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Introduction + 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 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 (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 impacts 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 community partners – 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 service officials, emergency medical services (EMS) personnel) and other emergency management professionals, as well as public and mental health entities in public and nonpublic schools.

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 planning efforts and then refer back to it throughout the planning process.

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 local, State and National levels. Recent developments have put a new emphasis on the process for developing EOPs.

The Guide Is Organized In Four (4) Sections:

- **Principles** of school emergency management planning.
- Process for developing, implementing and continually refining a school EOP with community partners at the school building level.
- Discussion of the form, function and content of school EOPs.
- **A Closer Look**, which considers key topics that support school emergency planning, includes addressing an active shooter, school climate, psychological first aid and information-sharing.

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National preparedness efforts, including planning, are now informed by Presidential Policy Directive-8 (PPD-8), which was signed by the President in March 2011. PPD-8 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.

Emergency management officials and emergency responders engaging with schools are familiar with this terminology. These mission areas generally align with the three (3) 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 (3) 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.

As schools plan for and execute response and recovery activities through their 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, schools are able to more effectively work with responders in their communities. For more information on ICS and NIMS, visit https://www.fema.gov/national-incident-management-system

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 State of Louisiana is 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.

PPD-8 defines preparedness around five (5) 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.
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 are equally helpful.
Planning Principles

The following principles are key to developing a comprehensive and high-quality EOP that addresses a range of threats and hazards:

**Table 1: PLANNING PRINCIPLES**

- **Planning must be supported by leadership.**
  
  At the district and school levels, senior-level officials 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 (LEP).

- **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, for example at sporting events or field trips.

- **Creating and revising a model EOP 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 local and State mandates, as applicable.
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. 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 (6) 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]

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Step 1: Form A Collaborative Planning Team

Discussion

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 understand and accept their roles. Close collaboration between schools and community partners ensures the coordination of efforts and the integration of emergency management plans.

Action Steps

☐ 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; 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, emergency management professionals, school resource officers, fire service 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.

☐ 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 terminology, command structure and culture in order to facilitate effective planning.
Define + Assign Roles + Responsibilities

Each person involved in the development and refinement of the plan should know their 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 facilitates greater collaboration, coordination and communication among team members and helps 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

Discussion

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.

Action Steps

- Identify Threats + Hazards

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

Table 2: THREATS + HAZARDS
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 Parish agencies that have a knowledge of threats and hazards include, but are not limited to, local law enforcement and emergency management offices, as well as local organizations and community groups (such as the local chapter of the American Red Cross (ARC) Community Emergency Response Team), utilities and other businesses that can provide helpful information.

**Assess The Risk Posed By The Identified Threats + Hazards**

Once an initial set of threats and hazards have been identified through the process described in the previous section, the planning team selects suitable assessment tools to evaluate the risk posed by the identified threats and hazards.³

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 school will have to warn students and staff about the threat or hazard.
- **How long it may last.**

The local and Parish 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 – its 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 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.

³For 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 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 – are included to the maximum extent appropriate. The assessment also has to be strategic: If the school is in an isolated region of a Parish 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 are to develop the initial plan and also 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.4

Table 3: ASSESSMENT

<table>
<thead>
<tr>
<th>Type Of Assessment</th>
<th>Description</th>
<th>Purpose + 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:  
  ▪ 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.  
  ▪ Emergency vehicle access. | • Increased understanding of the potential impact of threats and hazards on school buildings and grounds.  
• Increased understanding of risk and vulnerabilities of school buildings and grounds when developing the plan.  
• Knowledge of which facilities are physically accessible to students, staff, parents, volunteer workers and emergency response personnel with disabilities and can be used in compliance with the law. |
| Culture and Climate Assessment | • In schools with positive climates, students are more likely to feel connected to adults and their peers. This fosters a nurturing environment where students are more likely to succeed, feel safe and report threats.  
A school culture and climate assessment evaluates student and staff connectedness to the school and problem behaviors. For example, this assessment may reveal a high number of bullying incidents, indicating a need to implement an anti-bullying program.  
• If a student survey is used to assess culture and climate, student privacy must be protected.  
• A range of school personnel can assist in the assessment of culture and school climate, including school counselors and mental health staff. | • Knowledge of students’ and staff’s perceptions of their safety.  
• Knowledge of problem behaviors that need to be addressed to improve school climate. |
## Type Of Assessment | Description | Purpose + Results
--- | --- | ---
**School Threat Assessment** | A school threat assessment analyzes communication and behaviors to determine whether or not a student, staff, or other person may pose a threat. These assessments must be based on fact, must comply with applicable privacy, civil rights and other applicable laws, and are often conducted by multidisciplinary threat assessment teams. While a planning team may include the creation of a threat assessment team in its plan, the assessment team is a separate entity from the planning team and meets on its own regular schedule. | • Students, staff or other persons that may pose a threat are identified before a threat develops into an incident and are referred for services, if appropriate.

**Capacity Assessment** | The planning team needs to know what resources are 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 — 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 are also 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, 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 helps planners assign roles and responsibilities in the plan.

After conducting these assessments, the planning team consolidates 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 is then used to assess and compare 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:

**Table 4: RISK + VULNERABILITY ASSESSMENT**

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

While some of the information collected directly feeds into this table, other information – for example, details on school climate challenges – 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 + Hazards**

Next, the planning team uses the information it has organized to compare and prioritize risks posed by threats and hazards. This allows 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 – 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 provides a sample risk assessment worksheet for comparing and prioritizing threats and hazards.

**Table 5: 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></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>
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<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>
</tbody>
</table>

**Know Your School Population**

It is important to have school census data by age groups and/or grade levels, as well as locations of each when assessing risk. General populations are identified as well as those with functional needs. Teacher, administrative staff, office support, custodians and cafeteria workers among others are identified and located. A master schedule of where classes, grade levels and staffers are located during the day is provided to each classroom and is available in administrative and other non-classroom offices.
Plan development teams should be committed to the **safe evacuation** and **transport of students** and staff with functional needs. Enrollment numbers for those with functional needs will **fluctuate**. Students and/or staff may require **additional assistance** if they are **temporarily** on crutches or wearing a cast, for example.

Plan development includes **identifying** and **maintaining** a list of **staff members trained** and **assigned** to assist those with functional needs during drills, exercises and incidents. That list is included in the plan document.

