

# GUIDE FOR DEVELOPING HIGH-QUALITY EMERGENCY OPERATIONS PLANS FOR INSTITUTIONS OF HIGHER EDUCATION



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# **GUIDE FOR DEVELOPING HIGH-QUALITY EMERGENCY OPERATIONS PLANS FOR INSTITUTIONS OF HIGHER EDUCATION**

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

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## INTRODUCTION AND PURPOSE

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

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

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

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

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

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

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

Lessons learned from emergencies at IHEs highlight the importance of preparing IHE officials and first responders to implement emergency operations plans. By having plans in place to keep

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

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

The guide is organized in four sections:

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

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

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

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



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- ❖ **Prevention**,<sup>1</sup> for the purposes of this guide, means the capabilities necessary to avoid, deter, or stop an imminent crime or threatened or actual mass casualty incident. Prevention is the action IHEs take to prevent a threatened or actual incident from occurring.
  - ❖ **Protection** means the capabilities to secure IHEs against acts of terrorism and man-made or natural disasters. Protection focuses on ongoing actions that protect students, teachers, staff, visitors, networks, and property from a threat or hazard.
  - ❖ **Mitigation** means the capabilities necessary to eliminate or reduce the loss of life and property damage by lessening the impact of an event or emergency. In this document, mitigation also means reducing the likelihood that threats and hazards will happen.
  - ❖ **Response** means the capabilities necessary to stabilize an emergency once it has already happened or is certain to happen in an unpreventable way; establish a safe and secure environment; save lives and property; and facilitate the transition to recovery.
  - ❖ **Recovery** means the capabilities necessary to assist IHEs affected by an event or emergency in restoring the learning environment.

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

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

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

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

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<sup>1</sup> In the broader *PPD-8* construct, the term “prevention” refers to those capabilities necessary to avoid, prevent, or stop a threatened or actual act of terrorism. The term “prevention” also refers to preventing imminent threats.

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

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

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

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## PLANNING PRINCIPLES

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

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

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

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

**Planning provides for the access and functional needs of the whole IHE community.** The “whole IHE community” includes students, staff and visitors, including those with disabilities and others with access and functional needs, those from religiously, racially, and ethnically diverse backgrounds, and people with limited English proficiency.

**Planning considers all settings and all times.** Higher ed EOPs must account for incidents that may occur at any hour of the day or night, in numerous buildings and off-campus sites or satellite locations, including, but not limited to, laboratories and other facilities that house potentially dangerous materials.

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

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

**Creating and revising a model emergency operations plan is done by following a collaborative process.** This guide provides a process, plan format, and content guidance that are flexible enough for use by all IHE emergency planning teams. If a planning team also uses templates, it must first evaluate their usefulness to ensure the tools do not undermine the

collaborative initiative and collectively shared plan. There are some jurisdictions that provide templates to IHEs, and these will reflect state and local mandates, as applicable.

## THE PLANNING PROCESS

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

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

Figure 1 depicts the six steps in the planning process.<sup>2</sup> At each step in the planning process, IHEs should consider the impact of their decisions on ongoing activities such as training and exercises, as well as on equipment and resources.

**Figure 1: Steps in the Planning Process**



### Step 1: Form a Collaborative Planning Team

Lessons learned indicate that operational planning is best performed by a team. Case studies reinforce this concept by pointing out that the common thread found in successful operations is

<sup>2</sup> U.S. Department of Homeland Security, Federal Emergency Management Agency. *Developing and Maintaining Emergency Operations Plans: Comprehensive Preparedness Guide 101, Version 2.0*. Washington, DC: Author, November 2010. Available at [http://www.fema.gov/pdf/about/divisions/npd/CPG\\_101\\_V2.pdf](http://www.fema.gov/pdf/about/divisions/npd/CPG_101_V2.pdf).

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

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

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

| Department <sup>3</sup> | Illustrative Contributions to the Planning Team  |
|-------------------------|--|
| Academic Affairs        | <ul style="list-style-type: none"> <li>• Develop procedures to communicate with and account for teaching faculty in an emergency situation</li> <li>• Develop plans to identify alternate facilities where institutional activities can be conducted in the event of the destruction, disablement, or denial or lack of access to existing facilities</li> <li>• Identify and prioritize critical support services and systems</li> <li>• Identify and help ensure recovery of critical assets and information</li> <li>• Participate in the threat assessment team (TAT)</li> </ul> |

<sup>3</sup> Across varying types of IHEs, these departments are key to university functioning.

| Department <sup>3</sup>               | Illustrative Contributions to the Planning Team  |
|---------------------------------------|--|
| Business Office                       | <ul style="list-style-type: none"> <li>• Develop the processes and procedures for tracking employees' time and issuing paychecks during disaster operations</li> <li>• Develop procedures for procuring emergency resources for responding to and recovering from emergencies</li> <li>• Develop the process for documenting the financial cost of emergency response and recovery operations</li> <li>• Develop a Business Continuity Plan (BCP)</li> </ul>   |
| Central Administration or Designee    | <ul style="list-style-type: none"> <li>• Provide resources and leadership support to drive the initiative</li> <li>• Develop procedures for declaring an emergency</li> <li>• Identify alternate administrative facilities</li> <li>• Develop procedures for increasing public information efforts</li> <li>• Develop and coordinate procedures for recruiting volunteers and additional staff</li> <li>• Develop procedures to coordinate and approve volunteers and manage donations during an emergency</li> <li>• Develop a Continuity of Operations (COOP) Annex</li> </ul>   |
| Counseling and Mental Health Services | <ul style="list-style-type: none"> <li>• Identify and train appropriate staff to provide developmentally and culturally appropriate mental health services</li> <li>• Train mental health staff on specific interventions</li> <li>• Provide basic training on available resources and common reactions to trauma for all staff (including administrators)</li> <li>• Train faculty and other staff on early warning signs of individuals who pose a potential danger</li> <li>• Assemble and train recovery teams</li> <li>• Identify both internal and external partners (consider local mental health agencies that may be able to assist, and develop a structure for support) and develop partnership agreements</li> <li>• Develop template letters (that can be tailored) for alerting students, families, staff, and the community to emergencies</li> <li>• Participate in the TAT</li> </ul> |

| Department <sup>3</sup>         | Illustrative Contributions to the Planning Team  |
|---------------------------------|--|
| EMS                             | <ul style="list-style-type: none"> <li>• Develop and coordinate procedures for mobilizing resources needed for significant, longer-term emergencies</li> <li>• Identify sources for mutual aid agreements and assistance</li> </ul>  |
| Environmental Health and Safety | <ul style="list-style-type: none"> <li>• Participate in vulnerability and hazard assessments</li> <li>• Review and update office standard operating procedures to align with the higher ed EOP</li> <li>• Develop procedures for pre-positioning resources and equipment</li> <li>• Review and update processes and procedures for state and federal disaster declaration requests</li> <li>• Develop, review, and update state and federally required environmental emergency response plans, including management procedures for the plans</li> <li>• Coordinate with public safety operations (see next entry) to develop the process and procedures for increasing public information</li> <li>• Provide warning system information</li> </ul> |
| Facilities and Operations       | <ul style="list-style-type: none"> <li>• Participate in vulnerability and hazard assessments</li> <li>• Provide floor plans with room layout, electrical sources, and entrance and exit points for all campus buildings</li> <li>• Develop procedures for pre-positioning resources and equipment</li> <li>• Identify sources for mutual aid agreements and assistance</li> </ul>  |
| Food Services                   | <ul style="list-style-type: none"> <li>• Identify possible threats and mitigation strategies relating to food safety</li> <li>• Develop procedures for providing food to students, staff, faculty, and community partners during a major emergency</li> <li>• Develop mutual aid agreements for obtaining, preparing, and distributing food</li> </ul>   |

