Are you prepared for the Unthinkable?

By Arthur F. Blunc, VP Chief Risk Management Officer at Adventist Risk Management®, Inc.
On August 5, 2012 the unthinkable happened at the Sikh Temple in Oak Creek, Wisconsin as a gunman killed six parishioners. On December 14th, twenty innocent school children and six adults were senselessly gunned down at the Sandy Hook Elementary School in Newtown, Connecticut. These tragic events sadly remind us that our churches and schools must be prepared for the unthinkable at all times.

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Developing a strong Emergency Plan is one of the most important things you can do to prepare for the unexpected. Whether it is a shooter entering your church, a fire or a severe storm warning, it is best to have a plan in place. Developing that plan does not have to be an impossible task. John Dougan will walk us through the practical steps of developing an effective emergency plan.
Are you prepared for the Unthinkable?

Carina Franca posted on August 12, 2013 08:30

On August 5, 2012 the unthinkable happened at the Sikh Temple in Oak Creek, Wisconsin as a gunman killed six parishioners. On December 14th, twenty innocent school children and six adults were senselessly gunned down at the Sandy Hook Elementary School in Newtown, Connecticut. These tragic events sadly remind us that our churches and schools must be prepared for the unthinkable at all times.

Vice President Joe Biden announced on June 18, 2013 the release of three new safety guidelines prepared by various United States governmental agencies to help churches and schools prepare for all kinds of emergencies.
“The faith leaders are worried that their congregations are at risk. They want to know what they should be thinking about when someone stands up in the middle of the congregation and decides to do something similar as we saw in Newtown.”

Vice President Joe Biden
Speaking about the importance of these guidelines

There are three specific guidelines available

- Guide for Developing High-Quality Emergency Plans for Institutions of Higher Education

Each of these Federal publications provides useful guidelines that can be implemented at local churches, schools, and institutional facilities. They help you assess a wide range of emergency situations that can occur and assist your leaders in formulating their action plans. Adventist Risk Management (ARM) would encourage all denominational organizations to carefully review these and share them with your local church and school leaders.

To download copies of these documents simply click on the link above. For additional loss prevention resources, please visit the ARM website at www.Adventistrisk.org/prevention.aspx. Remember, disasters can happen at any time. We must be prepared to respond swiftly and appropriately at all times.

By Arthur F. Blindi,
VP Chief Risk Management Officer at Adventist Risk Management®, Inc.
As part of its plan to reduce incidents of gun violence, the Obama administration released on Tuesday guides that tell houses of worship and other institutions what to do in emergency situations, including shootings.

"Many people think of a house of worship as a safe area where violence and emergencies cannot affect them. However, violence in houses of worship is not a new phenomenon," the guide reads.

In January, one month after the mass-shooting tragedy in Newtown, Conn., that left 20 school children dead, President Barack Obama laid out a number of executive actions seeking to reduce gun violence.

As Vice President Joe Biden explained on Tuesday, steps have been taken to strengthen existing background checks, encourage people to be more responsible gun owners, prompt further research into gun violence, improve access to mental health care, and try to make schools and communities safer.

The White House published three separate "Emergency Operations" guides, one for schools, one for institutions of higher education, and one for houses of worship.

As the introduction to the house of worship guide reminds citizens, faith communities have seen their fair share of violence in the past few years in America. In August 2012, a 40-year-old U.S. army veteran killed six people at a Wisconsin Sikh temple, and just this past Sunday on Father's day, a man shot his father-in-law through the head at a church service in Ogden, Utah.

The guides, which are being jointly released by the Departments of Education, Justice (led by the FBI), Homeland Security (led by FEMA), and Health and Human Services, attempt to educate institutions on how to work with first responders and other community partners to plan and prepare for various emergencies, including natural disasters and shooting situations.
In the section on how to deal with active shooter situations, the guide reminds houses of worship that while evacuation drills for dangers such as fires and tornadoes have become routine, far fewer facilities practice for shooting scenarios.

"Understandably, this is a sensitive topic. There is no single answer for what to do, but a survival mindset can increase the odds of surviving," the 38-page PDF document states.

"During an active shooter situation, the natural human reaction, even for those who are highly trained, is to be startled; feel fear and anxiety; and even experience initial disbelief and denial," the guide continues. "Noise from alarms, gunfire, explosions, and people shouting and screaming should be expected. Training provides the means to regain composure, recall at least some of what has been learned, and commit to action. There are three basic response options: run, hide, or fight."

A White House report on the president's executive actions to reduce gun violence asserts that more needs to be done to address the problem, pointing to Congress.

A bipartisan amendment looking to expand background checks for gun purchases at gun shows and online died at the Senate in April after it failed to get enough votes. While it marked a blow for the Obama administration, the president promised that "this effort is not over" and that he will continue doing everything he can to protect communities.

The new report calls on Congress to act by passing common-sense gun safety legislation, which includes expanding background checks and making gun trafficking a federal crime, which it says is the most important step America can take toward reducing gun violence.

"A vast majority of the American people supports these critical steps, which would protect our kids and our communities without infringing in any way on our Second Amendment rights," the document states, noting concerns some Americans have had with proposed gun legislation that they fear might infringe on their right to bear arms.

"It is time for Congress to take action and get this done," the report urges.
Guide for Developing High-Quality Emergency Operations Plans for Houses of Worship

June 2013
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Introduction and Purpose

Many people think of a house of worship as a safe area where violence and emergencies cannot affect them. However, violence in houses of worship is not a new phenomenon. In addition to violent acts, fires, tornados, floods, hurricanes, earthquakes, and arson also affect houses of worship. With many incidents occurring with little to no warning, many houses of worship are developing and updating plans and procedures to ensure the safety and security of their congregations, staff, and facilities.

In collaboration with other houses of worship and community partners (i.e., governmental entities that have a responsibility in the plan, including first responders, public health officials, and mental health officials), houses of worship can take steps to plan for these potential emergencies through the creation of an emergency operations plan (EOP). Additionally, community organizations and private sector entities may have a role in the plan. Houses of worship are distinctive settings in that congregants share a common bond and have a predisposition to volunteer. The demographics of a congregation often mean that children and the elderly are present and may need assistance.

This guide provides houses of worship with information regarding emergency operations planning for the spectrum of threats and hazards they may face. It discusses actions that may be taken before, during, and after an incident in order to reduce the impact on property and any loss of life and it encourages every house of worship to develop an EOP.

The Departments issuing this guidance are providing examples of good practices and matters to consider for planning and implementation purposes. The guidance does not create any requirements beyond those included in applicable law and regulations, or create any additional rights for any person, entity, or organization. Moreover, the Departments fully understand that congregations may approach some of these issues differently than government and other community organizations. At the same time, the Departments would like to assist congregations that are interested in emergency operations planning, and this guidance is offered in that spirit. The information presented in this document generally constitutes informal guidance and provides examples that may be helpful. The inclusion of certain references does not imply any endorsement of any documents, products, or approaches. Other resources may be equally helpful.

It is recommended that planning teams responsible for developing and revising a house of worship’s EOP use this document to guide their efforts. To gain the most from this guide, users should read the entire document prior to initiating their planning efforts and refer back to it throughout the planning process.¹ The guide is organized in four sections:

- The principles of emergency operations planning
- A process for developing, implementing, and continually refining a house of worship’s EOP with community partners
- A discussion of the form and function of a house of worship’s EOP

¹ All Web sites listed in this guide were accessible as of June 6, 2013.
A closer look that discusses house of worship emergency planning in the event of an active shooter situation.

This guide is designed to be scalable for use by small to large-sized houses of worship in order to help navigate the planning process. Used in its entirety, this guide provides information on the fundamentals of planning and their application. At a minimum, houses of worship are encouraged to complete the planning process and develop a basic plan. This guide does not impose any new Federal requirements. While some Federal requirements may apply to houses of worship that receive Federal funding, they are not addressed in this document. For houses of worship that also operate a school, please see the Guide for Developing High-quality School Emergency Operations Plans for planning considerations specific to the school environment.²

Emergency planning efforts work best when they are aligned with emergency planning practices at the local, state, and national levels. Recent developments have put a new emphasis on the process for developing EOPs. National preparedness efforts, including planning, are informed by Presidential Policy Directive (PPD) 8, which was signed by the President in March of 2011 and describes the Nation’s approach to preparedness. This Directive represents an evolution in our collective understanding of national preparedness, based on the lessons learned from criminal activities, hurricanes, house of worship incidents, and other experiences.

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

- **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.³ Prevention is the action houses of worship take to prevent a threatened or actual incident from occurring.

- **Protection** means the capabilities to secure houses of worship against acts of terrorism and manmade or natural disasters. Protection focuses on ongoing actions that protect people, 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 incident. In this guide, mitigation also means reducing the likelihood that threats and hazards will happen.

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

- **Recovery** means the capabilities necessary to assist houses of worship affected by an incident in restoring their environment.

Emergency management officials and emergency responders engaging with houses of worship are familiar with this terminology. These mission areas generally align with the three timeframes associated with an incident: before, during, and after. The majority of Prevention, Protection, and Mitigation activities generally occur before an incident, although these three mission areas do

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³ In the broader PPD-8 construct, the term “prevention” refers to those capabilities necessary to avoid, prevent, or stop a threatened or actual act of terrorism. The term “prevention” refers to preventing imminent threats.
have ongoing activities that can occur throughout the incident. Response activities occur during an incident and Recovery activities can begin during an incident and occur after an incident. To help avoid confusion over terms and allow for ease of reference, this guide uses the terms before, during, and after.

As houses of worship plan for and execute response and recovery activities through the EOP, they should consider using the concepts and principles of the National Incident Management System (NIMS). NIMS provides all those involved with a common understanding of roles and responsibilities during response to incidents. Houses of worship may also find NIMS suitable for managing other large-scale non-emergency events, such as fairs or festivals. One component of NIMS is the Incident Command System (ICS), which provides a standardized approach for incident management, regardless of cause, size, location, or complexity. By using ICS during an incident, houses of worship will be able to work more effectively with the responders in their community.4

While some of the vocabulary, processes and approaches discussed in this guide may be new to congregations, they are critical to the creation of emergency management practices and plans that are integrated with the efforts of first responders (e.g., fire, law enforcement, emergency medical services [EMS]) and other key stakeholders. If a house of worship has an existing plan, revising and adapting that plan using the principles and process described in this guide will help ensure alignment with the terminology and approaches used across the Nation, including the first responders with whom the house of worship will need to collaborate before, during, and after an incident.

Planning Principles

The following principles are key to developing a house of worship EOP that addresses a range of threats and hazards.

- **Planning should be supported by leadership.** The leadership of the house of worship should initiate and support planning efforts to ensure engagement from the congregation and outreach to the entire community. Regardless of the size of the house of worship, one or more persons should lead emergency planning efforts.

- **Planning considers all threats and hazards.** The planning process should take into account a wide range of possible threats and hazards that may affect the house of worship. Emergency operations planning considers all threats and hazards throughout the planning process, addressing safety needs before, during, and after an incident.

- **Planning considers all setting and all times.** It is important to remember that threats and hazards can affect the house of worship at non-standard times (e.g., when facilities are being used by others), as well as off-site (e.g., an activity or event sponsored somewhere other than the grounds of the house of worship).

- **Planning provides for the access and functional needs of the whole house of worship community.** The whole house of worship community includes regular attendees, guests, and staff, including those with disabilities and others with access and functional needs; those

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4 For more information on NIMS and ICS, please see http://www.fema.gov/national-incident-management-system.
from racially and ethnically diverse backgrounds; and people with limited English proficiency.

- **A model EOP is created by following a collaborative process.** This guide provides a process, plan format, and content guidance that is flexible enough for use by all house of worship emergency planning teams. If the planning team also uses templates, it should take steps to first evaluate their usefulness to ensure the tools do not undermine the collaborative initiative and collectively shared plan. There are some jurisdictions that provide templates and these will reflect local and state mandates, as applicable.

## The Planning Process

There are many ways to develop a plan. The planning process discussed in this section is flexible and can be adapted to accommodate a house of worship’s unique characteristics and situation. Effective emergency operations planning is not done in isolation. It is critical that houses of worship work with their local emergency management agency and community partners, including first responders, during the planning process, as an effective house of worship EOP is integrated with community, regional, and state plans. This collaboration makes more resources available and helps to ensure the seamless integration of all responders.

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

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Figure 1: Steps in the Planning Process

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Step 1: Form a Collaborative Planning Team

Experience and lessons learned indicate that operational planning is best performed by a team. Case studies reinforce this concept by pointing out that the common thread found in successful operations is that participating organizations have understood and accepted their roles. Close collaboration between houses of worship and community partners, including first responders, ensures the coordination of efforts and the integration of plans. Houses of worship may consider joining or collaborating with other nearby houses of worship to form joint emergency planning teams. In addition, first responders and emergency managers may want to work with multiple houses of worship to address common goals and objectives.

Identify Core Planning Team

The core planning team should include representatives from the house of worship, as well as first responders and others who may have roles and responsibilities in house of worship emergency management before, during, and after an incident. Many houses of worship may have first responders or others with special emergency planning expertise in their congregation. Their expertise will inform the development, implementation, and refinement of the house of worship’s plan. Where possible, consider including diverse representation on the planning team, including individuals with disabilities and the elderly. The planning team should be small enough to permit close collaboration, yet large enough to be representative of the house of worship, its congregation, and its community partners. It should also be large enough as to not place an undue burden on any single person.

Form a Common Framework

All team members should consider taking time to learn each other’s vocabulary, command structure, and culture in order to facilitate effective planning.

Define and Assign Roles and Responsibilities

Each person involved in the development and refinement of the plan should know his or her role and responsibility in the planning process, as well as generally understand others’ roles so that they know with whom to speak regarding particular issues and questions that might arise during the planning process.

Determine a Regular Schedule of Meetings

Regularly scheduled planning meetings reinforce the ongoing planning effort. Establishing a flexible but regular schedule of meeting times will facilitate greater collaboration, coordination, and communication among team members and will help solidify crucial relationships.

Step 1 Outcome

After completing Step 1, the house of worship will have formed a planning team with representation from all necessary stakeholders. The planning team will have taken initial steps to form a common framework; define and assign roles and responsibilities in the planning process; and set a schedule of planning meetings.
Step 2: Understand the Situation

In Step 2, the planning team identifies possible threats and hazards and assesses the risk and vulnerabilities posed by those threats and hazards. Effective emergency planning depends on an analysis and comparison of the threats and hazards a particular house of worship faces. This is typically performed through a threat and hazard identification and risk assessment process that collects information about threats and hazards and assigns values to risk for the purposes of deciding which threats and hazards the plan should prioritize and subsequently address.

Identify Threats and Hazards

The planning team first needs to understand the threats and hazards faced by the house of worship and the surrounding community. The planning team can draw upon a wealth of existing information to identify the range of threats and hazards that may be faced by the house of worship. First, the planning team members should share their own knowledge of threats and hazards the house of worship and surrounding community has faced in the past or may face in the future. Houses of worship should work with their local emergency management agency to obtain a copy of the state or local risk assessment. This assessment contains information regarding the potential threats and hazards in the community that may also affect the house of worship.

Assess the Risk Posed by Identified Threats and Hazards

Once an initial set of threats and hazards has been identified through the process described above, the planning team should select suitable assessment tools to evaluate the risk posed by the identified threats and hazards.\(^6\) Evaluating risk involves understanding the probability that the specific threat or hazard will occur; the effects the threat or hazard will likely have, including their severity; the time the house of worship will have to warn occupants about the threat or hazard; and how long the threat or hazard may last.

The house of worship’s local emergency management agency should be able to provide information on the threats and hazards identified for the surrounding community. This enables the planning team to focus its assessment efforts on threats and hazards unique to the house of worship, as well as the particular vulnerabilities of the buildings and their occupants.\(^7\) Assessing risk and vulnerability enables the planning team to focus its efforts on prioritized threats and hazards.

A site assessment examines the safety, accessibility, and emergency preparedness of the house of worship’s buildings and grounds. This assessment includes, but is not limited to, a review of building access; visibility around the exterior of buildings; structural integrity of buildings; compliance with applicable architectural standards for individuals with disabilities and others with access and functional needs; and emergency vehicle access. The planning team may also identify additional threats and hazards through the site assessment process.


\(^7\) “Vulnerabilities” are characteristics that could make the house of worship more susceptible to threats and hazards.
After conducting threat and hazard identification, the planning team should organize the information into a format that is useful for comparison of the risks posed by the identified threats and hazards. This information will then be used to assess and compare the threats and hazards and their likely consequences, commonly referred to as a risk assessment. One effective method for organizing information is create a table with information about each possible threat and hazard, including any new threats or hazards identified through the assessment process. The table should include:

- Probability or frequency of occurrence (i.e., how often it may occur)
- Magnitude (i.e., the extent of expected damage)
- Time available to warn occupants
- Duration (i.e., how long the threat or hazard will be occurring)
- Follow-on effects

### Prioritize Threats and Hazards

The planning team should use the information it has organized to compare and prioritize risks posed by the threats and hazards. This will allow the team to decide which threats or hazards it will directly address in the plan. The team should consider multiple factors in order to develop an indicator of risk. One option is a mathematical approach, which assigns index numbers (e.g., 1-to-4 scale) for different categories of information used in the ranking scheme. Using this approach, the planning team can categorize threats and hazards as posing a relatively high, medium, or low risk. Table 1 provides an example risk assessment worksheet for comparing and prioritizing threats and hazards.

### Table 1: Example Risk Assessment Worksheet

<table>
<thead>
<tr>
<th>Hazard</th>
<th>Probability</th>
<th>Magnitude</th>
<th>Warning</th>
<th>Duration</th>
<th>Risk Priority</th>
</tr>
</thead>
</table>

### Step 2 Outcome

After completing Step 2, the planning team will have a prioritized (e.g., high, medium, or low risk) list of threats and hazards based on the results of the threat and hazard identification and risk assessment.

### Step 3: Determine Goals and Objectives

In Step 3, the planning team decides which of the threats and hazards identified in Step 2 will be addressed in the house of worship’s plan. The planning team may decide to address only those threats and hazards that were classified as high risk, or they may decide to address all threats and
hazards classified as high risk, as well as some of the threats and hazards that were classified as medium risk. This is a critical decision point in the planning process. It is recommended that the planning team address more than only the high-risk threats and hazards.

**Develop Goals and Objectives**

Once the planning team has determined the threats and hazards that will be addressed in the plan, it should develop goals and objectives for each threat or hazard.

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

The planning team should develop at least three goals for addressing each threat or hazard (although the planning team may want to identify more). Those three goals should indicate the desired outcome for before, during, and after the threat or hazard.

### Example: Goals for a Fire Hazard

Three possible goals for a fire hazard include:

**Goal #1 (Before):** Prevent a fire from occurring in the house of worship.

**Goal #2 (During):** Protect all persons and property from injury by the fire.

**Goal #3 (After):** Provide necessary medical attention to those in need.

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

### Example: Objectives for a Fire Hazard

For Goal #1 in the fire hazard example, possible objectives include:

- **Objective 1.1:** Provide fire prevention training to all persons that use combustible materials or equipment in or around the house of worship.

- **Objective 1.2:** Store combustible materials in fireproof containers or rooms.

For Goal #2 in the preceding example, possible objectives include:

- **Objective 2.1:** Evacuate all persons from the building and surrounding grounds immediately.

- **Objective 2.2:** Account for all persons known to be on site.

For Goal #3 in the preceding example, possible objectives include:

- **Objective 3.1:** Immediately notify 911, fire, and EMS of any fire in the house of worship.

- **Objective 3.2:** Immediately begin to provide first aid.

After the planning team has developed the objectives for each goal, it will find that certain critical **functions** or activities apply to more than one threat or hazard. Examples of these crosscutting functions include evacuation, shelter-in-place, and lockdown. 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
before, during, and after the function has been executed. These commonly occurring functions will be contained in functional annexes to the plan. More details on these functions are included in the “Plan Content” section of this guide, including issues to consider as goals and objectives are developed for these functions. Once the goals for a function are identified, possible supporting objectives are identified.

**Example: Goals and Objectives for an Evacuation Function**

For an evacuation function, three possible goals and associated objectives include:

- **Function Goal Example 1 (Before):** Ensure all persons know their evacuation route.
  - **Objective 1.1:** Assess, identify, and communicate the location of assembly points to be used during an evacuation.

- **Function Goal Example 2 (During):** Evacuate the house of worship immediately.
  - **Objective 2.1:** All persons will evacuate the house of worship using assigned routes.

- **Function Goal Example 3 (After):** Confirm that all persons have left the building.
  - **Objective 3.1:** Safely sweep the building.

**Step 3 Outcome**

After completing Step 3, the planning team will have at least three goals for each threat or hazard and function, as well as objectives for each goal.

**Step 4: Plan Development (Identifying Courses of Action)**

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

Courses of action include criteria for determining how and when each response will be implemented under a variety of circumstances. Subsequently, the planning team develops response protocols and procedures to support these efforts. Possible courses of action are typically developed using the following steps:

- **Depict the scenario.** Create a potential scenario based on the threats and hazards identified earlier in the planning process. For example, an earthquake occurs during the congregation’s gathering which might include childcare or school activities. The facility may also be offered or rented for other activities, bringing many individuals to the site.

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

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8 The term “annex” is used throughout this guide to refer to functional, threat/hazard-specific, or other supplements to the basic plan. Some plans may use the term “appendix” in the same fashion.
- **Identify decision points.** Decision points indicate the place in time, as threats or hazards unfold, when leaders anticipate making decisions about a course of action. Walking through each scenario in detail will help identify the relevant decision points for each scenario, such as whether to evacuate, shelter-in-place, or lockdown.

- **Develop courses of action.** Planners develop courses of action to achieve their goals and objectives by answering the following questions:
  - What is the action?
  - Who is responsible for the action?
  - When does the action take place?
  - Where does the action take place?
  - How long should the action take and how much time is actually available?
  - What has to happen before the action?
  - What happens after the action?
  - What resources and skills are needed to perform the action?
  - How will this action affect specific populations, such as children, the elderly, and individuals with disabilities and others with access and functional needs?

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

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

**Step 4 Outcome**

After completing Step 4, the planning team will have identified goals, objectives, and courses of action for before, during, and after threats and hazards, as well as functions. Goals, objectives, and courses of action for threats and hazards will be contained in the threat- and hazard-specific annexes in the plan. Goals, objectives, and courses of action for functions will be contained in the functional annexes of the plan.

**Step 5: Plan Preparation, Review, and Approval**

In Step 5, the planning team develops a draft of the EOP using the courses of action developed in Step 4. In addition, the team reviews the plan, obtains official approval, and shares the plan with community partners and stakeholders.
Format the Plan

An effective plan is presented in a way that makes it easy for users to find the information they need and that is compatible with local and state plans. This may include the use of plain language, providing pictures or visual cues for key action steps. This guide presents a traditional format that can be tailored to meet individual house of worship needs. This format has three major sections: the basic plan; functional annexes; and threat- and hazard-specific annexes.

The basic plan provides an overview of the house of worship’s approach to emergency operations. Although the basic plan guides the development of the more operationally oriented annexes, its primary audience consists of the house of worship, local emergency management officials, and the community (as appropriate). The elements listed in this section should meet the needs of this audience while providing a solid foundation for the development of supporting annexes.

The functional annexes detail the goals, objectives, and courses of action of functions (e.g., evacuation, lockdown, and recovery) that apply across multiple threats or hazards. Functional annexes discuss how the house of worship manages a function before, during, and after an incident.

The threat- and hazard-specific annexes specify the goals, objectives, and courses of action that a house of worship will follow to address a particular type of threat or hazard (e.g., hurricane, active shooter). Threat- and hazard-specific annexes, like the functional annexes, discuss how the house of worship manages a threat or hazard before, during, and after an incident.

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

<table>
<thead>
<tr>
<th>Sample Annex Format</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Title (Function, Threat, or Hazard)</td>
</tr>
<tr>
<td>• Goal(s)</td>
</tr>
<tr>
<td>• Objective(s)</td>
</tr>
<tr>
<td>• Course(s) of Action (i.e., describe the courses of action developed in Step 4 in the sequence in which they will occur)</td>
</tr>
</tbody>
</table>

Figure 2 outlines the different components of each of these three sections. The “Plan Content” section of this guide discusses content for each of these components. The format presented in this guide can be used for both the basic plan and annexes. Each function, threat, or hazard will have at least three goals, with one or more objectives for each goal, and a course of action for each of the objectives. Each annex should specify the title of the annex and list the goals, objectives, and courses of action (in the sequence in which they would occur).
## Basic Plan

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

## Functional Annexes
(Note: This is not a complete list; however, it is recommended that all plans include these functional annexes.)

1. Evacuation
2. Lockdown
3. Shelter-in-Place
4. Recovery
5. Security

## Hazard-, Threat-, or Incident-Specific Annexes
(Note: This is not a complete list. Each house of worship's annexes will vary based on their threat and hazard identification and risk assessment.)