**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.*
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Step 3: Determine Goals + Objectives

Discussion

In Step 3, the planning team decides which of the threats and hazards identified in Step 2 are 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 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 decides which threats and hazards are to be addressed in the school EOP, it develops goals and objectives for each.

Action Steps

☐ Develop Goals + 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 goals of recovery are to return to education and restore school infrastructure as quickly as possible.

The planning team develops at least three (3) 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 (3) 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 goals. Often, planners identify multiple objectives in support of a single goal.
Using the goal in Example 1 above (preventing a fire on or near school grounds), possible objectives may 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 (protecting all persons from injury by the fire), possible objectives may include:

- **Objective 2.1**
  Evacuate all persons from the building immediately.

- **Objective 2.2**
  Account for all persons.

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

- **Objective 3.1**
  Immediately notify fire department officials and EMS personnel of any fire on schools grounds by calling 9-1-1.

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

After the team finishes identifying and articulating objectives for prioritized threats and hazards, it likely finds that certain critical functions or activities apply to more than a single 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 develops three (3) goals for each function. As with the goals already identified for threats and hazards, the three (3) goals indicate the desired outcome for 1) Before, 2) During and 3) After the function has been executed.
These commonly occurring functions are 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 (3) 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 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 may 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 (3) goals *(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)

Discussion

In Step 4, the planning team develops courses of action for accomplishing each of the objectives identified in Step 3 – or 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 examines each course of action to determine whether it is feasible and whether 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 of this Guide.

Action Steps

☐ 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 helps identify the relevant decision points for each, 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 (ADA), 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 ADA is available at http://www.ada.gov.

Plans Must Address Language Access


☐ Select Courses Of Action

After developing courses of action, planners compare the costs and benefits of each proposed course of action against 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 and address resource gaps or shortfalls.
Step 4: Outcome

After completing Step 4, the planning team has 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 go into the Threat- and Hazard-Specific Annexes section of the school EOP.

Goals, objectives and courses of action for functions are contained in the Functional Annexes section of the school EOP.
Step 5: Plan Preparation + Review + Approval

Discussion

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.

Action Steps

☐ 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 (3) major sections: the Basic Plan, Functional Annexes and Threat- and Hazard-Specific Annexes.

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

The Functional Annexes section details the goals, objectives and courses of action of functions – such as evacuation, communications and 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 has at least three (3) goals, with one (1) 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.)

Table 6 below outlines the different components of each of these three sections.\(^5\)

### Table 6: TRADITIONAL EOP FORMAT

<table>
<thead>
<tr>
<th>Basic Plan</th>
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<td></td>
<td>d. Planning Assumptions</td>
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</tbody>
</table>

**Functional Annexes**

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

- Communications
- Evacuation
- Shelter-in-Place
- Lockdown
- Accounting for All Persons
- Reunification
- Continuity of Operations (COOP)
- Security
- Recovery
- Health and Medical

**Threat- Or Hazard-Specific Annexes**

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

- Hurricane or Severe Storm
- Earthquake
- Tornado
- Hazardous Materials Incident
- Mass Casualty Incident
- Active Shooter
- Pandemic or Disease Outbreak

\(^5\)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).
☐ 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 comments from stakeholders that have responsibilities for implementing the plan.

Successful plans are written according to the following simple rules.

- **Summarize** important information with checklists and visual aids, such as maps and flowcharts.
- Write **clearly**, using **plain language**, avoiding jargon and minimizing the use of abbreviations. Use short sentences and **active voice**. Qualifiers and vague wording only add to confusion.
- 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.
- Provide enough detail to convey an **easily understood** plan that is **actionable**. For example, classroom teachers may have a **one- (1-) page document** that covers what they 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.
- 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 help determine the **effectiveness** and **efficiency** of the plan. The following measures 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:

a. **Incorporates all courses of action** to be accomplished for **all** selected threats and hazards and identified functions.

b. **Integrates** the needs of the **whole school community**.

c. Provides a complete **picture** of what should happen, when and at whose direction.

d. **Estimates time** for achieving objectives, with **safety** remaining as the utmost priority.

e. Identifies **success criteria** and a **desired end state**.

f. Conforms with planning principles outlined in this **Guide**.

The plan must **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 must explain **where** or **how** the district and school will obtain the resources to support those requirements.

☐ **Approve + Share The Plan**

After finalizing the plan, the planning team **presents** the plan to **appropriate leadership** and obtains **official approval** of the plan. The team then shares the plan with its **community partners** who have a responsibility in the plan (e.g., first responders, local emergency management staff, etc.) and additional **stakeholders** that have a role in the plan, including relevant local, district, regional and/or State **agencies** with which the plan is page coordinated. The plan is also 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 local and State **open records laws** in storing and protecting the plan.

The planning team maintains a **record** of the people and organizations that **receive** a copy of the plan.
Step 5: Outcome

After completing Step 5, the planning team has a final school EOP.
Step 6: Plan Implementation + Maintenance

Action Steps

☐ Train Stakeholders On The Plan + Their Roles

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

- **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 distributing materials by email in an accessible format.

☐ Familiarize Students + Staff + Community Partners With The Plan

Bringing community partners (e.g., law enforcement officers, fire officials, emergency management and EMS personnel) that have a role in plan implementation into the school to talk about the plan makes students and staff more comfortable working with these partners.

☐ Train Staff On The Skills Necessary To Fulfill Their Roles

Staff is assigned specific roles in the plan and positions supporting the Incident Command System (ICS) that 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 are 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 and others), as well as identify gaps and weaknesses in the plan. The exercises below require increasing amounts of planning, time and resources. Ideally, schools 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 and others) 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 multi-agency, multi-jurisdictional efforts in which all resources are deployed. This type of exercise tests collaboration among 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 local or State 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 plan.

If students are involved, the school also considers 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 (AAR) that evaluates results, identifies gaps or shortfalls and documents lessons learned.
- Discuss how the school EOP and procedures will be modified, if needed, and specify who has responsibility for modifying the plan.


**[Review + Revise + 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 are 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 (2) years without being reviewed and revised.