| Department <sup>3</sup> | Illustrative Contributions to the Planning Team  |
|-------------------------|--|
| Health Services         | <ul style="list-style-type: none"> <li>• Develop procedures to determine if there are adequate supplies and equipment to triage for an emergency and to support community health partners</li> <li>• Develop procedures for mobilizing personnel on campus and at external sites</li> <li>• Develop procedures for developing mutual aid agreements</li> <li>• Develop pandemic flu and infectious disease plans</li> <li>• Develop a system for disease surveillance and tracking</li> <li>• Coordinate with local and state public health partners</li> </ul>  |
| Human Resources         | <ul style="list-style-type: none"> <li>• Develop plans to maintain the continuity of the payroll together with the business office (see above) during an emergency</li> <li>• Develop plans to maintain employee benefit services during an emergency</li> <li>• Develop plans to hire or replace staff with temporary employees, if needed</li> <li>• Develop plans to serve as the liaison or organizer, or both, of volunteer assistance in the event of an emergency</li> <li>• Prepare to execute components of the COOP relating to staffing, including assessing faculty and staff availability, appropriation of personnel, and assisting employees with work-recovery needs (e.g., psychological help, time off for personal needs)</li> <li>• Develop processes to account for personnel during or after an event</li> </ul> |



| Department <sup>3</sup>   | Illustrative Contributions to the Planning Team  |
|---------------------------|--|
| Information Technology    | <ul style="list-style-type: none"> <li>• Develop procedures and systems for checking critical information and alert systems to disseminate emergency information in an accessible format via a website, cell phone, e-mail, and other mechanisms. Coordinate beforehand with all departments to provide unified and factual messages to students, staff, faculty, families, and the media using multiple modalities, and in consideration of different language needs or accommodations, including effective communication with individuals with disabilities and others with access and functional needs, such as those who are blind or deaf.</li> <li>• Identify information technology resources needed to facilitate the emergency operations of all campus departments</li> <li>• Identify the need for and sources of emergency communication devices (e.g., ham radios, cell phones)</li> <li>• Develop plans to continue academic programs that significantly use technology for teaching purposes</li> </ul> |
| Legal Counsel             | <ul style="list-style-type: none"> <li>• Provide legal counsel on campus liability to key decision makers</li> <li>• Coordinate investigations completed by community partners</li> <li>• Review messages drafted by Public Information Officer (PIO)</li> <li>• Ensure that all campus and community actions are documented with a rationale for the action</li> <li>• Participate in the threat assessment team</li> <li>• Ensure compliance with applicable laws</li> </ul>   |
| Public Information Office | <ul style="list-style-type: none"> <li>• Coordinate beforehand with all departments to provide unified and factual messages to students, staff, faculty, families, and the media using multiple modalities</li> <li>• Develop pre-agreements with the media concerning debriefings and media holding areas during an emergency</li> <li>• Designate a campus spokesperson</li> </ul>   |

| Department <sup>3</sup>  | Illustrative Contributions to the Planning Team  |
|--------------------------|--|
| Public Safety Operations | <ul style="list-style-type: none"> <li>• Develop procedures for reviewing and updating higher ed EOP</li> <li>• Develop procedures for facilities and equipment, including testing systems</li> <li>• Develop procedures for mobilizing department of public safety personnel, and pre-positioning resources and equipment</li> <li>• Develop a process for managing incidents at the field level using the ICS</li> <li>• Develop a process for communicating with and directing the central dispatch center, including the activation of the emergency contact list</li> <li>• Develop procedures to warn threatened elements of the population, including those individuals with different language needs or accommodations needs, including effective communication with individuals with disabilities and others with access and functional needs (e.g., those who are deaf or blind)</li> <li>• Ensure that hazardous material procedures are consistent with the state and local environmental safety hazardous materials plans</li> <li>• Participate in the TAT</li> <li>• Become proficient in the understanding and use of the NIMS and ICS structures referenced in this document</li> </ul> |

| Department <sup>3</sup> | Illustrative Contributions to the Planning Team  |
|-------------------------|--|
| Residential Life        | <ul style="list-style-type: none"> <li>• Develop procedures to coordinate the need for on-campus housing, temporary shelters, and temporary off-campus housing locations, including consideration of physical accessibility for individuals with disabilities and others with access and functional needs</li> <li>• Develop procedures for mobilizing residential life personnel and pre-positioning resources</li> <li>• Develop an on-call staffing system to ensure staff are available at all times</li> <li>• Develop procedures for identifying resident students in need of emergency evacuation assistance</li> <li>• Develop procedures for the evacuation and temporary shelter accommodations for resident students</li> <li>• Develop procedures for checking residential facilities and equipment</li> <li>• Participate in the TAT</li> </ul> |

| Department <sup>3</sup> | Illustrative Contributions to the Planning Team  |
|-------------------------|--|
| Student Affairs         | <ul style="list-style-type: none"> <li>• Develop reunification procedures in collaboration with community reunification initiatives</li> <li>• Develop procedures for checking student affairs facilities and equipment, including those relating to on-campus recreation, student organizations, on-campus employment, community service, and volunteerism</li> <li>• Develop procedures for addressing the needs of students living in Greek housing or off-campus facilities</li> <li>• Develop procedures for pre-positioning resources to maintain functioning of such campus elements as career services and student government</li> <li>• Develop mutual aid agreements and pre-negotiate with service providers for delivering goods and services in the event of an emergency</li> <li>• Ensure that all obligations under the Americans with Disabilities Act are considered throughout the planning and implementation of the higher ed EOP</li> <li>• Ensure that the plan is accessible to students whose primary language is not English</li> <li>• Develop parent or family notification procedures</li> <li>• Participate in the TAT</li> <li>• Create a Campus Community Emergency Response Team (Campus CERT)</li> </ul> |
| Transportation          | <ul style="list-style-type: none"> <li>• Develop procedures for mobilizing campus wide transportation for an emergency and for maintaining control of traffic from private vehicles</li> <li>• Develop evacuation procedures from various campus locales</li> <li>• Develop procedures for IHE-sponsored transportation (e.g., buses)</li> </ul>   |

| Department <sup>3</sup>               | Illustrative Contributions to the Planning Team   |
|---------------------------------------|---|
| International Student Services Office | <ul style="list-style-type: none"> <li>• Develop procedures for staff to support COOP during crises, including ongoing management of the access to the Student and Exchange Visitor Information System (SEVIS)</li> <li>• Develop procedures for international students to communicate safety concerns, location, and short-term plans during an emergency</li> <li>• Coordinate beforehand with all staff and international students to distribute communication procedures during an emergency</li> </ul> |

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

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

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

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

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

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

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

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## Step 1 Outcome

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



## Step 2: Understand the Situation

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

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

### Identify Threats and Hazards

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

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

### Assess the Risk Posed by the Identified Threats and Hazards

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

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<sup>4</sup> The *Clery Act* is the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act* (20 U.S.C. Section 1092(f)).

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identified threats and hazards.<sup>5</sup> Evaluating risk entails understanding the probability that the specific threat or hazard will occur; the effects it will likely have, including the severity of the impact; the time the IHE will have to warn students, faculty, and staff about the threat or hazard; and how long it may last.

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

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

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

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

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

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<sup>5</sup> For more information on the threat and hazard identification and risk assessment process, please see the Federal Emergency Management Agency’s *Threat and Hazard Identification and Risk Assessment Guide (CPG 201)* available at <http://www.fema.gov/plan/>.

