
- **Post key information throughout the building.** It is important that everyone in the building is familiar with, and has easy access to, information about matters including evacuation routes and shelter-in-place procedures and locations. The district can help to ensure that this information is effectively communicated to the whole school community (students, staff members, families and guardians, and visitors with disabilities and other access and functional needs, and individuals with limited English proficiency) by producing accessible information in multiple languages, Braille, and in electronic formats that comply with *Section 508* of the *Rehabilitation Act*.¹
- **Familiarize students, staff, and families and guardians with the plan and community partners.** The district can help facilitate community engagement on the plan by bringing community partners (e.g., law enforcement officers, fire officials, and emergency medical

¹ *Section 508* requirements are defined as a part of the Federal Acquisition Regulation (FAR) at 2 CFR [Subpart 39.2]. They were established under the *Rehabilitation Act* and help ensure electronic and internet access for people with physical, sensory, or cognitive disabilities.

service personnel [EMS]) that have a role in the response or recovery process into schools to talk with students, staff, and families and guardians. This will make school-based stakeholders more comfortable working with these partners.

- **Train staff on the skills necessary to fulfill their roles.** The district can help to train school and district staff, as well as substitute teachers, on their roles in their respective school EOPs and their positions supporting the ICS. These roles and positions will require special skills, such as first aid, threat assessment, and provision of personal assistance services for students, staff members, families and guardians, and visitors with disabilities and other access and functional needs. The district can help to (1) assess and prioritize training needs for schools, (2) identify training topics and guidelines, (3) provide training to staff or provide staff with recommendations of organizations that provide training, (4) establish training certification requirements or guidelines, (5) assign professional development credits or hours for training or dedicate professional development time for training, and (6) assess school practitioners on training.

A school's training program should be based on guidance or requirements from the district's policies and procedures, which may address any of the following topics:

- The minimum requirements for when and how trainings occur
- The extent of requirements or recommendations regarding the frequency of community meetings on the school EOP
- The extent of requirements for trainings on special skills, such as first aid or the provision of personal assistance services to students or staff with disabilities and other access and functional needs

This section also establishes the expected frequency of exercises to be conducted by the school, which may be influenced by district, state, or local requirements. Exercises may range from basic fire and shelter-in-place drills to full-scale, community-wide drills that realistically portray a crisis and show the role the school plays in school district and municipal planning. The exercises below require increasing amounts of planning, time, and resources. Ideally, the district will work with schools to create an exercise program, building from a tabletop exercise up to something more advanced, like a functional exercise.

- **Seminar or orientation sessions.** These are informal, stress-free lectures followed by discussions. Often, the content of the seminar or orientation is related to emergency management, and offers an orientation on one or more district policies, protocols, or procedures, and/or a section of the school EOP (e.g., Communications Annex).
- **Tabletop exercises.** Tabletop exercises are small-group discussions that walk participants 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 the school core planning team assess the school EOP 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 like drills but involve multiple partners; some may be conducted districtwide. 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 in the exercise continuum and are multiagency, multi-jurisdictional efforts in which all resources are deployed. This type of exercise tests collaboration among the necessary agencies and participants, public information systems, communications systems, and equipment. An Emergency Operations Center is established by either law enforcement or fire services, and the ICS is activated.

Before deciding how many and which types of exercises to implement, the district should work with school core planning teams to consider the costs and benefits of each exercise, 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, thus providing more constructive feedback to improve the plans. If students are involved, the district should work with schools to consider the age of the student population when selecting the appropriate exercise. The district should also work with schools to consider the extent to which parents should be included, and should consider the cultural diversity of their populations.

To support the effective execution of an exercise, the district should work with school core planning teams to do the following:

- 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.
- Conduct exercises under different and nonideal conditions (e.g., during different times of day, points in the academic calendar, absence of key personnel, various school events, and under different weather conditions).
- Ensure consistency with common emergency management terminology.
- Debrief and develop an after-action report that evaluates results, identifies gaps or shortfalls, and documents lessons learned.
- Discuss how the school EOP and related procedures will be modified, if needed, and specify who is responsible for doing so.