Some schools have found it useful to review and revise portions of the plan 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 provide new information that is then 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.
- 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.
Basic Plan

Step 5 of the planning process in this Guide introduced a format with three (3) sections for schools to follow in developing a school EOP. This section provides greater detail about what each of the three (3) sections should include and some key considerations in developing content.

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. 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.

Concerning specific information recommended for inclusion in a school EOP, it is important to create and insert appropriate floor plans for each building and provide critical emergency information. These must be kept current. It is also important to identify appropriate staff to fill specific roles related to command operations, cross-train staff and keep this information in a secure and safe location.

Introductory Material

Introductory material enhances accountability with community partners – including first responders, local emergency managers and public and mental health officials – and makes 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 Documenter Signature Page.** This document or page contains a signed statement formally recognizing and adopting the school EOP. It gives both the authority and the responsibility to school officials to perform their tasks before, during or after an incident, and therefore should be signed by the school administrator or another authorizing official.

- **Approval and Implementation Page.** The approval and implementation page introduces the plan, outlines its applicability and indicates that it supersedes all previous plans. It includes a delegation of authority for specific modifications that can be made to the plan and by whom they can be made without the school administrator’s signature. It also includes a date and should be signed by the authorized school administrator.
Record of Changes. Each update or change to the plan is 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 (TOC). The TOC is a logically ordered, clearly identified layout of the major sections and subsections of the plan. The TOC makes finding information within the plan easier.

Campus and Building Information. Your plan needs to include where you are located with a description of the number of buildings on campus, where athletic fields, parking lots and other facilities are located and where classes are located. A campus map or a site plan and building floor plans help first responders move rapidly through the school when there is an emergency event. Maps, building schematics and/or floor plans need to be annotated with evacuation routes, shelter locations, fire alarm pull stations, fire hydrants, fire extinguishers, first-aid kits, hazardous materials storage and utility shut off valves. Photos of the outside and inside of building(s) and the campus are also helpful.

Classrooms containing students and staff that require additional assistance during an incident are noted (with an asterisk) next to the room number during the applicable class period(s) on the Master Schedule. A list of students and staff names with functional needs along with their schedules is located at the administrative offices.

School Populations. As noted earlier in this Guide, knowing who’s on campus and where is vital when an emergency or disaster occurs. Your EOP includes current enrollment, support staff and faculty. Your plan should identify the number of:

- Teachers and specialists
- Administrators
- Office and support staff
- Instructional assistants
- Cafeteria staff
- Maintenance and custodial staff
- Any others that are a part of your school community
Additionally, the plan identifies the number of students and faculty that have:

- Limited English proficiency (LEP)
- Blindness or visual disabilities
- Cognitive or emotional disabilities
- Deafness or hearing loss
- Mobility/physical disabilities (permanent and temporary)
- Medically fragile health (including asthmas and severe allergies)

The plan notes that a Master Schedule of where classes, grade levels and staff are located during the day is provided to each classroom and where it can be found outside of the classroom (likely through the administrative offices).

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 can assist them. These materials include a map, 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. This is especially true in an active shooter situation discussed on page 77. 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.

**Purpose + 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:
  - 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 (CONOPs)

The Concept of Operations (CONOPS) 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:

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

Assumptions

Assumptions are unknown but assumed conditions to be true that allow you to move forward with your planning efforts. For example, activation of the plan requires the involvement of multiple agencies and you assume you have their full support.

The EOP identifies and articulates the assumptions underlying the plan.

Organization + 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. Remember that key staff assignments and contact information must be regularly updated to ensure efficient operations in the event of an emergency. Finally, once you have developed your school EOP – High-Quality EOP – appropriate workshops and/or seminars should be conducted to ensure that all district and school personnel understand the plan and their roles and responsibilities. This section:
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.

- The following is an example of the type of information to include in the plan to describe the broad roles and responsibilities of teachers during all emergencies.

Teachers are responsible for the supervision of students, remaining 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 – including memorandums of understanding (MOUs) – 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.

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4If 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.
Direction + Control + Coordination

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

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

Information Collection + Analysis + Dissemination

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

- Identify the type of information that is helpful in the successful implementation of activities that occur before, during and after an emergency, such as:

  Before and During: Weather reports, law enforcement alerts, National Oceanic and Atmospheric Administration (NOAA) radio alerts, crime reports.

  After: Mental health agency websites and hotlines, emergency management and relief agency websites and hotlines assisting in all aspects of recovery.

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

Training + Exercises

This section describes the critical training and exercise activities the school uses 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 local and/or district jurisdiction level(s). Exercises may range from basic...
fire and shelter-in-place **drills** to **full-scale community-wide** drills that **realistically** portray a crisis and show the role the school plays in school district and municipal planning.

**Administration + Finance + 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 identifies and **references** policies and procedures that exist outside the plan. This section:

- Identifies **administrative controls** (e.g., budget and acquisition policies and procedures) and **requirements** that used to provide resource and expenditure **accountability**.
- Briefly describes how the school will maintain **accurate logs** of **key activities**.
- Briefly describes how **vital records** (e.g., student records) will be **preserved** (details may be contained in a *Continuity of Operations [COOP] Functional Annex*).
- Identifies 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 + 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.
- Provides for a **regular cycle** of training, evaluating, reviewing and updating of the school EOP.

**Authorities + References**

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

- **Lists** of laws, statutes, ordinances, executive orders (EOs), **regulations** and formal **agreements** relevant to emergencies.
- **Provisions** for the **succession** of decision-making **authority** and **operational control** to ensure that critical emergency **functions** can be performed in the **absence** of the school administrator.
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 EOP. As the planning team assesses school 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; they are not meant to constitute an exhaustive list.

MANY FUNCTIONS MAY OCCUR SIMULTANEOUSLY

While these functions are described separately, it is important to remember that many functions 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 begins. The evacuation function, however, is still 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 a 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 execute to evacuate school buildings and grounds.

The planning team considers 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.
All emergency operations plans (EOPs) must take into account students and staff with physical or emotional disabilities or challenges and prepare individual EOPs to address those needs.

**Lockdown Annex**

This annex focuses on the courses of action schools 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 rooms away from immediate danger.

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

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

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

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

Communications + 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 considers 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 communicates 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 handles the media (e.g., district or school Public Information Officer [PIO]).
- How impacts on students are 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 ensures 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.

