Operational Services

Administrative Procedure - Comprehensive Safety and Security Plan

Contents:

A. **Safety- and Security-Related Administrative Procedures and Forms**
B. **Definitions**
C. **District Safety Coordinator and Safety Team; Responsibilities**
D. **Safety Team Meetings**
E. **Annual Safety Review**
F. **School Safety Drill Plan**
G. **School Emergency Operations and Crisis Response Plan (SEOCRP)**
H. **Material to be Included in Each SEOCRP**
I. **Managing Communications During and About an Emergency or Crisis**
J. **Required Notices**
K. **Resources**

Attachment A – School Emergency Operations and Crisis Response Plan Format

Attachment B – Alignment of Comprehensive Safety and Security Plan with Targeted School Violence Prevention Program

A. **Safety and Security Related Administrative Procedures and Forms**

Administrative material on school safety and security may be implemented under this plan, including, without limitation, any in the following list.

4:60-AP3	*Criminal History Records Check of Contractor Employees*
4:110-AP1	*School Bus Post-Accident Checklist*
4:110-AP3	*School Bus Safety Rules*
4:110-E	*Emergency Medical Information for Students Having Special Needs or Medical Conditions Who Ride School Buses*
4:160-AP	*Environmental Quality of Buildings and Grounds*
4:170-AP1, E1	*Accident or Injury Form*
4:170-AP1, E2	*Memo to Staff Members Regarding Contacts by Media About a Crisis*
4:170-AP2	*Routine Communications Concerning Safety and Security*
4:170-AP2, E1	*Letter to Parents/Guardians Regarding Student Safety*
4:170-AP2, E2	*Letter to Parents/Guardians Regarding the Dangers of Underage Drinking*
4:170-AP2, E3	*Letter to Parents/Guardians About Disruptive Social Media Apps; Dangers*
4:170-AP4	*National Terrorism Advisory System*
4:170-AP5	*Unsafe School Choice Option*
4:170-AP6	*Plan for Responding to a Medical Emergency at a Physical Fitness Facility with an AED*
4:170-AP6, E1	*School Staff AED Notification Letter*

B. **Definitions**

SEOCRP is a School Emergency Operations and Crisis Response Plan (formerly *Emergency Operations Plan*). Each school or facility has an SEOCRP.

First responders are local law enforcement, fire department officials, emergency medical services personnel, and any other entity in the community that provides emergency assistance.

Incident means any event or occurrence that threatens the safety and security of individuals on school property or at school events.

District Safety Coordinator is the individual who manages the District's safety and security efforts.

Safety Team is the Superintendent's administrative committee that is responsible for its respective SEOCRP. Each school or facility has a Safety Team.

SRO means school resource officer, defined as a law enforcement officer who has been primarily assigned to a school or school district under an agreement with a local law enforcement agency.

C. **District Safety Coordinator and Safety Team; Responsibilities**

The Superintendent appoints an administrator to be the **District Safety Coordinator** to manage the District's safety and security efforts and serve as the District's spokesperson during a crisis or emergency.

The Superintendent appoints members of a **Safety Team** for each school or facility, with input from the District Safety Coordinator and each school's Building Principal. The Building Principal and SRO, if any, shall be members of the Safety Team.

The District Safety Coordinator and each school's Safety Team are responsible for developing, implementing, and maintaining a **SEOCRP** with the following objectives as explained in FEMA's *Guide to Developing High-Quality School Emergency Operations Plans (2013),* at www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf:

- **Prevention**, meaning the capabilities needed to avoid, deter, or stop an incident. Prevention requires the use of: (a) research-based principles of safety and security, (b) an ongoing analysis of data (e.g., incident and inspection reports, complaints, suggestions), and (c) an ongoing program for identifying and evaluating unreasonable risks.
- **Protection**, meaning the capabilities needed to secure schools against 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**, meaning the capabilities needed to reduce the likelihood or impact of an incident or emergency. Mitigation requires, among other things, high-quality training and instruction programs to execute and improve the SEOCRP.
- **Response**, meaning the capabilities needed to stabilize an incident, save lives, establish a safe and secure environment, and facilitate the transition to recovery. Effective response requires, among other things, a clear, rapid, factual, and coordinated system of internal and external communication.
- **Recovery**, meaning the capabilities needed to restore the learning environment.