A school's exercise program should be developed based on guidance or requirements from the district's policies and procedures, which may address any of the following topics:

- The extent of federal, state, and local laws, requirements, or recommendations regarding the type and frequency of exercises
- How an ideal exercise program is defined for the district, based on the threats, hazards, and functions addressed in school EOPs across the district
- How much time and how many resources are available for exercises
- The feasibility of conducting certain exercises
- Which community partners should be involved in different exercises

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 do the following:

- 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 COOP Annex)
- Identify general policies for maintaining 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 should do the following:

- Describe 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
- Assign responsibility for the overall planning and coordination to a specific position or person
- Provide for a regular cycle on which to train, evaluate, review, and update the school EOP

The district should work with school core planning teams to establish a recurring process for reviewing and revising plans. Many states have their own requirements related to the frequency

of EOP updates, and districts should use them as a guide. This *District Guide* recommends that no part of the plan should go for more than two years without being updated.

Instead of reviewing and revising the entire plan at once, the district should work with schools to establish a system for doing so in sections. For example, the schools can review part of the EOP each month or at natural breaks in the academic calendar, an arrangement that some schools find useful. Certain events provide new information that call for reviews and updates of at least sections of the EOPs, such as after

- actual emergencies have occurred;
- changes have been made in policy, personnel, organizational structures, processes, facilities, or equipment;
- formal updates to planning guidance or standards have been finalized;
- formal exercises have taken place;
- changes in the school, district, and surrounding community have occurred;
- threats or hazards change or new ones emerge; and/or
- ongoing assessments generate new information.

The district should consider providing guidance or requirements to school core planning teams regarding the way in which and how frequently school EOPs should be developed and updated. This guidance should align with all applicable federal, state, and local laws.

Authorities and References

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

- Lists of laws, statutes, ordinances, executive orders, regulations, and formal agreements relevant to emergencies
- 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

Assessment Types

To identify the risks posed by threats and hazards, planning teams can use a variety of assessments, including four (detailed below in Table 9 in the areas of site, culture and climate, school behavioral threats, and capacity). These assessments will help school core planning teams identify which threats and hazards apply to their school from the district's master list of threats and hazards that may affect any district school.

Table 9: Threat and hazard assessments, by type, description, and purpose and results

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, the following: (1) a review of building access and egress control measures, (2) visibility around the exterior of the building, (3) structural integrity of the building, (4) compliance with applicable architectural standards for individuals with disabilities and other access and functional needs, and (5) emergency vehicle access.	<ul style="list-style-type: none"> • Increased understanding of the potential impact of threats and hazards on the school buildings and grounds • Increased understanding of the risks 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 as well as 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.	<ul style="list-style-type: none"> • Knowledge of students' and staff members' 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 a student, staff member, 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.	<ul style="list-style-type: none"> • Students, staff, or other persons who may pose a threat are identified before the 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 its 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.	<ul style="list-style-type: none"> • An increased understanding of the resources available • Information about staff capabilities to help planners assign roles and responsibilities in the plan

Functional Annexes

Each comprehensive school EOP should include annexes. Each annex details goals, objectives, and courses of action for the schools that may be required before, during, and after an emergency. As the planning team develops these, it will find that certain critical “functions” or activities apply to more than one threat or hazard, and therefore are cross-cutting — for example, providing medical care. 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 section**” within the school EOP. Functional annexes include evacuation, communications, accounting for all persons, and recovery. As each school planning team assesses its buildings’ needs, it may need to prepare additional or different annexes.

Also included in this section are issues the district and school core planning team should consider when the district develops goals and objectives and courses of action for each function. While some of the most important functions are addressed here, the list of them is not meant to be exhaustive.

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

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.

The district should consider the following when developing policies and procedures that guide schools districtwide in identifying functions to be addressed in their EOPs:

- What federal, state, and local policies, recommendations, priorities, and lessons learned to consider and/or adhere to when identifying the functions that all schools in the district should address in their school EOPs
- The extent to which some schools need customized functions, and if so, the process for identifying those functions
- To what degree, if any, school core planning teams will be involved in identifying cross-cutting functions.

