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**To:** BOCES District Superintendents  
Superintendents of Public Schools  
Public School Administrators  
Charter School Administrators  
Nonpublic School Administrators

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**Subject:** Suggested Considerations in Planning Required Emergency Drills for New York State Schools (Including Adjustments for the COVID-19 Pandemic)

Education Law §807 requires that New York State public and nonpublic schools conduct four lockdown and eight evacuation drills each school year (September 1 - June 30), with at least eight of the required drills being conducted by December 31 of each school year. Two additional evacuation drills must be conducted during summer school (July 1 - August 30). Provided below are recommendations for school and district administrators and safety teams to consider when planning and conducting drills. Additional information regarding regulatory and statutory requirements related to school and district emergency planning and drills is included in the [Quick Guide to Emergency Planning Requirements](http://www.p12.nysed.gov/sss/documents/QuickGuideEmerPlanningMarch2018_final.pdf) ([http://www.p12.nysed.gov/sss/documents/QuickGuideEmerPlanningMarch2018\\_final.pdf](http://www.p12.nysed.gov/sss/documents/QuickGuideEmerPlanningMarch2018_final.pdf)).

Consistent with longstanding practice, twelve drills per year are required to be conducted.

While Education Law §807 requires that schools conduct four lockdown and eight evacuation drills, Education Law §2801-a and Commissioner's Regulation §155.17 require that school building-level emergency response plans include policies and procedures for response to emergency situations, such as those requiring evacuation, sheltering, and lockdown. Therefore, such plans must include policies and procedures for how the school will Shelter-in Place, Hold-in Place, Evacuate, Lockout, and Lockdown in an emergency. Please see the end of this document for a description of each of the response terms and the recommended actions for each.

## Considerations for the conduct of drills during and after the COVID-19 Pandemic

When planning drills, consideration should be given to how a school can modify its drill procedures to minimize risk of spreading infection. Conducting drills is an important part of keeping students and staff safe in an emergency. However, steps should be taken to minimize the risk of spreading infection and maintain social distancing while conducting drills. As such, it may be necessary for schools to conduct drills in the 2020-21 school year using protocols that are different than what schools are used to.

Regardless of the modification used when conducting a drill, students should be instructed that if it was an actual emergency that required evacuation or lockdown, the most immediate concern is to get to safety. Maintaining social distancing in an actual emergency that requires evacuation or lockdown may not be possible and should not be the first priority.

School and district safety teams should meet to determine the actions that are appropriate and essential for school staff and students to practice as part of a drill.

Modifications to evacuation drills may include, but are not limited to:

- conducting drills in a “staggered” classroom formation, where alternating classrooms evacuate sequentially and orderly rather than all at once to promote social distance between students to the evacuation site. Staggering by classroom minimizes contact of students in hallways, stairwells, and at the evacuation site. If conducting drills using a modified procedure, it is required that the drill be conducted with all students who are in the school building at the time of the drill, it may be necessary to do so during a class period that is extended for this purpose.
- If schools re-open with a “blended” or “hybrid” in-person and remote school model, such as one where students attend school alternate school weeks to reduce the occupancy of the school building, schools must be certain that all students are receiving instruction in emergency procedures, and drills should be planned in order to provide all students the opportunity to participate in drills while they are in attendance in person. In particular, the participation of students who are new to the building should be prioritized.

Modifications to Lockdown Drills may include, but are not limited to:

- Conducting lockdown drill in classroom setting while maintaining social distancing and using masks.
- Conducting lockdown drills on a “staggered” schedule with smaller numbers of students present to maintain social distancing; however, schools must be certain that all students are receiving instruction in emergency procedures and participating in drills while they are in attendance in person. In particular, the participation of students who are new to the building should be prioritized.

- Conduct lockdown drill in classroom without “hiding”/“sheltering” but provide an overview or demonstration of how to shelter or hide in the classroom.

Regardless of the modification used, students should be instructed that in an actual emergency that requires evacuation or lockdown, the most immediate concern is to get to safety. Maintaining social distancing in that instance should not be the first priority.

In circumstances when a school building does not provide in-person instruction in a given month or span of time, such as occurred with COVID-19 ordered school closures from March 19, 2020 - June 30, 2020, school officials may conduct drills with administrators, teachers, or staff in the building or test components of a plan, such as fire alarms, communication systems, etc.