D. Safety Team Meetings

The District Safety Coordinator chairs the Safety Team meetings. The meetings are held as determined by the District Safety Coordinator. **At least once annually, the Safety Team shall request the participation of first responders and the Board Attorney in a meeting to review and provide input.** The following matters are suggested agenda items:

- Review the agenda and determine who will take meeting notes.
- Review the notes from the previous meeting.
- Discuss the status of previously submitted recommendations.
- Receive, review, and discuss individual and Safety Team committee reports and recommendations concerning one or more items below.
  1. Safety and security data from incidents, investigations, audits, etc.
  2. Recommendations received from stakeholders and first responders
  3. Emerging issues
  4. Status of the SEOCRP
  5. Status of the safety and security communication system
  6. Status of training programs
  7. Status of programs to build awareness of, and support for, the SEOCRP (contests, posters, drives, etc.)
- Clarify information and recommendations for a report to the Superintendent.
- Confirm the Safety Team meeting schedule and review upcoming meeting dates.

E. Annual Safety Review

The District Safety Coordinator facilitates the annual safety review meeting conducted by the School Board or its designee, as required by 105 ILCS 128/25, amended by P.A. 101-455, and 128/30. During the annual safety review, the law requires the School Board or its designee to "review each school building's emergency and crisis response plans, protocols, and procedures, including procedures regarding the District's threat assessment team, and each building's compliance with the school safety drill programs." If the school board uses a designee, it should preferably be someone other than the District Safety Coordinator to assure an unbiased audit. The District Safety Coordinator assists the Board or its designee to comply with annual review requirements, including without limitation, the completion of a report certifying that the review took place. See ISBE's website for an annual review checklist and report at www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx. The Open Meetings Act (OMA) allows the Board to enter closed session to discuss security procedures, school building safety and security, and the use of personnel and equipment to respond to an actual, a threatened, or a reasonably potential danger to the safety of employees, students, staff, the public, or public property (5 ILCS 120/2(c)(8)). Consult the Board Attorney for assistance with this OMA exception.

F. **School Safety Drill Plan**

The School Safety Drill Act (105 ILCS 128/, amended by P.A.s 100-996 and 101-455) and any implementing State administrative rules shall supersede this procedure in the event of a conflict.

The Building Principal shall keep the Superintendent or designee informed of when drills are scheduled and/or accomplished. ISBE's fillable *School Drill Documentation* form for documenting the completion of minimum drill requirements may be used (see www.isbe.net/Documents/91-02_school_drill_documentation.pdf).

Each academic year, each school building that houses students must conduct a minimum of:

1. **Three school evacuation drills.** These drills prepare students and personnel for situations that occur when conditions outside of a school building are safer than inside a school building. Evacuation may be necessary depending on the circumstances. They may include a fire, suspicious item or person, or incident involving a hazardous material, including but not limited to a chemical, incendiary, explosive, and bomb threat.

    One of the three school evacuation drills requires the participation of the appropriate local fire department, unless waived as provided below. A date is selected according to the following timeline:

    - No later than **September 1** of each year, the local fire department or fire district must contact the Building Principal in order to make arrangements.

    - No later than **September 14** of each year, the Building Principal or designee and the local fire department or fire district may agree to waive the provisions concerning participation by the local fire department in a school evacuation drill.

    - No later than **September 15** of each year, each Building Principal or designee must contact the responding local fire official and propose to the local fire official four dates within the month of October, during at least two different weeks of October, on which to hold the drill. The fire official may choose any of the four available dates, and if he or she does so, the drill occurs on that date.

    - Alternatively, the Building Principal or designee and the local fire official may, by mutual agreement, set any other date for the drill, including a date outside of the month of October.

- If the fire official does not select one of the four offered dates in October or set another date by mutual agreement, the school does not need to include the local fire service in one of its mandatory school evacuation drills.

