# **Operational Services**

# Administrative Procedure - Comprehensive Safety and Security Program

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## 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-AP3 Parent and Student Handbook School Bus Safety Rules
- 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, E3 Letter to Parents/Guardians About Disruptive Social Media Apps; Dangers 4:170-AP1 Page 2 of 9
- 4:170-AP4 National Terrorism Advisory System
- 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
- 4:170-AP6, E2 Notification to Staff and Parents/Guardians of CPR and AED Video
- 4:170-AP7 Targeted School Violence Prevention Program
- 4:170-AP7, E3 Targeted School Violence Prevention and Threat Assessment Education
- 4:175-AP1 Criminal Offender Notification Laws; Screening
- 4:175-AP1, E1 Parent and Student Handbook Informing Parents/Guardians About Offender Community Notification Laws
- 4:180-AP1 School Action Steps for Pandemic Influenza or Other Virus/Disease
- 4:180-AP2 Pandemic Influenza Surveillance and Reporting

6:235-E4 Parent and Student Handbook - Keeping Yourself and Your Kids Safe On Social Networks

6:235-E5 Children's Online Privacy Protection Act

7:280-AP Managing Students with Communicable or Infectious Disease

7:290-AP Adolescent Resource Guide for Implementation of Suicide and Crisis Intervention Depression Awareness and Prevention Program

#### **B.** Definitions

SEOCRP is an 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.

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

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

# C. Cooperative Safety Coordinator and Safety Team; Responsibilities

The Executive Director appoints an administrator to be the **Cooperative Safety Coordinator** to manage the Cooperative's safety and security efforts.

The Executive Director or Cooperative Safety Coordinator appoints members of a **Safety Team** for each school or facility.

The Cooperative 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 for Developing High-Quality School Emergency Operations Plans (2013), at* https://rems.ed.gov/docs/School\_Guide\_508C.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 school 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

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The Cooperative Safety Coordinator chairs the Safety Team meetings. The meetings are held as determined by the Cooperative Safety Coordinator. The following matters are suggested agenda items:

- Review the notes from the previous meeting.
- Discuss the status of previously submitted recommendations.
- Receive, review, and discuss 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

At least once annually, the Safety Team shall request first responders to review the SEOCRP and provide input.

### E. Annual Safety Review

The Cooperative Safety Coordinator facilitates the annual safety review meeting conducted by the Board or its designee, as required by 105 ILCS 128/25, amended by P.A.s 101-455 and 102-395, and 128/30. During the annual safety review, the law requires the Board or its designee to "review each school building's emergency and crisis response plans, protocols, and procedures, including procedures regarding the Cooperative's threat assessment team, the efficacy and effects of law enforcement drills, and each building's compliance with the school safety drill programs." If the Board uses a designee, it should preferably be someone other than the Cooperative Safety Coordinator to assure an unbiased audit. The Cooperative 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 the Ill. State Board of Education (ISBE) website for an annual review checklist and report at https://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 101-455, 102-395, and 102-791) and any implementing State administrative rules shall supersede this procedure in the event of a conflict.

The Program Administrator shall keep the Executive Director 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 <a href="www.isbe.net/Documents/91-02">www.isbe.net/Documents/91-02</a> 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 Program Administrator in order to make arrangements.
- No later than **September 14** of each year, the Program Administrator 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 Program Administrator 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 Program Administrator 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 Program Administrator 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 lockdown 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 Cooperative'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

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school support personnel. The appropriate local law enforcement agency must observe administration of the drill.

Schools must notify parents/guardians in advance of any lockdown drill that involves student participation, and must allow parents/guardians to exempt their child from participating for any reason. For students who do not participate in the lockdown drill, the Cooperative must provide alternative safety education and instruction related to an active threat or active shooter event. For students who do participate in the lockdown drill, the Cooperative must allow them to ask questions related to it. See 4:170-AP2, E5, *Notice to Parent/Guardian of Lockdown Drill; Optout*. In addition, a law enforcement lockdown drill must meet each of the following criteria:

- During each calendar year, the appropriate local law enforcement agency contacts the Program Administrator to request participation in the law enforcement drill. The Program Administrator 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 Program Administrator 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 Program Administrator 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 lockdown drill cannot include any simulations that mimic an actual school shooting
  incident or active shooter event. Law enforcement may only run an active shooter
  simulation, including simulated gun fire drills, on school days when students are not
  present.
- All lockdown drills must be announced in advance to all school personnel and students prior to the commencement of the drill.
- Lockdown drill content must be age and developmentally appropriate, and must include trauma-informed approaches to address the concerns and well-being of school personnel.
- Lockdown drills must include and involve school personnel, including school-based mental health professionals.

The Cooperative Safety Coordinator, in cooperation with the Program Administrator, 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 for 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.

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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 also *The Role of Districts in Developing High-Quality School Emergency Operations Plans: A Companion to the School Guide* (2019), at:

https://rems.ed.gov/docs/District\_Guide\_508C.pdf; and 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. Cooperative-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 Program Administrator 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 Program Administrator shall schedule, execute, and document safety drills as per the School Safety Drill Act (105 ILCS 128/, amended by P.A.s 101-455, 102-395, and 102-791) 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 Program Administrator 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,p and procedures (105 ILCS 5/10-20.57, amended by P.A. 99-470, 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)).
- 18. Safety and security related administrative material. See section A, above.