**Table 2: Assessment**

| Assessment              | Description  | Purpose and Results  |
|-------------------------|--|--|
| Site Assessment         | A site assessment examines the safety, accessibility, and emergency preparedness of the buildings, facilities, and grounds. This assessment includes, but is not limited to, a review of building access control measures, visibility around the exterior of the buildings, compliance with applicable architectural standards for individuals with disabilities and others with access and functional needs, structural integrity of the buildings, and emergency vehicle access.                               | <ul style="list-style-type: none"> <li>• Increased understanding of the potential impact of threats and hazards on the buildings, facilities, and grounds.</li> <li>• Increased understanding of risk and vulnerabilities of the buildings, facilities, and grounds when developing the plan.</li> <li>• Knowledge of which facilities are physically accessible to individuals with disabilities and others with access and functional needs and can be used in compliance with the law.</li> </ul> |
| Climate Assessment      | In a nurturing, inclusive environment, members of a community are more likely to succeed, feel safe, and report threats. If a student survey is used to assess culture and climate, student privacy must be protected. A range of personnel across the IHE can assist in the assessment of climate, including counselors and mental health staff.  | <ul style="list-style-type: none"> <li>• Knowledge of students' and staff's perceptions of their safety.</li> <li>• Knowledge of problem behaviors that need to be addressed to improve climate.</li> </ul>  |
| Threat Assessment Teams | A campus threat assessment analyzes campus members' communications and behaviors to determine whether or not a member may pose a threat. These assessments must be based on fact must comply with applicable privacy, civil rights, and other applicable laws and are often conducted by multi-disciplinary TATs. While a planning team may include the creation of a threat assessment team in its plan, the assessment team is a separate entity from the planning team and meets on its own regular schedule. | <ul style="list-style-type: none"> <li>• Students, staff, or other persons that may pose a threat are identified before a threat develops into an incident and are referred for services.</li> </ul>   |



| Assessment          | Description  | Purpose and Results  |
|---------------------|--|--|
| Capacity Assessment | The planning team needs to know what resources will be at its disposal. A capacity assessment examines the capabilities of students, faculty, and staff as well as the services and material resources of community partners. This assessment is used to identify individuals on campus with applicable training and skills (e.g., first aid certification, search and rescue training, counseling and mental health expertise, ability to assist individuals with disabilities and others with access and functional needs). Equipment and supplies should also be inventoried. The inventory should include an evaluation of equipment and supplies uniquely for individuals with disabilities and others with access and functional needs, such as evacuation chairs, the availability of sign language interpreters and technology used for effective communication, accessible transportation, and consumable medical supplies and durable medical equipment that may be necessary during a shelter-in-place or evacuation. | <ul style="list-style-type: none"> <li>• An increased understanding of the resources available.</li> <li>• Information about staff capabilities will help planners assign roles and responsibilities in the plan.</li> </ul> |

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

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

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

### Prioritize Threats and Hazards

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

**Table 3: Sample Risk Assessment Worksheet**

| Hazard                                | Probability   | Magnitude   | Warning   | Duration   | Risk Priority  |
|---------------------------------------|---|---|---|--|--|
| Fire                                  | 4. Highly likely<br>3. Likely<br>2. Possible<br>1. Unlikely | 4. Catastrophic<br>3. Critical<br>2. Limited<br>1. Negligible | 4. Minimal<br>3. 6–12 hrs.<br>2. 12– 24 hrs.<br>1. 24+ hrs. | 4. 12+ hrs.<br>3. 6–12 hrs.<br>2. 3– 6 hrs.<br>1. < 3 hrs. | <input type="checkbox"/> High<br><input type="checkbox"/> Medium<br><input type="checkbox"/> Low |
| Hazmat spill inside a campus building | 4. Highly likely<br>3. Likely<br>2. Possible<br>1. Unlikely | 4. Catastrophic<br>3. Critical<br>2. Limited<br>1. Negligible | 4. Minimal<br>3. 6–12 hrs.<br>2. 12–4 hrs.<br>1. 24+ hrs.   | 4. 12+ hrs.<br>3. 6–12 hrs.<br>2. 3–6 hrs.<br>1. < 3 hrs.  | <input type="checkbox"/> High<br><input type="checkbox"/> Medium<br><input type="checkbox"/> Low |

### Step 2 Outcome

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



### Step 3: Determine Goals and Objectives

In Step 3, the planning team decides which of the threats and hazards identified in Step 2 will be addressed in the higher ed EOP. The planning team may decide to address only those threats and

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hazards that rank “high” in risk priority, or they may decide to also address some of the threats and hazards that rank “medium.” This is a critical decision point in the planning process that is left up to the planning team. It is recommended that the team address more than just the “high” risk priority threats and hazards.

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

### **Develop Goals and Objectives**

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

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

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

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

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

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

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

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

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

- ❖ Objective 3.1: Immediately notify fire department and EMS personnel of any fire in a student housing facility.
- ❖ Objective 3.2: Immediately begin to provide first aid.

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

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

For an evacuation function, three possible goals are

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

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

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

### Step 3 Outcome

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



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

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

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

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

1. **Depict the scenario.** Create a potential scenario based on the threats and hazards identified and prioritized in Step 2.
2. **Determine the amount of time available to respond.** This will vary based on the type of threat or hazard and the particular scenario. For example, in the case of a hurricane, the IHE might have days or hours to respond before the storm makes landfall, while the IHE may have to respond in minutes to an *active shooter*.
3. **Identify decision points.** Decision points indicate the place in time, as threats or hazards unfold, when leaders anticipate making decisions about a course of action. Walking through each scenario in detail will help identify the relevant decision points for each one, such as whether or not to evacuate, shelter-in-place, or lockdown.
4. **Develop courses of action.** Planners develop courses of action to achieve their goals and objectives by answering the following questions:
  - ❖ What is the action?
  - ❖ Who is responsible for the action?
  - ❖ When does the action take place?
  - ❖ How long does the action take and how much time is actually available?
  - ❖ What has to happen before?
  - ❖ What happens after?
  - ❖ What resources are needed to perform the action?
  - ❖ How will this action affect specific populations, such as individuals with disabilities and others with access and functional needs who may require medication, wayfinding, evacuation assistance, or personal assistance services, or who may experience severe anxiety during traumatic events?

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## PLANS MUST COMPLY WITH THE AMERICANS WITH DISABILITIES ACT

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

## PLANS MUST ADDRESS LANGUAGE ACCESS

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

### Select courses of action

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

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

### Step 4 Outcome

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

Goals, objectives, and courses of action for threats and hazards will go into the "Threat- and Hazard-Specific Annexes" section of the higher ed EOP.

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



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

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

### Format the Plan

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

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

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

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

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

- ❖ Title (the function, threat, or hazard)
- ❖ Goal(s)
- ❖ Objective(s)

- ❖ Courses of action (Describe the courses of action you developed in Step 4 in the sequence in which they will occur).

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

**Figure 2: Traditional EOP Format**

| <b>Higher Ed EOP Format</b>   |   |
|---|---|
| <p><b>Basic Plan</b></p> <ol style="list-style-type: none"> <li>1. Introductory Material               <ol style="list-style-type: none"> <li>1.1. Cover Page</li> <li>1.2. Promulgation Document and Signatures Page</li> <li>1.3. Approval and Implementation</li> <li>1.4. Record of Changes</li> <li>1.5. Record of Distribution</li> <li>1.6. Table of Contents</li> </ol> </li> <li>2. Purpose, Scope, Situation Overview, and Assumptions               <ol style="list-style-type: none"> <li>2.1. Purpose</li> <li>2.2. Situation Overview</li> <li>2.3. Planning Assumptions</li> </ol> </li> <li>3. Concept of Operations</li> <li>4. Organization and Assignment of Responsibilities</li> <li>5. Direction, Control, and Coordination</li> <li>6. Information Collection, Analysis, and Dissemination</li> <li>7. Training and Exercises</li> <li>8. Administration, Finance, and Logistics</li> <li>9. Plan Development and Maintenance</li> <li>10. Authorities and References</li> </ol> | <p><b>Functional Annexes</b></p> <p>NOTE: This is not a complete list, but it is recommended that all EOPs include at least the following functional annexes:</p> <ol style="list-style-type: none"> <li>1. Evacuation</li> <li>2. Deny Entry or Closing (Lockdown)</li> <li>3. Shelter-in-Place or Secure-In-Place</li> <li>4. Accounting for All Persons</li> <li>5. Communications and Notifications</li> <li>6. Continuity of Operations (COOP)</li> <li>7. Recovery</li> <li>8. Public Health, Medical and Mental Health</li> <li>9. Security</li> <li>10. Rapid Assessment</li> </ol> <p><b>Threat- or Hazard-Specific Annexes</b></p> <p>NOTE: This is not a complete list. Each IHE's annexes will vary based on its threats and hazard analysis.</p> <ol style="list-style-type: none"> <li>1. Hurricane or Severe Storm</li> <li>2. Earthquake</li> <li>3. Tornado</li> <li>4. Hazardous Materials Incident</li> <li>5. Mass Casualty Incident</li> <li>6. <i>Active Shooter</i></li> <li>7. Pandemic or Disease Outbreak</li> <li>8. Bomb Threat or Explosion</li> </ol> |

### Write the Plan

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

<sup>6</sup> 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).