After a drill in which the local fire service participated, the Building Principal should request certification from the local fire service that the school evacuation drill was conducted. Additional school evacuation drills for fire incidents may involve the participation of the appropriate local fire department. In addition, schools may conduct additional school evacuation drills to account for other evacuation incidents, including without limitation, suspicious items or bomb threats.

2. **One school bus evacuation drill.** This drill prepares students and school personnel for situations that occur when conditions outside of the bus are safer than inside the bus. Evacuation may be necessary, depending on the circumstances, in the event of a fire, suspicious items, and incidents involving hazardous materials. Schools may conduct additional bus evacuation drills.

   In addition, instruction on safe bus riding practices should be provided for all students. See 4:110-AP3, *School Bus Safety Rules*.

3. **One severe weather and shelter-in-place drill.** This drill prepares students for situations involving severe weather emergencies or the release of external gas or chemicals. Severe weather and shelter-in-place drills must address and prepare students and school personnel for possible tornado incidents. Other drills shall be based on the needs and environment of particular communities, including severe weather (such as tornadoes, wind shears, lightning, and earthquakes), incidents involving hazardous materials, and incidents involving weapons of mass destruction.

4. **One law enforcement drill.** This drill addresses a school shooting incident and evaluates the preparedness of school personnel and students for situations calling for the involvement of law enforcement when there is an active threat or an active shooter within a school building. A law enforcement drill must occur no later than 90 days after the first day of each school year. This drill must be conducted: (a) according to the District's emergency operations and crisis response plan(s), (b) on days and times when students are normally present in the school building, and (c) with the participation of all school personnel and students present at school at the time of the drill, except for those exempted at the discretion of administrators or school support personnel. The appropriate local law enforcement agency must observe administration of the drill. In addition, a law enforcement drill must meet each of the following criteria:

   - During each calendar year, the appropriate local law enforcement agency contacts the Building Principal to request participation in the law enforcement drill. The Building Principal and the local law enforcement agency shall set, by mutual agreement, a date for the drill.

   - The drill involves the onsite participation of the local law enforcement agency, provided that an agreeable date can be reached between the Building Principal and the local law enforcement agency. If the parties cannot reach an agreeable date, the school shall hold the drill without participation from the local law enforcement agency.

   - After a drill in which local law enforcement participated, the Building Principal should request a certification from local law enforcement that the law enforcement drill was conducted. The local law enforcement agency shall also notify the school of any deficiencies noted during the drill.

The District Safety Coordinator, in cooperation with the Building Principal, shall encourage local law enforcement agencies to establish a school walk-through program. This program encourages local law enforcement officials to walk through school properties during their patrols with the goal of increasing security (school districts are encouraged, but not mandated, to do this by House Resolution 153 (98th General Assembly, 2013)).

G. School Emergency Operations and Crisis Response Plan (SEOCRP)

Each Safety Team shall develop, implement, and maintain a SEOCRP using the process below, as explained in FEMA's *Guide to Developing High-Quality School Emergency Operations Plans (2013),* at www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf:

1. Develop a schedule and invite the participation of first responders.
2. Identify threats and hazards, assess risks, and prioritize threats and hazards.
3. Determine goals and objectives.
4. Develop, review, evaluate, and maintain the SEOCRP.
5. Share the SEOCRP with stakeholders and train them. This includes, without limitation, having the SEOCRP accessible in a digital format.

Each SEOCRP shall be in the format suggested by and explained in FEMA's *Guide for Developing High-Quality School Emergency Operations Plans (2013)*, at www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf. See the **Attachment** to this procedure.

H. Material to be Included in Each SEOCRP

Each school Safety Team annually gathers and/or renews the following material for inclusion in the SEOCRP:

1. District-level Targeted School Violence Prevention Plan. See Board policy 4:190, *Targeted School Violence Prevention Program*, and 4:190-AP1, *Targeted School Violence Prevention Program*.