Telling Family Members 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 ensures 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 ensures the notification is provided to family members with clarity and compassion. Counselors should be on hand to immediately assist family members.

The school EOP includes pre-identified points of contact (e.g., counselors, police officers) to work with and support family members. These points of contact are connected to families as early in the process as possible, including while children are still missing but also before any victims are 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 considers 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 explicitly addresses how impacted families and children are 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.

- 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 are updated.
• How to account for technology barriers faced by students, staff, parents and guardians.
• How to effectively address language access barriers faced by students, staff, parents and guardians.

☐ Continuity Of Operations (COOP) Annex

This annex describes how a school and district 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 considers the following when developing its goals, objectives and courses of action:

• How the COOP annex is designed so that it can be activated at any time and sustained for up to 30 days.
• How the COOP annex sets 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 ensures students receive applicable related services in the event of a prolonged closure.

☐ Recovery Annex

This annex describes how schools recover from an emergency. The four (4) most fundamental kinds of recovery are academic recovery, physical recovery, fiscal recovery and psychological and emotional recovery.

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

• Academic recovery
  o When the school is closed and reopened, and who has the authority to do so.
  o What temporary space(s) the school may use if school buildings cannot be immediately reopened.
  o How to provide alternate educational programming in the event that students cannot physically reconvene.
• Physical recovery
  o How to document school assets, including physically accessible facilities, in case of damage.
  o Which personnel have expert knowledge of the schools’ assets, and how and where they access records to verify current assets after disaster strikes.
  o How the school works with utility and insurance companies before an emergency to support a quicker recovery.

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

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

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

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

- The role of staff members in providing first-aid during an emergency.
- Where emergency medical supplies (e.g., first-aid kits, automated external defibrillators [AEDs], etc.) are 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 secures a sufficient number of counselors in the event of an emergency.
- How the school promptly shares and report information about outbreaks or epidemics or other unusual medical situations to the local health department.
- How the school supports the needs of students identified by the threat assessment team.

Security Annex

This annex focuses on the courses of action that schools 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 considers 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 ensure the building is physically secure (including implementation of crime prevention through environmental design [CPTED]).
- 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 is 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 section of this Guide and at the websites noted below.\(^7\)

**Crime Prevention Through Environmental Design (CPTED) Principles\(^8\)**

**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.

☐ Other

*School districts and individual schools may have *additional* or different annexes than those identified here, based on their assessment findings.*

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\(^8\) *The American Clearinghouse on Educational Facilities*, available at [http://www.acefacilities.org](http://www.acefacilities.org), provides additional information describing how CPTED can be applied in the school environment.
Threat- + Hazard-Specific Annexes

Threat- and hazard-specific annexes describe 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.

Schools develop threat- and hazard-specific annexes based on the prioritized list of threats and hazards determined in the assessment process. As planning teams develop courses of action for threats and hazards, they consider local, State and Federal 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 includes the functional annex 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 indicates “see Evacuation Annex” in the during course of action section rather than repeat the evacuation courses of action in the Fire Annex.

School districts and individual schools may not need annexes for all of the threats identified below OR they may have additional or different annexes based on their risk assessment findings.

Table 7: THREAT + HAZARD TYPES + EXAMPLES

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

Information Sharing
Psychological First Aid For Schools (PFA-S)
School Climate + Emergencies
Active Shooter Situations
This section of the Guide provides users with information on **four (4) key topics** to enhance the implementation of their EOP. These topics are described in the following sections:

- **Information Sharing.** Provides an overview of the *Family Educational Rights and Privacy Act (FERPA)*, *Health Insurance Portability and Accountability Act (HIPAA)* and the implications that these Federal statutes 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*.

### Information Sharing

This section of *A Closer Look* provides an overview of the 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 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 State and Federal 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 prohibit discrimination on the

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9Title II of the ADA prohibits discrimination based on disability by public entities, including public schools.
basis of disability, and generally 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.

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.

Family Educational Rights + Privacy Act (FERPA)

- What Is Family Educational Rights + Privacy Act (FERPA)?
- What Are Education Records?
- Who May Access FERPA-Protected Education Records?
- Balancing Safety + Privacy
  - Health Or Safety Emergency Exception To The Consent Requirement
  - 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 + When May The School Share It?
  - What Information Is Not FERPA-Protected + When May The School Share It?
- Frequently Asked Questions (FAQs) Pertaining To FERPA
- FERPA Guidance + Resources

What Is FERPA?

*Family Educational Rights and Privacy Act (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 (DOE) program (termed “schools” below). FERPA gives parents certain rights with respect to their children’s education records. These rights transfer to

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11See 28 CFR 35.135. 11.

12For more information about applicable civil rights statutes, please visit www.justice.gov/crt, www.ed.gov/ocr or www.ada.gov. Information about appropriate training and management for school resource officers and law enforcement officials in schools may be found at www.cops.usdoj.gov.
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 (FPCO) at DOE administers FERPA.

FERPA protects the rights of parents or eligible students to:

- **Inspect and review** education records.

- Seek to **amend** education records.

- 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 8: 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 ADA ⁴³</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>

⁴³Schools 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 on the basis of disability pursuant to the ADA or the Rehabilitation Act or other civil rights statutes.
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?

According to the law, “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 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:

i. Perform an **institutional service** or function for which the agency or institution would otherwise use employees.

ii. Are under the **direct control** of the agency or institution with respect to the use and maintenance of education records.

iii. 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 re-disclosure 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**.


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 + 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.

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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 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 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.
  - Parties with whom the school shared the PII.

DOE does 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.15

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:

- 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.

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.
- 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.
- 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 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 the event 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.\textsuperscript{16}

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 is 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 email 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.

\textsuperscript{16}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) \url{http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=ae535d41f8bb03bedf6f79634883360f&n=34y1.1.1.1.33&r=PART&ty=HTML#34:1.1.1.1.33.1.132.8}. 
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 local and State 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 (TATs)

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 (TAT) that utilizes the expertise of representatives from mental health service providers, persons familiar with emergency procedures and law enforcement agencies in the community.

The TAT must comply with applicable civil rights and other State and Federal 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 TAT 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), he or she is able to access students’ education records in which he or she has legitimate educational interests. A TAT member who is appropriately designated as a school official may not disclose PII from education records to anyone without consent unless one of the exceptions to consent under FERPA, such as the health or safety emergency exception, applies.