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1. Summarize important information with checklists and visual aids, such as maps and flowcharts.
  2. Avoid using jargon, minimize the use of abbreviations, and use short sentences and the active voice. Qualifiers and vague wording only add to confusion.
  3. Write clearly, using plain language. Use a logical, consistent structure that makes it easy for readers to grasp the rationale for the sequence of the information and to scan for the information they need.
  4. Provide enough detail to convey an easily understood plan that is actionable. For example, faculty may have a one-page document that covers what they will need to know and do during an emergency, or create signs giving simple directions. Organize the contents in a way that helps users quickly identify solutions and options. Plans should provide guidance for carrying out common courses of action, through the functional and Threat- and Hazard-Specific Annexes, while also staying out of the weeds.
  5. Develop accessible tools and documents. Use appropriate auxiliary aids and services necessary for effective communication, such as accessible websites, digital text that can be converted to audio or Braille, text equivalents for images, and captioning of any audio and audio description of any video content.

### **Review the Plan**

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

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

- ❖ Conforms with the Planning Principles outlined in this guide.
- ❖ The plan must *comply* with applicable states and local requirements because these provide a baseline that facilitates both planning and execution.

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

### Approve and Share the Plan

After finalizing the plan, the planning team should present it to the appropriate leadership and obtain official approval of the plan. The team should then share the plan with all community partners (e.g., first responders, local emergency managers, public and mental health officials) and all other entities that have a role in the plan, including relevant local, regional, and/or state agencies with which the plan will be coordinated. The plan should also be shared with other organizations that may use the campus and its building(s).

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

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

### Step 5 Outcome

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



## Step 6: Implement and Maintain the Plan

### Train Stakeholders on the Plan and Their Roles

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

**Hold a meeting.** At least once a year, hold a meeting to educate all parties on the plan. Go through the plan to familiarize these stakeholders with it. These meetings should include campus administration, department heads, the PIO, student affairs, community partners (first responders, emergency managers, public and mental health officials), other community entities and stakeholders, as well as the media.

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

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

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

**Familiarize the campus community with the plan and community partners.** Holding open house meetings for community partners, such as law enforcement officers, fire department officials, EMS personnel, emergency managers, public and mental health practitioners as well as the campus community to talk about the plan will make students, faculty, and staff more comfortable working with these partners. Consider involving students who volunteer with community partners and in the community in these events.

**Train members of the campus community on the skills necessary to fulfill their roles.** Each member of the college community may be assigned specific roles in the plan that will require special skills, such as first aid, threat assessment, using the ICS, and providing personal assistance services for students and staff with disabilities and others with access and functional needs.

### **Exercise the Plan**

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

- ❖ **Tabletop exercises:** Tabletop exercises are small-group discussions that walk through a scenario and the courses of action an IHE will need to take before, during, and after an emergency to lessen the impact on the IHE community. This activity helps assess the plan and resources, and facilitates an understanding of emergency management and planning concepts.
- ❖ **Drills:** During drills, community partners such as first responders and local emergency managers and relevant IHE personnel use the actual campus buildings, facilities, and grounds to practice responding to a scenario.
- ❖ **Functional exercises:** Functional exercises are similar to drills but involve multiple partners. Participants react to realistic simulated events (e.g., a bomb threat or an intruder with a gun in a classroom), and implement the plan and procedures using the ICS.

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- ❖ **Full-scale exercises** are the most time-consuming activities in the exercise continuum and are multi-agency, multi-jurisdictional efforts in which all resources are deployed. This type of exercise tests collaboration among the agencies and participants, public information systems, communications systems, and equipment. An Emergency Operations Center is established by either law enforcement or fire services, and the ICS is activated.

Before making a decision about how many and which types of exercises to implement, an IHE should consider the costs and benefits of each, as well as any state or local requirements. For example, while a tabletop exercise may be less costly and less time-consuming to run, a full-scale exercise provides a more realistic context for the simulated response to an emergency situation, thus providing more constructive feedback to improve the plans. Students should be included to the maximum extent possible, and IHEs should also consider whether to include families. The IHE should also take into account the cultural diversity of its population when designing exercises and training.

It is up to the planning team to decide how often exercises should be conducted. Note, however, that IHEs that are subject to the *Clery Act* are required to test their “emergency response and evacuation procedures” on at least an annual basis (see the “A Closer Look” section of this document for more details on the requirements of the *Clery Act*). While frequent exercise is important, it is imperative that exercises are of high quality.

To effectively execute an exercise

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

For additional information on conducting exercises, please see the Homeland Security Exercise and Evaluation Program Guide at [https://hseep.dhs.gov/pages/1001\\_HSEEP10.aspx](https://hseep.dhs.gov/pages/1001_HSEEP10.aspx).

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

This step closes the loop in the planning process. It focuses on adding the information gained from exercising the plan to the research collected in Step 2, starting the planning cycle over

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again. Remember, planning is a continuous process even after the plan is published. Plans should evolve as the IHE and planning team learn lessons, obtain new information and insights, and update their priorities.

Reviews should be a recurring activity. Planning teams should establish a process for reviewing and revising the plan. Many IHEs review their plans on an annual basis. In no case should any part of a plan go for more than 2 years without being reviewed and revised.

Some IHEs have found it useful to review and revise portions instead of reviewing the entire plan at once. IHEs may consider reviewing a portion each month or at natural breaks in the academic calendar. Certain events will also provide new information that will be used to inform the plan. IHEs should consider reviewing and updating their plans or sections of their plans after

- ❖ Actual emergencies;
- ❖ Changes have been made in policy, personnel, organizational structures, processes, facilities, or equipment;
- ❖ Formal updates of planning guidance or standards have been finalized;
- ❖ Formal exercises have taken place;
- ❖ Changes in the IHE and surrounding community have occurred;
- ❖ Threats or hazards change or new ones emerge; or
- ❖ Ongoing assessments generate new information.

The planning team should ensure that all first responders, local emergency management, and all community partners have the most current version of the higher ed EOP.