2. Building-level Threat Assessment Team procedures. See 4:190-AP2, *Threat Assessment Team (TAT)*.

3. Building evacuation protocol. The Building Principal or designee shall: (a) keep a comprehensive evacuation map - describing main and alternate routes - in the main office, (b) post signs containing main and alternate evacuation routes for each occupied area in a conspicuous place, preferably near the exit, (c) prepare evacuation plans for outdoor areas (playgrounds and stadiums), and (d) keep all staff informed of the evacuation plans.

4. Documents concerning safety drills. The Principal shall schedule, execute, and document safety drills as per the School Safety Drill Act (105 ILCS 128/, amended by P.A.s 100-996 and 101-455) and this procedure.

5. Maps and layouts, including: (a) campus map, (b) building floor plan, (c) location of first aid kits, AEDs, and fire extinguishers, and (d) map or plan describing the areas to be used in the event of an emergency or crisis for triage, emergency helicopter landing, media center, non-victim students, and parents/guardians. The Safety Team or Principal shall annually give a copy of these to first responders.

6. A protocol to secure a list of people present in the building at any time.

7. Tornado response plan, including a map showing tornado wall locations (105 ILCS 128/25).

8. Carbon monoxide alarm or detector activation plans, protocols and procedures (105 ILCS 5/10-20.57 and 430 ILCS 135/).

9. The safety equipment's maintenance schedule and the person(s) responsible.

10. An emergency early dismissal protocol.

11. A plan for inviting warnings or tips, e.g., a hotline or website for individuals to make anonymous tips.

12. A protocol for student supervision in the event of an emergency or crisis.

13. A safety patrol plan (105 ILCS 5/10-22.28).

14. Bicycle use rules.

15. Roadway and parking rules.

16. Procedures on student illness and injuries at school and school events (23 Ill.Admin.Code §1.530(c)).

17. A plan for giving students instructions on safe school bus riding practices, including the operation and use of emergency doors and windows (as a means of escape), seat belts, and fire extinguisher (105 ILCS 128/20(b)). The District's parent-teacher advisory committee, in cooperation with school bus personnel, establishes and maintains bus safety rules (105 ILCS 5/10-20.14). See 4:110-AP3, *School Bus Safety Rules*.

18. Safety and security related administrative material. See section A, above.

19. The location of any door security locking means and the use of the locking and unlocking means from within and outside the room(s) (105 ILCS 5/10-20.69 (final citation pending), added by P.A. 101-548).

20. Other documents identified by the Safety Team.

I. **Managing Communications During and About an Emergency or Crisis**

The District Safety Coordinator, with assistance from the Safety Team, is responsible for compiling information and preparing communications concerning an emergency or crisis. The District Safety Coordinator serves as the spokesperson during a crisis or emergency. All District communications should come from this source to ensure accuracy, creditability, and compliance with laws granting confidentiality to student records.

The spokesperson shall follow best practices for spokespersons during an emergency or crisis and receive training on public relations. The Board Attorney serves as a resource to the spokesperson. The objective is:

- To provide the maximum amount of verified information to staff members, students' family members, and the media as quickly as possible,

- While simultaneously respecting student privacy and complying with laws granting confidentiality to student records (Ill. School Student Records Act, 105 ILCS 10/; Family Educational Rights and Privacy Act, 20 U.S.C. §1232g). See 7:340-AP1, *School Student Records*.

All staff members are requested to refrain from spreading information about an emergency or crisis unless the information is from the District Safety Coordinator. All inquiries should be directed to the spokesperson.

Everyone in the school community can positively affect an emergency or crisis situation by:

1. Avoiding speculation as to the cause.

2. Avoiding allocation of blame.

3. Helping school and law enforcement officials gather the facts.

4. Sticking to the facts during discussions.

5. Deferring all media requests to the spokesperson.

6. Comforting and supporting each other.

J. Required Notices

A school staff member shall immediately notify the Building Principal when he or she:

1. Observes any person in possession of a firearm on or around school grounds; however, such action may be delayed if immediate notice would endanger students under his or her supervision. 105 ILCS 5/10-27.1A(a).

2. Has reason to suspect that any person on school grounds is or was involved in a drug-related incident. 105 ILCS 5/10-27.1B.