1. Severe Storm
2. Earthquake
3. Tornado
4. Fire
5. Hazardous Materials Incident
6. Active Shooter

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**Figure 2: Sample EOP Format**

### Write the Plan

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

- Use clear and simple writing in plain language. Summarize important information with checklists and visual aids, such as maps and flowcharts.
- Avoid using jargon and minimize the use of abbreviations.
- Use short sentences and the active voice. Qualifiers and vague wording only add to confusion.
- Use a logical, consistent structure that makes it easy for readers to understand the rationale for the sequence of information and to find the information they need.
- Provide enough detail to convey an easily understood plan that is actionable. Organize the contents in a way that helps users quickly identify solutions and options. Plans should provide guidance for carrying out common courses of action, through the functional- and threat and hazard-specific annexes, but “stay out of the weeds.”
- Develop accessible tools and documents. Use appropriate auxiliary aids and services necessary for effective communication, such as accessible Web sites; digital text that can be converted to audio or Braille; the use of text equivalents for images; and captioning of any audio and audio description of any video content.
Review the Plan

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

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

- A plan is **feasible** if the house of worship can accomplish the assigned critical courses of action by using available resources within the time contemplated by the plan.

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

- A plan is **complete** if it:
  - Incorporates all courses of action to be accomplished for all selected threats and hazards and identified functions
  - Integrates the needs of the whole house of worship population
  - Provides a complete picture of what should happen, when, and at whose direction
  - Makes time estimates for achieving objectives, with safety remaining as the utmost priority
  - Identifies success criteria and a desired end-state
  - Is developed with the planning principles described in this guide.

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

Additionally, when reviewing the plan, the planning team does not have to provide all of the resources needed to execute a course of action or meet a requirement established during the planning effort. However, the plan should explain where or how the house of worship would obtain the resources to support those requirements.

Approve and Share the Plan

After finalizing the plan, the planning team should present the plan to the appropriate leadership and obtain official approval of the plan. Once approval is granted, the planning team should share the plan with local emergency management officials, community partners that have a role in the plan, and organizations that may use the building(s). The planning team should maintain a record of the people and organizations that receive a copy of the plan.

Step 5 Outcome

After completing Step 5, the planning team will have a final EOP for the house of worship.
Step 6: Plan Implementation and Maintenance

Train Stakeholders on the Plan and Their Roles

Everyone involved in the plan needs to know their roles and responsibilities before, during, and after an incident. Key training components include:

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

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

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

- **Post key information throughout the building.** It is important that congregants are familiar with and have easy access to information such as evacuation routes and shelter-in-place procedures and locations. Ensure information concerning evacuation routes and shelter-in-place procedures and locations is communicated effectively to congregants with disabilities or others with access and functional needs.

- **Familiarize congregants with the plan and community partners.** Bringing law enforcement, fire, and EMS personnel and community partners that have a role in the plan, as well as other organizations that use the building(s), into the house of worship to talk about the plan will make congregants and others more comfortable working with these partners. This may include community partners who are congregation members.

- **Train stakeholders on the skills necessary to fulfill their roles.** Persons will be assigned specific roles in the plan that will require special skills, such as first aid, how to use ICS, and the provision of personal assistance services for children, the elderly, and individuals with disabilities and others with access and functional needs.

Exercise the Plan

The more a plan is practiced and stakeholders are trained on the plan, the more effectively they will be able to act before, during, and after an incident to lessen the impact on life and property. Exercises provide opportunities to practice with local emergency management officials and community partners, as well as to identify gaps and weaknesses in the plan. The exercises below require increasing amounts of planning, time, and resources. Ideally, houses of worship will create an exercise program, building from a tabletop up to a more advanced exercise, like a functional exercise.\(^9\)

- **Tabletop exercises** are small group discussions that walk through a scenario and the courses of action a house of worship will need to take before, during, and after an incident. This

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activity helps assess the plan and resources and facilitates an understanding of emergency management and planning concepts.

- **During drills**, local emergency management officials, community partners, and relevant house of worship personnel use the actual house of worship grounds and buildings to practice responding to a scenario.

- **Functional exercises** are similar to drills, but involve multiple partners. Participants react to realistic simulated events (e.g., a bomb threat, or an intruder with a gun), and implement the plan and procedures using ICS.

- **Full-scale exercises** are the most time-consuming activity in the exercise continuum and are multiagency, multi-jurisdiction efforts in which resources are deployed. This type of exercise tests collaboration among the agencies and participants, public information systems, communications systems, and equipment. An emergency operations center is established (usually by the local emergency management agency) and ICS is activated.

Before making a decision about how many and which types of exercises to implement, a house of worship should consider the costs and benefits. Houses of worship should also consider having representative(s) participate in larger community exercises to ensure that their efforts are synchronized with the whole community’s efforts.

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

- Include local emergency management officials and community partners
- Communicate information in advance to avoid confusion and concern
- Exercise under different and non-ideal conditions (e.g., time of day, weather)
- Be consistent with common emergency management terminology
- Debrief and develop an after-action report that evaluates results; identifies gaps or shortfalls; and documents lessons learned
- Discuss how the plan and procedures will be modified, if needed, and specify who has the responsibility for modifying the plan.

**Review, Revise, and Maintain the Plan**

Planning is a continuous process that does not stop when the plan is published. Plans should evolve as lessons are learned; new information and insights are obtained; new threats or hazards emerge; and priorities are updated. Reviews should be a recurring activity. Planning teams should establish a process for reviewing and revising the plan. Many organizations review their plans on an annual basis. In no case should any part of the plan go for more than two years without being reviewed and revised.

Some organizations have found it useful to review and revise portions instead of reviewing the entire plan at once. Certain events will also provide new information that will be used to inform the plan. Houses of worship should consider reviewing and updating their plan after the following events:

- Actual emergencies
Changes in policy, personnel, organizational structures, processes, facilities, equipment, or membership size

Formal updates of planning guidance or standards

Formal exercises

Threats or hazards change or new threats or hazards emerge

Changes in the house of worship’s demographics (e.g., changing language needs) or site assessment.

The planning team should ensure that all local emergency management officials and community partners have the most current version of the house of worship’s plan.

Plan Content

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

Basic Plan

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

Introductory Material

Introductory material can enhance accountability with local emergency management officials and community partners and make a plan easier to use. Typical introductory material includes:

- **Cover Page.** The cover page has the title of the plan. It should include a date and identify the house of worship covered by the plan.

- **Promulgation Document/Signature Page.** This document/page is a signed statement formally recognizing and adopting the plan as the house of worship’s plan. It gives both the authority and the responsibility to house of worship leadership to perform their tasks before, during, or after an incident, and therefore should be signed by the house of worship’s senior leadership.

- **Approval and Implementation Page.** The approval and implementation page introduces the plan, outlines its applicability, and indicates that it supersedes all previous plans. It should include a delegation of authority for specific modifications that can be made to the plan and by whom they can be made without the signature of leadership. It should also include a date and should be signed by the house of worship’s senior leadership.
Guide for Developing High-Quality Emergency Operations Plans for Houses of Worship

- **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 organization to which the recipient belongs, 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 tasked individuals and organizations have acknowledged their receipt, review, and/or acceptance of the plan.

- **Table of Contents.** The table of contents is a logically ordered and 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**

This section includes the following components:

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

- **Situation Overview.** The situation overview explains why the plan is necessary. The situation overview covers a general discussion of:
  - The threats and hazards that pose a risk to the house of worship and would result in a need to use this plan
  - Dependencies on parties outside the house of worship for critical resources

**Concept of Operations**

This section explains in broad terms the decision maker’s intent with regard to an operation. This section provides an overall impression of how the house of worship will protect its occupants and should:

- Identify those with authority to activate the plan
- Describe the process by which the house of worship coordinates with all appropriate agencies within the jurisdiction
- Describe how plans take into account the architectural, programmatic, and communication needs of children, the elderly, and individuals with disabilities and others with access and functional needs (including their service animals)
- Identify other response/support agency plans that directly support the implementation of the plan (e.g., city or county EOP)
- Explain that the primary purpose of actions taken before an incident is to prevent, protect from, and mitigate the impact on life or property
- Explain that the primary purpose of actions taken during an incident is to respond to the incident and minimize its impact on life or property
• Explain that the primary purpose of actions taken after an incident 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 house of worship leadership and staff; local emergency management officials; and community partners and an overview of organizational functions during all incidents. This section should:

• Describe the roles and responsibilities of each individual/organization that apply during an incident (response), including, but not limited to, house of worship leadership, staff, lay leadership, congregants, and local departments and agencies (e.g., fire, law enforcement, EMS, emergency management) 10

• Describe informal and formal agreements in place for the quick activation and sharing of resources during an incident (e.g., evacuation locations to a nearby business’ parking lot). Agreements may be between the house of worship and response organizations (e.g., fire, law enforcement, EMS), other houses of worship, organizations, and businesses.

**Direction, Control, and Coordination**

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

• Describe the chain of command used by the house of worship

• Describe the relationship between the house of worship’s plan and the broader community’s emergency management system

• Describe who has control of equipment, resources, and supplies needed to support the plan.

**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 incident. This section should:

• Identify the type of information that will be helpful in the successful implementation of the activities that occur before, during, and after an emergency, such as:
  • Before and during: weather reports, law enforcement alerts, National Oceanic and Atmospheric Administration radio alerts, and crime reports
  • After: Web sites and hotlines for mental health agencies, emergency management agencies, and relief agencies assisting in all aspects of recovery

• Provide answers to the following questions for each of the identified types of information:
  • What is the source of the information?
  • Who analyzes and uses the information?

10 If the planning team considers the information critical to the successful implementation of the plan, it may identify roles and responsibilities of one or more individuals/organizations before and after an incident in addition to during the incident.
• 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 house of worship will use in support of the plan. This includes the core training objectives and frequency to ensure that stakeholders understand roles, responsibilities, and expectations. This section also establishes the expected frequency of exercises to be conducted by the house of worship. Content may be influenced based on similar requirements at the local level (e.g., the local emergency management agency’s exercise schedule). Exercises may range from basic fire and shelter-in-place drills to full-scale community-wide drills.

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

• Identify administrative controls and requirements that will be used to provide resource and expenditure accountability
• Briefly describe how the house of worship will maintain accurate logs of key activities
• Briefly describe how vital records will be preserved
• Identify sources for replacement of assets
• Identify general policies for keeping financial records; tracking resource needs; tracking the source and use of resources; acquiring ownership of resources; and compensating the owners of private property used by the house of worship.

Plan Development and Maintenance
This section discusses the overall approach to planning and the assignment of plan development and maintenance responsibilities. This section should:

• Describe the planning process, participants in that process, and how development and revision of different sections of the plan (i.e., basic plan, annexes) are coordinated prior to an incident
• Assign responsibility for the overall planning and coordination to a specific position or person
• Provide for a regular cycle of training, evaluating, reviewing, and updating of the plan.

Authorities and References
This section provides the legal basis for emergency operations and includes:

• Lists of laws, statutes, ordinances, executive orders, regulations, and formal agreements relevant to emergencies in the community
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- Provisions for the succession of decisionmaking authority and operational control to ensure that critical emergency functions can be performed in the absence of the house of worship’s senior leadership.

**Functional Annexes**

Functional annexes focus on critical operational functions and the courses of action developed to carry them out. This section describes functional annexes that the house of worship should develop as part of the plan. As the planning team assesses the house of worship’s needs, it may need to prepare additional or different annexes. Also included in this section are issues the planning team should consider as it develops goals, objectives, and courses of action for these functions. These are some of the most important issues, but this is not meant to be an exhaustive list.

Functions may occur consecutively or concurrently, depending on 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 not necessary to list a course of action for reunification within the evacuation annex.

**Evacuation Annex**

This annex focuses on the courses of action that the house of worship will execute to evacuate buildings and grounds. The planning team should consider the following when developing their goals, objectives, and courses of action:

- How to safely move persons to designated assembly areas from buildings and outside areas
- How to evacuate when the primary route evacuation route is unusable
- How to evacuate children who are not with a parent or guardian
- How to evacuate senior citizens and individuals with disabilities (along with service animals and assistive devices) and others with access and functional needs, including language, transportation, and medical needs.

**Lockdown Annex**

This annex focuses on the courses of action the house of worship will execute to secure buildings and grounds during incidents that pose an immediate threat of violence in or around the house of worship. The primary objective of a lockdown is to ensure all persons are secured quickly in the rooms away from immediate danger. The planning team should consider the following when developing their 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 building characteristics (e.g., windows, doors) affect possible lockdown courses of action
- What to do when a threat materializes inside the house of worship
- When to use the different variations of a lockdown (e.g., when outside activities are curtailed, doors are locked, and visitors closely monitored but all other activities continue as normal).
Shelter-in-Place Annex

A shelter-in-place annex focuses on courses of action when persons 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, persons may be required to move to rooms that can be sealed (such as in the event of a chemical or biological hazard) or without windows, or to a weather shelter (such as in the event of a tornado). The planning team should consider the following when developing their goals, objectives, and courses of action:

- What supplies will be needed to seal the room and to provide for personal needs (e.g., water)
- How shelter-in-place can affect individuals with disabilities and others with access and functional needs, such as persons who require the regular administration of medication, durable medical equipment, and personal assistant services
- How to move persons when the primary route is unusable
- How to locate and move children who are not with a parent or guardian
- Consider the need for and integration of “safe rooms” for protection against extreme wind hazards (such as a tornado or hurricane) in order to provide immediate life-safety protection when evacuation is not an option.

Recovery Annex

This annex describes how the house of worship will recover from an emergency. The four fundamental kinds of recovery are services recovery; physical recovery; fiscal recovery; and psychological and emotional recovery. The planning team should consider the following when developing their goals, objectives, and courses of action:

- Services Recovery
  - When and who has the authority to close and reopen the house of worship
  - What temporary space(s) may be used if buildings cannot be immediately reopened
  - How alternate services will be provided in the event that congregation members cannot physically reconvene.

- Physical Recovery
  - How assets are documented, including physically accessible facilities, in case of damage
  - Which personnel have expert knowledge of the assets and how and where they will access records to verify current assets after an emergency
  - How the house of worship will work with utility and insurance companies before an emergency to support a quicker recovery.

- Fiscal Recovery
  - How will staff receive timely and factual information regarding returning to work
  - What sources the house of worship may access for emergency relief funding.

- Psychological and Emotional Recovery:
  - Who will serve as the leader
• Where will counseling and psychological first aid be provided
• How members will create a calm and supportive environment for the congregation, share basic information about the incident, provide psychological first aid (if trained), and identify members and staff who may need immediate crisis counseling
• Who will provide trained counselors
• How to address immediate-, short-, and long-term counseling needs of staff members and families
• How to handle commemorations, memorial activities, or permanent markers and/or memorial structures (if any will be allowed); including concerns such as when a commemoration site will be closed, what will be done with notes/tributes, and how the congregation will be informed in advance
• How memorial activities will strike a balance among honoring the loss; resuming routines and schedules; and maintaining hope for the future.

Security Annex
This annex focuses on the courses of action that the house of worship will implement on a routine, ongoing basis to secure the house of worship from criminal threats, including efforts done in conjunction with law enforcement.

Threat- and Hazard-Specific Annexes
The threat- and hazard-specific annexes describe the courses of action unique to particular threats and hazards. Courses of action already outlined in a functional annex need not be repeated in a threat- or hazard-specific annex. A house of worship will develop these based on the prioritized list of threats and hazards determined during the planning process. As planning teams develop courses of action for threats and hazards, they should consider the local, state, and Federal regulations or mandates that often apply to specific hazard. Table 2 provides example threats and hazards for which a house of worship may need to plan.

<table>
<thead>
<tr>
<th>Threat/Hazard Type</th>
<th>Examples</th>
</tr>
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<tbody>
<tr>
<td>Natural Hazards</td>
<td>• Earthquakes</td>
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<td></td>
<td>• Tornadoes</td>
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<td></td>
<td>• Lightning</td>
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<td>• Severe wind</td>
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<td>• Hurricanes</td>
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<td>• Floods</td>
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<td>• Wildfires</td>
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<td>• Extreme temperatures</td>
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<td>• Landslides or mudslides</td>
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<td>• Tsunamis</td>
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<td></td>
<td>• Volcanic eruptions</td>
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<td>• Winter precipitation</td>
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<table>
<thead>
<tr>
<th>Threat/Hazard Type</th>
<th>Examples</th>
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</thead>
<tbody>
<tr>
<td>Technological Hazards</td>
<td>• Explosions or accidental releases from industrial plants</td>
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<td></td>
<td>• Hazardous materials releases from major highways or railroads</td>
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<td></td>
<td>• Radiological releases from nuclear power stations</td>
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<td></td>
<td>• Dam failure</td>
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<td>• Power failure</td>
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<td>• Water failure</td>
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<tr>
<td>Adversarial and Human-caused Threats</td>
<td>• Arson</td>
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<tr>
<td></td>
<td>• Active shooters</td>
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<td></td>
<td>• Criminal or gang violence</td>
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<td></td>
<td>• Violence related to domestic disputes</td>
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<tr>
<td></td>
<td>• Bomb</td>
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<td></td>
<td>• Cyber attacks</td>
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</table>

If there is a functional annex that applies to one of the threat- or hazard-specific annexes, the threat- or hazard-specific annex will include it by reference.

For example if a during course of action for a fire hazard involves evacuation and there is an evacuation functional annex, the fire annex would state “see evacuation annex” in the fire annex’s during course of action section rather than repeat the evacuation courses of action in the fire annex.

A Closer Look: Active Shooter Situations

Police officers, firefighters, and EMS (i.e., first responders) who come to a house of worship because of a 911 call involving gunfire face a daunting task. Though the objective—protect congregants—remains the same, the threat of an active shooter incident is different from responding to a natural disaster or other emergencies.

Active shooter situations are defined as those where an individual is “actively engaged in killing or attempting to kill people in a confined and populated area.”\(^1\) Unfortunately, houses of worship are not immune from this tragedy. For example, in 2012, six people were killed and four injured in a shooting at a Sikh temple in Oak Creek, Wisconsin, and in 2008, two people were killed and seven wounded at a Unitarian Church in Knoxville, Tennessee.

The better first responders and those working and visiting a house of worship are able to discern these threats and react swiftly, the more lives can be saved. This is particularly true in an active shooter situation, where law enforcement responds to a 911 call of shots fired. Many innocent lives are at risk in a concentrated area. Working with emergency management officials and community partners, houses of worship can develop a plan to better prepare their staff and congregants in prevention, reaction, and response to an active shooter incident.

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http://www.dhs.gov/xlibrary/assets/active_shooter_booklet.pdf. Other gun-related incidents that may occur in a house of worship are not defined as active shooter incidents because they do not meet this definition. Instead, they may involve a single shot fired, accidental discharge of a weapon, or incidents that are not ongoing.
Active shooter situations are unpredictable and evolve quickly. Because of this, individuals must be prepared to deal with an active shooter situation before law enforcement arrives on the scene.

**Preparing for an Active Shooter Incident**

**Planning**

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

- How to evacuate or lockdown personnel and visitors. Personnel involved in such planning should pay attention to disability-related accessibility concerns when advising on shelter sites and evacuation routes.
- How to evacuate when the primary evacuation routes are unusable.
- How to select effective shelter-in-place locations (optimal locations have thick walls, solid doors with locks, minimal interior windows, first aid-emergency kits, communication devices and duress alarms).
- How those present in buildings and on the ground will be notified that there is an active shooter incident underway. This could be done using familiar terms, sounds, lights, and electronic communications, such as text messages or emails. Include in the courses of action how to communicate with those who have language barriers or need other accommodations, such as visual signals to communicate with hearing-impaired individuals. Planners should make sure this protocol is readily available and understood by those who may be responsible for sending out or broadcasting an announcement. Rapid notification of a threat can save lives by keeping people out of harm’s way.
- How everyone will know when buildings and grounds are safe.

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

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

**Sharing Information with First Responders**

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

Providing detailed information to first responders allows them to rapidly move through buildings and the grounds during an emergency; to ensure areas are safe; and to tend to those in need. It is critically important to share this information with law enforcement and other first responders before an emergency occurs so that they have immediate access to the information. Law enforcement agencies have secure Web sites where these items already are stored for many schools, business, public venues, and other locations. All of these can be provided to first responders and viewed in drills, exercises, and walkthroughs.

Technology and tools with the same information (e.g., a portable USB drive that is compatible with computers used by first responders) should be maintained in secured locations in the building where designated staff for the house of worship can immediately provide it to responding officials, or where first responders can directly access it. The locations of these materials should be known by and accessible to a number of individuals to ensure ready access in an emergency. Every house of worship should have more than one individual charged with meeting first responders to provide them with the site assessment, the EOP, and any other details about facility safety or concerns.12

**Exercises**

Evacuation drills for fires and protective measures for tornadoes may be part of routine activities for a house of worship, but far fewer facilities practice for active shooter situations. To be prepared for an active shooter incident, houses of worship should train their staff and congregation, as appropriate, in what to expect and how to react.

Good planning includes conducting drills that involve first responders. Exercises with these valuable partners are one of the most effective and efficient ways to ensure that everyone knows not only their role, but also the role of others at the scene. These exercises should include walks through buildings to allow law enforcement to provide input on shelter sites as well as familiarize first responders with the location.

<table>
<thead>
<tr>
<th>Each person carries a responsibility that is three-fold:</th>
</tr>
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<tbody>
<tr>
<td>1. Learn the signs of a potentially volatile situation and ways to prevent an incident.</td>
</tr>
<tr>
<td>2. Learn the best steps for survival when faced with an active shooter situation.</td>
</tr>
<tr>
<td>3. Be prepared to work with law enforcement during the response.</td>
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**Preventing an Active Shooter Incident**

**Warning Signs**

No profile exists for an active shooter; however, research indicates there may be signs or indicators. Leaders and staff in houses of worship counsel congregants on a daily basis as part of

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12 For additional information, please see http://www.ready.gov.
their work. Law enforcement can assist in knowing the signs of a potentially volatile situation and help houses of worship proactively seek ways to prevent an incident from escalating.

By highlighting common pre-attack behaviors displayed by past offenders, Federal researchers have sought to enhance the detection and prevention of tragic attacks of violence, including active shooting incidents. Several agencies within the Federal Government continue to explore incidents of targeted violence in the effort to identify these potential “warning signs.” In 2002, the Federal Bureau of Investigation (FBI) published a monograph on workplace violence, including problematic behaviors of concern that may telegraph violent ideations and plans.13

Specialized units in the Federal Government (such as the FBI’s Behavioral Analysis Unit) continue to support behaviorally-based operational assessments of persons of concern in a variety of settings (e.g. schools, workplaces, houses of worship) who appear to be on a trajectory toward a catastrophic violent act. A review of current research, threat assessment literature, and active shooting incidents, combined with the extensive case experience of the Behavioral Analysis Unit, suggest that there are observable pre-attack behaviors which, if recognized, could lead to the disruption of a planned attack.14 While checklists of various “warning signs” are often of limited use in isolation, there are some behavioral indicators that should prompt further exploration and attention from law enforcement and/or house of worship officials. These behaviors often include:

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

No research has been conducted on individuals solely engaged in active shooting incidents at houses of worship; however, the behaviors listed above may be useful in identifying some of the behaviors of individuals of potential concern.15

Threat Assessment Teams

As described in the previous section, research shows that perpetrators of targeted acts of violence engage in both covert and overt behaviors preceding their attacks. They consider, plan, prepare, share, and, in some cases, move on to action. A useful tool to identify, evaluate, and address these troubling signs is the creation of a multidisciplinary Threat Assessment Team (TAT) for the house of worship. The TAT serves as a central convening body, so that warning signs observed by multiple people are not considered isolated incidents, slipping through the cracks, when they actually may represent escalating behavior that is a serious concern. TATs should keep in mind, however, the importance of relying on facts (including observed behavior) and avoid unfair labeling or stereotyping of individuals to remain in compliance with civil rights laws, when applicable.

Although not as common in private industry or in religious establishments, TATs are increasingly common in college and university settings, pushed to the forefront of concern following the 2007 shooting at Virginia Polytechnic Institute and State University, Blacksburg, Virginia, where 32 individuals were killed. In some cases, state funding mandates that institutions of higher learning create TATs. Houses of worship may also want to create TATs. The Departments offer the following recommendations for the creation and operation of TATs, although they fully recognize that houses of worship may differ in their approaches to certain issues.

For the purposes of consistency and efficiency, a TAT should be developed and implemented in coordination with other policy and practices for the organization. A TAT with diverse representation often will operate more efficiently and effectively. TAT members may include the leaders or administrators of the house of worship, counselors, staff, congregants, and medical and mental health professionals, who may be drawn from the congregation.

TATs review troubling or threatening behavior of persons brought to the attention of the TAT. TATs contemplate a holistic assessment and management strategy that considers the many aspects of the person’s life. More than focusing on warning signs or threats alone, a TAT assessment involves a unique overall analysis of changing and relevant behaviors. The TAT takes into consideration, as appropriate, information about behaviors; communications; any threats made; security concerns; family issues; or relationship problems that might involve a troubled individual. The TAT may also identify any potential victims with whom the individual may interact. Once the TAT identifies an individual that may pose a threat, the team will identify a course of action for addressing the situation. The appropriate course of action, whether law


17 For example, please see http://leg1.state.va.us/cgi-bin/legp504.exe/000+cod+23-9.2C10. Additional information can be found in *Recommended Practices for Virginia Colleges Threat Assessments* (Virginia Department of Criminal Justice Services, 2009, http://www.threatassessment.vt.edu/resources/tat_info/VArecommended_practices.pdf).
enforcement intervention, counseling, or other actions, will depend on the specifics of the situation.

The TAT may wish to seek assistance from law enforcement that can help assess reported threats or troubling behavior and tap available Federal resources (as part of the TAT process or separately). The FBI’s behavioral experts in its National Center for the Analysis of Violent Crimes (NCAVC) at Quantico, Virginia are available on a 24 hours per day, seven days per week basis to join in any threat assessment analysis and develop threat mitigation strategies for persons of concern. Law enforcement working with a TAT from a house of worship should contact the local FBI office for this behavioral analysis assistance.