• Security videos

Schools are increasingly using security cameras as a tool to monitor and improve student safety. Images of students captured on security videotapes 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 + When May The School Share It?

Education records are protected by FERPA and schools may generally only share PII those records 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.
Table 9a: EXAMPLES OF FERPA INFORMATION-SHARING REQUIREMENTS

**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 TAT 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 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 the school principal. At this juncture, the 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 a police agency, to protect the health or safety of the principal (in this case). (See also the discussion of TAT 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 also 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 determine whether the student’s parents opted out of the disclosure of directory information.

What Information Is Not FERPA-Protected + 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.)
Table 9b: EXAMPLES OF FERPA INFORMATION-SHARING REQUIREMENTS

Example: Your school contracts with the law enforcement agency in your Parish to bring in an SRO. 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.)

Example: The SRO knows that she may not re-disclose 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 + Protocols, Including Memoranda Of Understanding (MOUs), In Place For Information Sharing + 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 local, State and Federal 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 (FAQs) 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 (DOE). 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 DOE and, therefore, are not subject to FERPA.

Q: Does an interagency agreement with partners such as the local or State 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 is a helpful tool for planning purposes, schools must comply with FERPA 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 does 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 is 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 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 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 re-disclosure of PII from education records; and otherwise meet the school’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 re-disclose 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 re-disclose 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 TAT generally cannot re-disclose, 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 re-disclose 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: DOE and the U.S. Department of Health and Human Services (DHH) 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: Whom should I contact for more information related to FERPA?

A: The DOE's Family Policy Compliance Office (FPCO) is available to respond to any questions about FERPA. For quick responses to routine questions, please email the DOE at FERPA@ed.gov.

For more in-depth technical assistance or a more formal response, 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 State and Federal 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 State and Federal civil rights laws that protect the disclosure of information about students. Schools and their community partners should review guidance from the DOE and the U.S. Department of 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. 17,18

FERPA Guidance + Resources

The FPCO at DOE administers FERPA. FPCO has developed, and continues to develop, extensive guidance pertaining to the implementation of FERPA and emergency situations. 19

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17See Title 28 of the Code of Federal Regulations, Section 35.139.

18In enacting the Americans with Disabilities Act (ADA), Congress relied on School Board of Nassau County, Florida v. Arline, 480 U.S. 273, (1987) to "acknowledged 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.

19For more detailed information or additional guidance, please see the documents below and the FPCO website at www2.ed.gov/fpco.
Health Insurance Portability + Accountability Act Of 1996 (HIPAA)

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 – protects 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).

Privacy Rule

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.

Security Rule

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 (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, consult the guidance and resources below for further information about how HIPAA applies.

HIPAA Guidance + Resources

HHS 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.

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.

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

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20 For more detailed information or additional guidance, please see the HHS OCR website at http://www.hhs.gov/ocr/privacy/index.html and the HHS/DOE HIPAA/FERPA guide at http://www.hhs.gov/ocr/privacy/hipaa/understanding/coveredentities/hipaaferpajointguide.pdf.
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.21

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.
- 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.

School Climate + 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.
- Appropriate facilities and physical surroundings.

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 helps 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 helps 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 helps 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 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 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 is 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 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.  

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 + 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 is comprise of the following:

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

- **Tier 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 addressed more effectively when a school-wide foundation is in place.

- **Tier 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

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22 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).
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.


☐ Promote Social + 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 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](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](http://www.pbis.org).

Active Shooter Situations

Police officers, firefighters and emergency medical services (EMS) technicians who come to a school because of a 9-1-1 call involving **gunfire** face a daunting task. Though the objective remains the same – protect students and staff – the threat of an active shooter incident is **different** than responding to a natural disaster or many other emergencies.

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

Active shooter situations are defined\(^{23}\) as those where an individual is “actively engaged in **killing** or **attempting** to kill people in a confined and populated area.” Unfortunately, schools face active shooter situations as well.\(^{24}\)

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 9-1-1 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,

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\(^{23}\)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.

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 officers arrive on the scene.

**Preparing For An Active Shooter Situation**

- **Plan**

As with any threat or hazard that is included in a school’s EOP, the planning team establishes goals, objectives and courses of action for an *Active Shooter Annex*. These plans are 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 considers 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 is notified** that there is an active shooter on school grounds. This can 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 9-1-1-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 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** is **different** during an active shooter situation than it for a fire.

Additional considerations are included in the **Responding to an Active Shooter and After an Active Shooter Incident** sections below.
☐ Share Information With First Responders

Any planning process is not complete until the school EOP is shared with first responders.

This is equally true for active shooter planning. Sharing information includes site assessment information, building schematics, floor plans and other site-specific information discussed in detail on page 41.

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 active shooter situations. To be prepared for an active shooter incident, schools should train staff, students and families, as appropriate, in what to expect and how to react. If students are involved, select the appropriate exercise considering 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 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.

Table 10: RESPONSIBILITY THRESHOLD

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.

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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. 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.

• 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 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 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, can lead to the disruption of a planned attack. While checklists of

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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**.
- 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 (TATs)**

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.31

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 State and Federal laws. One of the most useful tools a school can develop to identify, evaluate and address these troubling signs is of a **multidisciplinary school TAT**.

For the purposes of consistency and efficiency, a school TAT is 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.

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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 action — 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 (TATs)**.

Even in a K–12 setting, where a designated TAT may not have been established, area **law enforcement officials** 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. Their focus is 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.

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Responding To An Active Shooter Situation

School EOPs should include courses of action that 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 saves valuable time. Depicting scenarios and considering response options in advance assists 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 (3) basic options: run, hide or fight. More recently, this is talked about as evacuate, hide out or take action against the shooter. 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 rarely has 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.33

☐ 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

33As 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.
waited longer to start evacuating than those on unaffected floors.\textsuperscript{34} Similarly, during the Virginia Tech shooting, individuals on campus responded to the shooting with varying degrees of urgency.\textsuperscript{35}

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. These studies highlight this delayed response or denial. For example, some people report hearing firecrackers when in fact they heard gunfire.