3. Observes an attack on any staff member or is subject to an attack. 105 ILCS 5/10-21.7

Upon receiving a report on any of the above, the Building Principal or designee shall immediately notify local law enforcement. See 3:60-E, *Event Reporting and Notice Requirements for Building Principals Concerning School Safety and Security*. In addition, he or she must notify the Superintendent and, within one to three days of the incident's occurrence, one or both of them must notify the Ill. Dept. of State Police (ISP). Notification to the ISP may be accomplished using ISBE's web-based School Incident Reporting System (SIRS) to report incidents electronically. SIRS is available at www.isbe.net/Pages/School-Incident-Reporting-System.aspx or by going to ISBE's home page and accessing the District's Web Application Security (IWAS) account.

K. Resources

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center; Guides for Developing Emergency Operations Plans www.rems.ed.gov/EOPGuides.aspx

Guide for Developing High-Quality School Emergency Operations Plans: At a Glance www.rems.ed.gov/K12GuideForDevelHQSchool.aspx

Guide for Developing High-Quality School Emergency Operations Plans www.rems.ed.gov/docs/REMS_K-12_Guide_508.pdf

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center www.rems.ed.gov/toolbox.aspx

ALICE (Alert, Lockdown, Inform, Counter, Evacuate) Training Institute www.alicetraining.com

SBE/OSFM All Hazard Preparedness Guide for Illinois Schools www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx

Illinois Emergency Management Agency (IEMA) www2.illinois.gov/ready/Pages/default.aspx

Schools/Campus - Resources www2.illinois.gov/ready/plan/Pages/Schools.aspx

School Safety Information Sharing Program (SSISP) www2.illinois.gov/ready/plan/Pages/Schools.aspx

Illinois Terrorism Task Force www2.illinois.gov/iema/ITTF/Pages/default.aspx

National Association of School Psychologists (NASP) - Recommendations for Comprehensive School Safety Policies www.nasponline.org/resources-and-publications/resources/school-safety-and-crisis

U.S. Secret Service (USSS) Active Shooter Related Research Prior Knowledge of Potential School-Based Violence: Information Students Learn May Prevent a Targeted Attack www.secretservice.gov/data/protection/ntac/bystander_study.pdf

Bomb Threat Response Planning Tool, developed by the U.S. Dept. of Justice's Bureau of Alcohol, Tobacco, Firearms and Explosives and the U.S. Dept. of Education's Office of Safe and Drug Free Schools www.threatplan.org/default.htm

School Crisis Guide - Help and Healing in a Time of Crisis, published by NEA Health Information Network www.nea.org/assets/docs/NEA%20School%20Crisis%20Guide%202018.pdf