As schools re-open, any changes in drill procedures related to health and safety precautions could be shared with students prior to conducting drills. Sharing information and communicating with both staff and parents regarding any planned modifications to procedures may be helpful.

The principal should record the dates and times drills were conducted with a description of how the drill procedures were modified, if at all.

**Key Terms:**

A description of each of the response terms and the recommended actions for each is available in an [Emergency Response Quick Reference Card](http://www.p12.nysed.gov/sss/documents/QuickReferenceCardv102-13-15.pdf) (http://www.p12.nysed.gov/sss/documents/QuickReferenceCardv102-13-15.pdf) for school and district use, and are described below.

Emergency Response Term	Use	Actions
<b>Shelter-in-Place</b>	Shelter students and staff inside the building.	<ul style="list-style-type: none"> <li>• Listen for instructions about the situation and the actions that should be taken.</li> <li>• Students in hallways should return to assigned classroom, if possible.</li> <li>• Classroom teachers must take attendance.</li> <li>• All other staff should assist students, as needed.</li> <li>• Move away from windows, if situation warrants.</li> <li>• If instructed, move out of classroom to designated safe area. Classroom groups should stay together at all times.</li> <li>• Bring attendance list and class roster. If the group moves to the safe area, take attendance again.</li> <li>• Listen for updates to instructions.</li> </ul>

<b>Emergency Response Term</b>	<b>Use</b>	<b>Actions</b>
<b>Hold-In-Place</b>	Limit movement of students and staff while dealing with short-term emergencies.	<ul style="list-style-type: none"> <li>• Listen for instructions about the situation and the actions that should be taken.</li> <li>• Students in hallways should return to assigned classroom, if possible.</li> <li>• Classroom teachers must take attendance.</li> <li>• All other staff should assist students, as needed.</li> <li>• Listen for updates to instructions.</li> </ul>
<b>Evacuate</b>	Evacuate students and staff from the building.	<ul style="list-style-type: none"> <li>• Listen for instructions about the situation and the actions that should be taken.</li> <li>• Lead students to designated assembly or announced assembly area. Use secondary route if necessary.</li> <li>• Bring attendance list and class roster.</li> <li>• Close the classroom door after exiting.</li> <li>• Take attendance when safe to do so.</li> <li>• If evacuating off site, take attendance before moving from and upon arrival at off-site location.</li> <li>• Listen for updates to instructions.</li> </ul>
<b>Lockout</b>	Secure school buildings and grounds during incidents that pose an imminent concern outside of the school.	<ul style="list-style-type: none"> <li>• Listen for instructions regarding the situation and your actions.</li> <li>• Lock all exterior windows.</li> <li>• Leave blinds/lights as they are.</li> <li>• Take attendance.</li> <li>• After initial instructions, listen for updates.</li> <li>• Classroom instruction continues as normal.</li> <li>• All outdoor activities are terminated.</li> <li>• Listen for updates to instructions.</li> </ul>
<b>Lockdown</b>	Secure school buildings and grounds during incidents that pose an immediate threat of violence in or around the school.	<p>When you hear lockdown announced, move quickly to execute the following actions:</p> <ul style="list-style-type: none"> <li>• If safe, gather students from hallways and common areas near the classroom.</li> <li>• Close and lock the door. Barricade if necessary.</li> <li>• Move students to a safe area in the classroom, out of sight of the door.</li> <li>• Leave windows, blinds/lights as they are.</li> <li>• Keep everyone quiet, silence cell phones.</li> <li>• Take attendance, if possible.</li> <li>• Do not communicate through door or answer room phone.</li> <li>• Do not respond to P.A. announcements or fire alarm.</li> <li>• Stay hidden until physically released by law enforcement personnel.</li> </ul>

## Planning and Preparing

Drills are a required component of school operations because they provide the opportunity for students and staff to practice the actual actions they would take in an emergency. It is required that every year, each school develop a building-level emergency response plan that details these actions and a district-wide safety plan to describe the policies and procedures in place at the district level. The building-level emergency response team and district-wide school safety team should meet to determine the actions that are important for school staff and students to practice as part of a drill. It is recommended that teams consult with law enforcement, fire and Emergency Management Services (EMS) as part of their planning. Teams should review and incorporate the NYS Emergency Response actions described in the [Emergency Response Quick Reference Card](http://www.p12.nysed.gov/sss/documents/QuickReferenceCardv102-13-15.pdf) (<http://www.p12.nysed.gov/sss/documents/QuickReferenceCardv102-13-15.pdf>).