Upon recognizing the danger, as soon as it is safe to do so, staff or others must alert responders by contacting 9-1-1 with as clear and accurate information as possible.

\section*{Evacuate (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 evacuate of the building and get far away until you are in a safe location.

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 9-1-1 when safe to do so.
- Let a responsible adult know where they are.

\section*{Hide Out (Hide)}

If running is not a safe option, hide out 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:

\textsuperscript{34} 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 three (3) minutes for occupants from the ground floor to floor 76, and five (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.

• 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.
• Remain in place until given an all clear by identifiable law enforcement officers.

☐ Take Action Against Shooter (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.36

While talking to 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. To be clear, confronting an active shooter should never be a requirement in any school employee’s job description; how each staff member chooses to respond if directly confronted by an active shooter is up to him or her. Further, the possibility of an active shooter situation is not justification for the presence of firearms on campus in the hands of any personnel other than law enforcement officers.

Know What To Expect When 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.37


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

After An Active Shooter Incident

Once the scene is secured, first responders 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 identifies trained personnel who provide assistance to victims and their families. This includes establishing an incident response team (including local first responders and other community partners) that is trained to appropriately assess and triage an active shooter situation (as well as other emergencies), and provide emergency intervention services and victim assistance beginning immediately after the incident and throughout the recovery efforts. This team will integrate with State and Federal resources when an emergency occurs.

Within an ongoing and/or evolving emergency, where the immediate reunification of loved ones is not possible, providing family members with timely, accurate and relevant information is paramount. Having family members wait for long periods of time for information about their loved ones not only adds to their stress and frustration but also escalates 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 include:

- 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.
- 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. See page 50 for a detailed discussion on family notification of missing and injured, or children who have recently been killed.

38 Also see the Functional Annexes Content and Recovery Annex sections of this Guide.
Appendix A: Evacuation Plan

I. Purpose

Evacuation should take place if it is determined that it is safer outside than inside the building (fire, explosion, intruder, hazardous material spill) and staff, students and visitors can safely reach the evacuation location without danger (playground, football stadium, or off-site location in the community).

Individuals with disabilities who are self-sufficient under normal circumstances may have to rely on the help of others in an emergency. The quick, safe and efficient evacuation of an entire school during an emergency can only be accomplished through careful planning and preparation. When planning and implementing your building’s Emergency Evacuation Plan, incorporate the following suggested procedures to address any special needs of disabled individuals.

II. Responsibilities

Designated staff members, including teachers and bus drivers, participate in the development, implementation and evaluation of this procedure.

III. Procedures

A. Actions To Take Prior To Emergency Situations

At the beginning of each school year, each school administration should compile a list of those disabled individuals who may require assistance in evacuating the building. Update this list at least monthly to reflect any changes that occur during the school year.

- Compile a list of all students and employees with disabilities that might affect their ability to evacuate safely.
- Prepare schedules and classroom assignments that locate individuals with mobility impairments in areas closest to an accessible exit or an area of rescue assistance. Institute other scheduling changes that will increase the safety of evacuations.
- Develop a master schedule showing the location(s) of those disabled students and employees who require evacuation assistance.

Each school should maintain a master schedule showing the assigned locations of all persons with disabilities who require assistance to evacuate the building. Mark the locations of each affected student and employee on a floor plan diagram. Update this schedule to reflect any changes that occur during the course of the year. This schedule should be maintained in the main office or at any other assigned locations for emergency preparedness records.
1. Determine Special Needs

Determine what assistance, if any, each disabled individual may require to safely evacuate the building. When determining the most effective methods of evacuation, consideration should be given to the size and weight of the individual, distance required to reach the assembly area, and obstacles such as steps, curbs, streets, intersections, traffic, etc.

- Determine the **number of people** needed to provide the necessary assistance for every disabled individual.

- Determine any **special medical needs** that students and employees may require. Determine if any special equipment or apparatus must accompany the students or employees when evacuated from the building. Compile a list of these special needs and update it as necessary.

- Inform **staff members** of their **responsibilities**.

- Inform staff members of their responsibilities for assisting with the evacuation of **disabled individuals**. Consider the nature and degree of the disabling condition when determining the most appropriate assisting staff members.

**For students**—In an emergency, the responsibility for assisting the disabled student should be assigned to the **teacher or person in charge** of the student at that time. As the student changes locations throughout the school day, responsibility will shift to the next person in charge of the student. School administrators and/or the school nurse may also be appropriate staff members to assist in evacuations.

**For employees**—Responsibility for providing evacuation assistance for a disabled employee should be assigned to the **staff member** who works closest to the employee. Again, this responsibility will shift as the employee works in different locations of the building throughout the day.

**For visitors**—Responsibility for providing evacuation assistance to visitors should be assigned to staff members already assigned the duty of **checking areas** of the building (such as lavatories) to make sure that all areas are clear during an emergency. Given unpredictable visitors, those assisting them may not be able to evacuate them on their own. In such cases, the staff member should assist the visitor to an Area of Rescue Assistance and seek assistance from other staff members or from professional rescue personnel.

- Assign an administrative staff member to inform any **emergency responders** (fire fighters, police, etc.) of the **number, identity and locations** of any disabled individuals who could not be evacuated from the building and/or those who require special medical attention. Representatives of the school and emergency responders should meet at a prearranged location.

- Assign **backup staff members** for each of these responsibilities.
2. Practice Emergency Evacuation Procedures

When conducting monthly evacuation drills, incorporate all aspects of your evacuation plan for the disabled in at least during two (2) drills a year.

During these drills, it may not be advisable to evacuate all disabled persons from the building. In certain cases, the potential risk of injury may outweigh the benefits of conducting the drill. Discuss these health or safety concerns with local fire department representatives. Under these special circumstances, during drills only evacuate those individuals to the appropriate designated Areas of Rescue Assistance.

- Evaluate the effectiveness of each evacuation drill. Include all students and staff members involved in using the disabled evacuation procedures. Make adjustments and recommend necessary changes to the established procedures in consultation with the appropriate crisis agencies.

- Discuss and review this evacuation procedure frequently with all staff members.

- Review and update your building’s evacuation plan.

- Keep your plan current to reflect changes in your building that might impact on the safe evacuation of your building. At minimum, building administrators must review and update their building’s evacuation plan on an annual basis.