## **PLAN CONTENT**

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

### **The Basic Plan**

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

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## Introductory Material

Introductory material can enhance accountability with community partners, including first responders, and local emergency managers, and make a higher ed EOP easier to use. Typical introductory material includes

- ❖ **Cover Page.** The cover page includes the title of the plan, a date and the campus(es) covered by the plan.
- ❖ **Promulgation Document and Signature Page.** This document or page contains a signed statement formally recognizing and adopting the higher ed EOP. It gives both the authority and the responsibility to IHE officials to perform their tasks before, during, or after an incident, and therefore should be signed by the authorized IHE administrator or another authorizing official.
- ❖ **Approval and Implementation Page.** The approval and implementation page introduces the plan, outlines its applicability, and indicates that it supersedes all previous plans. It includes a delegation of authority for specific modifications that can be made to the plan and by whom they can be made without the authorized IHE administrator's signature. It also includes a date and should be signed by the authorized IHE administrator.
- ❖ **Record of Changes.** Each update or change to the plan should be tracked. The record of changes, usually in table format, contains, at a minimum, a change number, the date of the change, the name of the person who made the change, and a summary of the change.
- ❖ **Record of Distribution.** The record of distribution, usually in table format, indicates the title and the name of the person receiving the plan, the agency to which the recipient belongs (either the IHE department, or if from outside the IHE, the name of the appropriate government agency or private-sector entity), the date of delivery, and the number of copies delivered. Other relevant information could be considered. The record of distribution can be used to prove that individuals and organizations with specified roles have acknowledged their receipt, review, and/or acceptance of the plan. Copies of the plan can be made available to the public and media without sensitive information, in accordance with public records laws.
- ❖ **Table of Contents.** The table of contents is a logically ordered, clearly identified layout of the major sections and subsections of the plan that will make finding information within the plan easier.

## Purpose and Situation Overview

The Purpose and Situation Overview section includes the following components:

- ❖ **Purpose.** The purpose sets the foundation for the rest of the higher ed EOP. The basic plan's purpose is a general statement of what the higher ed EOP is meant to do. The statement should be supported by a brief synopsis of the basic plan and annexes.
- ❖ **Situation Overview.** The situation section explains why a higher ed EOP is necessary. The situation section covers a general discussion of

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

## Concept of Operations

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

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

## Organization and Assignment of Responsibilities

This section provides an overview of the broad roles and responsibilities of IHE faculty and staff, students, families, first responders, local emergency management, and community partners, and of organizational functions *during* all emergencies.

- ❖ Describes the broad roles and responsibilities of individuals that apply *during*<sup>7</sup> all emergencies.
  - Individuals that the planning team may wish to include in this section of the plan are IHE administrators, faculty, and staff; IHE board members; counselors; social workers; medical staff; and students.

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<sup>7</sup> If the planning team considers the information critical to the successful implementation of the plan, it may identify roles and responsibilities of one or more of these individuals before and after an emergency in addition to during an emergency.

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- The planning team may also wish to include the community partners represented on it.
  - The following is an example of the type of information that would be included in the plan to describe the broad roles and responsibilities of the resident director of a student housing facility during an emergency.
    - The resident director will be responsible for the supervision of residents located in his or her housing units and shall remain with residents until directed otherwise. Resident director responsibilities include:
      - ✓ evacuating residents to inside or outside assembly areas according to instructions provided by the Incident Commander or designee;
      - ✓ obtaining first aid services for injured students; and
      - ✓ if trained and certified in first aid, rendering first aid, if necessary.
    - ❖ Describes informal and formal agreements in place for the quick activation and sharing of resources during an emergency (e.g., evacuation locations to a nearby business' parking lot). Agreements may be between the IHE and response groups (e.g., fire department, police department, emergency management agency), other IHEs, organizations, and businesses.

### **Direction, Control, and Coordination**

- ❖ This section describes the framework for all direction, control, and coordination activities. It should explain
  - ❖ The ICS structure as used by the IHE;
  - ❖ The relationship between the higher ed EOP and the broader community's emergency management system; and
  - ❖ Who has control of the equipment, resources, and supplies needed to support the higher ed EOP.

### **Information Collection, Analysis, and Dissemination**

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

- ❖ Identify the type of information that will be helpful in the successful implementation of the activities that occur before, during, and after an emergency, such as
  - ❖ Before and during: weather reports, law enforcement alerts, National Oceanic and Atmospheric Administration radio alerts, *Clery Act* crime statistics and crime logs, and local crime reports.
  - ❖ After: mental health, emergency management, and relief agencies' websites and hotlines assisting in all aspects of recovery.



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

### **Training and Exercises**

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

### **Administration, Finance, and Logistics**

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

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

### **Plan Development and Maintenance**

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

- ❖ Describes the planning process, participants in that process, and how development and revision of different sections of the higher ed EOP (basic plan and annexes) are coordinated before an emergency;

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- ❖ Assigns responsibility for the overall planning and coordination to a specific position or person; and
  - ❖ Provides for a regular cycle of training, evaluating, reviewing, and updating of the higher ed EOP.

### **Authorities and References**

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

- ❖ Lists of laws, statutes, ordinances, executive orders, regulations, and formal agreements relevant to emergencies; and
- ❖ Provisions for the succession of decision-making authority and operational control to ensure that critical emergency functions can be performed in the absence of the authorized IHE administrator.

### **Functional Annexes Content**

Functional annexes focus on critical operational functions and the courses of action developed to carry them out. This section of the guide describes functional annexes that IHEs should address in developing a comprehensive, high-quality campus EOP. As the planning team assesses the IHE's needs, it may need to prepare additional or different annexes. Also included in this section are issues the planning team should consider as it develops goals, objectives, and courses of action for these functions. While these are some of the most important issues, they are not meant to constitute an exhaustive list. For sources of more detailed information about these functions, please see the Resources section of this guide.

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

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

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

### **Evacuation Annex**

This annex focuses on the courses of action that IHEs will execute to evacuate buildings, facilities, and grounds.

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

- ❖ How to account for students, faculty, staff, and visitors located in various locations at different points in the day
- ❖ How to safely move students, faculty, staff, and visitors from unsafe areas to designated assembly areas such as classrooms, student housing facilities, campus grounds, dining halls, stadiums, and other IHE locations
- ❖ How to evacuate when the primary evacuation route is unusable
- ❖ How to evacuate individuals with disabilities (along with service animals and assistive devices, e.g., wheelchairs) and others with access and functional needs, including language, transportation, and medical needs

### **Deny Entry or Closing (Lockdown) Annex**

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

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

- ❖ How to account for students, staff, faculty, and visitors located in various locations at different points in the day
- ❖ How to secure exterior doors to campus buildings and facilities and when it may or may not be safe to do so
- ❖ How particular classroom and building characteristics (i.e., windows, doors) impact possible lockdown courses of action
- ❖ When to use the different variations of a lockdown (when outside activities are curtailed, doors are locked, and visitors closely monitored but all other activities continue as normal)

### **Shelter-in-Place/Secure-in-Place Annex**

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

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

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

### **Accounting for All Persons Annex**

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

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

- ❖ How IHE personnel will determine who should be in attendance at the assembly area
- ❖ What to do when a student, faculty, staff member, or visitor cannot be located
- ❖ How IHE personnel will report to the assembly supervisor
- ❖ How and when will students, faculty, and staff will be permitted to resume their activities

### **Communications and Notification Annex**

The communications and notification function includes communication and coordination during emergencies and disasters (both internal communication and communication with external stakeholders), as well as the communication of emergency protocols before an emergency and communication after an emergency.