Each FBI field office has a NCAVC representative available to work with the house of worship TAT and coordinate access to the FBI’s Behavioral Analysis Unit, if the congregation wishes. They focus not on how to respond tactically to an active shooter situation, but rather on how to prevent one. Early intervention can prevent a situation from escalating by identifying, assessing, and managing the threat.

Houses of worship should also work with local law enforcement to gain an understanding of the threats from outside the house of worship community that may affect the facility, so that, in partnership, appropriate security measures can be established.

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

**Responding to an Active Shooter Incident**

The house of worship’s EOP should include courses of action that will describe how congregants and staff can most effectively respond to an active shooter situation to minimize the loss of life, and teach and train on these practices.

Law enforcement officers may not be present when a shooting begins. Providing information on how congregants and staff can respond to the incident can help prevent and reduce the loss of life.

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

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

During an active shooter situation, the natural human reaction, even for those who are highly trained, is to be startled; feel fear and anxiety; and even experience initial disbelief and denial. Noise from alarms, gunfire, explosions, and people shouting and screaming should be expected. Training provides the means to regain composure, recall at least some of what has been learned,
and commit to action. There are three basic response options: run, hide, or fight. Individuals can run away from the shooter; seek a secure place where they can hide and/or deny the shooter access; or incapacitate the shooter in order to survive and protect others from harm.

As the situation develops, it is possible that congregants and staff will need to use more than one option. During an active shooter situation, these individuals will rarely have all of the information they need to make a fully informed decision about which option is best. While they should follow the plan and any instructions given during an incident, they will often have to rely on their own judgment to decide which option will best protect lives.18

Respond Immediately

It is common for people confronted with a threat to first deny the possible danger rather than respond. An investigation by the National Institute of Standards and Technology (2005) into the collapse of the World Trade Center towers on September 11, 2001 found that people close to the affected floors waited longer to start evacuating than those on unaffected floors.19 Similarly, during the Virginia Tech shooting, individuals on campus responded to the shooting with varying degrees of urgency.20 These studies support this delayed response or denial. For example, some people report hearing firecrackers, when in fact they heard gunfire. Train congregants and staff to skip denial and to respond immediately.

For example, train congregants to recognize the sounds of danger, act, and forcefully communicate the danger and necessary action (e.g., “Gun! Get out!”). In addition, those closest to a communications system should communicate the danger and necessary action. Repetition in training and preparedness shortens the time it takes to orient, observe, and act. Upon recognizing the danger, as soon as it is safe to do so staff or others should alert responders by contacting 911 with as clear and accurate information as possible.

Run

If it is safe to do so, the first course of action that should be taken is to run out of the building and far away until in a safe location. Congregants and staff should be trained to:

- Leave personal belongings behind
- Visualize possible escape routes, including physically accessible routes for individuals with disabilities
- Avoid escalators and elevators

18 As part of its preparedness mission, Ready Houston produces videos, handouts, and trainings to promote preparedness among residents of the Houston, Texas region. These videos are not recommended for viewing by minors. All of these items are available free-of-charge and many are available at http://www.readyhouston.tx.gov/videos.html.
19 Occupants of both towers delayed initiating their evacuation after WTC 1 was hit. In WTC 1, the median time to initiate evacuation was three minutes for occupants from the ground floor to floor 76, and five minutes for occupants near the impact region (floors 77 to 91). Averill, Jason D., et al. 2005. Federal Building and Fire Safety Investigation of the World Trade Center Disaster: Occupant Behavior, Egress, and Emergency Communications. Washington, DC: National Institute of Standards and Technology. http://www.mingerfoundation.org/downloads/mobility/nist%20world%20trade%20center.pdf
Guide for Developing High-Quality Emergency Operations Plans for Houses of Worship

- Take others with them, but do not stay behind because others will not go
- Call 911 when safe to do so
- Let a responsible adult know where they are.

Hide

If running is not a safe option, hide in as safe a place as possible. Congregants and staff should be trained to hide in a location where the walls might be thicker and have fewer windows. In addition:

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

Fight

If neither running nor hiding is a safe option, as a last resort, when confronted by the shooter, adults in immediate danger should consider trying to disrupt or incapacitate the shooter by using aggressive force and items in their environment, such as fire extinguishers or chairs. In a study of 41 active shooter events that ended before law enforcement arrived, the potential victims stopped the attacker themselves in 16 instances. In 13 of those cases, they physically subdued the attacker.²¹

While talking to the congregation and staff about confronting a shooter may be daunting and upsetting for some, they should know that they might be able to successfully take action to save lives. How each individual chooses to respond if directly confronted by an active shooter is up to him or her. Each house of worship should determine, as part of its planning process, policies on the control and presence of weapons, as permitted by law.

Interacting with First Responders

If a shooting occurs, congregants and staff should be trained to understand and expect that law enforcement’s first priority must be to locate and stop the person or persons believed to be the shooter(s); all other actions are secondary. One comprehensive study found that in more than half of mass shooting incidents where a solo officer arrived on the scene (57 percent) shooting was still underway when the officer arrived. In 75 percent of those instances, that solo officer had to confront the perpetrator to end the threat. In those cases, the officer was shot one-third of the time.22

Congregants and staff should be trained to cooperate and not to interfere with first responders. They should display empty hands with open palms and anticipate that law enforcement may instruct everyone to place their hands on their heads or get on the ground.

After an Active Shooter Incident23

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

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

Within an ongoing and/or evolving emergency, where the immediate reunification of loved ones is not possible, providing family members with timely, accurate, and relevant information is paramount. Having family members wait for long periods for information about their loved ones not only adds to their stress and frustration, but can also escalate the emotions of the entire group. When families are reunited, it is critical that there are child release processes in place where minors might be involved (e.g., childcare, religious classes) to assure that no child is released to an unauthorized person, even if that person well meaning.

Essential steps to help establish trust and provide family members with a sense of control can be accomplished by:

- Identifying a safe location separate from distractions and/or media and the general public, but close enough to allow family members to feel connected in proximity to their children/loved ones
- Scheduling periodic updates even if no additional information is available
- Being prepared to speak with family members about what to expect when reunified with their child/loved ones

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22 Ibid.
23 Please see the “Functional Annexes” section of this guide for additional recovery annex considerations.
Ensuring effective communication with those that have language barriers or need other accommodations, such as sign language interpreters for the hearing impaired.

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

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

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

The house of worship’s EOP should consider printed and age-appropriate resources to help families recognize and seek help in regard to a variety of reactions that they or their loved ones can experience during and after an emergency. It is critical that families and loved ones are supported as they both grieve their loss and support their surviving family members.

The house of worship’s EOP also should explicitly address how affected families will be supported if they prefer not to engage with the media. This includes strategies for keeping the media separate from families while the emergency is ongoing and support for families that may experience unwanted media attention at their homes.
Appendix A: References


GUIDE FOR DEVELOPING HIGH-QUALITY SCHOOL EMERGENCY OPERATIONS PLANS

U.S. Department of Education
U.S. Department of Health and Human Services
U.S. Department of Homeland Security
U.S. Department of Justice
Federal Bureau of Investigation
Federal Emergency Management Agency

2013
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June 2013

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INTRODUCTION AND PURPOSE

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

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

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

The guide is organized in four sections:

1. The principles of school emergency management planning.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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2 In the broader PPD-8 construct, the term “prevention” refers to those capabilities necessary to avoid, prevent, or stop a threatened or actual act of terrorism. The term “prevention” also refers to preventing imminent threats.
As schools plan for and execute response and recovery activities through the emergency operations plan, they should use the concepts and principles of the National Incident Management System (NIMS). One component of NIMS is the Incident Command System (ICS), which provides a standardized approach for incident management, regardless of cause, size, location, or complexity. By using ICS during an incident, schools will be able to more effectively work with the responders in their communities. For more information on ICS and NIMS, please see the Resources section.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Figure 1: Steps in the Planning Process

Step 1: Form a Collaborative Planning Team
Lessons learned from experience indicate that operational planning is best performed by a team. Case studies reinforce this concept by pointing out that the common thread found in successful operations is that participating organizations have understood and accepted their roles. Close

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

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

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

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

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

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

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

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

**Determine a Regular Schedule of Meetings:** School emergency management planning is an ongoing effort that is reinforced through regularly scheduled planning meetings. Establishing a
flexible but regular schedule of meeting times will facilitate greater collaboration, coordination, and communication among team members and will help solidify crucial relationships.

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

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

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

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

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

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

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4 For more information on the threat and hazard identification and risk assessment process, please see FEMA’s *Threat and Hazard Identification and Risk Assessment Guide (CPG 201)* at [http://www.fema.gov/plan](http://www.fema.gov/plan).
the severity of the impact; the time the school will have to warn students and staff about the threat or hazard; and how long it may last. The local and county emergency management staff should be able to provide information on some of the risks posed by threats and hazards common to the school and surrounding community. This enables the planning team to focus its assessment efforts on threats and hazards unique to the school community, as well as on the particular vulnerabilities of the building and its occupants.

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

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

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

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

---

<table>
<thead>
<tr>
<th>Type of Assessment</th>
<th>Description</th>
<th>Purpose and Results</th>
</tr>
</thead>
</table>
| Site Assessment         | A site assessment examines the safety, accessibility, and emergency preparedness of the school’s buildings and grounds. This assessment includes, but is not limited to, a review of building access and egress control measures, visibility around the exterior of the building, structural integrity of the building, compliance with applicable architectural standards for individuals with disabilities and others with functional and access needs, and emergency vehicle access. | • Increased understanding of the potential impact of threats and hazards on the school buildings and grounds.  
• Increased understanding of risk and vulnerabilities of the school buildings and grounds when developing the plan.  
• Knowledge of which facilities are physically accessible to students, staff, parents, volunteer workers, and emergency response personnel with disabilities and can be used in compliance with the law. |
| Culture and Climate Assessment | In schools with positive climates, students are more likely to feel connected to adults and their peers. This fosters a nurturing environment where students are more likely to succeed, feel safe, and report threats. A school culture and climate assessment evaluates student and staff connectedness to the school and problem behaviors. For example, this assessment may reveal a high number of bullying incidents, indicating a need to implement an anti-bullying program. If a student survey is used to assess culture and climate, student privacy must be protected. A range of school personnel can assist in the assessment of culture and school climate, including school counselors and mental health staff. | • Knowledge of students’ and staff’s perceptions of their safety.  
• Knowledge of problem behaviors that need to be addressed to improve school climate. |
<table>
<thead>
<tr>
<th>Type of Assessment</th>
<th>Description</th>
<th>Purpose and Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>School Threat Assessment</td>
<td>A school threat assessment analyzes communication and behaviors to determine whether or not a student, staff, or other person may pose a threat. These assessments must be based on fact, must comply with applicable privacy, civil rights, and other applicable laws, and are often conducted by multidisciplinary threat assessment teams. While a planning team may include the creation of a threat assessment team in its plan, the assessment team is a separate entity from the planning team and meets on its own regular schedule.</td>
<td>• Students, staff, or other persons that may pose a threat are identified before a threat develops into an incident and are referred for services, if appropriate.</td>
</tr>
</tbody>
</table>
| Capacity Assessment        | The planning team needs to know what resources will be at their disposal. A capacity assessment examines the capabilities of students and staff as well as the services and material resources of community partners. This assessment is used to identify people in the building with applicable skills (e.g., first aid certification, search and rescue training, counseling and mental health expertise, ability to assist individuals with disabilities and others with access and functional needs). Equipment and supplies should also be inventoried. The inventory should include an evaluation of equipment and supplies uniquely for individuals with disabilities, such as evacuation chairs, the availability of sign language interpreters and technology used for effective communication, accessible transportation, and consumable medical supplies and durable medical equipment that may be necessary during a shelter-in-place or evacuation. | • An increased understanding of the resources available.  
• Information about staff capabilities will help planners assign roles and responsibilities in the plan. |
After conducting these assessments, the planning team should consolidate all of the information it has obtained into a format that is usable for comparing the risks posed by the identified threats and hazards. This information will then be used to assess and compare the threats and hazards and their likely consequences. This is referred to as a “risk and vulnerability assessment.” One effective method for organizing information is to create a table with a range of information about each possible threat and hazard, including any new threats or hazards identified through the assessment process. The table should include:

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

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

**Prioritize Threats and Hazards**

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

<table>
<thead>
<tr>
<th>Hazard</th>
<th>Probability</th>
<th>Magnitude</th>
<th>Warning</th>
<th>Duration</th>
<th>Risk Priority</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>3. Likely</td>
<td>3. Critical</td>
<td>3. 6–12 hrs.</td>
<td>3. 6–12 hrs.</td>
<td>Medium</td>
</tr>
<tr>
<td></td>
<td>2. Possible</td>
<td>2. Limited</td>
<td>2. 12–24 hrs.</td>
<td>2. 3–6 hrs.</td>
<td>Low</td>
</tr>
<tr>
<td></td>
<td>1. Unlikely</td>
<td>1. Negligible</td>
<td>1. 24+ hrs.</td>
<td>1. &lt; 3 hrs.</td>
<td></td>
</tr>
<tr>
<td>the school</td>
<td>3. Likely</td>
<td>3. Critical</td>
<td>3. 6–12 hrs.</td>
<td>3. 6–12 hrs.</td>
<td>Medium</td>
</tr>
<tr>
<td></td>
<td>2. Possible</td>
<td>2. Limited</td>
<td>2. 12–4 hrs.</td>
<td>2. 3–6 hrs.</td>
<td>Low</td>
</tr>
<tr>
<td></td>
<td>1. Unlikely</td>
<td>1. Negligible</td>
<td>1. 24+ hrs.</td>
<td>1. &lt; 3 hrs.</td>
<td></td>
</tr>
</tbody>
</table>

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

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

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

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

The planning team should develop at least three goals for addressing each threat or hazard (though the planning team may want to identify more). Those three goals should indicate the
desired outcome for (1) before, (2) during, and (3) after the threat or hazard. For a fire, for instance, three possible goals include

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

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

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

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

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

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

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

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

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

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

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

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

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

**Step 3 Outcome**

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

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**Step 4: Plan Development (Identifying Courses of Action)**

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

**Identify Courses of Action**

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

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

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

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

4. **Develop courses of action.** Planners develop courses of action to achieve their goals and objectives by answering the following questions:
   - What is the action?
   - Who is responsible for the action?
   - When does the action take place?
   - How long does the action take and how much time is actually available?
   - What has to happen before?
   - What happens after?
   - What resources are needed to perform the action?
   - How will this action affect specific populations, such as individuals with disabilities and others with access and functional needs who may require medication, wayfinding, evacuation assistance, or personal assistance services, or who may experience severe anxiety during traumatic events?

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**PLANS MUST COMPLY WITH THE AMERICANS WITH DISABILITIES ACT**

Plans must comply with the *Americans with Disabilities Act*, among other prohibitions on disability discrimination, across the spectrum of emergency management services, programs, and activities, including preparation, testing, notification and alerts, evacuation, transportation, sheltering, emergency medical care and services, transitioning back, recovery, and repairing and rebuilding. Plans should include students, staff, and parents with disabilities. Among other things, school emergency plans must address the provision of appropriate auxiliary aids and services to ensure effective communication with individuals with disabilities (e.g., interpreters, captioning, and accessible information technology); ensure individuals with disabilities are not separated from service animals and assistive devices, and can receive disability-related assistance throughout emergencies (e.g., assistance with activities of daily living, administration of medications); and comply with the law's architectural and other requirements. (Information and technical assistance about the *Americans with Disabilities Act* (ADA) is available at [http://www.ada.gov](http://www.ada.gov).)
Select Courses of Action
After developing courses of action, planners compare the costs and benefits of each proposed course of action against the goals and objectives. Based on this comparison, planners select the preferred course or courses of action to move forward in the planning process. Plans often include multiple courses of action for a given scenario to reflect the different ways it could unfold.

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

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

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

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

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

Format the Plan
An effective school EOP is presented in a way that makes it easy for users to find the information they need and that is compatible with local and state plans. This may include using
plain language and providing pictures and/or visual cues for key action steps. This guide presents
a traditional format that can be tailored to meet individual school needs. This format has three

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

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

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

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

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

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

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6 The term *annex* is used throughout this guide to refer to functional, hazard- or threat-specific, or other supplements
to the basic plan. Some plans may use the term *appendix* in the same fashion (e.g., hazard-specific appendix).
**Figure 2: Traditional EOP Format**

### School EOP Format

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

<table>
<thead>
<tr>
<th>Functional Annexes</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>NOTE: This is not a complete list, but it is recommended that all EOPs include at least the following functional annexes:</td>
<td></td>
</tr>
<tr>
<td>1.   Communications</td>
<td>6.   Reunification</td>
</tr>
<tr>
<td>2.   Evacuation</td>
<td>7.   Continuity of Operations (COOP)</td>
</tr>
<tr>
<td>3.   Shelter-in-Place</td>
<td>8.   Security</td>
</tr>
<tr>
<td>4.   Lockdown</td>
<td>9.   Recovery</td>
</tr>
<tr>
<td>5.   Accounting for All Persons</td>
<td>10.  Health and Medical</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Threat- or Hazard-Specific Annexes</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>NOTE: This is not a complete list. Each school’s annexes will vary based on its hazard analysis.</td>
<td></td>
</tr>
<tr>
<td>1.   Hurricane or Severe Storm</td>
<td>5.   Mass Casualty Incident</td>
</tr>
<tr>
<td>2.   Earthquake</td>
<td>6.   Active Shooter</td>
</tr>
<tr>
<td>3.   Tornado</td>
<td>7.   Pandemic or Disease Outbreak</td>
</tr>
<tr>
<td>4.   Hazardous Materials Incident</td>
<td></td>
</tr>
</tbody>
</table>

**Write the Plan**

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

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

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

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

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

**Review the Plan**

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

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

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

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

- A plan is *complete* if it
  - Incorporates all courses of action to be accomplished for all selected threats and hazards and identified functions;
  - Integrates the needs of the whole school community;
  - Provides a complete picture of what should happen, when, and at whose direction;
  - Estimates time for achieving objectives, with safety remaining as the utmost priority;
  - Identifies success criteria and a desired end state; and
  - Conforms with the planning principles outlined in this guide.

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

Additionally, when reviewing the plan, the planning team does not have to provide all of the resources needed to execute a course of action or meet a requirement established during the
planning effort. However, the plan should explain where or how the district and school will obtain the resources to support those requirements.

**Approve and Share the Plan**

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

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

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

**Step 5 Outcome**

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

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**Step 6: Plan Implementation and Maintenance**

**Train Stakeholders on the Plan and Their Roles**

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

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

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

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

- **Post key information throughout the building.** It is important that students and staff are familiar with and have easy access to information such as evacuation routes and shelter-in-place procedures and locations. Ensure that information concerning evacuation routes and shelter-in-
place procedures and locations is effectively communicated to students, staff, and parents with
disabilities as well as others with access and functional needs, such as by distributing the
materials by e-mail in an accessible format.

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

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

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

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

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

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

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

Before making a decision about how many and which types of exercises to implement, a school
should consider the costs and benefits of each, as well as any state or local requirements. For
example, while a tabletop exercise may be less costly and less time-consuming to run, a full-scale exercise provides a more realistic context for the simulated response to an emergency situation, thus providing more constructive feedback to improve the plans. If students are involved, the school should also consider the age of the student population when selecting the appropriate exercise. Schools should also consider whether to include parents and should take into account the cultural diversity of their populations when designing exercises and training.

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

To effectively execute an exercise

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


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

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

Some schools have found it useful to review and revise portions instead of reviewing the entire plan at once. Schools may consider reviewing a portion each month or at natural breaks in the academic calendar. Certain events will also provide new information that will be used to inform the plan. Schools should consider reviewing and updating their plans or sections of their plans after
- Actual emergencies;
- Changes have been made in policy, personnel, organizational structures, processes, facilities, or equipment;
- Formal updates of planning guidance or standards have been finalized;
- Formal exercises have taken place;
- Changes in the school and surrounding community have occurred;
- Threats or hazards change or new ones emerge; or
- Ongoing assessments generate new information.

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

**Plan Content**

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

**The Basic Plan**

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

**Introductory Material**

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

- **Cover Page.** The cover page includes the title of the plan, a date, and the school(s) covered by the plan.
- **Promulgation Document or Signature Page.** This document or page contains a signed statement formally recognizing and adopting the school EOP. It gives both the authority and the responsibility to school officials to perform their tasks before, during, or after an incident, and therefore should be signed by the school administrator or another authorizing official.
Approval and Implementation Page. The approval and implementation page introduces the plan, outlines its applicability, and indicates that it supersedes all previous plans. It includes a delegation of authority for specific modifications that can be made to the plan and by whom they can be made without the school administrator’s signature. It also includes a date and should be signed by the authorized school administrator.

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

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

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

Purpose and Situation Overview
The Purpose and Situation Overview section includes the following components:

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

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

- The threats and hazards that pose a risk to the school and would result in a need to use this plan; and
- Dependencies on parties outside the school for critical resources.

Concept of Operations
The Concept of Operations section explains in broad terms the school administrator’s intent with regard to an operation.
This section is designed to give an overall picture of how the school will protect the students, staff, and visitors, and should

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

### Organization and Assignment of Responsibilities

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

- Describes the broad roles and responsibilities of individuals that apply during all emergencies.

- Individuals that the planning team may wish to include in this section of the plan are principals and other school administrative leaders, teachers, support personnel (e.g., instructional aides, counselors, social workers, psychologists, nurses, maintenance staff, school resource officers [SROs], cafeteria workers, bus drivers), and parents and guardians.

- The planning team may also wish to include community-based organizations represented in the EOP.

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7 If the planning team considers the information critical to the successful implementation of the plan, it may identify roles and responsibilities of one or more of these individuals before and after an emergency in addition to during an emergency.
• The following is an example of the type of information that would be included in the plan to describe the broad roles and responsibilities of teachers during all emergencies.

  ▪ Teachers will be responsible for the supervision of students and shall remain with students until directed otherwise. Teachers’ responsibilities include:

    ✓ directing students to inside or outside assembly areas according to instructions provided by the Incident Commander or designee;

    ✓ accounting for students when class relocates to an outside or inside assembly area or evacuates to another location;

    ✓ reporting missing students to the Incident Commander or designee;

    ✓ obtaining first-aid services for injured students; and if trained and certified in first aid, rendering first aid, if necessary.

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

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

  ❖ The ICS structure as used by the school;

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

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

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

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

    • Before and during: weather reports, law enforcement alerts, National Oceanic and Atmospheric Administration radio alerts, crime reports.

    • After: mental health agencies’ websites and hotlines, and emergency management and relief agencies websites and hotlines assisting in all aspects of recovery.
For each of the identified types of information, provide answers to the following questions:

- What is the source of the information?
- Who analyzes and uses the information?
- How is the information collected and shared?
- What is the format for providing the information to those who will use it?
- When should the information be collected and shared?

**Training and Exercises**

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

**Administration, Finance, and Logistics**

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

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

**Plan Development and Maintenance**

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

- Describes the planning process, participants in that process, and how development and revision of different sections of the school EOP (basic plan and annexes) are coordinated before an emergency;
Assigns responsibility for the overall planning and coordination to a specific position or person; and

Provides for a regular cycle of training, evaluating, reviewing, and updating of the school EOP.

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

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

- Provisions for the succession of decision-making authority and operational control to ensure that critical emergency functions can be performed in the absence of the school administrator.

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

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

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

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

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

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

- How to safely move students and visitors to designated assembly areas from classrooms, outside areas, cafeterias, and other school locations.
How to evacuate when the primary evacuation route is unusable.

How to evacuate students who are not with a teacher or staff member.

How to evacuate individuals with disabilities (along with service animals and assistive devices, e.g., wheelchairs) and others with access and functional needs, including language, transportation, and medical needs.

**Lockdown Annex**

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

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

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

**Shelter-in-Place Annex**

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

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

- What supplies will be needed to seal the room and to provide for the needs of students and staff (e.g., water).
- How a shelter-in-place can affect individuals with disabilities and others with access and functional needs, such as students who require the regular administration of medication, durable medical equipment, and personal assistant services.
- How to move students when the primary route is unusable.
- How to locate and move students who are not with a teacher or staff member.
Consider the need for and integration of “safe rooms” for protection against extreme wind hazards (such as a tornado or hurricane) in order to provide immediate life-safety protection when evacuation is not an option.

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

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

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

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

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

- How the school’s communications system integrates into the local disaster and response law enforcement communication networks (e.g., fire department and law enforcement staff).
- How to ensure relevant staff members can operate communications equipment.
- How the school will communicate with students, families, and the broader community before, during, and after an emergency.
- How to account for technology barriers faced by students, staff, parents, and guardians.
- How to effectively address language access barriers faced by students, staff, parents, and guardians.
- How the school will handle the media (e.g., district or school Public Information Officer [PIO]).
- How impacts on students will be communicated to the community, including the impact on activities related to the school but not necessarily at the school or during regular school hours (i.e., church use of school property and athletic events).
How the school will ensure effective communication with individuals with disabilities and others with access and functional needs (e.g., coordinating with first responders and local emergency managers to provide sign language interpreters for use during press conferences, publishing only accessible documents, ensuring information on websites is accessible).