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 a school will execute to secure 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 ensure all school staff, students, and visitors are secured quickly 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 (e.g., 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 to take when students, staff, and visitors are required to remain indoors, perhaps for an extended period, because it is safer inside the building or a room than outside. Depending on the threat or hazard, students, staff, and visitors 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 severe 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
- The need for and integration of “safe rooms” to protect against extreme wind hazards (such as a tornado or hurricane) 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 located in the assembly area
- What to do when a student, staff member, or visitor cannot be located
- How staff will report to the assembly supervisor
- How and when students, staff, and visitors 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)
- How impacts on students will be communicated to the community, including the impact on activities related to the school but not necessarily held at the school or during regular school hours (e.g., 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

Continuity of Operations (COOP) Annex

This annex describes how to 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 restoring school operations, and maintaining the safety and well-being of students and the learning environment
- How the COOP Annex will ensure that students receive applicable related services in the event of a prolonged closure

Recovery Annex

This annex describes how to 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 if 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, minimizing attention paid to the perpetrator, 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, automated external defibrillators) 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 enough 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 to 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.

<http://www.acefacilities.org/>

- 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*, the *Health Insurance Portability and Accountability Act of 1996*, and civil rights and other laws)

Behavioral Threat Assessment Annex

This annex focuses on the courses of action for operation of a behavioral threat assessment team. A behavioral threat assessment team analyzes communication and behaviors to determine the extent to which a student, staff member, or other person may pose a threat. The purpose of the behavioral threat assessment is to identify students, staff, or other persons who may pose a threat before a threat develops into an incident. The team may also refer any identified persons to services, if appropriate.

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

- Which representatives should participate on the behavioral threat assessment team
- How the team will help to ensure that information complies with applicable privacy, civil rights, and other applicable laws

A Closer Look

The “A Closer Look” section of the *School Guide* provides users with information on four key topics to enhance the implementation of school EOPs. These topics include

- “Information Sharing,” which 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), which 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,” which describes how a positive school climate provides ready access to emotional and behavioral supports that can affect the capacity of students and staff to prevent, respond to, and recover from all-hazards emergencies; and
- “Active Shooter Situations,” which describes unique challenges involved in preparing for, responding to, and recovering from a school-based shooting.

Appendix B: An Example for Scenario-Based Planning

This scenario provides an example for a possible emergency, which can be used to guide schools in developing the goals, objectives, and courses of action outlined under Step 4, Task 1. The scenario demonstrates the importance of developing comprehensive plans that allow the quick decisions often needed to save lives and reduce injuries.

- **Setting.** It is 10:05 Wednesday morning and school is in session. The temperature is 40 degrees Fahrenheit outside, the sky is overcast, and there is a light breeze from the west.
- **Incident.** A tanker truck carrying an apparent hazardous material crashes into another vehicle on a road a few blocks from the school. The truck is leaking a yellowish gas that is hovering close to the ground.
- **+2 minutes.** A motorist comes upon the crash and calls 9-1-1. First responders are immediately dispatched to the incident.
- **+8 minutes.** Media has begun reporting on the tanker truck crash. Family members begin to call the school office to check on the status of their children. This is the first the school has heard of the incident.
- **+10 minutes.** The principal calls police dispatch to get first-hand information. Dispatch verifies the crash and that they are still gathering information, but they do not tell the school how to respond.
- **+12 minutes.** The principal assembles the school incident response team to assess the situation and determine an initial course of action: evacuate, shelter-in-place, or continue school as normal and wait for further instructions from 9-1-1. Decision Points:
 - Continue school as normal — A lot is still unknown in terms of the hazardous substance and if it will affect the school, but since the crash happened so close to the school, the principal determines that some sort of protective action should be taken as a precaution.
 - Evacuation — Due to the proximity of the crash to the school, the principal does not think he can get enough bus drivers and buses to the school quick enough to do an off-campus evacuation without putting students, staff, and bus drivers at risk.
 - Shelter-in-place — Due to the proximity of the crash, the school decides to take precautionary measures and implements a shelter-in-place to seal off the school from the possible contaminant.
- **+13 minutes.** The school principal uses the intercom system to instruct staff to immediately implement a shelter-in-place procedure and seal their rooms.

- **+15 minutes.** The custodian who knows how to turn off the heating, ventilation, and air conditioning (HVAC) system is out sick for the day. Thankfully, two other staff members were cross-trained to turn off the HVAC system and immediately begin that process.
- **+18 minutes.** As classroom windows are being sealed, a teacher notices students outside on a field with their teacher, who is seemingly unaware of the incident. From a distance, it looks like some students might be coughing. The teacher immediately calls the office.
- **+20 minutes.** In the office, phones are ringing non-stop, office staff are sealing their windows and doors, and plans are being made to deliver inhalers and other needed medications to students.
- **+20 minutes.** The principal needs to decide what to do about the classes meeting outside. Decision points:
 - Have the classes and staff meeting outside been contaminated? Verify with school medical personnel if anyone needs medical attention.
 - Are other classes meeting outside?
 - How will outside classes be given emergency instructions?
 - Should these classes be returned to the building?
 - Should these classes do a walking “off-campus” evacuation?
 - Should the principal call 9-1-1 for assistance and advice?