The planning phase should include how these terms and actions will be shared with staff, students and parents prior to conducting a drill, with every effort taken to minimize trauma or negative psychological effects on students while conducting drills. For additional information, see the [National Association of School Psychologists, Mitigating Negative Psychological Effects of School Lockdowns: Brief Guidance for Schools](https://www.nasponline.org/resources-and-publications/resources-and-podcasts/school-climate-safety-and-crisis/systems-level-prevention/mitigating-psychological-effects-of-lockdowns) (<https://www.nasponline.org/resources-and-publications/resources-and-podcasts/school-climate-safety-and-crisis/systems-level-prevention/mitigating-psychological-effects-of-lockdowns>).

- How does the school plan to communicate these procedures to students and when? For example, is this information better shared during an assembly, or in smaller groups?
- How and when will parents and persons in parental relation be informed about emergency procedures, including drill requirements and procedures, and procedures for notifying parents and persons in parental relation in an emergency?
- The school's plan for communicating with students, staff, and families regarding school emergency procedures should be tailored to the audience. Have consideration and appropriate accommodation been included for:
  - Age and developmental age<sup>1</sup>
  - English Language Learner status<sup>2</sup>
  - Disability status?<sup>3</sup>

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<sup>1</sup> See resources by the [American Academy of Pediatrics](https://www.healthychildren.org) (<https://www.healthychildren.org>) regarding keeping children safe at school and talking with children and parents about school safety.

<sup>2</sup> See information prepared by the U.S. Department of Justice, Civil Rights Division, [Tips and Tools for Reaching Limited English Proficient Communities in Emergency Preparedness, Response, and Recovery](https://www.justice.gov/crt/file/885391/download) (<https://www.justice.gov/crt/file/885391/download>), 2016

<sup>3</sup> See resources from the [U.S. Department of Education's REMS Technical Assistance Center](https://rems.ed.gov/docs/Disability_NewsletterV2I1.pdf) ([https://rems.ed.gov/docs/Disability\\_NewsletterV2I1.pdf](https://rems.ed.gov/docs/Disability_NewsletterV2I1.pdf)).

## Conducting Drills

Important things to consider when conducting drills include:

- **When conducting a drill, it should ALWAYS be announced that it is a DRILL and NOT AN EMERGENCY.** It is recommended that the school document and inform students and staff of the actual language that will be used during a drill, such as “*This is an emergency drill, not an actual emergency. This is a drill. We are now practicing how to Lockdown (or Evacuate). This is a drill.*”
- While it may be desirable to practice certain actions during a drill, such as law enforcement “releasing” a classroom from lockdown, it should be done in a way to minimize the likelihood that a student may experience trauma as a result. For example, will law enforcement personnel be in uniform or tactical gear? If so, does your description of drill procedures for students, staff and parents include this information?
- Is the drill conducted in the same way each time? Consider whether modifying components of the drill better prepares students and staff to respond in an emergency.
- How is the school prepared to address access and functional needs of English language learners, and those with various disabilities?
- How will information about the drills be communicated to parents, staff, and students?

Additional information about creating a building-level emergency response plan and a district-wide safety plan can be found in the [Guide for Developing High-Quality School Emergency Operations Plans](https://rems.ed.gov/docs/Guide_for_Developing_HQ_School_EOPs.pdf) (https://rems.ed.gov/docs/Guide\_for\_Developing\_HQ\_School\_EOPs.pdf) and [The Role of Districts in Developing High-Quality School Emergency Operations Plans](https://rems.ed.gov/docs/District_Guide_508C.pdf) (https://rems.ed.gov/docs/District\_Guide\_508C.pdf) from the U.S. Department of Education’s Readiness and Emergency Management (REMS) Technical Assistance Center.

Questions may be directed to the Office of Student Support Services at [SchoolClimate@nysed.gov](mailto:SchoolClimate@nysed.gov).