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- 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 5/10-20.72, added by P.A. 101-548 and renumbered by P.A. 102-558).
- 20. Other documents identified by the Safety Team.

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

The Cooperative Safety Coordinator, with assistance from the Safety Team, is responsible for compiling information and preparing communications concerning an emergency or crisis. The Executive Director serves as the spokesperson during a crisis or emergency. All Cooperative 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 spokesperson. 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 Program Administrator 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, amended by P.A. 102-894.

Upon receiving a report of No. 1, above, the Program Administrator or designee shall immediately notify local law enforcement. In addition, upon receiving a report on any of the above Nos. 1-3, the Program Administrator or designee must notify the Executive Director or designee. See 3:60-E, *Event Reporting and Notice Requirements for Building Principals Concerning School Safety and Security*.

Upon receiving a report of Nos. 1-3, above, the Executive Director or designee shall immediately notify local law enforcement. The Executive Director will also report incidents involving attacks on staff members to ISBE through its web-based School Incident Reporting System (SIRS) as they occur during the year and no later than August 1 for the preceding school year. 105 ILCS 5/10-21.7,

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amended by P.A. 102-894. SIRS is available at <a href="https://www.isbe.net/Pages/School-Incident-Reporting-System.aspx">www.isbe.net/Pages/School-Incident-Reporting-System.aspx</a> or by going to ISBE's home page and accessing the District's Web Application Security (IWAS) account.

#### K. Resources

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

The Role of Districts in Developing High-Quality School Emergency Operations Plans: A Companion to the School Guide https://rems.ed.gov/docs/District\_Guide\_508C.pdf

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

ALICE (Alert, Lockdown, Inform, Counter, Evacuate) Training Institute <a href="www.alicetraining.com">www.alicetraining.com</a>
ISBE/OSFM All Hazard Preparedness Guide for Illinois Schools <a href="www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx">www.isbe.net/Pages/School-Emergency-and-Crisis-Response-Plan-Guide.aspx</a>

Illinois Emergency Management Agency (IEMA) <a href="www2.illinois.gov/ready/Pages/default.aspx">www2.illinois.gov/ready/Pages/default.aspx</a> Schools/Campus – Resources, including School Safety Information Sharing <a href="www2.illinois.gov/ready/plan/Pages/Schools.aspx">www2.illinois.gov/ready/plan/Pages/Schools.aspx</a>

Safe2Help Illinois, designed to offer students a safe, confidential way in which to share information that might help prevent suicides, bullying, school violence, or other threats to school safety, <a href="https://www.safe2helpil.com/">www.safe2helpil.com/</a>

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

National Association of School Psychologists (NASP) - Recommendations for Comprehensive School Safety and Crisis Policies <a href="www.nasponline.org/resources-and-publications/resources/school-safety-and-crisis">www.nasponline.org/resources-and-publications/resources/school-safety-and-crisis</a>

U.S. Secret Service (USSS) National Threat Assessment Center <a href="https://www.secretservice.gov/protection/ntac">www.secretservice.gov/protection/ntac</a>

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 <a href="https://www.threatplan.org/default.htm">www.threatplan.org/default.htm</a>

School Crisis Guide - Help and Healing in a Time of Crisis, published by NEA Health Information Networkwww.nea.org/resource-library/neas-school-crisis-guide

# Attachment A

# School Emergency Operations and Crisis Response Plan Format

Basic Plan						
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					

## **Functional Annexes**

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

1.	Communications	6.	Reunification
2.	Evacuation	7.	Continuity of Operations (COOP)
3.	Shelter-in-Place	8.	Security
4.	Lockdown	9.	Recovery
5.	Accounting for All Persons	10.	Health and Medical

Threat- or Hazard-Specific Annexes

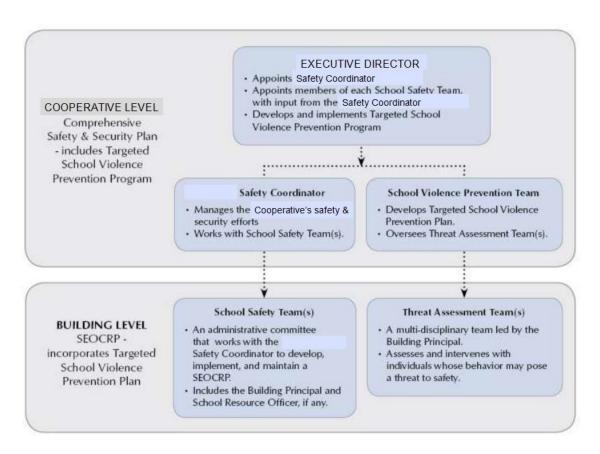
Note: This is not a complete list. Each school's annexes will vary based on its hazard analysis.

1.	Hurricane or Severe Storm	5.	Mass Casualty Incident
2.	Earthquake	6.	Active Shooter
3.	Tornado	7.	Pandemic or Disease Outbreak
4.	Hazardous Materials Incident		

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#### Attachment B

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



Revised: 9/2014 Reviewed: 10/2014 Revised: 5/2016 Revised: 8/2019 Revised: 3/2020 Revised: 8/2022 Revised: 3/2023