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

- ❖ How the IHE’s communications system integrates into the local disaster response communications network (e.g., fire department, law enforcement agency)
- ❖ How the IHE will communicate with community partners in accordance with pre-established agreements (e.g., memoranda of understanding)
- ❖ How to ensure relevant staff members can operate communications equipment

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- ❖ How the IHE will communicate with students, families and the broader community before, during, and after an emergency, including by using alert and notification systems
  - ❖ How to account for technology barriers faced by students, faculty, staff, and families
  - ❖ How to effectively address language access barriers faced by students, faculty, staff, and guardians
  - ❖ How impacts will be communicated to the broader community, including off-campus student activities or events on IHE grounds not sponsored by the IHE (i.e., third-party use of campus grounds, athletic events)
  - ❖ How the IHE will ensure effective communication with individuals with disabilities and others with access and functional needs (e.g., coordinating with local emergency management staff to provide sign language interpreters for use during press conferences, publishing only accessible documents, ensuring information on websites is accessible)
  - ❖ How to obtain and update emergency contact information for students, faculty, and staff
  - ❖ How to reach out to emergency contacts, including international contacts, during or following an emergency
  - ❖ How to track students, faculty, staff, or visitors transported to another location for care or shelter, including hospitals
  - ❖ How to coordinate information sharing among hospitals, families, and the IHE
  - ❖ Whether goals, objects, and courses of action are consistent with the requirements in the Clery Act, the Health Insurance Portability and Accountability Act (HIPAA), the Family Educational Rights and Privacy Act (FERPA), and civil rights laws (see the “A Closer Look” section for more information on these federal laws)
  - ❖ How to communicate with students, staff, or members of the public who refuse to comply with safety instructions

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## **Telling Family Members That Their Loved One Is Missing, Injured, or Killed**

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

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

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

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

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

### **Continuity of Operations (COOP) Annex**

This annex describes how an IHE will help ensure essential functions continue during an emergency and its immediate aftermath. Essential functions include business services (e.g., payroll and purchasing), communication (internal and external), computer and systems support, facilities maintenance, safety and security, and continuity of teaching and learning. For more information on COOP for IHEs, see the Resource section.

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

- ❖ How the COOP will be designed so that it can be activated at any time and sustained for up to 30 days
- ❖ How the COOP will set priorities for re-establishing essential functions, such as restoration of IHE operations, and maintaining the safety and well-being of students and the learning environment
- ❖ How COOP will ensure students receive related services (e.g., financial aid, instruction, food, and housing for residents) in the event of a prolonged closure
- ❖ Whether to develop agreements with other institutions to prepare for situations, such as a hurricane, where the IHE may not be able to provide routine services for long periods of time

### **Recovery Annex**

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

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

- ❖ Academic recovery
- ❖ When the IHE should be closed and reopened, and who has the authority to close and reopen the IHE
- ❖ What temporary space(s) the IHE may use if IHE buildings and facilities cannot be immediately reopened
- ❖ How to provide alternate educational programming in the event that students cannot physically reconvene
- ❖ Physical recovery
- ❖ How to document IHE assets, including physically accessible facilities, in case of damage
- ❖ Which personnel have expert knowledge of the IHE's assets, and how and where they will access records to verify current assets after an emergency
- ❖ How to provide for the housing and nutrition needs of students, faculty, or staff living on campus
- ❖ How to address research facilities that contain sensitive information, materials, or animals

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- ❖ How the IHE will work with utility and insurance companies before an emergency to support a quicker recovery
  - ❖ Fiscal recovery
  - ❖ How the IHE leadership will be included (e.g., the president or chief executive officer, chief business officer, personnel director, and risk manager)
  - ❖ How faculty and staff will receive timely and factual information regarding returning to work
  - ❖ What sources the IHE may access for emergency relief funding
  - ❖ Psychological and emotional recovery
  - ❖ Who will serve as the team leader
  - ❖ Where counseling and psychological first aid will be provided
  - ❖ How the IHE will create a calm and supportive environment for its community, share basic information about the incident, provide psychological first aid (if trained), and identify those who may need immediate crisis counseling
  - ❖ Who will provide trained counselors
  - ❖ How to address immediate, short-, and long-term counseling needs of students, faculty, staff, and families
  - ❖ How to handle commemorations, memorial activities, or permanent markers and/or memorial structures (if any will be allowed), including concerns such as when a commemoration site will be closed, what will be done with notes and tributes, and how students will be informed in advance
  - ❖ How memorial activities will strike a balance among honoring the loss, resuming IHE and class routines and schedules, and maintaining hope for the future
  - ❖ How the Public Health, Medical, and Mental Health annex will inform the actions and plans for all components of the Recovery annex

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

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



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

- ❖ What is the role of staff members is in providing first aid during an emergency
- ❖ Where emergency medical supplies (first aid kits, AEDs, etc.) will be located and who is responsible for purchasing and maintaining those materials
- ❖ Which staff have relevant training or experience such as first aid or CPR
- ❖ How the IHE will secure a sufficient number of counselors and others trained in psychological first aid in the event of an emergency
- ❖ How the IHE will promptly share and report information about outbreaks or epidemics or other unusual medical situations to the local health department
- ❖ How the IHE will support the needs of students, faculty, and staff identified by the TAT

### **Security Annex**

This annex focuses on the courses of action that IHEs will implement on a routine, on-going basis to secure the IHE from criminal threats originating from both inside and outside the IHE. This includes efforts done in conjunction with law enforcement officers.

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

- ❖ How agreements with law enforcement agencies address the daily role of law enforcement officers in and around campus (For more information about this topic, see the “A Closer Look” section, “Campus Public Safety”).
- ❖ How to help ensure the buildings and facilities are physically secure (including implementation of Crime Prevention Through Environmental Design [CPTED])
- ❖ How to assist students, faculty, and staff in safely traveling to, from, and within the campus safely (including traffic control and pedestrian safety)
- ❖ How to keep prohibited items or materials off the campus
- ❖ How to respond to threats identified by the TAT
- ❖ How to address issues related to cybersecurity and threats to the IHE’s information technology systems
- ❖ How security will be provided at stadiums, arenas, and other large-event facilities
- ❖ How to provide security for sensitive facilities, including research labs and test reactors on the campus
- ❖ How to account for students, faculty, staff, and visitors in a variety of locations at different points in the day

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- ❖ How information will be shared with law enforcement officers or other responders (keeping in mind any requirements or limitations of applicable privacy laws, including *FERPA*, *HIPAA*, and other civil rights laws. More information on *FERPA* and *HIPAA* can be found in the “A Closer Look” section, “Information Sharing”.)

### **Rapid Assessment Annex**

This annex focuses on the courses of action that IHEs will implement when it is notified of or becomes aware of an occurring or impending emergency situation.

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

- ❖ How to immediately gather information to determine the type and scale of the incident
- ❖ How to determine an appropriate response
- ❖ How to determine which annexes should be implemented
- ❖ How the institution will take immediate action to protect life and property
- ❖ Whether goals, objects, and courses of action are consistent with the requirements of the *Clery Act* (see the “A Closer Look” section for more information on the *Clery Act*).

The IHE’s response team lead (Incident Commander) has responsibility for the management of all emergency activities, including development, implementation, and review of strategic decisions. These actions and decisions are made in concert and in consultation with other community response partners and leaders as applicable.

### **Threat- and Hazard-Specific Annexes**

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

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

**Table 4: Threat and Hazard Types and Examples**

| Threat/Hazard Type                   | Examples  |
|--------------------------------------|---|
| Natural Hazards                      | <ul style="list-style-type: none"> <li>• Earthquakes</li> <li>• Tornadoes</li> <li>• Lightning</li> <li>• Severe wind</li> <li>• Hurricanes</li> <li>• Floods</li> <li>• Wildfires</li> <li>• Extreme temperatures</li> <li>• Landslides or mudslides</li> <li>• Tsunamis</li> <li>• Volcanic eruptions</li> <li>• Winter precipitation</li> <li>• Infectious diseases, such as pandemic influenza, extensively drug-resistant tuberculosis, <i>Staphylococcus aureus</i>, and meningitis</li> <li>• Contaminated food outbreaks, including salmonella, botulism, and <i>E. coli</i></li> </ul> |
| Technological Hazards                | <ul style="list-style-type: none"> <li>• Explosions or accidental release of toxins from industrial plants</li> <li>• Accidental release of hazardous materials from within the IHE, such as gas leaks or laboratory spills</li> <li>• Hazardous materials releases from major highways or railroads</li> <li>• Radiological releases from nuclear power stations</li> <li>• Dam failure</li> <li>• Power failure</li> <li>• Water failure</li> <li>• Fire</li> </ul>   |
| Adversarial and Human-caused Threats | <ul style="list-style-type: none"> <li>• Arson</li> <li>• <i>Active shooters</i></li> <li>• Criminal threats or actions</li> <li>• Gang violence</li> <li>• Bomb threats</li> <li>• Domestic violence and abuse</li> <li>• Cyber attacks</li> <li>• Suicide</li> </ul>  |