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

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

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

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

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

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

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

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

Continuity of Operations (COOP) Annex

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

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

- How the COOP annex will be designed so that it can be activated at any time and sustained for up to 30 days.
How the COOP annex will set priorities for re-establishing essential functions, such as restoration of school operations, and maintaining the safety and well-being of students and the learning environment.

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

**Recovery Annex**

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

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

- **Academic recovery**
  - When the school should be closed and reopened, and who has the authority to do so.
  - What temporary space(s) the school may use if school buildings cannot be immediately reopened.
  - How to provide alternate educational programming in the event that students cannot physically reconvene.

- **Physical recovery**
  - How to document school assets, including physically accessible facilities, in case of damage.
  - Which personnel have expert knowledge of the schools’ assets, and how and where they will access records to verify current assets after disaster strikes.
  - How the school will work with utility and insurance companies before an emergency to support a quicker recovery.

- **Fiscal recovery**
  - How district leadership will be included (e.g., superintendent, chief business officer, personnel director, and risk manager).
  - How staff will receive timely and factual information regarding returning to work.
  - What sources the school may access for emergency relief funding.

- **Psychological and emotional recovery**
  - Who will serve as the team leader.
• Where counseling and psychological first aid will be provided.

• How teachers will create a calm and supportive environment for the students, share basic information about the incident, provide psychological first aid (if trained), and identify students and staff who may need immediate crisis counseling.

• Who will provide trained counselors.

• How to address the immediate, short-, and long-term counseling needs of students, staff, and families.

• How to handle commemorations, memorial activities, or permanent markers and/or memorial structures (if any will be allowed). This includes concerns such as when a commemoration site will be closed, what will be done with notes and tributes, and how students will be informed in advance.

• How memorial activities will strike a balance among honoring the loss, resuming school and class routines and schedules, and maintaining hope for the future.

• How the Public Health, Medical and Mental Health annex will inform the actions and plans of the Recovery annex.

**Public Health, Medical, and Mental Health Annex**

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

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

- What the role of staff members is in providing first aid during an emergency.

- Where emergency medical supplies (e.g., first aid kits, AEDs) will be located and who is responsible for purchasing and maintaining those materials.

- Which staff have relevant training or experience, such as in first aid or CPR.

- How the school will secure a sufficient number of counselors in the event of an emergency.

- How the school will promptly share and report information about outbreaks or epidemics or other unusual medical situations to the local health department.

- How the school will support the needs of students identified by the threat assessment team.
Security Annex
This annex focuses on the courses of action that schools will implement on a routine, ongoing basis to secure the school from criminal threats originating from both inside and outside the school. This includes efforts done in conjunction with law enforcement personnel.

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

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

CPTED Principles

Natural surveillance – arranging physical features to maximize visibility

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

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

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

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

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

Threat- and Hazard-Specific Annexes
The Threat- and Hazard-specific annexes describe the courses of action unique to particular threats and hazards. Courses of action already outlined in a Functional annex need not be
repeated in a Hazard-Specific annex. Schools will develop these based on the prioritized list of hazards determined in the assessment process. As planning teams develop courses of action for threats and hazards, they should consider the federal, state, and local regulations or mandates that often apply to specific hazards.

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

### Table 3: Threat and Hazard Types and Examples

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

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

- “Information Sharing” provides an overview of the *Family Educational Rights and Privacy Act*, the *Health Insurance Portability and Accountability Act*, and the implications that these federal statutes may have for information-sharing in the emergency planning process.

- “Psychological First Aid for Schools” (PFA-S) describes this type of aid and how schools can use it to help students, staff, and families during and immediately after a traumatic incident.

- “School Climate and Emergencies” describes how a positive school climate provides students with ready access to emotional and behavioral supports that can affect the capacity of students and staff to prevent, respond to, and recover from emergencies.

- “Active Shooter Situations” describes unique challenges involved in preparing for, responding to, and recovering from a school-based shooting.
1. Information Sharing

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

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

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

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

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\(^8\) Title II of the ADA prohibits discrimination based on disability by public entities, including public schools.


\(^10\) See 28 CFR 35.139.

\(^11\) For more information about applicable civil rights statutes, please visit [www.justice.gov/crt](http://www.justice.gov/crt), [www.ed.gov/ocr](http://www.ed.gov/ocr) or [www.ada.gov](http://www.ada.gov). Information about appropriate training and management for school resource officers and law enforcement officials in schools may be found at [www.cops.usdoj.gov](http://www.cops.usdoj.gov).
Family Educational Rights and Privacy Act (FERPA)

In this section:

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

What Is FERPA?

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

FERPA protects the rights of parents or eligible students to

- Inspect and review education records;
- Seek to amend education records; and
- Consent to the disclosure of personally identifiable information (PII) from education records, except as specified by law.
For a thorough review of FERPA, in addition to what is provided in this document, please see the implementing regulations for FERPA, found in Title 34 of the Code of Federal Regulations (CFR), part 99, and the resources and guidance documents listed at the end of this section.

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

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

<table>
<thead>
<tr>
<th>Education Records</th>
<th>Not Education Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transcripts</td>
<td>Records that are kept in the sole possession of the maker and used only as personal memory aids</td>
</tr>
<tr>
<td>Disciplinary records</td>
<td>Law enforcement unit records</td>
</tr>
<tr>
<td>Standardized test results</td>
<td>Grades on peer-graded papers before they are collected and recorded by a teacher</td>
</tr>
<tr>
<td>Health (including mental health) and family history records</td>
<td>Records created or received by a school after an individual is no longer in attendance and that are not directly related to the individual’s attendance at the school</td>
</tr>
<tr>
<td>Records on services provided to students under the Individuals with Disabilities Education Act (IDEA)</td>
<td>Employee records that relate exclusively to an individual in that individual’s capacity as an employee</td>
</tr>
<tr>
<td>Records on services and accommodations provided to students under Section 504 of the Rehabilitation Act of 1973 and Title II of the ADA¹²</td>
<td>Information obtained through a school official’s personal knowledge or observation and not from the student’s education records</td>
</tr>
</tbody>
</table>

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

Who May Access FERPA-Protected Education Records?
“School officials with a legitimate educational interest” may access FERPA-protected education records. Schools determine the criteria for who is considered a school official with a legitimate

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

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

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

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

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

**Balancing Safety and Privacy**

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

**The Health or Safety Emergency Exception to the Consent Requirement**

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

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

- Schools have discretion to determine what constitutes a health or safety emergency.

- “Appropriate parties” typically include law enforcement officials, first responders, public health officials, trained medical personnel, and parents. This FERPA exception is temporally limited to the period of the emergency and does not allow for a blanket release of PII. It does not allow disclosures to address emergencies that might occur, such as would be the case in emergency preparedness activities.

- The information that may be disclosed is limited to only PII from an education record that is needed based on the type of emergency.

- Disclosures based on this exception must be documented in the student’s education records to memorialize the
  - Emergency that formed the basis for the disclosure; and
  - Parties with whom the school shared the PII.

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


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

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

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

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

Significantly, to be considered a “law enforcement unit” under this definition, an individual or component must be officially authorized or designated to carry out the functions listed above by the school. Schools may designate a traditional law enforcement entity (such as school security staff, school resource officers [SROs], school safety officers, school police, or other school
security personnel) as a law enforcement unit, or opt to designate another non-law enforcement school official to serve as their law enforcement unit, such as a vice principal or another school official.

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

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

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

Law enforcement unit records do not include

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

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

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

- A school’s law enforcement unit officials must protect the privacy of education records they receive and may disclose them only in compliance with FERPA. For that reason, we recommend that law enforcement unit records be maintained separately from education records.
For more information on law enforcement unit records and FERPA, refer to the following sources:

- “Addressing Emergencies on Campus,” June 2011

- The discussion in the preamble to the final rule in the Federal Register published Dec. 9, 2008, starting on page 74836

- Family Policy Compliance Office website

- The regulatory definition of “Law Enforcement Unit” under FERPA in 34 CFR § 99.8(a)
  available at http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=ae535d41f8bb03bedfef79634883360f&n=34y1.1.1.133&r=PART&ty=HTML#34:1.1.1.133.1.132.8

**Common FERPA Misunderstandings**

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

**Sharing Personal Observation or Knowledge**

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

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

**Releasing Directory Information**

In some circumstances, schools may be able to disclose “directory information” to prevent an emergency situation. Directory information means information contained in a student’s education record that would not generally be considered harmful or an invasion of privacy if disclosed. Some examples of directory information include a student’s name, address, telephone number, or e-mail address. Schools must follow certain requirements in publicly designating “directory information,” and they may not disclose directory information from a student’s
education record if the parent or eligible student has opted out of allowing that disclosure. For example, assuming that the parents’ cell phone numbers have been properly designated as “directory information,” what if the parents have not opted out of the disclosure of such “directory information,” and a flood displaced families from their homes and these children are brought to a shelter? The school may disclose those parents’ cell phone numbers to an emergency management agency that is trying to locate the parents.

**Additional Situations With FERPA Considerations**

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

- **Infectious Disease**

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

- **Threat Assessment Teams**

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

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

  If a threat assessment team member meets the definition of a school official (as a party to whom the school has outsourced administrative functions or services) with a legitimate educational interest under *FERPA*, (see “Who May Access FERPA-Protected Education Records” above), then he or she would be able to access students’ education records in which he or she has legitimate educational interests. A threat assessment team member who is appropriately designated as a school official, however, may not disclose PII from
education records to anyone without consent or unless one of the exceptions to consent under FERPA, such as the health or safety emergency exception, applies.

วา่า.Security Videos

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

Incorporating FERPA Into Your Emergency Planning Process

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

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

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

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

Example: Your school’s threat assessment team includes representatives from your community partners, and you have properly designated them as “school officials with a legitimate educational interest.” (See “Who May Access FERPA-Protected Records” above.) The local law enforcement representative on your team does not share with his police chief or other law enforcement official the PII that he obtains from a student’s
education records in his capacity as a threat assessment team member while working to identify possible threats because he knows that this is not permitted. Several months after the threat assessment team initially convened to review a collection of behaviors and communications concerning a particular student and determined that there was not sufficient information demonstrating that the student posed a threat, the team learns that the student has now communicated his intent to harm the school principal. At this juncture, the law enforcement representative (and other members of the threat assessment team) shares pertinent PII from education records with appropriate parties so they can take steps, such as consulting with a police agency, to protect the health or safety of the principal (in this case). (See also the discussion of threat assessment teams under “Additional Situations With FERPA Considerations” above.)

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

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

What Information Is Not FERPA-Protected and When May the School Share It?
Records that are created and maintained by a school’s law enforcement unit for a law enforcement purpose are not protected by FERPA, and there are no FERPA restrictions on the sharing of information in law enforcement unit records. (See “What Are ‘Education Records’” and “Balancing Safety and Privacy” above.)

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

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

Frequently Asked Questions Pertaining to FERPA

Q: To what entities does FERPA apply?

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

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

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

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

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

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

Q: When would the health or safety exception apply?

A: Under FERPA, an emergency means a situation in which there is an articulable and significant threat to the health or safety of students or other individuals. This determination must be made by the school.
**Q: Do I need to tell parents and eligible students or otherwise document when I have disclosed PII from their education records without consent under a health or safety emergency?**

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

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

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

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

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

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

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

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

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

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

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

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

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14 See Title 28 of the Code of Federal Regulations, Section 35.139.
15 In enacting the Americans with Disabilities Act, Congress relied on School Board of Nassau County, Florida v. Arline, 480 U.S. 273, (1987) to “acknowledge[] that society's accumulated myths and fears about disability and disease are as handicapping as are the physical limitations that flow from actual impairment.” As explained in the preamble to the Justice Department's 1991 ADA regulation, codification of the Arline standard was deemed essential if the ADA is to achieve its goal of protecting disabled individuals from discrimination based on prejudice, stereotypes, or unfounded fear, while giving appropriate weight to legitimate concerns, such as the need to avoid exposing others to significant health and safety risks. See 28 C.F.R. pt. 36, app. C, sec. 36.208. This rationale applies with equal force to making determinations based on stereotypes about other characteristics protected by Titles IV and VI of the Civil Rights Act of 1964.
What Is HIPAA?
The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and its implementing regulations, commonly known as the HIPAA Privacy Rule and the HIPAA Security Rule, protect the privacy and security of individually identifiable health information, called protected health information or PHI, held by health plans, health care clearinghouses, and most health care providers, collectively known as covered entities, and their business associates (entities that have access to individuals’ health information to perform work on behalf of a covered entity).

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

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

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

The HHS Office for Civil Rights (OCR) has responsibility for administering and enforcing the Privacy and Security Rules.
How Does HIPAA Apply in Schools?
Generally, HIPAA does not apply to student health information maintained by a school. While schools and school districts may maintain student health records, these records are in most cases not protected by HIPAA. Rather, student health information maintained at a school would be considered education records protected by the Family Educational Rights and Privacy Act (FERPA).

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

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

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

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

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

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

Students and staff may experience a broad range of reactions (e.g., physical, cognitive, psychological, behavioral, spiritual) to an emergency. Some of these reactions can cause distress
that interferes with adaptive coping. Support from informed, compassionate, and caring professionals can help students and staff members recover from these reactions. PFA-S has the potential to decrease the likelihood of mental health problems or long-term difficulties by identifying individuals who may need additional services and linking them to such services as needed.16

PFA-S assists students, staff, and families by

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

Training School Staff

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

3. School Climate and Emergencies

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

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

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

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

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

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

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

**Recovery**
A positive school climate can help in the recovery from an emergency because it represents a commitment, even prior to an emergency, to providing emotional and mental health services and supports to all members of the community. Schools with such a climate create an environment that recognizes the importance of social and emotional health, and so support the recovery of all members of the school community and promote an understanding that individual needs will vary in a post-emergency situation.
The following steps when implemented as part of a single, comprehensive, and integrated strategy for improving student health and safety will help schools promote a positive school climate.

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

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

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

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

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

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

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

While interventions for students who are at elevated levels of risk address their needs and problem behaviors, they should also build the skills that support thriving in life and resiliency in crisis. Using an evidence-based, multi-tiered behavioral framework has been found to improve
school climate by reducing problem behaviors like bullying, drug abuse, and poor attendance, while making students feel safer and improving academic performance. Implementation of a school-wide framework provides a structure for schools in which to customize and organize the varied practices and programs they need to provide to their students based on data on student needs and local resources. Further, such a framework may help schools to better identify students struggling with trauma post-event, and select appropriate interventions to help them to recover. For more information about a multi-tiered behavioral framework, visit the Technical Assistance Center on Positive Behavioral Interventions and Supports available at http://www.pbis.org.

**Promote Social and Emotional Competencies**

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

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

**4. Active Shooter Situations**

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

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

“*Active shooter situations*” are defined17 as those where an individual is “actively engaged in killing or attempting to kill people in a confined and populated area.”18 Unfortunately, schools face active shooter situations as well.

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

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

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

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

Preparing for an Active Shooter Situation

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

- How to evacuate or lock down students, staff, and visitors, including those who are not with staff or in a classroom (e.g., in the hall, bathroom, break room). Personnel involved in such planning should pay attention to disability-related accessibility concerns when advising on shelter sites and evacuation routes.

- How to evacuate when the primary evacuation route is unusable.

- How to select effective shelter-in-place locations (optimal locations have thick walls, solid doors with locks, minimal interior windows, first-aid emergency kits, communication devices and duress alarms).

- How the school community will be notified that there is an active shooter on school grounds. This could be done through the use of familiar terms, sounds, lights, and electronic communications such as text messages. Include in the courses of action how to communicate with those who have language barriers or need other accommodations, such as visual signals or alarms to advise deaf students, staff, and parents about what is occurring. School wide “reverse 911-style” text messages sent to predetermined group distribution lists can be very helpful in this regard. Posting this protocol near locations where an all-school announcement can be broadcast (e.g., by the microphone used for the public announcement system) may save lives by preventing students and staff from stepping into harm’s way.

- How students and staff will know when the building is safe.

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

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

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

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

Exercises
Most schools practice evacuation drills for fires and protective measures for tornadoes, but far fewer schools practice for active shooter situations. To be prepared for an active shooter incident, schools should train their staff, students, and families, as appropriate, in what to expect and how to react. If students are involved, to select the appropriate exercise the school should consider the ages of the students. In a study of 84 active shooter events that occurred between 2000 and 2010, 34 percent involved schools. Good planning includes conducting drills which must include first responders and school resource officers (where applicable). Exercises with these valuable partners are one of the most effective and efficient ways to ensure that everyone knows not only his or her roles, but also the

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19 See also, http://www.ready.gov.
roles of others at the scene. These exercises should include walks through school buildings to allow law enforcement to provide input on shelter sites as well as familiarize first responders with the location.

**Each person carries a threefold responsibility.**

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

### Preventing an Active Shooter Situation

**Warning Signs**

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

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

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

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

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Most attackers engaged in some behavior prior to the incident that caused others concern or indicated a need for help.

Most attackers had difficulty coping with significant loss or personal failures. Moreover, many had considered or attempted suicide.

Many attackers felt bullied, persecuted, or injured by others prior to the attack.

Most attackers had access to and had used weapons prior to the attack.

In many cases, other students were involved in some capacity.

Despite prompt law enforcement officer responses, most shooting incidents were stopped by means other than law enforcement intervention.  

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

- In only 13 percent of the cases did subjects make verbal and/or written threats to cause harm to the target. These threats were both veiled and direct, and were conveyed to the target or to a third party about the target.

- In 19 percent of the cases, stalking or harassing behavior was reported prior to the attack. These behaviors occurred within the context of a current or former romantic relationship, or in academic and other non-romantic settings. They took on various forms, including written communications (conventional and electronic), telephonic contact, and harassment of the target and/or the target’s friends and/or family. Subjects also followed, visited, or damaged property belonging to target(s) or their families prior to the attack.

- In only 10 percent of the cases did the subject engage in physically aggressive acts toward the targets. These behaviors took the form of physical assaults, menacing actions with weapons, or repeated physical violence to intimate partners.


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

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

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

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

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

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

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

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

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

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

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

**Responding to an Active Shooter Situation**

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

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

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

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

During an *active shooter situation*, the natural human reaction, even if you are highly trained, is to be startled, feel fear and anxiety, and even experience initial disbelief and denial. You can expect to hear noise from alarms, gunfire and explosions, and people shouting and screaming. Training provides the means to regain your composure, recall at least some of what you have learned, and commit to action. There are three basic options: run, hide, or fight. You can run away from the shooter, seek a secure place where you can hide and/or deny the shooter access, or incapacitate the shooter to survive and protect others from harm.
As the situation develops, it is possible that students and staff will need to use more than one option. During an active shooter situation, staff will rarely have all of the information they need to make a fully informed decision about which option is best. While they should follow the plan and any instructions given during an incident, often they will have to rely on their own judgment to decide which option will best protect lives.27

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

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

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

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

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

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

Students and staff should be trained to

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

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

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

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

Fight
If neither running nor hiding is a safe option, as a last resort when confronted by the shooter, adults in immediate danger should consider trying to disrupt or incapacitate the shooter by using aggressive force and items in their environment, such as fire extinguishers, and chairs. In a study of 41 active shooter events that ended before law enforcement officers arrived, the potential
victims stopped the attacker themselves in 16 instances. In 13 of those cases they physically subdued the attacker.\textsuperscript{30}

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

\textbf{Interacting With First Responders}

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

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

\textbf{After an Active Shooter Incident}\textsuperscript{32}

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

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

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


\textsuperscript{31} Ibid.

\textsuperscript{32} Also see the “Functional Annexes Content” and “Recovery Annex” sections of this guide.
loved ones not only adds to their stress and frustration but can also escalate the emotions of the entire group. When families are reunited, it is critical that there be child release processes in place to ensure that no child is released to an unauthorized person, even if that person is well-meaning.

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

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

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

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

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

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

The school EOP also should explicitly address how impacted families and children will be supported if they prefer not to engage with the media. This includes strategies for keeping the media separate from families and students while the emergency is ongoing and support for families that may experience unwanted media attention at their homes.
GUIDE FOR DEVELOPING HIGH-QUALITY EMERGENCY OPERATIONS PLANS FOR INSTITUTIONS OF HIGHER EDUCATION
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INTRODUCTION AND PURPOSE

Our nation’s postsecondary institutions are entrusted to provide a safe and healthy learning environment for students, faculty, and staff who live, work, and study on campus. Faced with emergencies ranging from active shooter situations to fires, tornadoes, floods, hurricanes, earthquakes, and pandemic influenza, this is no easy task. Many of these emergencies occur with little to no warning; therefore, it is critical for institutions of higher education (IHEs) to plan ahead to help ensure the safety and general welfare of all members of the campus community.

IHEs face unique challenges in planning for potential emergencies in terms of geography, environment, governance, and the population served. Colleges and universities, including community colleges and technical colleges, are large, small, urban, rural, residential, transient, two-year, four-year, public, and private, and often operate around-the-clock.

IHE campuses often span large geographic areas, and many have additional locations in other cities, states, or countries. Many IHEs operate complex enterprises in addition to their academic programs, including hospitals, research and development facilities, performing arts venues, athletic complexes, agricultural centers, residential complexes, and transportation systems. They frequently have open campuses that are integrated into the surrounding community, with visitors regularly on campus touring facilities, attending events, and receiving medical care.

Many campuses house sensitive materials and information and sponsor activities and events that increase their vulnerability. It is common for major universities to employ people and establish facilities dedicated to research in areas such as nuclear energy, engineering, biochemistry, medicine, public safety, defense, technology, and intelligence. In addition, many universities house critical research. Major universities also serve as contractors to government agencies such as the Department of Defense, Department of Justice, National Institutes of Health, National Security Agency, and the National Aeronautics and Space Administration, as well as to the nation’s largest corporations, and thus house important information.

Additionally, IHE governance is highly varied and often widely dispersed. Many institutions have decentralized organizational structures and academic departments with differing processes and decision-making responsibilities. In addition, the variance in purpose, structure, authority, and operations among campus police and security agencies makes one-size-fits-all programs and policies impractical.

IHEs serve primarily adult students who are capable of making decisions on their own. The campus population is perpetually in flux, changing from day to day, semester to semester, and year to year. Some students commute to and from campus, others attend class virtually, while still others live in housing facilities located on or near the college campus, resulting in a dispersed population. IHEs also often host individuals from other nations.

While these characteristics pose challenges, in collaboration with their local government and community partners, IHEs can take steps to plan for these potential emergencies through the creation of a higher education Emergency Operations Plan (higher ed EOP).

Lessons learned from emergencies at IHEs highlight the importance of preparing IHE officials and first responders to implement emergency operations plans. By having plans in place to keep
students and staff safe, IHEs play a key role in taking preventative and protective measures to stop an emergency from occurring or reduce the impact of an incident. When an emergency occurs, IHE personnel must respond immediately, providing first aid, notifying response partners, and providing instruction before first responders arrive. IHE officials must work with partners across the institution as well as their community partners (governmental organizations that have a responsibility in the IHE emergency operations plan) including first responders (law enforcement officers, fire department officials, and emergency medical services [EMS] personnel), emergency managers, and public health and mental health practitioners to provide a cohesive, coordinated response.

It is recommended that planning teams at IHEs responsible for developing and revising a higher ed EOP use this document to guide their efforts. It is recommended that IHEs compare existing plans and processes against the content and process outlined in this guide. To gain the most from it, users should read through the entire document prior to initiating their planning efforts and then refer back to it throughout the planning process.

The guide is organized in four sections:

- The principles of emergency management planning for IHEs.
- A process for developing, implementing, and continually refining a higher ed EOP with community partners.
- A discussion of the content of higher ed EOPs.
- “A Closer Look” which considers key topics that support emergency management for IHEs, including the Clery Act, information sharing, international students, psychological first aid, campus climate, campus law enforcement officers, and active shooter situations.

As the team that developed this guide began its work to respond to the president’s call for model emergency management plans for IHEs, it became clear that there is a need to help ensure that college and university emergency planning efforts are aligned with the emergency planning practices at the national, state, and local levels. Recent developments have put a new emphasis on the process for developing higher ed EOPs.

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

PPD-8 defines preparedness around five mission areas: Prevention, Protection, Mitigation, Response, and Recovery.
- **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 IHEs take to prevent a threatened or actual incident from occurring.

- **Protection** means the capabilities to secure IHEs against acts of terrorism 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; establish a safe and secure environment; save lives and property; and facilitate the transition to recovery.

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

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

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

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

While some of the vocabulary, processes, and approaches discussed in this guide may be new to the higher 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 incorporate everything possible to keep our campus communities safe. If an IHE has an existing plan, revising and adapting that plan using the principles and process described in this guide will help ensure alignment with the terminology and approaches used across the nation.

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1 In the broader PPD-8 construct, the term “prevention” refers to those capabilities necessary to avoid, prevent, or stop a threatened or actual act of terrorism. The term “prevention” also refers to preventing imminent threats.
The Departments issuing this guidance are providing examples of good practices and matters to consider for planning and implementation purposes. The guidance does not create any requirements beyond those included in applicable law and regulations, or create any additional rights for any person, entity, or organization. The information presented in this document generally constitutes informal guidance and provides examples that may be helpful. The inclusion of certain references does not imply any endorsement of any documents, products, or approaches. There may be other resources that may be equally helpful.

This guide replaces Action Guide for Emergency Management at Institutions of Higher Education (January 2010), which is rescinded.