Attachment A

School Emergency Operations and Crisis Response Plan Format

<u>Basic Plan</u>

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

<u>Functional Annexes</u>

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

1. Communications
2. Evacuation
3. Shelter-in-Place
4. Lockdown
5. Accounting for All Persons

6. Reunification
7. Continuity of Operations (COOP)
8. Security
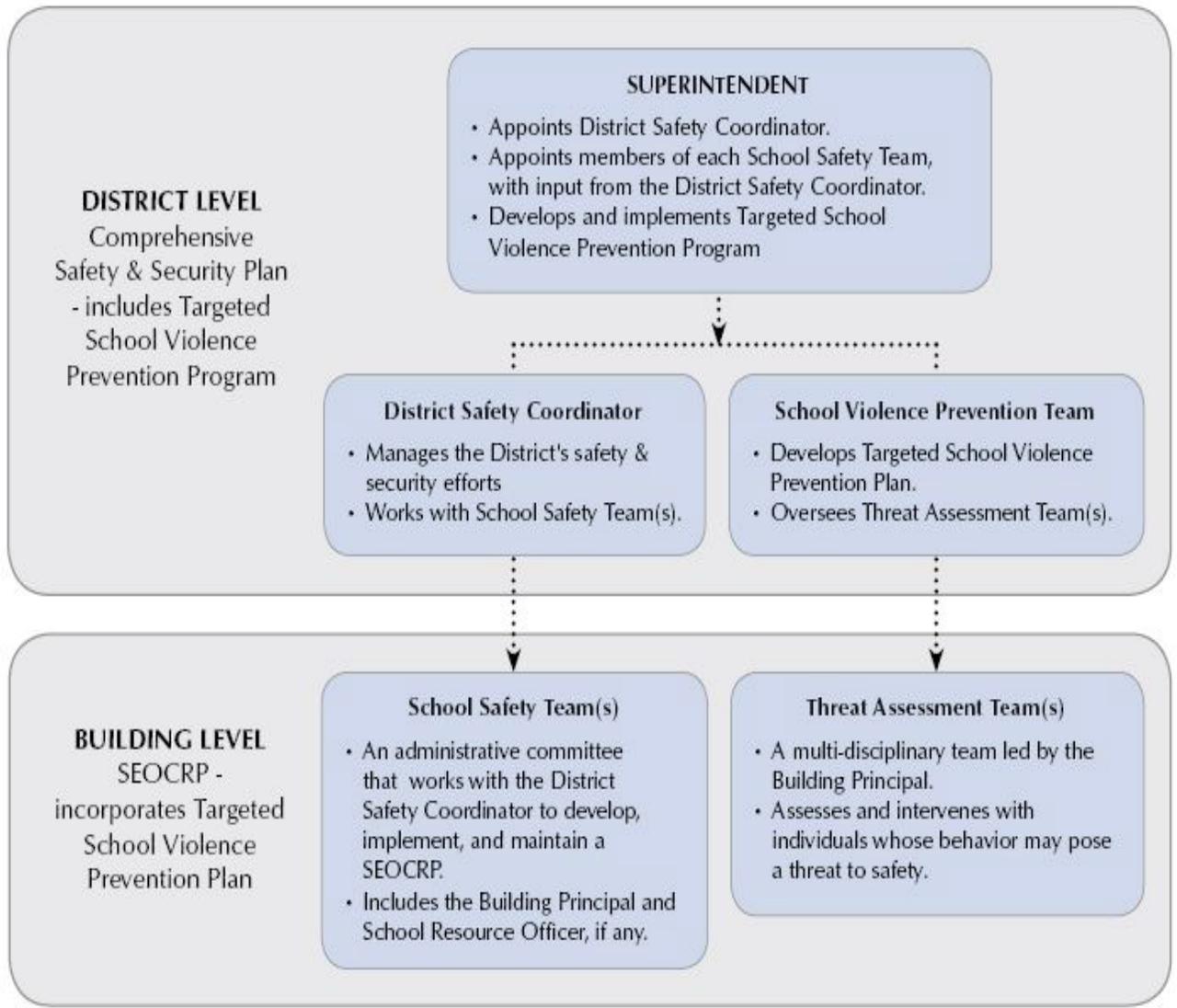9. Recovery
10. Health and Medical

Threat- or Hazard-Specific Annexes

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

1. Hurricane or Severe Storm
2. Earthquake
3. Tornado
4. Hazardous Materials Incident

5. Mass Casualty Incident
6. Active Shooter
7. Pandemic or Disease Outbreak

Attachment B

Alignment of Comprehensive Safety and Security Plan with Targeted School Violence Prevention Program

DISTRICT LEVEL
Comprehensive Safety & Security Plan - includes Targeted School Violence Prevention Program

SUPERINTENDENT
- Appoints District Safety Coordinator.
- Appoints members of each School Safety Team, with input from the District Safety Coordinator.
- Develops and implements Targeted School Violence Prevention Program

District Safety Coordinator
- Manages the District's safety & security efforts
- Works with School Safety Team(s).

School Violence Prevention Team
- Develops Targeted School Violence Prevention Plan.
- Oversees Threat Assessment Team(s).

BUILDING LEVEL
SEOCRP - incorporates Targeted School Violence Prevention Plan

School Safety Team(s)
- An administrative committee that works with the District Safety Coordinator to develop, implement, and maintain a SEOCRP.
- Includes the Building Principal and School Resource Officer, if any.

Threat Assessment Team(s)
- A multi-disciplinary team led by the Building Principal.
- Assesses and intervenes with individuals whose behavior may pose a threat to safety.

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