A. Actions To Take During Emergency Situations

1. School Incident Commander/Principal

- Call or designate another to immediately call public safety (9-1-1) (police, fire and emergency responders) to give notice the school has been evacuated.

- Notify appropriate district staff that an evacuation of the school has occurred.

- Communicate the need to evacuate the building or a specific area of the building to the building staff and other occupants by activating the fire alarm or by a public address system or bullhorn. Make the following announcement:

```
YOUR ATTENTION, PLEASE. WE NEED TO EVACUATE THE BUILDING.
TEACHERS ARE TO TAKE THEIR STUDENTS TO THEIR DESIGNATED ASSEMBLY AREA.
TEACHERS, TAKE YOUR CLASS ROSTER AND TAKE A HEADCOUNT AT THE ASSEMBLY AREA.
```

- Determine evacuation routes based on location of the incident and type of emergency.
- Communicate changes in evacuation routes based on location and type of emergency.
- Designate staff with assigned radios and/or cell phones to assist in evacuation procedures.
- Monitor the situation and provide updates and additional instructions as needed.
- During inclement weather, consider requesting buses for sheltering students.
- Communicate when it is safe to re-enter the building or re-occupy a section of the school by bell system, radio transmission, public address system, designated staff or bullhorn.

2. Teachers + Staff

- Instruct students to exit the building using the designated emergency exit routes or as directed by the school incident commander/principal. Emergency exit routes should be diagramed on the school floor plan drawing posted near the light switch inside each room.
- Use a secondary route if the primary route is blocked or hazardous. Exit routes and the location of the inside the building evacuation location will be selected and communicated by the school incident commander/principal at the time of the emergency and the evacuation.
- Help those needing special assistance.
- Do not lock classroom doors when leaving, close door and turn off lights. Do not stop for student or staff belongings.
- Take class roster, phone lists, first-aid kit and other emergency supplies with you.
- Check the bathrooms, hallways and common areas for visitors, staff or students while exiting.
- Go to designated evacuation assembly area (minimum of 50 feet from building is required in fire evacuation and 1000 feet from building for bomb threat, chemical spill inside building or other directed evacuations).
- When outside the building or inside the building evacuation location, check for injuries.
- Account for all students. Immediately report any missing or injured students to the school incident commander/principal.
- Wait for additional instructions.

3. Office Staff

- Take visitor log and student sign-out sheet to evacuation assembly area.
- Gather headcount information from teachers and inform the school incident commander/principal.
4. Executing Emergency Evacuation Procedures

- Never use elevators, chair lifts or any other system requiring electrical power in an emergency.

- In most cases, delay exiting persons with disabilities until the exit route is clear of traffic. This is for the disabled person’s safety as well as for the safety of others. For example, where a person will be carried down sets of stairs, it is much safer to wait until the stairs are free of quicker moving traffic.

- Ensure that appropriate staff members account for all individuals with disabilities immediately after notification that an emergency exists. Inform the appropriate administrator immediately of anyone who cannot be accounted for.

- Ensure that appropriate staff members assist individuals with disabilities in moving to their predetermined Areas of Rescue Assistance and assist them in exiting the building.

- Ensure that appropriate staff members assisting individuals with disabilities remain with them until the emergency is over.

- Upon arrival of emergency responders, ensure that an administrative staff member meets with them at a prearranged location with information on number, identity and locations of individuals with disabilities who are still in the building. Also, provide a copy of the list that describes any special medical needs that students or employees may have as well as any special equipment or apparatus that may be needed.
# Appendix B: School EOP Development Checklist

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<tr>
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<td>c. Health Insurance Portability And Accountability Act Of 1996 (HIPAA)</td>
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</tbody>
</table>
### Step 5: Plan Preparation + Review + Approval

1. Format The Plan
2. Write The Plan
3. Review The Plan
4. Approve + Share The Plan

### Step 6: Plan Implementation + Maintenance

1. Train Stakeholders
   - a. Hold A Meeting
   - b. Visit Evacuation Sites
   - c. Give Involved Parties Appropriate And Relevant Literature On The Plan, Policies And Procedures
   - d. Post Key Information Throughout The Building
   - e. Familiarize Students And Staff With The Plan And Community Partners
   - f. Train Staff On The Necessary Skills To Fulfill Their Roles
2. Exercise The Plan
   - a. TableTop Exercises
   - b. Drills
   - c. Functional Exercises
   - d. Full-scale Exercises
3. Review + Revise + Maintain The Plan

### Activity - Plan Content (Basic Plan)

1. Introductory Material
   - a. Cover Page
   - b. Promulgation and Documenter Signature Page
   - c. Approval and Implementation Page
   - d. Record Of Changes
   - e. Record Of Distribution
   - f. Table Of Contents (TOC)
   - g. Campus and Building Information (Maps, Plans, Etc)
   - h. School Population
2. Purpose + Situation Overview
3. Concept Of Operations (CONOPs)
4. Organization + Assignment Of Responsibilities
5. Direction + Control + Coordination
6. Information Collection + Analysis + Dissemination
7. Training + Exercises
8. Administration + Finance + Logistics
9. Plan Development + Maintenance
10. Authorities + References

### Activity – Functional Annexes Content

1. Evacuation Annex
2. Lockdown Annex
3. Shelter-In-Place Annex
4. Accounting For All Persons Annex
5. Communications + Warning Annex
6. Family Reunification Annex
7. Continuity Of Operations (COOP) Annex
8. Recovery Annex
   a. Academic recovery
   b. Physical recovery
   c. Fiscal recovery
   d. Psychological and emotional recovery
9. Public Health + Medical + Mental Health Annex
10. Security Annex
11. Other

### Activity – Threat + Hazard Specific Annexes

1. Natural Hazards
2. Technological Hazards
3. Biological Hazards
4. Adversarial + Incidental + Human-caused Threats
5. Other