All websites listed in this guide were last accessed on June 3, 2013.
**PLANNING PRINCIPLES**

The following principles are key to developing a comprehensive higher ed EOP that addresses a range of threats and hazards:

**Planning must be supported by IHE senior leadership.** The IHE president, chancellor, or provost initiates and supports planning efforts to help ensure engagement from the entire campus community. Since budgetary realities may force campus administrators to make decisions within select fiscal parameters, it is important to have high-level support to provide both political and financial backing to the effort.

**Planning uses assessment to customize plans to the individual institution.** Effective planning is built around comprehensive, ongoing assessment of the IHE’s unique physical, social, and environmental characteristics, including the academic programs offered, size and geographic location of the campus, the number and types of buildings and facilities (including athletic, health, and research facilities), the availability of campus and community resources, student demographics, campus law enforcement officers and security personnel, and pertinent physical security information.

**Planning considers all threats and hazards.** The planning process must take into account a wide range of possible threats and hazards that may impact the IHE. Comprehensive IHE 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 IHE community.** The “whole IHE community” includes students, staff and visitors, including those 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.** Higher ed EOPs must account for incidents that may occur at any hour of the day or night, in numerous buildings and off-campus sites or satellite locations, including, but not limited to, laboratories and other facilities that house potentially dangerous materials.

**Planning considers the individual preparedness of students, faculty, and staff.** The planning team should raise awareness of the importance of individual preparedness. Students should be informed of the possibility of a prolonged shelter-in-place condition and should understand that they will be responsible for ensuring that they have the necessary supplies, such as access to sufficient medication.

**Planning meets the requirements of all applicable laws.** A number of laws at all levels of government may apply to IHEs. For example, the Clery Act includes requirements for emergency response and evacuation procedures, as well as timely warning and emergency notifications.

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

THE PLANNING PROCESS

Effective emergency management planning and development of a higher ed EOP are not done in isolation. It is critical that IHEs work with their community partners including first responders (e.g., law enforcement officers, fire officials, EMS personnel), emergency managers, public health officials, and mental health officials as well as with other local governmental officials and community organizations during the planning process, as an effective higher ed EOP is integrated with community, regional, and state plans. This collaboration makes more resources available and helps to ensure the seamless integration of all responders.

There are many ways to develop a higher ed EOP. The planning process discussed in this section is flexible and can be adapted to accommodate an IHE’s unique characteristics and situation. IHEs can use the process outlined below to develop a plan, do a comprehensive review of their entire plan, or conduct periodic and incremental reviews of the plan’s components.

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

Figure 1: Steps in the Planning Process

Step 1: Form a Collaborative Planning Team
Lessons learned indicate that operational planning is best performed by a team. Case studies reinforce this concept by pointing out that the common thread found in successful operations is

that participating organizations have understood and accepted their roles. Close collaboration between IHEs and their community partners ensures the coordination of efforts and the integration of emergency management plans.

**Identify Core Planning Team:** The core planning team should include representatives from across the IHE. The table below illustrates some of the contributions that various IHE departments may make to the planning team. The team should also include student and family representatives, to the extent applicable. Additionally, the team should include individuals and organizations that serve and represent the interests of students, staff, and families with disabilities and others with access and functional needs, as well as those from diverse racial, ethnic, linguistic, and religious backgrounds, including international student populations, so that specific concerns will be included from the early stages of planning. In addition, the core planning team should include first responders (e.g., law enforcement officers, EMS personnel, fire department officials), local emergency managers and public and mental health practitioners, all of whom have roles and responsibilities in IHE emergency management before, during, and after an incident. Campus and community partners’ expertise will inform the development, implementation, and refinement of the higher ed EOP.

**Table 1: Contributions to the Planning Team**

<table>
<thead>
<tr>
<th>Department</th>
<th>Illustrative Contributions to the Planning Team</th>
</tr>
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</table>
| Academic Affairs         | • Develop procedures to communicate with and account for teaching faculty in an emergency situation  
                           | • Develop plans to identify alternate facilities where institutional activities can be conducted in the event of the destruction, disablement, or denial or lack of access to existing facilities  
                           | • Identify and prioritize critical support services and systems  
                           | • Identify and help ensure recovery of critical assets and information  
                           | • Participate in the threat assessment team (TAT) |

3 Across varying types of IHEs, these departments are key to university functioning.
<table>
<thead>
<tr>
<th>Department</th>
<th>Illustrative Contributions to the Planning Team</th>
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</table>
| Business Office                  | • Develop the processes and procedures for tracking employees’ time and issuing paychecks during disaster operations  
• Develop procedures for procuring emergency resources for responding to and recovering from emergencies  
• Develop the process for documenting the financial cost of emergency response and recovery operations  
• Develop a Business Continuity Plan (BCP) |
| Central Administration or Designee| • Provide resources and leadership support to drive the initiative  
• Develop procedures for declaring an emergency  
• Identify alternate administrative facilities  
• Develop procedures for increasing public information efforts  
• Develop and coordinate procedures for recruiting volunteers and additional staff  
• Develop procedures to coordinate and approve volunteers and manage donations during an emergency  
• Develop a Continuity of Operations (COOP) Annex |
| Counseling and Mental Health Services | • Identify and train appropriate staff to provide developmentally and culturally appropriate mental health services  
• Train mental health staff on specific interventions  
• Provide basic training on available resources and common reactions to trauma for all staff (including administrators)  
• Train faculty and other staff on early warning signs of individuals who pose a potential danger  
• Assemble and train recovery teams  
• Identify both internal and external partners (consider local mental health agencies that may be able to assist, and develop a structure for support) and develop partnership agreements  
• Develop template letters (that can be tailored) for alerting students, families, staff, and the community to emergencies  
• Participate in the TAT |
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<thead>
<tr>
<th>Department</th>
<th>Illustrative Contributions to the Planning Team</th>
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<tr>
<td>EMS</td>
<td>• Develop and coordinate procedures for mobilizing resources needed for significant, longer-term emergencies</td>
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<td>• Identify sources for mutual aid agreements and assistance</td>
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<tr>
<td>Environmental Health and Safety</td>
<td>• Participate in vulnerability and hazard assessments</td>
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<td></td>
<td>• Review and update office standard operating procedures to align with the higher ed EOP</td>
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<td></td>
<td>• Develop procedures for pre-positioning resources and equipment</td>
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<td>• Review and update processes and procedures for state and federal disaster declaration requests</td>
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<td>• Develop, review, and update state and federally required environmental emergency response plans, including management procedures for the plans</td>
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<td>• Coordinate with public safety operations (see next entry) to develop the process and procedures for increasing public information</td>
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<td>• Provide warning system information</td>
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<tr>
<td>Facilities and Operations</td>
<td>• Participate in vulnerability and hazard assessments</td>
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<td></td>
<td>• Provide floor plans with room layout, electrical sources, and entrance and exit points for all campus buildings</td>
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<tr>
<td></td>
<td>• Develop procedures for pre-positioning resources and equipment</td>
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<tr>
<td></td>
<td>• Identify sources for mutual aid agreements and assistance</td>
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<tr>
<td>Food Services</td>
<td>• Identify possible threats and mitigation strategies relating to food safety</td>
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<tr>
<td></td>
<td>• Develop procedures for providing food to students, staff, faculty, and community partners during a major emergency</td>
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<td>• Develop mutual aid agreements for obtaining, preparing, and distributing food</td>
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<tr>
<td>Health Services</td>
<td>• Develop procedures to determine if there are adequate supplies and equipment to triage for an emergency and to support community health partners</td>
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<td>• Develop procedures for mobilizing personnel on campus and at external sites</td>
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<td>• Develop procedures for developing mutual aid agreements</td>
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<td></td>
<td>• Develop pandemic flu and infectious disease plans</td>
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<td></td>
<td>• Develop a system for disease surveillance and tracking</td>
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<td>• Coordinate with local and state public health partners</td>
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<tr>
<td>Human Resources</td>
<td>• Develop plans to maintain the continuity of the payroll together with the business office (see above) during an emergency</td>
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<td></td>
<td>• Develop plans to maintain employee benefit services during an emergency</td>
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<td>• Develop plans to hire or replace staff with temporary employees, if needed</td>
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<td></td>
<td>• Develop plans to serve as the liaison or organizer, or both, of volunteer assistance in the event of an emergency</td>
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<td>• Prepare to execute components of the COOP relating to staffing, including assessing faculty and staff availability, appropriation of personnel, and assisting employees with work-recovery needs (e.g., psychological help, time off for personal needs)</td>
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<tr>
<td></td>
<td>• Develop processes to account for personnel during or after an event</td>
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<td>Department</td>
<td>Illustrative Contributions to the Planning Team</td>
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| Information Technology | • Develop procedures and systems for checking critical information and alert systems to disseminate emergency information in an accessible format via a website, cell phone, e-mail, and other mechanisms. Coordinate beforehand with all departments to provide unified and factual messages to students, staff, faculty, families, and the media using multiple modalities, and in consideration of different language needs or accommodations, including effective communication with individuals with disabilities and others with access and functional needs, such as those who are blind or deaf.  
• Identify information technology resources needed to facilitate the emergency operations of all campus departments  
• Identify the need for and sources of emergency communication devices (e.g., ham radios, cell phones)  
• Develop plans to continue academic programs that significantly use technology for teaching purposes |
| Legal Counsel        | • Provide legal counsel on campus liability to key decision makers  
• Coordinate investigations completed by community partners  
• Review messages drafted by Public Information Officer (PIO)  
• Ensure that all campus and community actions are documented with a rationale for the action  
• Participate in the threat assessment team  
• Ensure compliance with applicable laws |
| Public Information Office | • Coordinate beforehand with all departments to provide unified and factual messages to students, staff, faculty, families, and the media using multiple modalities  
• Develop pre-agreements with the media concerning debriefings and media holding areas during an emergency  
• Designate a campus spokesperson |
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<th>Department</th>
<th>Illustrative Contributions to the Planning Team</th>
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| Public Safety Operations | • Develop procedures for reviewing and updating higher ed EOP  
• Develop procedures for facilities and equipment, including testing systems  
• Develop procedures for mobilizing department of public safety personnel, and pre-positioning resources and equipment  
• Develop a process for managing incidents at the field level using the ICS  
• Develop a process for communicating with and directing the central dispatch center, including the activation of the emergency contact list  
• Develop procedures to warn threatened elements of the population, including those individuals with different language needs or accommodations needs, including effective communication with individuals with disabilities and others with access and functional needs (e.g., those who are deaf or blind)  
• Ensure that hazardous material procedures are consistent with the state and local environmental safety hazardous materials plans  
• Participate in the TAT  
• Become proficient in the understanding and use of the NIMS and ICS structures referenced in this document |
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<th>Department</th>
<th>Illustrative Contributions to the Planning Team</th>
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<tr>
<td>Residential Life</td>
<td>• Develop procedures to coordinate the need for on-campus housing, temporary shelters, and temporary off-campus housing locations, including consideration of physical accessibility for individuals with disabilities and others with access and functional needs.</td>
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<td>• Develop procedures for mobilizing residential life personnel and pre-positioning resources.</td>
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<td>• Develop an on-call staffing system to ensure staff are available at all times.</td>
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<td>• Develop procedures for identifying resident students in need of emergency evacuation assistance.</td>
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<td>• Develop procedures for the evacuation and temporary shelter accommodations for resident students.</td>
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<td>• Develop procedures for checking residential facilities and equipment.</td>
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<td>• Participate in the TAT.</td>
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<td>Department</td>
<td>Illustrative Contributions to the Planning Team</td>
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<tr>
<td>Student Affairs</td>
<td>• Develop reunification procedures in collaboration with community reunification initiatives</td>
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<td>• Develop procedures for checking student affairs facilities and equipment, including those relating to on-campus recreation, student organizations, on-campus employment, community service, and volunteerism</td>
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<td>• Develop procedures for addressing the needs of students living in Greek housing or off-campus facilities</td>
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<td>• Develop procedures for pre-positioning resources to maintain functioning of such campus elements as career services and student government</td>
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<td></td>
<td>• Develop mutual aid agreements and pre-negotiate with service providers for delivering goods and services in the event of an emergency</td>
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<td></td>
<td>• Ensure that all obligations under the Americans with Disabilities Act are considered throughout the planning and implementation of the higher ed EOP</td>
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<td>• Ensure that the plan is accessible to students whose primary language is not English</td>
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<td>• Develop parent or family notification procedures</td>
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<td>• Participate in the TAT</td>
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<td></td>
<td>• Create a Campus Community Emergency Response Team (Campus CERT)</td>
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<tr>
<td>Transportation</td>
<td>• Develop procedures for mobilizing campus wide transportation for an emergency and for maintaining control of traffic from private vehicles</td>
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<tr>
<td></td>
<td>• Develop evacuation procedures from various campus locales</td>
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<td>• Develop procedures for IHE-sponsored transportation (e.g., buses)</td>
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</table>
#### Illustrative Contributions to the Planning Team

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<thead>
<tr>
<th>Department</th>
<th>Illustrative Contributions to the Planning Team</th>
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</table>
| International Student Services Office |  - Develop procedures for staff to support COOP during crises, including ongoing management of the access to the Student and Exchange Visitor Information System (SEVIS)  
  - Develop procedures for international students to communicate safety concerns, location, and short-term plans during an emergency  
  - Coordinate beforehand with all staff and international students to distribute communication procedures during an emergency |

The planning team should be small enough to permit close collaboration, yet large enough to be representative of the campus community and its families, as well as its broader community. It should also be large enough to not place an undue burden on any single person.

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

IHEs undertake emergency operations planning within the context of local or regional, state, tribal, and federal agency emergency planning. In order to promote coordination among these entities, the planning team is strongly encouraged to include a local or regional emergency planning representative. The local or regional emergency planning policies, procedures, and training activities will inform and enhance the IHE’s planning to a significant degree. Similarly, representatives from the IHE planning team should participate on their partners’ teams.

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

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**Form a Common Framework:** All team members need to take time to learn each other’s vocabulary, command structure, and culture to facilitate effective planning.

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

**Determine a Regular Schedule of Meetings:** IHE emergency management planning is an ongoing effort that is reinforced through regularly scheduled planning meetings. Establishing a flexible but regular schedule of meeting times will facilitate greater collaboration, coordination, and communication among team members and will help solidify crucial relationships.
Step 1 Outcome
After completing Step 1, the IHE has formed a planning team with representatives from all necessary stakeholders. The planning team has taken initial steps to form a common framework, define and assign roles and responsibilities in the planning process, and set a schedule of planning meetings.

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

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

Identify Threats and Hazards
The planning team first needs to understand the threats and hazards faced by the IHE and the surrounding community.

The planning team can draw upon a wealth of existing information to identify the range of threats and hazards that might be faced by the IHE. First, the planning team members should share their own knowledge of threats and hazards the IHE and surrounding community have faced in the past or may face in the future. Institutional data, including crime statistics and crime logs required under the Clery Act\(^4\) may provide guidance (see the “A Closer Look” section, “The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act” for more information about the Clery Act). The planning team should then reach out to local, state, and federal agencies for data about historical threats and hazards faced by the surrounding community. Local and county agencies that have a knowledge of threats and hazards include, but are not limited to, emergency management offices, fire and police departments, as well as local organizations and community groups (e.g., local chapter of the American Red Cross, CERT), utilities, and other businesses that can provide helpful information.

Assess the Risk Posed by the Identified Threats and Hazards
Once an initial set of threats and hazards have been identified through the process described above, the planning team should select suitable assessment tools to evaluate the risk posed by the

\(^4\) The Clery Act is the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (20 U.S.C. Section 1092(f)).
identified threats and hazards. Evaluating risk entails understanding the probability that the specific threat or hazard will occur; the effects it will likely have, including the severity of the impact; the time the IHE will have to warn students, faculty, and staff about the threat or hazard; and how long it may last.

The local and county emergency management staff should be able to provide information on some of the risks posed by threats and hazards common to the IHE and surrounding community. This enables the planning team to focus its assessment efforts on threats and hazards unique to the campus community, as well as the particular vulnerabilities of the buildings and facilities, and their occupants.

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

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

The most successful assessments are conducted by a broad array of individuals, including support staff and first responders. Students and families, including students and families with disabilities and others with access and functional needs, should be included to the maximum extent appropriate. The assessment has to be strategic. If the IHE is in an isolated region of a county and the response times for law enforcement, fire department and EMS personnel are lengthy, that may alter the calculus of the assessment, and, if response time is lengthy, other security measures may need to be enacted to compensate for lengthy response times. Successful assessments also take into account strategic issues, such as the location of the IHE and the speed by which outside assets could arrive.

Assessments will be used not only to develop the initial plan but also to inform updates and revisions to the plan on an ongoing basis. The table below provides more information about some of the most essential assessments the planning team should undertake (see Resources section for A Guide to School Vulnerability Assessments produced by the Readiness and Emergency Management for Schools Technical Assistance Center).

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Table 2: Assessment

<table>
<thead>
<tr>
<th>Assessment</th>
<th>Description</th>
<th>Purpose and Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Assessment</td>
<td>A site assessment examines the safety, accessibility, and emergency preparedness of the buildings, facilities, and grounds. This assessment includes, but is not limited to, a review of building access control measures, visibility around the exterior of the buildings, compliance with applicable architectural standards for individuals with disabilities and others with access and functional needs, structural integrity of the buildings, and emergency vehicle access.</td>
<td>• Increased understanding of the potential impact of threats and hazards on the buildings, facilities, and grounds.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Increased understanding of risk and vulnerabilities of the buildings, facilities, and grounds when developing the plan.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Knowledge of which facilities are physically accessible to individuals with disabilities and others with access and functional needs and can be used in compliance with the law.</td>
</tr>
<tr>
<td>Climate Assessment</td>
<td>In a nurturing, inclusive environment, members of a community are more likely to succeed, feel safe, and report threats. If a student survey is used to assess culture and climate, student privacy must be protected. A range of personnel across the IHE can assist in the assessment of climate, including counselors and mental health staff.</td>
<td>• Knowledge of students’ and staff’s perceptions of their safety.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Knowledge of problem behaviors that need to be addressed to improve climate.</td>
</tr>
<tr>
<td>Threat Assessment</td>
<td>A campus threat assessment analyzes campus members’ communications and behaviors to determine whether or not a member 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 multi-disciplinary TATs. 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.</td>
<td>• Students, staff, or other persons that may pose a threat are identified before a threat develops into an incident and are referred for services.</td>
</tr>
<tr>
<td>Teams</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Assessment

<table>
<thead>
<tr>
<th>Capacity Assessment</th>
<th>Description</th>
<th>Purpose and Results</th>
</tr>
</thead>
</table>
|                     | The planning team needs to know what resources will be at its disposal. A capacity assessment examines the capabilities of students, faculty, and staff as well as the services and material resources of community partners. This assessment is used to identify individuals on campus with applicable training and 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 and others with access and functional needs, such as evacuation chairs, the availability of sign language interpreters and technology used for effective communication, accessible transportation, and consumable medical supplies and durable medical equipment that may be necessary during a shelter-in-place or evacuation. | • An increased understanding of the resources available.  
• Information about staff capabilities will help planners assign roles and responsibilities in the plan.                                                                                                                                                      |

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

- Probability or frequency of occurrence (i.e., how often a threat or hazard may occur);
- Magnitude (i.e., the extent of expected damage);
- Time available to warn staff, students, and visitors;
- Duration (i.e., for how long the hazard or threat will be occurring); and
- Follow-on and cascading effects of threat or hazard.
While some of the information collected will directly feed into this table, other information, for example details on campus climate challenges, may have to be organized differently. The most important outcome is that information is clearly presented so that it can be easily used to inform the plan’s development.

**Prioritize Threats and Hazards**

Next, the planning team should use the information it has organized to compare and prioritize the risks posed by threats and hazards. This will allow the team to decide which threats or hazards it will directly address in the plan. The team must consider several factors in order to develop an indicator of risk. One option is a mathematical approach, which assigns index numbers (e.g., a 1-to-4 scale) for different categories of information used in the ranking scheme. Using this approach, the planning team will categorize threats and hazards as posing a relatively high, medium, or low risk. The Table 3 below (separate from the Table 2, above) provides a sample risk assessment worksheet for comparing and prioritizing threats and hazards.

**Table 3: Sample Risk Assessment Worksheet**

<table>
<thead>
<tr>
<th>Hazard</th>
<th>Probability</th>
<th>Magnitude</th>
<th>Warning</th>
<th>Duration</th>
<th>Risk Priority</th>
</tr>
</thead>
</table>

**Step 2 Outcome**

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

**Step 3: Determine Goals and Objectives**

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

Once the planning team has decided which threats and hazards will be addressed in the higher ed EOP, it will develop goals and objectives for each.

**Develop Goals and Objectives**

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

The planning team should develop at least *three goals* for addressing each threat or hazard (though the planning team may want to identify more). Those three goals should indicate the desired outcome for (1) before; (2) during, and (3) after the threat or hazard. For a fire, for instance, three possible goals include

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

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

Using the goal in Example 1 of preventing a fire in IHE-governed student housing facilities, possible objectives include

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

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

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

Using the goal in Example 3 of providing necessary medical attention to those in need, possible objectives include
Objective 3.1: Immediately notify fire department and EMS personnel of any fire in a student housing facility.

Objective 3.2: Immediately begin to provide first aid.

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

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

For an evacuation function, three possible goals are

- Function Goal Example 1 (before): Ensure all students, faculty, and staff know the evacuation routes for the chemistry building.
- Function Goal Example 2 (during): Evacuate the chemistry building immediately.
- Function Goal Example 3 (after): Confirm that all individuals have left the chemistry building.

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

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

**Step 3 Outcome**

After completing Step 3, the planning team has at least three goals (i.e., before, during, and after) for each threat or hazard and function, as well as objectives for each goal.
**Step 4: Plan Development (Identifying Courses of Action)**

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

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

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

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

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

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

4. **Develop courses of action.** Planners develop courses of action to achieve their goals and objectives by answering the following questions:
   - What is the action?
   - Who is responsible for the action?
   - When does the action take place?
   - How long does the action take and how much time is actually available?
   - What has to happen before?
   - What happens after?
   - What resources are needed to perform the action?
   - How will this action affect specific populations, such as individuals with disabilities and others with access and functional needs who may require medication, wayfinding, evacuation assistance, or personal assistance services, or who may experience severe anxiety during traumatic events?
PLANS MUST COMPLY WITH THE AMERICANS WITH DISABILITIES ACT

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

PLANS MUST ADDRESS LANGUAGE ACCESS

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

Select courses of action

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

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

Step 4 Outcome

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

Goals, objectives, and courses of action for threats and hazards will go into the “Threat- and Hazard-Specific Annexes” section of the higher ed EOP.
Goals, objectives, and courses of action for functions will be contained in the “Functional Annexes” section of the higher ed EOP.

**Step 5: Prepare, Review, and Approve the Plan**

In Step 5, the planning team develops a draft of the higher ed EOP using the courses of action developed in Step 4. In addition, the team reviews the plan, obtains official approval, and shares the plan with community partners (e.g., first responders, local emergency managers, public and mental health officials), staff, and stakeholders.

**Format the Plan**

An effective higher ed EOP is presented in a way that makes it easy for users to find the information they need and that is compatible with local and state plans. This may include using plain language and providing pictures or visual cues for key action steps. This guide presents a traditional format that can be tailored to meet individual IHE needs. This format has three major sections: the Basic Plan, Functional Annexes, and Threat- and Hazard-Specific Annexes.

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

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

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

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

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

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

**Figure 2: Traditional EOP Format**

<table>
<thead>
<tr>
<th>Basic Plan</th>
<th>Functional Annexes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Introductory Material</td>
<td>NOTE: This is not a complete list, but it is recommended that all EOPs include at least the following functional annexes:</td>
</tr>
<tr>
<td>1.1. Cover Page</td>
<td>1. Evacuation</td>
</tr>
<tr>
<td>1.2. Promulgation Document and Signatures Page</td>
<td>2. Deny Entry or Closing (Lockdown)</td>
</tr>
<tr>
<td>1.3. Approval and Implementation</td>
<td>3. Shelter-in-Place or Secure-In-Place</td>
</tr>
<tr>
<td>1.4. Record of Changes</td>
<td>4. Accounting for All Persons</td>
</tr>
<tr>
<td>1.5. Record of Distribution</td>
<td>5. Communications and Notifications</td>
</tr>
<tr>
<td>1.6. Table of Contents</td>
<td>6. Continuity of Operations (COOP)</td>
</tr>
<tr>
<td>2. Purpose, Scope, Situation Overview, and Assumptions</td>
<td>7. Recovery</td>
</tr>
<tr>
<td>2.1. Purpose</td>
<td>8. Public Health, Medical and Mental Health</td>
</tr>
<tr>
<td>2.2. Situation Overview</td>
<td>9. Security</td>
</tr>
<tr>
<td>2.3. Planning Assumptions</td>
<td>10. Rapid Assessment</td>
</tr>
<tr>
<td>3. Concept of Operations</td>
<td></td>
</tr>
<tr>
<td>4. Organization and Assignment of Responsibilities</td>
<td></td>
</tr>
<tr>
<td>5. Direction, Control, and Coordination</td>
<td></td>
</tr>
<tr>
<td>6. Information Collection, Analysis, and Dissemination</td>
<td></td>
</tr>
<tr>
<td>7. Training and Exercises</td>
<td></td>
</tr>
<tr>
<td>8. Administration, Finance, and Logistics</td>
<td></td>
</tr>
<tr>
<td>9. Plan Development and Maintenance</td>
<td></td>
</tr>
<tr>
<td>10. Authorities and References</td>
<td></td>
</tr>
</tbody>
</table>

**Write the Plan**

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

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6 The term *annex* is used throughout this guide to refer to functional, hazard-, or threat-specific, or other supplements to the basic plan. Some plans may use the term *appendix* in the same fashion (e.g., hazard-specific appendix).
1. Summarize important information with checklists and visual aids, such as maps and flowcharts.