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## A CLOSER LOOK

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

- ❖ “*The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act*” provides an overview of Institutions of Higher Education (IHE) responsibilities, focusing on the emergency notification and timely warning requirements.
- ❖ “Information Sharing, *FERPA*, and *HIPAA*” provides an overview of the *Family Educational Rights and Privacy Act*, the *Health Insurance Portability and Accountability Act*, and the implications that these federal statutes may have for information sharing in the emergency planning process.
- ❖ “Incorporating International Students into IHE Emergency Management and Planning” describes the unique needs of international students that IHEs should consider when planning for and responding to crises.
- ❖ “Campus Public Safety” describes the unique challenges faced by campus public safety departments and provides recommendations for working with campus public safety throughout the emergency planning process.
- ❖ “*Active Shooter Situations*” describes the unique challenges involved in preparing for, responding to, and recovering from a shooting at an IHE.
- ❖ “Psychological First Aid” (PFA) describes PFA and how IHEs can use it to help students and staff during and immediately after a traumatic incident.

## 1. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act)

The *Clery Act*, found in section 485(f) of the *Higher Education Act of 1965*, as amended (*HEA*), requires IHEs that participate in the *Title IV HEA* federal student financial assistance programs to disclose campus crime statistics and security information.<sup>8</sup> Among other things, the *Clery Act* requires IHEs to provide timely warnings to the campus community of certain crimes reported to campus security authorities that represent a threat to students and employees, and to maintain a log of crimes reported to the campus police or security department. In addition, IHEs must include in their annual security report, a statement of policy regarding the institution’s emergency response and evacuation procedures. This requirement complements and supports a number of the concepts described throughout this guide, such as the importance of clearly delineating the responsibilities of individuals involved during an emergency response, the need to develop and implement notification and communication strategies to share information with the campus community, the imperative of testing and practicing a higher ed EOP, and the importance of keeping the community informed of current policies and procedures.

Generally, the requirements under the *Clery Act* fall into three categories:

- 1) Reporting crime statistics and disclosing security-related policies
  - a. Every IHE must collect, classify, and count reported crimes and disclose crime statistics for certain crimes (see the chart below) to the campus community and the public (through the U.S. Department of Education’s campus security website).

| Crimes Reported Under the <i>Clery Act</i>  |  |   |
|---|--|---|
| Criminal Offenses   | Hate Crimes (any of the crimes listed under Criminal Offenses in addition to the ones below) | Arrests and Referrals for Disciplinary Action |
| Murder and Non-Negligent Manslaughter   | Larceny-Theft  | Weapons Law Violations                        |
| Negligent Manslaughter  | Simple Assault   | Liquor Law Violations                         |
| Sex Offenses <ul style="list-style-type: none"> <li>• Forcible</li> <li>• Non-forcible (i.e., incest and statutory rape)</li> </ul> | Intimidation   | Drug Law Violations                           |
| Robbery   | Destruction, Damage, or Vandalism of Property  |   |
| Aggravated Assault  |  |   |
| Burglary  |  |   |
| Motor Vehicle Theft   |  |   |
| Arson   |  |   |

<sup>8</sup> The implementing regulations for the *Clery Act* are found in 34 C.F.R. Sections 668.14(c)(2)(i), 41(e), 46, and 49. In March 2013, the *Clery Act* was amended by the *Violence Against Women Reauthorization Act of 2013 (VAWA)*. *VAWA* expanded the scope of the Act and requires IHEs to take additional steps to provide information to students and employees.

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- b. Under certain circumstances an IHE must issue a campus alert to provide members of the campus community with information necessary to make informed decisions about their health and safety. There are two kinds of alerts under the *Clery Act*:
    - i. Timely warnings are issued for certain crimes that represent a threat to the safety of students or employees.
    - ii. Emergency notifications are issued upon the confirmation of a significant emergency or dangerous situation occurring on the campus that involves an immediate threat to the health or safety of students or employees.
  - c. Every IHE must publish an annual security report that contains safety- and security-related policy statements and crime statistics, and distribute it to all current students and employees. IHEs also must inform prospective students and employees about the availability of the report.
  - d. Every IHE must submit crime statistics to the U.S. Department of Education annually. Those statistics are available to the public available at <http://www.collegenavigator.gov>, as well as via the Office of Postsecondary Education's Campus Safety and Security Data Analysis Cutting Tool available at <http://www.ope.ed.gov/security/>.
- 2) Maintaining a crime log at IHEs that have a campus police or security department. IHEs that maintain a campus police or security department must keep a daily crime log of reported crimes that is open to public inspection.
- 3) Disclosing missing student notification and fire-safety requirements for IHEs that have any on-campus student housing facility
- a. IHEs with on-campus student housing facilities must disclose missing student notification procedures that pertain to students residing in those facilities.
  - b. IHEs with on-campus student housing facilities must disclose fire safety information related to those facilities. IHEs must provide this information to students and employees, and potential students and employees, in the same manner as they disclose crime information under the *Clery Act*.<sup>9</sup> These IHEs must
    - i. Keep a fire log that is open for public inspection;
    - ii. Publish an annual fire safety report with policy statements and fire statistics associated with each on-campus student housing facility, provide

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<sup>9</sup> Please see the U.S. Department of Education's regulations on fire safety at 34 CFR Section 668.49 available at <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=676893907309b77d0c88954dcce41914&rgn=div8&view=text&node=34:3.1.3.1.34.4.39.9&idno=34/>.

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students and employees with the report, and inform prospective students and employees of the availability of the report; and

- iii. Submit fire statistics to the U.S. Department of Education annually.

As part of the emergency planning process, it is critical that IHEs take the time to review and understand all the *Clery Act* requirements. In this “A Closer Look” section, however, we focus on two of those requirements: timely warnings and emergency notifications. These issues tie directly to and reinforce other concepts in this guide. The U.S. Department of Education’s *Handbook for Campus Safety and Security Reporting* (listed in the Resources section of this guide) details all of the *Clery Act* requirements in depth and provides sample policy statements, diagrams, and other helpful aids for IHEs in complying with this statute.

### **Timely Warnings**

The *Clery Act* requires IHEs to alert the campus community to certain crimes that are reported to campus security authorities or local police agencies, and are considered by the IHE to represent a threat to students and employees. These alerts must be done in a manner that is timely and that will aid in the prevention of such crimes. The *Clery Act* does not include a specific definition of “timely”. However, the intent of a timely warning is to enable people to protect themselves; therefore, warnings should be issued as soon as pertinent information is available. The decision to issue a timely warning should be made on a case-by-case basis, taking into account the nature of the crime, the danger to the campus community, and the possible risk of compromising law enforcement efforts.

An IHE must include in the annual security report a policy statement that accurately reflects the institution’s timely warning policy and practice. The policy should specify the circumstances under which the IHE will issue a timely warning, how those timely warnings will be distributed, and the individual or office responsible for issuing a timely warning. IHEs must take appropriate steps to ensure that timely warnings are communicated to individuals with disabilities, including those who have hearing or vision disabilities, as effectively as they are to others.

### **Emergency Notification**

IHEs must also develop and disclose emergency response and evacuation procedures, including emergency notification procedures that describe their response to significant emergency or dangerous situations involving an immediate threat to the health or safety of students or employees occurring on the campus.<sup>10</sup> This requirement is intended to ensure that an IHE has sufficiently prepared for an emergency situation on campus, has tested those procedures to identify and improve on weaknesses, and has considered how it will inform the campus community and other individuals, such as parents and guardians.