### Activity – A Closer Look

1. Information Sharing
   a. Family Educational Rights and Privacy Act (FERPA)
   b. Health Insurance Portability and Accountability Act (HIPAA)
2. Psychological First Aid For Schools (PFA-S)
3. School Climate + Emergencies
   a. Conduct A Comprehensive Needs Assessment
   b. Use Multi-Tiered Interventions + Supports
   c. Promote Social + Emotional Competencies
4. Active Shooter Situations
   a. Preparing For + Active Shooter Situation
      i. Plan
      ii. Share Information With First Responders
<table>
<thead>
<tr>
<th>b. Exercises</th>
</tr>
</thead>
<tbody>
<tr>
<td>c. Preventing + Active Shooter Situation</td>
</tr>
<tr>
<td>d. Threat Assessment Teams (TATs)</td>
</tr>
<tr>
<td>e. Responding To An Active Shooter Situation</td>
</tr>
<tr>
<td>i. Respond Immediately</td>
</tr>
<tr>
<td>ii. Evacuate (Run)</td>
</tr>
<tr>
<td>iii. Hide Out (Hide)</td>
</tr>
<tr>
<td>iv. Take Action Against Shooter (Fight)</td>
</tr>
<tr>
<td>f. Interacting With First Responders</td>
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<tr>
<td>g. After An Active Shooter Incident</td>
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</table>
# Appendix C: High-Quality EOP FINAL Plan Review Checklist + CrossWalk

## School Information
- **School**: ____________________________
- **Address**: __________________________
- **School Point of Contact (POC)**: ____________________________
- **POC Phone**: ____________________________
- **Cell**: ____________________________
- **POC Email**: ____________________________

## Items to Include

<table>
<thead>
<tr>
<th>ITEMS TO INCLUDE</th>
<th>[SCHOOL NAME] EOP</th>
<th>PAGE #</th>
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<tbody>
<tr>
<td><strong>Plan Content</strong></td>
<td></td>
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<tr>
<td>• Cover Page</td>
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<tr>
<td>• Promulgation Document Signature Page</td>
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<tr>
<td>• Approval + Implementation Page</td>
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<td>• Record of Changes</td>
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<tr>
<td>• Record of Distribution (including school personnel and community partners)</td>
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<tr>
<td>• Schematics</td>
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<td>o Floor Plans</td>
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<td>o Annotated Evacuation Routes</td>
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<tr>
<td>o Shelter Locations</td>
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<td></td>
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<tr>
<td>o Fire Alarm Pull Stations</td>
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<tr>
<td>o Special Needs Populations</td>
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<tr>
<td>• Fire Hydrants</td>
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</tr>
<tr>
<td>• Fire Extinguishers</td>
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<td></td>
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<tr>
<td>• First-aid Kits</td>
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<td></td>
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<tr>
<td>• Hazardous Materials Storage</td>
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<tr>
<td>• Utility Shutoffs</td>
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<tr>
<td>Department or Role</td>
<td>Responsibilities</td>
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<td></td>
</tr>
<tr>
<td>Administration</td>
<td>Responsibilities</td>
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<tr>
<td>Teachers + Specialists</td>
<td>Responsibilities</td>
<td></td>
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<tr>
<td>Office Support Staff</td>
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<tr>
<td>Cafeteria Workers</td>
<td>Responsibilities</td>
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<tr>
<td>Maintenance + Custodial Staff</td>
<td>Responsibilities</td>
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</tr>
<tr>
<td>Other (specify)</td>
<td>Responsibilities</td>
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</table>

- **Americans with Disabilities Act (ADA) Access Statement of Compliance**
  - □

- **Family Educational Rights and Privacy Act (FERPA) and Health Insurance Portability and Accountability Act (HIPAA) Statements of Compliance**
  - □

**Basic Plan**

- **Table of Contents (TOC)**
  - □

- **Purpose + Situation Overview**
  - □

- **Risk Assessment Worksheet**
  - □

- **Concept of Operations (CONOPs) (including who has authority to activate the plan)**
  - □

- **Organization + Assignment Responsibilities (including memorandums of understanding [MOUs])**
  - □

- **Direction + Control + Coordination**
  - □

- **ICS Structure Used**
  - □

- **Who has Control of Equipment, Resources and Supplies**
  - □

- **Relationship between School EOP and District and/or Parish EOP**
  - □

- **Information Collection + Analysis + Dissemination**
  - □

- **Communications Plan**
  - □

- **Training + Exercise Plan/Schedule**
  - □

- **Administration + Finance + Logistics**
  - □

- **Plan Development + Maintenance**
  - □

- **Authorities + References**
  - □

**Functional Annexes**

- **Accounting For All Persons**
  - □

- **Communications + Warnings**
  - □

- **COOP**
  - □

- **Evacuation**
  - □

- **Family Reunification**
  - □

- **Lockdown**
  - □

**NOTE:** Individual school EOPs may have more, less and/or different annexes than shown here. Annexes are customized to the needs of the school.
Although not required by State or Federal law, it is recommended as a best practice for the school superintendent to review the school EOP with the Parish OHSEP Director.

<table>
<thead>
<tr>
<th>Threat- + Hazard- Specific Annexes</th>
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<tbody>
<tr>
<td>• Natural Hazards</td>
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<tr>
<td>o Earthquake</td>
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<td>o Tornado</td>
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<tr>
<td>o Lightning</td>
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<td>o Flood</td>
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<td>o Wildfires</td>
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<td>o Extreme Temperature</td>
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<td>o Landslides or Mudslide</td>
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<td>o Tsunami</td>
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<td>o Volcanic Eruption</td>
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<td>o Winter Precipitation</td>
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<td>o Explosions or Accidental</td>
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<tr>
<td>Release of Toxins From an</td>
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<td>Industrial Plant</td>
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<td>o Accidental Release of</td>
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<tr>
<td>Hazardous Materials within</td>
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<td>the School</td>
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<td>o Hazardous Materials</td>
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<td>o Industrial Plant or</td>
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<td>o Other External Source</td>
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<td>o Radiological Release from</td>
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<td>Nuclear Power Stations</td>
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<td>o Dam Failure</td>
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<td>o Power Failure</td>
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<tr>
<td>o Water Failure</td>
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<td>• Biological Hazards</td>
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<td>o Infectious Diseases</td>
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<td>o Contaminated Food Outbreaks</td>
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<td>o Toxic Materials in School Labs</td>
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<td>• Adversarial Incidental + Human-caused Threats</td>
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<td>o Cyber Attacks</td>
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<td>o Criminal Threats or Actions</td>
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<td>o Gang Violence</td>
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<tr>
<td>o Suicide</td>
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