2. Avoid using jargon, minimize the use of abbreviations, and use short sentences and the active voice. Qualifiers and vague wording only add to confusion.

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

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

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

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

- A plan is adequate if it identifies and addresses critical courses of action effectively, it can accomplish the assigned function, and its assumptions are valid and reasonable.
- A plan is feasible if the IHE can accomplish the assigned function and critical tasks by using available resources within the time contemplated by the plan.
- A plan is acceptable if it meets the requirements driven by a threat or hazard, meets cost and time limitations, and is consistent with the law.
- A plan is complete if it
- Incorporates all courses of action to be accomplished for all selected threats and hazards and identified functions;
- Integrates the needs of the whole IHE community;
- Provides a complete picture of what should happen, when, and at whose direction;
- Estimates time for achieving objectives, with safety remaining as the utmost priority;
- Identifies success criteria and a desired end state; and
Conforms with the Planning Principles outlined in this guide.

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

Additionally, when reviewing the plan, the planning team does not have to provide all of the resources needed to execute a course of action or meet a requirement established during the planning effort. However, the plan should explain where or how the IHE will obtain the resources to support those requirements.

Approve and Share the Plan
After finalizing the plan, the planning team should present it to the appropriate leadership and obtain official approval of the plan. The team should then share the plan with all community partners (e.g., first responders, local emergency managers, public and mental health officials) and all other entities that have a role in the plan, including relevant 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 campus and its building(s).

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

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

Step 5 Outcome
After completing Step 5, the planning team will have a final higher ed EOP.

Step 6: Implement and Maintain the Plan

Train Stakeholders on the Plan and Their Roles
Everyone involved in the plan needs to know their roles and responsibilities before, during and after an emergency. Key training components include the following:

Hold a meeting. At least once a year, hold a meeting to educate all parties on the plan. Go through the plan to familiarize these stakeholders with it. These meetings should include campus administration, department heads, the PIO, student affairs, community partners (first responders, emergency managers, public and mental health officials), other community entities and stakeholders, as well as the media.
**Visit evacuation sites.** Show involved parties not only where evacuation sites are located but also where specific areas, such as media areas and triage areas, will be located.

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

**Post key information throughout the building.** It is important that students, faculty, and staff are familiar with and have easy access to information such as evacuation routes and shelter-in-place procedures and locations. Ensure information concerning evacuation routes and shelter-in-place procedures and locations is effectively communicated to students and staff, such as by distributing materials by e-mail in an accessible format.

**Familiarize the campus community with the plan and community partners.** Holding open house meetings for community partners, such as law enforcement officers, fire department officials, EMS personnel, emergency managers, public and mental health practitioners as well as the campus community to talk about the plan will make students, faculty, and staff more comfortable working with these partners. Consider involving students who volunteer with community partners and in the community in these events.

**Train members of the campus community on the skills necessary to fulfill their roles.** Each member of the college community may be assigned specific roles in the plan that will require special skills, such as first aid, threat assessment, using the ICS, and providing personal assistance services for students and staff with disabilities and others with access and functional needs.

**Exercise the Plan**

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

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

- **Drills:** During drills, community partners such as first responders and local emergency managers and relevant IHE personnel use the actual campus buildings, facilities, and grounds to practice responding to a scenario.

- **Functional exercises:** Functional exercises are similar to drills but involve multiple partners. 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 are the most time-consuming activities in the exercise continuum and are multi-agency, multi-jurisdictional efforts in which all resources are deployed. This type of exercise tests collaboration among the agencies and participants, public information systems, communications systems, and equipment. An Emergency Operations Center is established by either law enforcement or fire services, and the ICS is activated.

Before making a decision about how many and which types of exercises to implement, an IHE should consider the costs and benefits of each, as well as any state or local requirements. For example, while a tabletop exercise may be less costly and less time-consuming to run, a full-scale exercise provides a more realistic context for the simulated response to an emergency situation, thus providing more constructive feedback to improve the plans. Students should be included to the maximum extent possible, and IHEs should also consider whether to include families. The IHE should also take into account the cultural diversity of its population when designing exercises and training.

It is up to the planning team to decide how often exercises should be conducted. Note, however, that IHEs that are subject to the *Clery Act* are required to test their “emergency response and evacuation procedures” on at least an annual basis (see the “A Closer Look” section of this document for more details on the requirements of the *Clery Act*). While frequent exercise is important, it is imperative that exercises are of high quality.

To effectively execute an exercise

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


**Review, Revise, and Maintain the Plan**

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

Reviews should be a recurring activity. Planning teams should establish a process for reviewing and revising the plan. Many IHEs review their plans on an annual basis. In no case should any part of a plan go for more than 2 years without being reviewed and revised.

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

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

The planning team should ensure that all first responders, local emergency management, and all community partners have the most current version of the higher ed EOP.

**PLAN CONTENT**

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

**The Basic Plan**

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

Introductory material can enhance accountability with community partners, including first responders, and local emergency managers, and make a higher ed EOP easier to use. Typical introductory material includes

- **Cover Page.** The cover page includes the title of the plan, a date and the campus(es) covered by the plan.

- **Promulgation Document and Signature Page.** This document or page contains a signed statement formally recognizing and adopting the higher ed EOP. It gives both the authority and the responsibility to IHE officials to perform their tasks before, during, or after an incident, and therefore should be signed by the authorized IHE 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 authorized IHE administrator’s signature. It also includes a date and should be signed by the authorized IHE 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 IHE department, or if from outside the IHE, 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 higher ed EOP. The basic plan’s purpose is a general statement of what the higher ed EOP is meant to do. The statement should be supported by a brief synopsis of the basic plan and annexes.

- **Situation Overview.** The situation section explains why a higher ed EOP is necessary. The situation section covers a general discussion of
The threats and hazards that pose a risk to the IHE and would result in a need to use this plan; and

Dependencies on parties outside the IHE for critical resources.

**Concept of Operations**
The Concept of Operations section explains in broad terms the authorized IHE administrator’s intent with regard to an operation. This section is designed to give an overall picture of how the IHE will protect the students, faculty, staff, and visitors, and should

- Identify those with authority to activate the plan (e.g., IHE administrators, department heads);
- Describe the process by which the IHE coordinates with all appropriate agencies, boards, or divisions within the jurisdiction;
- Describe how plans take into account the architectural, programmatic, and communication rights of individuals with disabilities and others with access and functional needs;
- Identify other response and support agency plans that directly support the implementation of this plan (e.g., city or county EOP);
- 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 IHE faculty and staff, students, families, first responders, local emergency management, and community partners, and of organizational functions during all emergencies.

- 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 IHE administrators, faculty, and staff; IHE board members; counselors; social workers; medical staff; and students.

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7 If the planning team considers the information critical to the successful implementation of the plan, it may identify roles and responsibilities of one or more of these individuals before and after an emergency in addition to during an emergency.
• The planning team may also wish to include the community partners represented on it.

• 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 the resident director of a student housing facility during an emergency.

  ▪ The resident director will be responsible for the supervision of residents located in his or her housing units and shall remain with residents until directed otherwise. Resident director responsibilities include:

    ✓ evacuating residents to inside or outside assembly areas according to instructions provided by the Incident Commander or designee;
    ✓ obtaining first aid services for injured students; and
    ✓ if trained and certified in first aid, rendering first aid, if necessary.

  ✔ Describes informal and formal agreements in place for the quick activation and sharing of resources during an emergency (e.g., evacuation locations to a nearby business’ parking lot). Agreements may be between the IHE and response groups (e.g., fire department, police department, emergency management agency), other IHEs, organizations, and businesses.

**Direction, Control, and Coordination**

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

  ✔ The ICS structure as used by the IHE;

  ✔ The relationship between the higher ed EOP and the broader community’s emergency management system; and

  ✔ Who has control of the equipment, resources, and supplies needed to support the higher ed EOP.

**Information Collection, Analysis, and Dissemination**

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

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

  ✔ Before and during: weather reports, law enforcement alerts, National Oceanic and Atmospheric Administration radio alerts, Clery Act crime statistics and crime logs, and local crime reports.

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

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

- Identify administrative controls (e.g., budget and acquisition policies and procedures) and requirements that will be used to provide resource and expenditure accountability;
- Briefly describe how the IHE 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); and
- Identify general policies for keeping financial records, tracking resource needs, tracking the source and use of resources, acquiring ownership of resources, and compensating the owners of private property used by the IHE.

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

- Describes the planning process, participants in that process, and how development and revision of different sections of the higher ed EOP (basic plan and annexes) are coordinated before an emergency;
Assigns responsibility for the overall planning and coordination to a specific position or person; and

Provides for a regular cycle of training, evaluating, reviewing, and updating of the higher ed EOP.

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

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

Functional Annexes Content
Functional annexes focus on critical operational functions and the courses of action developed to carry them out. This section of the guide describes functional annexes that IHEs should address in developing a comprehensive, high-quality campus EOP. As the planning team assesses the IHE’s needs, it may need to prepare additional or different annexes. Also included in this section are issues the planning team should consider as it develops goals, objectives, and courses of action for these functions. While these are some of the most important issues, they are not meant to constitute an exhaustive list. For sources of more detailed information about these functions, please see the Resources section of this guide.

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

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

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

Evacuation Annex
This annex focuses on the courses of action that IHEs will execute to evacuate buildings, facilities, and grounds.
The planning team should consider the following when developing its goals, objectives, and courses of action:

- How to account for students, faculty, staff, and visitors located in various locations at different points in the day
- How to safely move students, faculty, staff, and visitors from unsafe areas to designated assembly areas such as classrooms, student housing facilities, campus grounds, dining halls, stadiums, and other IHE locations
- How to evacuate when the primary evacuation route is unusable
- 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

**Deny Entry or Closing (Lockdown) Annex**

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

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

- How to account for students, staff, faculty, and visitors located in various locations at different points in the day
- How to secure exterior doors to campus buildings and facilities and when it may or may not be safe to do so
- How particular classroom and building characteristics (i.e., windows, doors) impact possible lockdown courses of action
- When to use the different variations of a lockdown (when outside activities are curtailed, doors are locked, and visitors closely monitored but all other activities continue as normal)

**Shelter-in-Place/Secure-in-Place Annex**

A Shelter-in-Place or Secure-in-Place Annex focuses on courses of action when students, faculty, and staff are required to remain indoors, potentially for an extended period of time, because it is safer inside a building or a room than outside. Depending on the threat or hazard, students, faculty, and staff may be required to move to rooms that can be sealed (such as in the event of a chemical or biological hazard) or are without windows, or to a weather shelter (such as in the event of a tornado).
The planning team should consider the following when developing its goals, objectives, and courses of action:

- What supplies will be needed to seal the room and to provide for the needs of students, faculty, and staff (e.g., water)
- How a shelter-in-place can affect individuals with disabilities and others with access and functional needs who require durable medical equipment and personal assistance services
- How to move individuals when the primary route is unusable
- How to locate and shelter all students, faculty, staff, and visitors
- Consider the need for and integration of “safe rooms” for protection against extreme wind hazards (such as a tornado or hurricane) in order to provide immediate life-safety protection when evacuation is not an option

**Accounting for All Persons Annex**

This annex focuses on developing courses of action for accounting for the whereabouts and well-being of students, faculty, 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 IHE personnel will determine who should be in attendance at the assembly area
- What to do when a student, faculty, staff member, or visitor cannot be located
- How IHE personnel will report to the assembly supervisor
- How and when will students, faculty, and staff will be permitted to resume their activities

**Communications and Notification Annex**

The communications and notification function 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 IHE’s communications system integrates into the local disaster response communications network (e.g., fire department, law enforcement agency)
- How the IHE will communicate with community partners in accordance with pre-established agreements (e.g., memoranda of understanding)
- How to ensure relevant staff members can operate communications equipment
- How the IHE will communicate with students, families and the broader community before, during, and after an emergency, including by using alert and notification systems
- How to account for technology barriers faced by students, faculty, staff, and families
- How to effectively address language access barriers faced by students, faculty, staff, and guardians
- How impacts will be communicated to the broader community, including off-campus student activities or events on IHE grounds not sponsored by the IHE (i.e., third-party use of campus grounds, athletic events)
- How the IHE will ensure effective communication with individuals with disabilities and others with access and functional needs (e.g., coordinating with local emergency management staff to provide sign language interpreters for use during press conferences, publishing only accessible documents, ensuring information on websites is accessible)
- How to obtain and update emergency contact information for students, faculty, and staff
- How to reach out to emergency contacts, including international contacts, during or following an emergency
- How to track students, faculty, staff, or visitors transported to another location for care or shelter, including hospitals
- How to coordinate information sharing among hospitals, families, and the IHE
- Whether goals, objects, and courses of action are consistent with the requirements in the Clery Act, the Health Insurance Portability and Accountability Act (HIPAA), the Family Educational Rights and Privacy Act (FERPA), and civil rights laws (see the “A Closer Look” section for more information on these federal laws)
- How to communicate with students, staff, or members of the public who refuse to comply with safety instructions
Telling Family Members That Their Loved One Is Missing, Injured, or Killed

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

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

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

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

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

Continuity of Operations (COOP) Annex
This annex describes how an IHE will help ensure essential functions continue during an emergency and its immediate aftermath. Essential functions include business services (e.g., payroll and purchasing), communication (internal and external), computer and systems support, facilities maintenance, safety and security, and continuity of teaching and learning. For more information on COOP for IHEs, see the Resource section.
The planning team should consider the following when developing its goals, objectives, and courses of action:

- How the COOP will be designed so that it can be activated at any time and sustained for up to 30 days
- How the COOP will set priorities for re-establishing essential functions, such as restoration of IHE operations, and maintaining the safety and well-being of students and the learning environment
- How COOP will ensure students receive related services (e.g., financial aid, instruction, food, and housing for residents) in the event of a prolonged closure
- Whether to develop agreements with other institutions to prepare for situations, such as a hurricane, where the IHE may not be able to provide routine services for long periods of time

**Recovery Annex**

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

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

- Academic recovery
- When the IHE should be closed and reopened, and who has the authority to close and reopen the IHE
- What temporary space(s) the IHE may use if IHE buildings and facilities cannot be immediately reopened
- How to provide alternate educational programming in the event that students cannot physically reconvene
- Physical recovery
- How to document IHE assets, including physically accessible facilities, in case of damage
- Which personnel have expert knowledge of the IHE’s assets, and how and where they will access records to verify current assets after an emergency
- How to provide for the housing and nutrition needs of students, faculty, or staff living on campus
- How to address research facilities that contain sensitive information, materials, or animals
How the IHE will work with utility and insurance companies before an emergency to support a quicker recovery

Fiscal recovery

How the IHE leadership will be included (e.g., the president or chief executive officer, chief business officer, personnel director, and risk manager)

How faculty and staff will receive timely and factual information regarding returning to work

What sources the IHE 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 the IHE will create a calm and supportive environment for its community, share basic information about the incident, provide psychological first aid (if trained), and identify those who may need immediate crisis counseling

Who will provide trained counselors

How to address immediate, short-, and long-term counseling needs of students, faculty, staff, and families

How to handle commemorations, memorial activities, or permanent markers and/or memorial structures (if any will be allowed), including concerns such as when a commemoration site will be closed, what will be done with notes and tributes, and how students will be informed in advance

How memorial activities will strike a balance among honoring the loss, resuming IHE 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 for all components of the Recovery annex

Public Health, Medical and Mental Health Annex

This annex describes the courses of action that the IHE will implement to address emergency medical (e.g., first aid), public health, and mental health counseling issues. IHEs 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 is the role of staff members in providing first aid during an emergency
- Where emergency medical supplies (first aid kits, AEDs, etc.) will be located and who is responsible for purchasing and maintaining those materials
- Which staff have relevant training or experience such as first aid or CPR
- How the IHE will secure a sufficient number of counselors and others trained in psychological first aid in the event of an emergency
- How the IHE will promptly share and report information about outbreaks or epidemics or other unusual medical situations to the local health department
- How the IHE will support the needs of students, faculty, and staff identified by the TAT

**Security Annex**

This annex focuses on the courses of action that IHEs will implement on a routine, on-going basis to secure the IHE from criminal threats originating from both inside and outside the IHE. This includes efforts done in conjunction with law enforcement officers.

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

- How agreements with law enforcement agencies address the daily role of law enforcement officers in and around campus (For more information about this topic, see the “A Closer Look” section, “Campus Public Safety”).
- How to help ensure the buildings and facilities are physically secure (including implementation of Crime Prevention Through Environmental Design [CPTED])
- How to assist students, faculty, and staff in safely traveling to, from, and within the campus safely (including traffic control and pedestrian safety)
- How to keep prohibited items or materials off the campus
- How to respond to threats identified by the TAT
- How to address issues related to cybersecurity and threats to the IHE’s information technology systems
- How security will be provided at stadiums, arenas, and other large-event facilities
- How to provide security for sensitive facilities, including research labs and test reactors on the campus
- How to account for students, faculty, staff, and visitors in a variety of locations at different points in the day
• How information will be shared with law enforcement officers or other responders (keeping in mind any requirements or limitations of applicable privacy laws, including FERPA, HIPAA, and other civil rights laws. More information on FERPA and HIPAA can be found in the “A Closer Look” section, “Information Sharing”.)

**Rapid Assessment Annex**

This annex focuses on the courses of action that IHEs will implement when it is notified of or becomes aware of an occurring or impending emergency situation.

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

• How to immediately gather information to determine the type and scale of the incident
• How to determine an appropriate response
• How to determine which annexes should be implemented
• How the institution will take immediate action to protect life and property
• Whether goals, objects, and courses of action are consistent with the requirements of the Clery Act (see the “A Closer Look” section for more information on the Clery Act).

The IHE’s response team lead (Incident Commander) has responsibility for the management of all emergency activities, including development, implementation, and review of strategic decisions. These actions and decisions are made in concert and in consultation with other community response partners and leaders as applicable.

**Threat- and Hazard-Specific Annexes**

The Threat- and Hazard-Specific annexes describe the courses of action unique to particular threats and hazards. Courses of action already outlined in a Functional Annex need not be repeated in a hazard-specific annex. IHEs will develop these based on the prioritized list of hazards determined in the assessment process. As planning teams develop courses of action for threats and hazards, they should consider the federal, state, and local regulations or mandates that often apply to specific hazards.

If there is a functional annex that applies to one of the threat or hazard annexes, the latter will include it by reference. For example, if a “during” course of action for a fire hazard involves evacuation and there is an evacuation annex, the fire annex would indicate “see Evacuation annex” in the “during” course of action section rather than repeat the evacuation courses of action in the fire annex.
## Table 4: Threat and Hazard Types and Examples

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

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


- “Information Sharing, FERPA, and HIPAA” 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.

- “Incorporating International Students into IHE Emergency Management and Planning” describes the unique needs of international students that IHEs should consider when planning for and responding to crises.

- “Campus Public Safety” describes the unique challenges faced by campus public safety departments and provides recommendations for working with campus public safety throughout the emergency planning process.

- “Active Shooter Situations” describes the unique challenges involved in preparing for, responding to, and recovering from a shooting at an IHE.

- “Psychological First Aid” (PFA) describes PFA and how IHEs can use it to help students and staff during and immediately after a traumatic incident.
1. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act)

The Clery Act, found in section 485(f) of the Higher Education Act of 1965, as amended (HEA), requires IHEs that participate in the Title IV HEA federal student financial assistance programs to disclose campus crime statistics and security information.\(^8\) Among other things, the Clery Act requires IHEs to provide timely warnings to the campus community of certain crimes reported to campus security authorities that represent a threat to students and employees, and to maintain a log of crimes reported to the campus police or security department. In addition, IHEs must include in their annual security report, a statement of policy regarding the institution’s emergency response and evacuation procedures. This requirement complements and supports a number of the concepts described throughout this guide, such as the importance of clearly delineating the responsibilities of individuals involved during an emergency response, the need to develop and implement notification and communication strategies to share information with the campus community, the imperative of testing and practicing a higher ed EOP, and the importance of keeping the community informed of current policies and procedures.

Generally, the requirements under the Clery Act fall into three categories:

1) Reporting crime statistics and disclosing security-related policies

   a. Every IHE must collect, classify, and count reported crimes and disclose crime statistics for certain crimes (see the chart below) to the campus community and the public (through the U.S. Department of Education’s campus security website).


<table>
<thead>
<tr>
<th>Criminal Offenses</th>
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<th>Arrests and Referrals for Disciplinary Action</th>
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<td>Larceny-Theft</td>
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<tr>
<td>Negligent Manslaughter</td>
<td>Simple Assault</td>
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<td>Sex Offenses</td>
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<td>• Forcible</td>
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<td>• Non-forcible (i.e., incest and statutory rape)</td>
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<td>Robbery</td>
<td>Intimidation</td>
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<td>Aggravated Assault</td>
<td>Destruction, Damage, or Vandalism of Property</td>
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<td>Burglary</td>
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<tr>
<td>Arson</td>
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</table>

\(^8\) The implementing regulations for the Clery Act are found in 34 C.F.R. Sections 668.14(c)(2)(i), 41(e), 46, and 49. In March 2013, the Clery Act was amended by the Violence Against Women Reauthorization Act of 2013 (VAWA). VAWA expanded the scope of the Act and requires IHEs to take additional steps to provide information to students and employees.
b. Under certain circumstances an IHE must issue a campus alert to provide members of the campus community with information necessary to make informed decisions about their health and safety. There are two kinds of alerts under the *Clery Act*:

i. Timely warnings are issued for certain crimes that represent a threat to the safety of students or employees.

ii. Emergency notifications are issued upon the confirmation of a significant emergency or dangerous situation occurring on the campus that involves an immediate threat to the health or safety of students or employees.

c. Every IHE must publish an annual security report that contains safety- and security-related policy statements and crime statistics, and distribute it to all current students and employees. IHEs also must inform prospective students and employees about the availability of the report.


2) Maintaining a crime log at IHEs that have a campus police or security department. IHEs that maintain a campus police or security department must keep a daily crime log of reported crimes that is open to public inspection.

3) Disclosing missing student notification and fire-safety requirements for IHEs that have any on-campus student housing facility

a. IHEs with on-campus student housing facilities must disclose missing student notification procedures that pertain to students residing in those facilities.

b. IHEs with on-campus student housing facilities must disclose fire safety information related to those facilities. IHEs must provide this information to students and employees, and potential students and employees, in the same manner as they disclose crime information under the *Clery Act.* These IHEs must

i. Keep a fire log that is open for public inspection;

ii. Publish an annual fire safety report with policy statements and fire statistics associated with each on-campus student housing facility, provide

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9 Please see the U.S. Department of Education’s regulations on fire safety at 34 CFR Section 668.49 available at [http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=676893907309b77d0c88954dece41914&rgn=div8&view=text&node=34:3.1.3.1.34.4.39.9&idno=34/](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=676893907309b77d0c88954dece41914&rgn=div8&view=text&node=34:3.1.3.1.34.4.39.9&idno=34/)
As part of the emergency planning process, it is critical that IHEs take the time to review and understand all the Clery Act requirements. In this “A Closer Look” section, however, we focus on two of those requirements: timely warnings and emergency notifications. These issues tie directly to and reinforce other concepts in this guide. The U.S. Department of Education’s Handbook for Campus Safety and Security Reporting (listed in the Resources section of this guide) details all of the Clery Act requirements in depth and provides sample policy statements, diagrams, and other helpful aids for IHEs in complying with this statute.

**Timely Warnings**

The Clery Act requires IHEs to alert the campus community to certain crimes that are reported to campus security authorities or local police agencies, and are considered by the IHE to represent a threat to students and employees. These alerts must be done in a manner that is timely and that will aid in the prevention of such crimes. The Clery Act does not include a specific definition of “timely”. However, the intent of a timely warning is to enable people to protect themselves; therefore, warnings should be issued as soon as pertinent information is available. The decision to issue a timely warning should be made on a case-by-case basis, taking into account the nature of the crime, the danger to the campus community, and the possible risk of compromising law enforcement efforts.

An IHE must include in the annual security report a policy statement that accurately reflects the institution’s timely warning policy and practice. The policy should specify the circumstances under which the IHE will issue a timely warning, how those timely warnings will be distributed, and the individual or office responsible for issuing a timely warning. IHEs must take appropriate steps to ensure that timely warnings are communicated to individuals with disabilities, including those who have hearing or vision disabilities, as effectively as they are to others.

**Emergency Notification**

IHEs must also develop and disclose emergency response and evacuation procedures, including emergency notification procedures that describe their response to significant emergency or dangerous situations involving an immediate threat to the health or safety of students or employees occurring on the campus. This requirement is intended to ensure that an IHE has sufficiently prepared for an emergency situation on campus, has tested those procedures to identify and improve on weaknesses, and has considered how it will inform the campus community and other individuals, such as parents and guardians.

IHEs must include a policy statement in their annual security reports that accurately reflect their emergency response and evacuation procedures. This policy statement must include

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The procedures the IHE will use to immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring on the campus, unless issuing a notification will compromise efforts to contain the emergency;

A description of the process the IHE will use to confirm that there is a significant emergency or dangerous situation, determine the appropriate segment or segments of the campus community to receive a notification, determine the content of the notification, and initiate the notification system;

A statement that the IHE will, without delay and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency;

A list of the titles of the person(s) or organization(s) responsible for carrying out the actions described above;

The IHE’s procedures for disseminating emergency information to the larger community; and

The IHE’s procedures to test the emergency response and evacuation procedures on at least an annual basis.