Other considerations:

- **Medical needs.** Who is responsible for delivering medical supplies to students who are in need? How is this done once rooms are sealed? Is there a mechanism in place to accomplish this before rooms are sealed? Is this practiced as part of the drills and exercise program?
- **Students and staff outside.** The school forgot to notify students outside. Does this school have a mechanism for notifying those meeting outside? Does the intercom system reach to the field? Do teachers carry two-way radios when meeting outside? Who is responsible for notifying those outside? Does someone have to risk their life to go and notify them? If those outside are brought into the school, will they contaminate the school environment and make others sick?

Appendix C: Glossary

Access and Functional Needs: The general needs of persons with physical, cognitive, and behavioral disabilities or health issues that, if unaddressed by planners, deny access to the plan and to the general protections it puts forth. The plan must ensure a full and equal opportunity to use and enjoy programs, services, activities, goods, facilities, privileges, advantages, and accommodations in the most integrated setting. For example, people with limited mobility may have access needs to transportation if they require a wheelchair. Planners must take this into consideration and provide meaningful access in the form of actions; services; accommodations; and programmatic, architectural, medical, and communication modifications. Access and functional needs may prompt modifications to programs, policies, procedures, architecture, equipment, services, supplies, and communication methods.

Annex: A section of the plan that details goals, objectives, and courses of action to protect the school community before, during, and after a possible incident. There are two types of annexes: functional (e.g., communications) and hazard- or threat-specific (e.g., earthquake).

Basic Plan Section: Provides an overview of the approach to emergency operations. Although the Basic Plan section guides development of the more operationally oriented annexes, its primary audiences consist of the school principal or institution of higher education (IHE) administrator, 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.

Common Command Structure: Agreed upon lines of authority and leadership among members of the planning team.

Common Framework: The framework used by all members of the EOP planning team — the educational personnel as well as the community partners with shared roles and responsibilities in school preparedness (e.g., school safety, security, emergency management). This common framework is designed to facilitate a mutual understanding, coordination, and execution of the emergency management strategies, as well as the use of a common command structure. Additionally, this framework will reflect the common vocabulary and culture of the group.

Community Partners: Others from local agencies working with the school districts who have roles and responsibilities in school safety. This includes local law enforcement officers, emergency medical services (EMS) personnel, school resource officers (SROs), fire officials, public and mental health practitioners, local emergency managers and more. Their expertise will inform the development, implementation, and refinement of the school emergency operations plan (EOP) and help ensure all agencies understand their roles and responsibilities protecting the school community, before, during and after possible emergencies. **Continuity of Operations (COOP) Annex:** An effort within individual executive departments and agencies to ensure that primary and essential functions continue for up to 30 days during a wide range of emergencies, including localized acts of nature, accidents, technological, or attack-related emergencies.

Core Planning Team: The consistent group of representatives who together organize and administer the process of EOP development and maintenance.

Crime Prevention Through Environmental Design (CPTED): Strategies implemented to directly modify the environment to take advantage of pre-existing environmental assets or change the design features and condition of specific targets (e.g., school buildings, doors, and windows) or areas to reduce crime. Natural Surveillance, Natural Access Control, Territoriality Reinforcement, and Management and Maintenance are key principles of CPTED. In some instances, CPTED strategies are implemented during the beginning phases of a project (e.g., during planning of a new housing development).

Cross-Cutting Functions: Activities that apply to more than one threat or hazard, and that may need to be conducted after a range of hazards or threats, such as communication, evacuation, and continuity of operations.

Drill: One type of exercise that allows stakeholders to become familiar with practices carried out in an emergency. During a drill, 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.

Family Educational Rights and Privacy Act (FERPA): A law that protects the privacy of student education records and 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." FERPA applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

Full-Scale Exercise: A type of exercise that allows stakeholders to practice for an emergency. It is the most time-consuming in the exercise continuum and is a multiagency, multi-jurisdictional effort in which all resources are deployed. This type of exercise tests collaboration among the necessary agencies and participants, public information systems, communications systems, and equipment. The Emergency Operations Center, established by either law enforcement or fire services, and the Incident Command System may be activated during a full-scale exercise.

Functional Annex: An annex that includes detailed goals, objectives, and courses of action that pertain to critical, "cross-cutting functions" that apply to more than one threat or hazard. Examples of cross-cutting functions include evacuating, providing medical care, and accounting for all students, staff, and guests.

Functional Annexes Section: One of three main sections of an emergency operations plan; it provides courses of action that may be needed in a broad range of emergencies. The functional annexes section details the goals, objectives, and courses of action of critical and cross-cutting functions (e.g., evacuation, communications, and recovery) that apply across multiple threats or hazards. Functional annexes set forth how the IHE or school manages a function before, during, and after an emergency.

Functional Exercise: A type of exercise that allows stakeholders to practice for an emergency. A functional exercise is like a drill but involves multiple partners; some may be conducted districtwide. 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 Incident Command System.

Goals: Goals are broad, general statements that indicate the desired outcome in response to the threat or hazards identified by the planning team. 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.

Health Insurance Portability and Accountability Act (HIPAA): A law that provides federal protections for individually identifiable health information held by covered entities and their business associates. It gives patients an array of privacy rights with respect to how the information is shared and with whom that information is shared. At the same time, *HIPAA*'s Privacy Rule is balanced so that it permits the disclosure of health information needed for patient care and other important purposes.

IHE Guide: The common name for the federal *Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education*.

Incident Commander (IC): The individual responsible for all incident activities, including the development of strategies and tactics and the ordering and release of resources. The IC has overall authority and responsibility for conducting incident operations and is responsible for the management of all incident operations at the incident site (see ICS).

Mitigation: 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.

National Incident Management System (NIMS): The systematic, proactive approach to guide departments and agencies at all levels of government, nongovernmental organizations, and the private sector to work together seamlessly and manage incidents involving all threats and hazards — regardless of cause, size, location, or complexity — to reduce loss of life, property, and harm to the environment.

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

Policies: District-established expectations or requirements.

Prevention: The capabilities necessary to avoid, deter, or stop an imminent crime or threatened or actual mass casualty incident. Prevention is the action schools and IHEs take to prevent a threatened or actual incident from occurring. In the broader National Preparedness System 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.

Procedures: Steps to implement a specific policy.

Protection: As described in the *School Guide* and the *Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education (IHE Guide)* the capability to secure the campus against acts of violence and man-made or natural disasters. Protection focuses on ongoing actions that protect students, educators, staff, visitors, networks, and property from a threat or hazard.

Psychological First Aid for Schools (PFA-S): An evidence-informed approach for assisting children, adolescents, adults, and families in the aftermath of a school crisis, disaster, or terrorism event. PFA-S is designed to reduce the initial distress caused by emergencies and to foster short- and long-term adaptive functioning and coping.

Public Information Officer (PIO): A member of the command staff within the ICS who is responsible for interfacing with the public and media and/or with other agencies needing information about the emergency.

Recovery: The capabilities necessary to assist IHEs affected by an event or emergency in restoring the learning environment.

Response: 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.

Risk and Vulnerability Evaluation: The process by which the planning team consolidates all the assessment information it has obtained into a format that is usable for comparing risks posed by identified threats and hazards, and uses the information to assess and compare the threats and hazards and their likely consequences. **School Emergency Operations Plan (School EOP):** An emergency operations plan (EOP) developed for and by school level emergency planning and response teams.

School Guide: The common name for the federal *Guide for Developing High-Quality School Emergency Operations Plans*.

Tabletop Exercise: A small-group discussion that walks participants 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 the school core planning team assess the school EOP and resources available for use during an emergency, and facilitates an understanding of emergency management and planning concepts.

Threat- and Hazard-Specific Annexes Section: A part of the EOP that details the goals, objectives, and courses of action that a school will follow to address a specific type of threat or hazard (e.g., hurricane, active shooter/aggressor). Threat- and hazard-specific annexes, like functional annexes, set forth how the IHE and school manage a function before, during, and after an emergency.

Vulnerabilities: The characteristics of the campus (e.g., structures, equipment, information technology [IT] or electrical systems, grounds, surrounding area) that could make it more susceptible to the identified threats and hazards.