In addition, the IHE should take steps to ensure the emergency notification planning, testing, and implementation will provide such notifications and related information to individuals with disabilities, including those with vision or hearing disabilities, as effectively as they are provided to others.

As stressed elsewhere in this guide, testing a higher ed EOP is critical to the successful implementation of the appropriate course of action during an emergency situation. The Clery Act provides flexibility to IHEs in designing their tests and does not prescribe a particular type that must be used. These tests may be announced or unannounced, but IHEs must publicize their emergency response and evacuation procedures in conjunction with at least one test per calendar year. They must also document, for each test, a description of the exercise, the date and time of the exercise, and whether it was announced or unannounced.
## Emergency Notification and Timely Warning: Sorting Out the Differences

<table>
<thead>
<tr>
<th>Emergency Notification</th>
<th>Timely Warning</th>
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<tr>
<td><strong>Scope:</strong> Wide focus on any significant emergency or dangerous situation (e.g., crime, severe storm, chemical spill, disease outbreak)</td>
<td><strong>Scope:</strong> Required for certain crimes</td>
</tr>
<tr>
<td><strong>Why:</strong> Emergency notification is triggered by an event that is currently occurring on or imminently threatening the campus. Initiate emergency notification procedures for any significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus.</td>
<td><strong>Why:</strong> Timely warnings are triggered by crimes that have already occurred (but may be continuing) but which represent an ongoing threat. An IHE must issue a timely warning for certain crimes that are reported to its campus security authorities or a local law enforcement agency, and is considered by the institution to represent a serious or continuing threat to students and employees.</td>
</tr>
<tr>
<td><strong>Where:</strong> Applies to situations that occur on campus</td>
<td><strong>Where:</strong> Applies to crimes that occur on campus, in or on non-campus buildings or property, and on public property.</td>
</tr>
<tr>
<td><strong>When:</strong> Initiate procedures immediately upon confirmation that a dangerous situation or emergency exists or threatens.</td>
<td><strong>When:</strong> Issue a warning as soon as the pertinent information is available.</td>
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</table>

An IHE that follows its emergency notification procedures is not required to issue a timely warning based on the same circumstances; however, the institution must provide adequate follow-up information to the community as needed.

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11 “Campus security authority” is a specific term under the Clery Act that includes four groups of individuals and organizations associated with the institution: 1) a campus police department or campus security department; 2) individuals with responsibility for campus security but who do not constitute a police or security department; 3) individuals or organizations specified in the IHE’s statement of campus security policy as entities to whom students and employees should report criminal offenses; and 4) an IHE official with significant responsibility for student and campus activities.
2. Information Sharing

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

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

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

Postsecondary institutions are strongly urged to take the time to review these laws, as well as others that apply in their jurisdictions, when working with their community partners (e.g., law enforcement agencies, fire departments, emergency management agencies, public and mental health agencies) to ensure that all parties have a strong understanding of applicable laws when deciding whether to disclose information from education records without consent. In particular, it is critical to train the institutions’ employees, including contractors, on applicable laws to ensure that institutions, IHE officials, or employees do not release information inappropriately or make

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12 Title IV of the Civil Rights Act of 1964 applies to public postsecondary institutions.
13 Title II of the ADA prohibits discrimination based disability by public entities, including public institutions of higher education.
15 See 28 CFR 35.139 available at http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=263f01c0db63e7266a3711907eb6b6d3&rgn=div8&view=text&node=28:10.1.1.36.2.32.10&iddo=28 to 28 CFR 36.208 available at http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=01903fc38a7db19c90e9c2e84fa788e&rgn=div8&view=text&node=28:10.1.1.37.2.32.8&iddo=28/.
decisions about students or release of records based upon myths, fears, or stereotypes related to race, color, national origin, sex, sexual orientation, gender identity, religion, or disability.¹⁶

**Family Educational Rights and Privacy Act (FERPA)**

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**What Is FERPA?**

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

FERPA protects the rights of eligible students to:

- Inspect and review education records;
- Seek to amend education records; and

Consent to the disclosure of personally identifiable information (PII)\(^{17}\) from education records, except as specified by law.

For a thorough review of \textit{FERPA}, in addition to what is provided in this document, please see the implementing regulations for \textit{FERPA} found in Title 34 of the Code of Federal Regulations (CFR), part 99 available at http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title34/34cfr99_main_02.tpl.

\textbf{What are “Education Records?”}

Different types of records and information may be protected by \textit{FERPA} if that information constitutes PII from “education records.” Education records are protected by \textit{FERPA} and are broadly defined as records that are directly related to a student and maintained by an institution, or by a party acting for the institution.

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

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<thead>
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<th>Education Records</th>
<th>Not Education Records</th>
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<td>Transcripts</td>
<td>Records that are kept in the sole possession of the maker and used only as personal memory aids</td>
</tr>
<tr>
<td>Disciplinary records</td>
<td>Law enforcement unit records</td>
</tr>
<tr>
<td>Immunization and other health records, unless the records meet the exclusion for “treatment records” under \textit{FERPA}</td>
<td>Records made or maintained by a physician or other medical professional used only in connection with treatment of the student (“treatment records”)</td>
</tr>
<tr>
<td>Records on services and accommodations provided to students under Section 504 of \textit{the Rehabilitation Act of 1973}, and Title II and Title III of the \textit{ADA}</td>
<td>Records created or received by an institution after an individual is no longer in attendance and that are not directly related to the individual’s attendance at the institution</td>
</tr>
<tr>
<td>Records on a student who is employed as a result of his or her status as a student (i.e., work-study)</td>
<td>Grades on peer-graded papers before they are collected and recorded by an instructor</td>
</tr>
<tr>
<td></td>
<td>Information obtained through a school official’s personal knowledge or observation and not from the student’s education records</td>
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<tr>
<td></td>
<td>Employment records (unless the individual is employed as a result of his or her status as a student)</td>
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</tbody>
</table>

\(^{17}\) Under \textit{FERPA}, “personally identifiable information” is a term that includes, but is not limited to the student’s name; the name of the student’s parent or other family members; the address of the student or student’s family, a personal identifier, such as the student’s social security number, student number, or biometric record; other indirect identifiers, such as the student’s date of birth, place of birth, and mother’s maiden name; other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or information requested by a person who the educational agency reasonably believes knows the identity of the student to whom the education record relates. (See 34 CFR 99.3.)
Additionally, records created and maintained by the institution’s law enforcement unit are not likely to fall into the protected definition of “education records.” See the discussion under “Balancing Safety and Privacy” below for more detail on law enforcement units under FERPA, what constitutes a law enforcement unit record, and how these records may be used.

*Treatment records* are also not considered to be education records. The term “treatment records” generally applies to records involving students who are at least 18 years old or who are attending an institution of postsecondary education, and means records that are

- Made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in his or her professional capacity or assisting in a paraprofessional capacity;
- Made, maintained, or used only in connection with treatment of the student; and
- Disclosed only to individuals providing the treatment.

Treatment does not include remedial educational activities or activities that are part of the program of instruction at the institution. In a college setting, treatment records typically include those created and maintained at the campus health clinic.

**Who May Access FERPA-Protected Education Records?**

“School officials with a legitimate educational interest” may access *FERPA*-protected education records. Institutions determine the criteria for who is considered a school official with a legitimate educational interest under FERPA regulations. In a postsecondary context, there is a wide variety of individuals in different functions at the institution who could meet this definition. For example, faculty, administrators, and support staff, including law enforcement unit personnel, health center personnel, students serving on an official committee, the board of trustees, and others could be considered school officials with a legitimate educational interest.

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

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

In addition, institutions must notify eligible students of their rights under FERPA, and must include in this notification the criteria for who constitutes an IHE official and what constitutes a
legitimate educational interest. The U.S. Department of Education provides model notification statements on its website at \url{http://www2.ed.gov/policy/gen/guid/fpco/ferpa/ps-officials.html}.\footnote{See 34 CFR § 99.7(a)(3)(iii) for further information. Available at \url{http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=ea1af3867103d06eb14b239518b24822&rgn=div8&view=text&node=34:1.1.1.33.1.132.7&idno=34/}.

This means that if an institution wishes to consider non-employee members of its threat assessment team, its contracted counseling, nursing, service, or security staff, campus safety officials, and other non-employees as “school officials” who may have access to education records, the institution must ensure that these individuals meet the criteria in the bullets above and the criteria in the IHE’s annual notification of FERPA rights.

**Parents of an eligible student may, in some cases and at the discretion of the institution, access FERPA-protected records.** When a student turns 18 years old or enters a postsecondary institution, all rights afforded to parents under FERPA transfer to the student (the “eligible student”). However, institutions may – but are not required to – share information from an eligible student’s records with parents, without the eligible student’s consent, if an exception to the general requirement of consent is applicable, such as

- If the student is claimed as a dependent for tax purposes;
- If the student is under 21 at the time of disclosure and if the student has violated any law or institutional rule or policy concerning the use or possession of alcohol or a controlled substance, and the postsecondary institutions determines that the student has committed a disciplinary violation with respect to that use or possession;
- Information based on that official’s personal knowledge or observation of the student; or
- During a health or safety emergency involving their child.

**Balancing Safety and Privacy**

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

**The Health or Safety Emergency Exception to the Consent Requirement**

FERPA generally requires written consent before the IHE may disclose PII from the student’s education records. However, the FERPA regulations permit IHE officials to disclose PII from education records without consent to appropriate parties only when there is an actual, impending, or imminent emergency, such as an articulable and significant threat. Information may be disclosed only to protect the health or safety of students or other individuals. In applying the health and safety exception, note that:

- Institutions determine what constitutes a health or safety emergency.
“Appropriate parties” typically include law enforcement officials, first responders, public health officials, trained medical personnel, and parents, including parents of an eligible student.

This FERPA exception is temporally limited to the period of the emergency and does not allow for a blanket release of PII. It does not allow disclosures to address emergencies that might occur, such as would be the case in emergency preparedness activities.

The information that may be disclosed is limited to only PII from an education record that is needed based on the type of emergency.

Disclosures based on this exception must be documented in the student’s education records to memorialize the

Emergency that formed the basis for the disclosure; and

Parties with whom the IHE shared the PII.

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


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

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

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

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

Significantly, to be considered a “law enforcement unit” under this definition, an individual or component must be officially authorized or designated to carry out the functions listed above by the institution. IHEs may designate a traditional law enforcement entity (such as a campus safety department, campus police officer, or other IHE security personnel), or opt to designate another
non-law-enforcement school official to serve as their law enforcement unit, such as a provost or other school official.

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

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

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

Law enforcement unit records do NOT include

- Records created by a law enforcement unit for a law enforcement purpose that are maintained by a component of the institution other than the law enforcement unit, such as a provost, dean, disability services coordinator, or health clinic;
- Records received from another component of the IHE, such as health records, PII collected about or related to the disability of a student, and disciplinary records; and
- Records created and maintained by a law enforcement unit exclusively for a non-law enforcement purpose, such as an institutional disciplinary action or proceeding.

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

- To be given access to PII from a student’s education records, law enforcement unit officials who are employed by the institution must meet the criteria set forth in the institution’s FERPA notification for “school officials with a legitimate educational interest.” While law enforcement unit officials are not required to be an institution’s officials under FERPA, many institutions have found that it is useful for them to be their officials so that they may access education records that may be necessary to ensure IHE safety. For instance, if a student has been barred from campus for a period of time (a fact that would be recorded in the student’s education records), the law enforcement unit might need to know this in case the student attempts to enter a campus building when not permitted to do so.

- An institution’s law enforcement unit officials must protect the privacy of education records they receive and may disclose them only in compliance with FERPA. For that reason, we recommend that law enforcement unit records be maintained separately from education records.
For more information on law enforcement unit records and FERPA, refer to the following sources:

- The regulatory definition of “Law Enforcement Unit” under FERPA in 34 CFR § 99.8(a) available at http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=ae535d41f8bb03bedfef79634883360f&n=34y1.1.1.1.33&r=PART&ty=HTML#34:1.1.1.1.33.1.132.8.

**Common FERPA Misunderstandings**

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

**Sharing Personal Observation or Knowledge**

Misinterpreting FERPA can lead institutional administrators to miss opportunities to share crucial information that could prevent an emergency situation. For instance, some institutions incorrectly believe that information obtained from a school official’s personal observations or knowledge is protected by FERPA. In fact, personal observation or knowledge is generally not considered to be part of the student’s education records (see “What Are Education Records” above) and therefore may be disclosed. For example, if a faculty member overhears a student making threatening remarks to other students or is concerned after having a discussion with a student that the student may be violent, the faculty member is not prohibited from sharing that information with appropriate authorities, including the parents of the students who were threatened and the student’s parents. While FERPA would not prohibit the sharing of such information with others, there may be state laws or institutional policies and procedures that would preclude the faculty member from sharing the information.

However, if a school official learns of information about a student through his or her official role in creating or maintaining an education record, then that information would be covered by FERPA. For instance, if an institutional disciplinary panel takes action against a student, then an individual serving on the panel would not be permitted to non-consensually disclose that information because he or she gained personal knowledge of that information in making the disciplinary determination and the determination is maintained in an education record.

**The Clery Act’s Timely Warning Requirement and FERPA**

The Clery Act requires institutions to, among other things, give timely warnings of crimes that represent a threat to the safety of students or employees (see the “A Closer Look” section on the
Clery Act for more information about it). These warnings are intended to enable members of the campus community to protect themselves. While the Clery Act does not specify what information should be included in a timely warning,\(^\text{19}\) it should include all information that would promote safety and that would aid in the prevention of similar crimes. Institutions often incorrectly believe that FERPA conflicts with this timely warning requirement. It does not. FERPA allows the release of PII from education records in the case of an emergency without consent when needed to protect the health and safety of others. In addition, if institutions utilize the law enforcement unit records of a campus law enforcement unit to issue a timely warning, FERPA is irrelevant as those records are not protected by FERPA. (See Clery Act, 20 U.S.C. §1092(f),\(^\text{20}\) with implementing regulations at 34 CFR § 668.46.)\(^\text{21}\)

Releasing Directory Information
In some circumstances, institutions may be able to disclose “directory information” to prevent an emergency situation. Directory information means information contained in a student’s education record that would not generally be considered harmful or an invasion of privacy if disclosed. Some examples of directory information include a student’s name, address, telephone number, or e-mail address. Institutions must follow certain requirements in publicly designating “directory information,” and they may not disclose directory information from a student’s education record if the eligible student has opted out of allowing that disclosure. (See 34 CFR §99.37.) For example, an institution could disclose properly designated directory information to first responders for emergency-preparedness exercises if the eligible students have not opted out of the disclosure.

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

- **Infectious Disease**
  
  Under the health or safety emergency exception, school officials may, without consent, disclose PII from education records to appropriate parties in connection with an emergency. In the case of an influenza outbreak, for instance, if an institution’s officials determine that an emergency exists, they may share immunization records with parties, such as state and local public health officials, whose knowledge of the information is necessary to protect the health or safety of students or others in the campus community. Under this exception, institutions may share information only during the limited period of time connected with the emergency. A blanket release of information is not allowed. You

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\(^{19}\) Beginning in March 2014, the Clery Act will prohibit the release of victims’ names in timely warning notifications and crime logs.


\(^{21}\) 34 CFR § 668.46 is available at [http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=676893907309b77d0e88954dece41914&rgn=div8&view=text&node=34:3.1.3.1.34.4.39.6&idno=34](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=676893907309b77d0e88954dece41914&rgn=div8&view=text&node=34:3.1.3.1.34.4.39.6&idno=34).
must instead determine what information to disclose on a case-by-case basis depending on the particular threat.

**Threat Assessment Teams**

Some institutions may need assistance in determining whether a health or safety emergency exists for purposes of complying with *FERPA*. Federal agencies encourage institutions to implement a threat assessment program, including the establishment of a multi-disciplinary TAT that utilizes the expertise of representatives from mental health service providers, persons familiar with emergency procedures, and law enforcement agencies in the community, as well as from the major areas of the institutions, such as student affairs, academic affairs, the campus security department, and other appropriate professionals.

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

If a TAT member meets the definition of an official of the institution (as a party to whom the IHE has outsourced administrative functions or services) with a legitimate educational interest under *FERPA*, (see “Who May Access *FERPA*-Protected Education Records” above), then he or she would be able to access students’ education records in which he or she has legitimate educational interests. A TAT member, however, may not disclose PII from education records to anyone without consent or unless one of the exceptions to consent under *FERPA*, such as the health or safety emergency exception, applies.

**Security Videos**

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

**Transfer of Education Records**

*FERPA* permits school officials to disclose any and all education records, including disciplinary records, to another institution at which the student seeks or intends to
While student consent is not required for transferring education records in this scenario, the institution’s annual FERPA notification should indicate that such disclosures are made. In the absence of information about disclosures in the annual FERPA notification, school officials must make a reasonable attempt to notify the student about the disclosure, unless the student initiates the disclosure. Additionally, upon request, the institution must provide a copy of the information disclosed and an opportunity for a hearing to address information the student believes to be inaccurate, misleading, or in violation of the student’s rights of privacy.

**FERPA and Student Health Information**

Postsecondary institutions that provide health or medical services to students may disclose an eligible student’s treatment records to health care professionals who are providing treatment to the student, including health care professionals who are not part of or not acting on behalf of the institution (i.e., third-party providers), as long as the information is being disclosed only for the purpose of providing treatment to the student. In addition, an eligible student’s treatment records may be disclosed to a third-party provider when the student has requested that his or her records be reviewed by a physician or other appropriate professional of the student’s choice.

While, by definition, treatment records are not available to anyone other than professionals providing treatment to the student, this does not prevent an institution from disclosing these records for other purposes. However, once such a disclosure is made, the treatment records are no longer excluded from the definition of “education records” and are subject to all of the FERPA requirements as “education records” under FERPA. For example, if the institution chooses to do so, it may make a disclosure to the eligible student’s parents, under one of the exceptions to the general consent requirement. The records may also be disclosed to appropriate parties in connection with a health or safety emergency.

**FERPA and Student and Exchange Visitor Information System (SEVIS)**

FERPA permits institutions to comply with information requests from the U.S. Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE) in order to comply with the requirements of SEVIS. Officials who have specific questions about this and other matters involving international students should contact the U.S. Department of Education’s Family Policy Compliance Office at 400 Maryland Avenue SW, Washington, DC 20202-8520 or by calling 1-800-872-5327 (1-800-USA-LEARN).

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22 Please note that civil rights laws may apply. For instance, Section 504 of the Rehabilitation Act prohibits pre-admission inquiries about an applicant’s disability. See 34 CFR § 104.42(b)(4) available at [http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=ec9ff20a16040ddc021d2d0b60f6f668&rgn=div8&view=text&node=34:1.2.1.1.3.5.132.2&idno=34](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=ec9ff20a16040ddc021d2d0b60f6f668&rgn=div8&view=text&node=34:1.2.1.1.3.5.132.2&idno=34).
Disciplinary Records

While student disciplinary records are protected as education records under FERPA, there are certain circumstances in which specified information contained in disciplinary records may be disclosed without the student’s consent. Under the Clery Act, an IHE must disclose to the accuser and the accused the outcome of an institutional disciplinary proceeding alleging a sex offense. For this purpose, the outcome of a disciplinary hearing means the institution’s final determination with respect to the alleged sex offense and any sanction imposed against the accused. The final results must include the name of the alleged perpetrator, the violation committed, and any sanction imposed by the institution against the alleged perpetrator. An institution may disclose to anyone—not just the victim—the final results of a disciplinary proceeding, if it determines that the student is an alleged perpetrator of a crime of violence or non-forcible sex offense, and with respect to the allegation made against him or her, the student has committed a violation of the institution’s rules or policies.

Missing Students

The Clery Act, as amended, requires postsecondary institutions that maintain on-campus student housing facilities to establish, for students who reside in on-campus student housing, a missing student notification policy that includes notifying students that they may register “confidential” contact information for an individual to be contacted if the student is determined to be missing. Although missing student contact information would be considered PII from a student’s education records under FERPA, under the Higher Education Act, only authorized campus officials and law enforcement officers in furtherance of a missing person investigation may have access to this confidential contact information. This means that an institution may not disclose a student’s confidential contact information to a student’s parent or guardian or any other person other than authorized campus officials and law enforcement officers. A student’s identification of a confidential contact is accepted as permission for law enforcement personnel to contact the identified individual if the student is determined to be missing.

Incorporating FERPA into Your Emergency Planning Process

Below are critical questions and concepts that institutions should discuss with their community partners (e.g., first responders, emergency managers, public and mental health officials) while in the process of developing or revising an emergency management plan. While building partnerships is critical, in gathering information to support these partnerships, institutions must also take steps to balance student privacy with their mission of safety. Be sure to refer to the sections elsewhere in this guidance to review any concepts with which you are unfamiliar.

What Information is FERPA-Protected, and When May the Institution Share It?

Education records are protected by FERPA, and institutions may generally disclose PII from those records only with written consent from an eligible student, unless a FERPA exception to consent applies. (See “What Are ‘Education Records’” above.) The following are examples of how FERPA would apply in a variety of situations.
Example: At the start of flu season, your local public health agency requests the names of those students showing influenza-like symptoms, as well as the name and location of their dorm rooms. You know that you may not disclose PII from a student’s education records without consent if there is not a health or safety emergency or another exception to consent under FERPA that applies. So, to facilitate this disclosure of information, you opt to develop a consent form that identifies students’ names and the name or location of their dorm rooms as specific PII from student education records that you would like to share with the local public health agency, as well as the purpose of the disclosure. The form gives eligible students the option to allow or to not allow this sharing of information. After collecting the signed and dated consent forms, for the students for whom you received consent, you begin to share with the local health agency the names of those students who are showing influenza-like symptoms and the name and location of their dorm rooms. Your purpose in sharing this information is to help the health agency be able to conduct real-time surveillance to prevent the spread of the illness. (See “What Is FERPA?” above.)

Example: Your institution’s TAT includes representatives from your community partners (e.g., law enforcement, public health officials), and you have properly designated them as “school officials with a legitimate educational interest.” (See “Who May Access FERPA-Protected Records?” above.) The local law enforcement agency representative on your team does not share with his police chief or other local law enforcement officials the PII that he obtains from a student’s education records as a TAT member while working to identify possible threats because he knows that this is not permitted. Several months after the TAT initially convened to review a collection of behaviors and communications concerning a particular student and determined that there was not sufficient information demonstrating that the student posed a threat, the team learns that the student has now communicated his intent to harm one of his professors. At this juncture, the local law enforcement representative (and other members of the TAT) shares pertinent PII from education records with appropriate parties so they can take steps, such as consulting with the municipal police agency, to protect the health or safety of the professor. (See also the discussion of TATs under “Additional Situations With FERPA Considerations” above.)

Example: At the beginning of the fall term, your institution notified eligible students that you had designated students’ names, phone numbers, and e-mail addresses as “directory information,” explaining to them that you would disclose this information upon request to anyone contacting the IHE. In your notice, you provided an option to opt out of this disclosure, and you explained how and by when they could opt out. When a reporter contacts your institution requesting the directory information about a student, you check to see whether the student opted out of the disclosure of directory information. Because the eligible student did not opt out of the IHE’s directory information policy, you decide to provide that directory information to the reporter. (See “Common FERPA Misunderstandings” above.)

Example: Two students have an altercation in their residence hall, and one student is stabbed in the abdomen and falls unconscious. A bystander calls 911 for an ambulance and contacts the resident-life director. When the ambulance arrives, the resident-life director discloses to the EMS practitioner the PII from the student’s education record
related to the stabbed student with hemophilia without obtaining the wounded student’s consent under the health or safety emergency exception. (See “The Health or Safety Emergency Exception” above.)

Example: A parent of a student at your institution calls requesting PII from their child’s education records after learning that the student has been disciplined by the institution for underage drinking. Because you know that you may share information without the student’s consent because the student is under 21 and has violated a law concerning the use or possession of alcohol, and there has been a disciplinary finding, you comply with the parent’s request. (See “Who May Access FERPA-Protected Records” above.)

What Information Is Not FERPA-Protected, and When May the IHE Share It?
Records that are created and maintained by an IHE’s law enforcement unit for law enforcement purposes are not protected by FERPA, and there are no FERPA restrictions on the sharing of information in law enforcement unit records. (See “What Are ‘Education Records’?” and “Balancing Safety and Privacy” above.)

Example: Your institution contracts with a security company to provide campus security, and you properly designate the security officer as your institution’s law enforcement unit. You also properly designate the officer as a “school official with a legitimate educational interest.” (See “Who May Access FERPA-Protected Records” above.) The officer knows that he may not redisclose PII from education records to anyone unless there is a health or safety emergency or another FERPA exception to consent applies. However, he shares his law enforcement unit records about a student who was arrested for smoking marijuana on campus with the other law enforcement officials because he knows that law enforcement unit records are not protected by FERPA.

Are Processes and Protocols, Including Memoranda of Understanding (MOUs), in Place for Information Sharing and Record Keeping That Comply With FERPA?
It is important for institutions to consider entering into MOUs with law enforcement officials and their other community partners to formalize roles, responsibilities, and protocols. MOUs can be tailored to the needs of the individual campuses in the jurisdiction. Any policies regarding information sharing between the institution and the law enforcement agency, however, must comply with applicable federal, state, and local laws, including FERPA. While information-sharing MOUs should be developed regarding what information can be shared between departments and what information is protected, no provision in an MOU can override an IHE’s obligations under FERPA.

Frequently Asked Questions Pertaining to FERPA
Q: To what entities does FERPA apply?
A: FERPA applies to educational agencies and institutions that receive funds under any program administered by the U.S. Department of Education. This includes virtually all public schools and school districts, and most private and public postsecondary institutions, including medical and other professional institutions.
**Q:** Does an interagency agreement with partners such as the state or local health department enable an institution to non-consensually disclose education records?

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

**Q:** Under the health and safety emergency exception, may an IHE non-consensually disclose PII from education records to the media?

**A:** No. You generally may not disclose *FERPA*-protected information to the media, unless the PII disclosed is directory information on eligible students who have not opted out. While the media play a role in alerting the community of a health epidemic or violent incident, they do not generally have a role in protecting the health or safety of individual students or others at the institution.

**Q:** When would the health or safety exception apply?

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

**Q:** Do I need to tell eligible students or otherwise document when I have disclosed information from their education records without consent under a health or safety emergency or other exception?

**A:** When an educational agency or institution makes a disclosure under this exception, an institution must record in the student’s education records the articulable and significant threat that formed the basis for the disclosure, and the parties to whom the information was disclosed. Eligible students have a right to inspect and review the record of disclosure but do not need to be proactively informed that records have been disclosed.

**Q:** Can members of our TAT have access to student education records?

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

Members of a TAT who are considered school officials with a legitimate educational interest generally cannot non-consensually redisclose PII from a student’s education records to which he or she was privy as part of the team. However, if a TAT determines that a health or safety emergency exists, as defined under *FERPA*, members may non-consensually redisclose PII from a student’s education records on behalf of the institution to appropriate officials under the health or safety emergency exception.
For example, a representative from the city police force who serves on an IHE’s TAT generally could not redisclose, without consent, PII from the student’s education records to the city police during the initial discussions about a particular student. However, once the TAT determines that a health or safety emergency exists, as defined under FERPA, the representative may redisclose, without consent, PII from a student’s education records on behalf of the institution to appropriate officials. (See the discussion under “Additional Situations With FERPA Considerations” above.)

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

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

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

**A:** As noted in the introduction to this “A Closer Look” section, IHEs may also be subject to federal and state civil rights laws that protect the disclosure of information about students. IHEs and their community partners should review guidance from the U.S. Departments of Education and Justice on any applicable civil rights or other statutes governing privacy and information sharing, and discuss their implications for emergency management and related planning processes. At a minimum, in determining what constitutes an “emergency,” IHEs and their community partners must base their decisions on actual risks and not on assumptions, stereotypes, fears, or myths about people with disabilities (including mental health-related disabilities) or people of a particular race, color, ethnicity, national origin, religion, sex, sexual identity, or gender identification.23,24


24 In enacting ADA, Congress relied on School Board of Nassau County, Florida v. Arline, 480 U.S. 273, 284 (1987) to “acknowledge[] that society’s accumulated myths and fears about disability and disease are as handicapping as are the physical limitations that flow from actual impairment.” As explained in the preamble to the U.S. Department of Justice’s 1991 ADA regulation, codification of the Arline standard was deemed essential if the ADA is to achieve its goal of protecting disabled individuals from discrimination based on prejudice, stereotypes, or unfounded fear, while giving appropriate weight to legitimate concerns, such as the need to avoid exposing others to significant health and safety risks. See 28 C.F.R. pt. 36, app. C, sec. 36.208 available at http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=01903fc38a7bd19c90e9c2e84fa788e&n=28y1.0.1.1.37.2.32.8. This rationale applies with equal force to making determinations based on stereotypes about other characteristics protected by Titles IV and VI of the Civil Rights Act of 1964.
Q: Whom should I contact for more information related to FERPA?

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

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

In addition, please see the U.S. Department of Education’s website at http://www2.ed.gov/policy/gen/guid/fpco/index.html for the most recent guidance.

FERPA Guidance and Resources
The Family Policy Compliance Office (FPCO) at the U. S. Department of Education administers FERPA. FPCO has developed, and continues to develop, extensive guidance pertaining to the implementation of FERPA and emergency situations. For more detailed information or additional guidance, please see the documents below and the FPCO website at www.ed.gov/fpco. In addition, please see the Navigating Information Sharing Toolkit, developed by the National Center for Mental Health Promotion and Youth Violence Prevention, at http://sshs.promoteprevent.org/nis.
What Is HIPAA?
The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and its implementing regulations, commonly known as the HIPAA Privacy Rule and the HIPAA Security Rule, protect the privacy and security of individually identifiable health information, called “protected health information” or “PHI.” Such information is held by health plans, health care clearinghouses, and most health care providers, collectively known as “covered entities,” and their business associates (entities that have access to individuals’ health information to perform work on behalf of a covered entity).

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

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

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

The U.S. Department of Health and Human Services Office for Civil Rights has responsibility for administering and enforcing the Privacy and Security Rules.
How Does HIPAA Apply in Institutions of Higher Education?

**Basic Principle.** A major purpose of the Privacy Rule is to define and limit the circumstances in which an individual’s protected health information may be used or disclosed by covered entities. A covered entity may not use or disclose protected health information, except either: (1) as the Privacy Rule permits or requires; or (2) as the individual who is the subject of the information (or the individual’s personal representative) authorizes in writing.

Generally, HIPAA does not apply to health information in student records maintained by an IHE. While IHEs may maintain student health records, these records are in most cases not protected by HIPAA. Rather, student health information maintained at an IHE would be considered education or treatment records protected by FERPA.

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

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

**HIPAA Guidance and Resources**

The Office for Civil Rights has developed, and continues to develop, extensive guidance pertaining to the implementation of HIPAA Privacy Rule and emergency situations. The Office for Civil Rights website has guidance about the intersection between HIPAA and FERPA, and the release of PHI for common emergency preparedness issues and public health purposes, such as terrorism preparedness and outbreak investigations. For more detailed information or additional guidance, please see the Office for Civil Rights website at [http://www.hhs.gov/ocr/privacy/index.html](http://www.hhs.gov/ocr/privacy/index.html).

Each year, approximately 800,000 international students and scholars come to the United States to study at our colleges and universities. While here, these students and their family members become members of campus communities, participating in activities in and outside of the classroom. As members of a campus community, international students are affected, as all students are, during crises. They also present a set of unique needs for IHEs to consider in planning for and responding to crises. IHE and community preparedness can be enhanced by IHEs incorporating these unique needs into their emergency management plans. When a crisis occurs, IHE officials must be able to quickly communicate with international students and help manage their individual situations.

IHEs must also have procedures in place to ensure proper reporting with federal authorities. All international students who come to the United States in F, M, or J visa classes are monitored by the U.S. Department of Homeland Security through its online database, SEVIS. Colleges and universities certified by the ICE Student and Exchange Visitor Program (SEVP) to enroll international students must have Designated School Officials on campus. Designated School Officials maintain responsibility for advising international students and inputting data into SEVIS regarding student programs, location, and status to assist the U.S. Department of Homeland Security in monitoring compliance with immigration law. During emergencies, IHEs maintain the responsibility of making timely updates to SEVIS to reflect the status and location of international students. Likewise, international students need to know how to maintain their immigration status and other timely information about their options, such as transferring, if they are unable to continue their studies at their current IHEs.

To aid in appropriate and timely handling of international student issues during emergencies, prior to any emergency, it is important that IHEs consider the following actions:

- **Understand** the key issues related to international students in emergency management scenarios outlined above;
- **Incorporate** the Principal Designated School Official (PDSO), the IHE’s international student office, and appropriate law enforcement points of contact into its EOP;
- **Define** IHE policies for staff and international students to support continuity of operations during crises;
- **Establish** processes for international students to communicate to the IHE their location, safety concerns, and short- and long-term plans;
- **Incorporate** the PDSO and/or other key international student contacts into the crisis response process;
- **Develop** the ability to access SEVIS from alternate facilities or remote locations; and
Support the PDSO and/or other key international student contacts in understanding the principles of emergency management and their role(s) in the IHE’s emergency management plans.

There may be instances in which an international student is a victim of an event or an alleged perpetrator. In this scenario, IHEs may have to coordinate with local, state, and federal law enforcement officials on administrative or criminal matters. Understanding the IHE’s role and accompanying rules for communication can lead to swifter and more efficient resolution by the appropriate authorities.

Examples such as Hurricane Katrina and the April 2013 Boston Marathon bombing illustrate the need to incorporate international students into higher ed EOPs. During Hurricane Katrina, many IHEs in the Gulf Coast region suffered damage and were forced to close in its aftermath. This left thousands of international students displaced, requiring timely communication to address immediate safety concerns and coordination between IHEs and DHS to resolve immigration status issues. One of three victims killed in the Boston Marathon bombing was a Chinese graduate student, requiring notification to SEVP and the U.S. Department of State. Each situation required action by an IHE and coordination with local, state, and federal authorities.
4. Campus Public Safety
The characteristics of security and police services on the nation's college and university campuses vary considerably. However, the following four primary types of campus public safety services are most common:

1. **Campus police department**: An integral part of the IHE that provides law enforcement and other services (e.g., traffic control, building security) to the IHE. All the members of the department are employed by the IHE, and the sworn law enforcement officers of the department also have authority to enforce federal, state, local, and tribal laws, as authorized.

2. **Security department or operation**: An agency whose members are employed by the IHE, but whose members are not sworn officers. Because the members do not have sworn authority, the IHE relies on federal, state, local, and tribal law enforcement for support in criminal matters.

3. **Contract security personnel**: A private firm contracted to provide security services to the IHE. The IHE relies on federal, state, local, and tribal law enforcement for support in criminal matters.

4. **Local, state, or tribal police**: A local, state, or tribal police agency that provides law enforcement services to the IHE by contract or agreement.

On some campuses, police and security operations may be provided by a combination of the above services, with some services contracted to private vendors while others are maintained as the responsibility of the campus public safety agency (which can include a fire department or emergency medical services unit).

Regardless of the type of public safety model utilized by the IHE, the planning team must take into consideration the authority granted to federal, state, local, and tribal first responders to act on campus as permitted by law for each agency (e.g., law enforcement agency, fire department, and public health office).

The type of police or security operation may vary within the same system or campus. Among major state university systems the police or security operations may differ from campus to campus. Individual campuses may have separate police or security departments for different components of the campus, such as the hospital, graduate school, or athletic facility. These different departments may have their own uniforms, insignia, training operations, and policies.

The type of security operation also may vary between on- and off-campus facilities. Many IHEs are decentralized, with remote centers and facilities located away from the main campus. Off-campus sites may house important research and data records. Off-campus residences may house thousands of students. Some campus public safety agencies are responsible for patrolling areas that surround campuses pursuant to legislation or through formal agreement with the federal, state, local, or tribal law enforcement authority. At some IHEs, students are not required to live on campus, and off-campus housing sites may not fall within the IHEs policing or security
jurisdiction. This may create legal, jurisdictional, and operational conflicts in preventing and responding to crimes and managing emergencies.

Regardless of these variations, campus public safety officials should be intricately involved in the creation of the higher ed EOP, as they have critical responsibilities before, during, and after an emergency. To effectively develop and implement a high-quality EOP, the planning team should work with the campus public safety agency to

- Inform federal, state, local, and tribal agencies about the characteristics, strengths, vulnerabilities, and needs of the campus;
- Develop mutual-aid agreements and memoranda of understanding with other public safety partners (e.g., those adjoining the IHE’s public safety entities, nearby fire departments);
- Participate in federal, state, local, and tribal activities, including exercises, that address the range of campus public safety needs;
- Meet with other IHEs to foster information sharing, common prevention and response strategies, and consistency in working with federal, state, local, and tribal public safety partners;
- Improve interagency coordination, create coalitions, and develop partnerships with federal, state, local, and tribal emergency management agencies; and
- Adopt common incident response strategies, policies, and procedures for use across multiple campuses and sites, as recommended by the National Incident Management System (NIMS).
5. Active Shooter Situations

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

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

“Active shooter situations” are defined\(^{25}\) as those where an individual is “actively engaged in killing or attempting to kill people in a confined and populated area.”\(^{26}\) Unfortunately, IHEs face active shooter situations as well.

The better first responders and IHE personnel are able to discern these threats and react swiftly, the more lives can be saved. This is particularly true in an active shooter situation where law enforcement responds to a 911 call of shots fired. Many innocent lives are at risk in concentrated areas. This is why it is critical that IHEs work with their community partners (e.g., first responders, emergency managers) to identify, prepare, prevent, and effectively respond to an active shooter situation in a coordinated fashion.

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

While this “A Closer Look” section addresses how IHEs should plan for active shooter situations, IHEs should also plan for other gun-related incidents (e.g., a single shot fired, possession of a weapon on campus).

Preparing for an Active Shooter Situation

Planning

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

- How to evacuate or lock down students, staff, and visitors. (Personnel involved in such planning should pay attention to disability-related accessibility concerns when advising on shelter sites and evacuation routes.)

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\(^{25}\) Other gun-related incidents that may occur in a school environment are not defined as active shooter incidents because they do not meet this definition. Instead, they may involve a single shot fired, accidental discharge of a weapon, or incidents that are not ongoing.

How to evacuate when the primary evacuation routes are unusable.

How to select effective shelter-in-place locations (optimal locations have thick walls, solid doors with locks, minimal interior windows, first-aid emergency kits, communication devices, and duress alarms).

How the IHE community will be notified that there is an active shooter on campus as required by the Clery Act.\textsuperscript{27} This could be done through the use of familiar terms, sounds, lights, and electronic communications, such as text messages or e-mails. Include in the courses of action how to communicate with those who have language barriers or need other accommodations, such as visual signals or alarms to advise deaf students, staff, and parents about what is occurring. IHE-wide “reverse 911-style” text messages sent to predetermined group distribution lists can be very helpful in this regard. Planners should make sure this protocol is readily available and understood by those who may be responsible for sending out or broadcasting an all-IHE announcement. Rapid notification of a threat can save lives by keeping people out of harm’s way.

How students and staff will know when buildings and campus grounds are safe.

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

Additional considerations are included in the “Responding to an Active Shooter” and “After an Active Shooter Situation” sections below.

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

Providing the detailed information listed above to first responders allows them to rapidly move through an IHE during an emergency, to ensure areas are safe, and to tend to people in need. It is critically important to share this information with law enforcement and other first responders before an emergency occurs. Law enforcement agencies have secure websites where this

Each person carries a three-fold responsibility.

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

28 See also http://www.ready.gov/
**Preventing an Active Shooter Situation**

**Warning Signs**

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

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

- In only 13 percent of the cases did subjects make verbal and/or written threats to cause harm to the target. These threats were both veiled and direct, and were conveyed to the target or to a third party about the target.

- In 19 percent of the cases stalking or harassing behavior was reported prior to the attack. These behaviors occurred within the context of a current or former romantic relationship, or in academic and other non-romantic settings. They took on various forms, including written communications (conventional and electronic), telephonic contact, and harassment of the target and/or the target’s friends and/or family. Subjects also followed, visited, or damaged property belonging to target(s) or their families prior to the attack.

- In only 10 percent of the cases did the subject engage in physically aggressive acts toward the targets. These behaviors took the form of physical assaults, menacing actions with weapons, or repeated physical violence to intimate partners.

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

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

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

Threat Assessment Teams
As described in the previous section, research shows that perpetrators of targeted acts of violence engage in both covert and overt behaviors preceding their attacks. They consider, plan, prepare, share, and, in some cases, move on to action.\(^{34}\) One of the most useful tools an IHE can develop to identify, evaluate, and address these troubling signs is a multidisciplinary IHE TAT. A TAT with diverse representation often will operate more efficiently and effectively. TAT members should include IHE administrators, counselors, current employees, medical and mental health professionals, and residential life, public safety, and law enforcement personnel.

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

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

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

The TAT may also identify any potential victims with whom the individual may interact. TATs are increasingly common in IHE settings, pushed to the forefront of concern following the 2007 shooting at Virginia Polytechnic Institute and State University in Blacksburg, Va., where 32 individuals were killed. In some cases, state funding mandates that IHEs create threat assessment teams.\(^{35}\)

Law enforcement can help assess reported threats or troubling behavior and reach out to available federal resources as part of the TAT process or separately. The FBI’s behavioral


experts in its National Center for the Analysis of Violent Crimes at Quantico, Va., are available on a 24/7 basis to join in any threat assessment analysis and develop threat mitigation strategies for persons of concern. The law enforcement member of the IHE TAT should contact the local FBI office for this behavioral analysis assistance.

Each FBI field office has a NCAVC representative available to work with IHE TATs and coordinate access to the FBI’s Behavioral Analysis Unit, home to the National Center for the Analysis of Violent Crimes. It focuses not on how to respond tactically to an active shooter situation but rather on how to prevent one. Early intervention can prevent a situation from escalating by identifying, assessing, and managing the threat. The TAT should consult with its IHE administration and develop a process to seek these additional resources.

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

**Responding to an Active Shooter Situation**

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

Law enforcement officers may not be present when a shooting begins. Providing information on how staff and students can respond to the incident can help prevent and reduce the loss of life. No single response fits all active shooter situations; however, making sure each individual knows his or her options for response and can react decisively will save valuable time. Depicting scenarios and considering response options in advance will assist individuals and groups in quickly selecting their best course of action.

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

During an active shooter situation, the natural human reaction, even if you are highly trained, is to be startled, feel fear and anxiety, and even experience initial disbelief and denial. You can expect to hear noise from alarms, gunfire, and explosions, and people shouting and screaming. Training provides the means to regain your composure, recall at least some of what you have learned and commit to action. There are three basic options: run, hide, or fight. You can run
away from the shooter, seek a secure place where you can hide and/or deny the shooter access, or incapacitate the shooter in order to survive and protect others from harm.\textsuperscript{36}

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

\textbf{Respond Immediately}

It is not uncommon for people confronted with a threat to first deny the possible danger rather than respond. An investigation by the National Institute of Standards and Technology (2005) into the collapse of the World Trade Center towers on September 11, 2011, found that people close to the floors impacted waited longer to start evacuating than those on unaffected floors.\textsuperscript{37} Similarly, during the Virginia Tech shooting, individuals on campus responded to the shooting with varying degrees of urgency.\textsuperscript{38} These studies highlight this delayed response or denial. For example, some people report hearing firecrackers, when in fact they heard gunfire.

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

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

\textbf{Run}

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

\textsuperscript{36} As part of its preparedness mission, \textit{Ready Houston} produces “Run, Hide, Fight” videos, handouts, and trainings to promote preparedness among residents of the Houston region. These materials may or may not be relevant to IHEs, as they are not for an IHE setting. These videos are not recommended for viewing by minors. All of these items are available free-of-charge and many are available at http://www.readyhoustontx.gov/videos.html.

\textsuperscript{37} Occupants of both towers delayed initiating their evacuation after World Trade Center 1 was hit. In World Trade Center 1, the median time to initiate evacuation was 3 minutes for occupants from the ground floor to floor 76, and 5 minutes for occupants near the impact region (floors 77 to 91). See National Institute of Standards and Technology, \textit{Federal Building and Fire Safety Investigation of the World Trade Center Disaster Occupant Behavior, Egress, and Emergency Communications}. Washington, DC: Author, 2005. Available at http://www.mingerfoundation.org/downloads/mobility/nist%20world%20trade%20center.pdf.

Students and staff should be trained to

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

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

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

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

**Fight**
If neither running nor hiding is a safe option, as a last resort when confronted by the shooter, adults in immediate danger should consider trying to disrupt or incapacitate the shooter by using aggressive force and items in their environment, such as fire extinguishers, chairs, etc. In a study of 41 *active shooter* events that ended before law enforcement arrived, the potential victims
stopped the attacker themselves in 16 instances. In 13 of those cases, they physically subdued the attacker.\textsuperscript{39}

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

**Interacting with First Responders**

Staff should be trained to understand and expect that law enforcement’s first priority must be to locate and stop the person or persons believed to be the shooter(s); all other actions are secondary. One comprehensive study found that in more than half (57 percent) of \textit{active shooter} incidents where a solo officer arrived on the scene, shooting was still underway when the officer arrived. In 75 percent of those instances, that solo officer had to confront the perpetrator to end the threat. In those cases, the officer was shot one-third of the time.\textsuperscript{40}

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

**After an Active Shooter Incident\textsuperscript{41}**

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

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

Within an on-going and/or evolving emergency, where the \textbf{immediate reunification} of loved ones is \textbf{not possible}, providing family members with timely, accurate and relevant information is paramount. Having family members wait for long periods of time for information about their loved ones not only adds to their stress and frustration, but can also escalate the emotions of the entire group. When families are reunited, it is critical that there are child release processes in

\textsuperscript{39} J. Pete Blair with M. Hunter Martaindale, \textit{United States Active Shooter Events from 2000 to 2010: Training and Equipment Implications}. San Marcos, TX: Texas State University, 2013. Available at \url{http://alert.org/files/research/ActiveShooterEvents.pdf}.

\textsuperscript{40} Ibid.

\textsuperscript{41} Also see the section of the Guide on Considerations for the Recovery Annex.
place where minors might be involved (e.g., childcare) to assure that no child is released to an unauthorized person, even if that person well-meaning.

Essential steps to help establish trust and provide family members with a sense of control can be accomplished by:

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

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

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

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

The higher ed EOP should consider printed and age-appropriate resources to help families recognize and seek help in regard to a variety of reactions that they or their loved ones can experience during and after an emergency. For example, a family that has lost a child may have other family members in the area or at the IHE. It is critical that these families and loved ones are supported as they both grieve their loss and support their surviving family members.

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

PFA is an evidence-informed modular approach used by mental health and disaster response workers to help individuals of all ages in the immediate aftermath of disaster and terrorism. PFA is designed to reduce the initial distress caused by traumatic events and to foster short- and long-term adaptive functioning and coping.

PFA does not assume that all survivors will develop mental health problems or long-term difficulties in recovery. Instead, it is based on an understanding that disaster survivors and others affected by such events will experience a broad range of early reactions (e.g., physical, psychological, behavioral, spiritual). Some of these reactions will cause enough distress to interfere with adaptive coping and recovery may be helped by support from compassionate and caring disaster responders.

PFA is designed for delivery by mental health and other disaster response workers who provide early assistance to affected children, families, and adults as part of an organized disaster response effort. These providers may be embedded in a variety of response units, including first responder teams, the ICS, primary and emergency health care, incident crisis response teams, faith-based organizations, Community Emergency Response Teams (CERT), Medical Reserve Corps, the Citizens Corps, and other disaster relief organizations.

Basic objectives of PFA are:

- Establish a human connection in a non-intrusive, compassionate manner.
- Enhance immediate and ongoing safety and provide physical and emotional comfort.
- Calm and orient emotionally overwhelmed or distraught survivors.
- Help survivors tell you specifically what their immediate needs and concerns are, and gather additional information as appropriate. Offer practical assistance and information to help survivors address their immediate needs and concerns.
- Connect survivors as soon as possible to social support networks, including family members, friends, and neighbors.
- Support adaptive coping, acknowledge coping efforts and strengths, and empower survivors; encourage adults, children, and families to take an active role in their recovery.
- Provide information that may help survivors cope effectively with the psychological impact of disasters.
- When appropriate, link the survivor to another member of a disaster response team or to local recovery systems, mental health services, public-sector services, and organizations.

PFA is designed for delivery in diverse settings. Mental health and other disaster response workers may be called upon to provide PFA in:
- General population shelters
- Special need shelters
- Field hospitals and medical triage areas
- Acute care facilities (e.g., emergency departments)
- Staging areas or respite centers for first responders or relief workers
- Emergency operations centers
- Crisis hotlines or phone banks
- Mobile dining facilities
- Disaster assistance service centers
- Family reception and assistance centers
- Homes
- Businesses
- Other community settings

Content taken from *Psychological First Aid Field Operations Guide* 

**Training on Psychological First Aid**

PFA Training can be provided face-to-face or online. The online version (http://learn.nctsn.org/) is vastly utilized and is a 6-hour interactive course that puts the participant in the role of a provider in a post-disaster scene. This professionally narrated course is for individuals new to disaster responses who want to learn the core goals of PFA, as well as for seasoned practitioners who want a review. It features innovative activities, video demonstrations, and mentor tips from the nation’s trauma experts and survivors. PFA online also offers a Learning Community where participants can share about experiences using PFA in the field, receive guidance during times of disaster, and obtain additional resources and training.

The *Psychological First Aid: Field Operations Guide* provides information for adults, families, first responders, disaster relief workers, crisis counselors, and volunteers to help survivors immediately in the aftermath of a traumatic event. Available online at http://www.nctsn.org/content/psychological-first-aid, the guide describes key steps for providing PFA including how to approach someone in need, how to talk to them, how to help stabilize someone, and how to gather information. Appendices include resources about service delivery sites and settings, provider care, and worksheets and handouts.

Following disasters or emergencies, the PFA Mobile app can assist responders who provide PFA to adults, families, and children. Materials in PFA Mobile are adapted from the
The app allows responders to:

- Read summaries of the 8 core PFA actions.
- Match PFA interventions to specific stress reactions of survivors.
- Get mentor tips for applying PFA in the field.
- Self-assess to determine their own readiness to conduct PFA.
- Assess and track survivors’ needs to simplify data collection and referrals.

*Psychological First Aid – Field Operations Guide*

http://www.nctsn.org/content/psychological-first-aid