IHEs must include a policy statement in their annual security reports that accurately reflect their emergency response and evacuation procedures. This policy statement must include

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<sup>10</sup> The *Clery Act* differentiates among “on-campus locations,” “public property,” and “non-campus buildings or property.” These geographic categories drive a number of *Clery Act* requirements, including crime reporting and disclosures, and emergency response and evacuation procedures. See Chapter 2 of the *Handbook for Campus Safety and Security Reporting* available at <http://www2.ed.gov/admins/lead/safety/handbook.pdf>.

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- ❖ The procedures the IHE will use to immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring on the campus, unless issuing a notification will compromise efforts to contain the emergency;
  - ❖ A description of the process the IHE will use to confirm that there is a significant emergency or dangerous situation, determine the appropriate segment or segments of the campus community to receive a notification, determine the content of the notification, and initiate the notification system;
  - ❖ A statement that the IHE will, without delay and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency;
  - ❖ A list of the titles of the person(s) or organization(s) responsible for carrying out the actions described above;
  - ❖ The IHE's procedures for disseminating emergency information to the larger community; and
  - ❖ The IHE's procedures to test the emergency response and evacuation procedures on at least an annual basis.

In addition, the IHE should take steps to ensure the emergency notification planning, testing, and implementation will provide such notifications and related information to individuals with disabilities, including those with vision or hearing disabilities, as effectively as they are provided to others.

As stressed elsewhere in this guide, testing a higher ed EOP is critical to the successful implementation of the appropriate course of action during an emergency situation. The *Clery Act* provides flexibility to IHEs in designing their tests and does not prescribe a particular type that must be used. These tests may be announced or unannounced, but IHEs must publicize their emergency response and evacuation procedures in conjunction with at least one test per calendar year. They must also document, for each test, a description of the exercise, the date and time of the exercise, and whether it was announced or unannounced.



## Emergency Notification and Timely Warning: Sorting Out the Differences

| Emergency Notification   | Timely Warning  |
|--|---|
| <b>Scope:</b> Wide focus on any significant emergency or dangerous situation (e.g., crime, severe storm, chemical spill, disease outbreak)   | <b>Scope:</b> Required for certain crimes   |
| <b>Why:</b> Emergency notification is triggered by an event that is currently occurring on or imminently threatening the campus. Initiate emergency notification procedures for any significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus. | <b>Why:</b> Timely warnings are triggered by crimes that have already occurred (but may be continuing) but which represent an ongoing threat. An IHE must issue a timely warning for certain crimes that are reported to its campus security authorities <sup>11</sup> or a local law enforcement agency, and is considered by the institution to represent a serious or continuing threat to students and employees. |
| <b>Where:</b> Applies to situations that occur on campus   | <b>Where:</b> Applies to crimes that occur on campus, in or on non-campus buildings or property, and on public property.  |
| <b>When:</b> Initiate procedures immediately upon confirmation that a dangerous situation or emergency exists or threatens.  | <b>When:</b> Issue a warning as soon as the pertinent information is available.   |
| An IHE that follows its emergency notification procedures is not required to issue a timely warning based on the same circumstances; however, the institution must provide adequate follow-up information to the community as needed.  |   |

<sup>11</sup> “Campus security authority” is a specific term under the *Clery Act* that includes four groups of individuals and organizations associated with the institution: 1) a campus police department or campus security department; 2) individuals with responsibility for campus security but who do not constitute a police or security department; 3) individuals or organizations specified in the IHE’s statement of campus security policy as entities to whom students and employees should report criminal offenses; and 4) an IHE official with significant responsibility for student and campus activities.

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## 2. Information Sharing

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

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

While this section of the guide focuses on *FERPA*, and to a lesser extent *HIPAA*, there may be additional federal and state civil rights and other laws that place restrictions on when and with whom IHEs may share information. At the federal level, for instance, postsecondary institutions are subject to federal civil rights laws, including laws that prohibit discrimination based on disability (*ADA* and *Section 504 of the Rehabilitation Act of 1973*), race, color, and national origin (*Titles IV<sup>12</sup> 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<sup>13</sup>* prohibit discrimination on the basis of disability, and generally would prohibit unnecessary disclosures of disability status, or information related to that disability, to third parties.<sup>14</sup> Disclosures may be necessary when the student presents a significant, articulable threat to others.<sup>15</sup>

Postsecondary institutions are strongly urged to take the time to review these laws, as well as others that apply in their jurisdictions, when working with their community partners (e.g., law enforcement agencies, fire departments, emergency management agencies, public and mental health agencies) to ensure that all parties have a strong understanding of applicable laws when deciding whether to disclose information from education records without consent. In particular, it is critical to train the institutions’ employees, including contractors, on applicable laws to ensure that institutions, IHE officials, or employees do not release information inappropriately or make

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<sup>12</sup> *Title IV of the Civil Rights Act of 1964* applies to public postsecondary institutions.

<sup>13</sup> *Title II of the ADA* prohibits discrimination based disability by public entities, including public institutions of higher education.

<sup>14</sup> See 34 CFR § 104.4 available at <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=38a42834a329452c07d853e5091f6d3f&rgn=div5&view=text&node=34:1.2.1.1.3&idno=34#34:1.2.1.1.3.1.132.4>; 28 CFR § 35.130 available at <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=fed2599073ee2b61363d831ea8e2b5f1&rgn=div8&view=text&node=28:1.0.1.1.36.2.32.1&idno=28>; and “Dear Colleague Letter and Frequently Asked Questions on Report Cards and Transcripts for Students with Disabilities Attending Public Elementary and Secondary Schools,” October 2008, available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-20081017.pdf>.

<sup>15</sup> See 28 CFR 35.139 available at <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=263f01c0db63e7266a3711907eab6bd3&rgn=div8&view=text&node=28:1.0.1.1.36.2.32.10&idno=28> to 28 CFR 36.208 available at <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=01903fc38a7bdb19c90e9c2e84fa788e&rgn=div8&view=text&node=28:1.0.1.1.37.2.32.8&idno=28/>.

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decisions about students or release of records based upon myths, fears, or stereotypes related to race, color, national origin, sex, sexual orientation, gender identity, religion, or disability.<sup>16</sup>

## ***Family Educational Rights and Privacy Act (FERPA)***

### **In this section:**

What Is *FERPA*?

What Are “Education Records?”

Who May Access *FERPA*-Protected Education Records?

Balancing Safety and Privacy

The Health and Safety Emergency Exception to the Consent Requirement

The Law Enforcement Unit Records Exception to the Definition of Education Records

Common *FERPA* Misunderstandings

Additional Situations With *FERPA* Considerations

Incorporating *FERPA* Into Your Emergency Planning Process

Frequently Asked Questions Pertaining to *FERPA*

*FERPA* Guidance and Resources

### **What Is *FERPA*?**

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

*FERPA* protects the rights of eligible students to:

- ❖ Inspect and review education records;
- ❖ Seek to amend education records; and

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<sup>16</sup> For more information about applicable civil rights laws, please visit <http://www.justice.gov/crt/>, <http://www.ed.gov/ocr/>, or <http://www.ada.gov/>. Information about the appropriate training and management of campus public safety may be found at <http://www.cops.usdoj.gov/>.

- ❖ Consent to the disclosure of personally identifiable information (PII)<sup>17</sup> 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 available at [http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title34/34cfr99\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title34/34cfr99_main_02.tpl).

### What are “Education Records?”

Different types of records and information may be protected by *FERPA* if that information constitutes PII from “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 institution, or by a party acting for the institution.

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

| Education Records   | Not Education Records  |
|---|--|
| Transcripts   | Records that are kept in the sole possession of the maker and used only as personal memory aids  |
| Disciplinary records  | Law enforcement unit records   |
| Immunization and other health records, unless the records meet the exclusion for “treatment records” under <i>FERPA</i>   | Records made or maintained by a physician or other medical professional used only in connection with treatment of the student (“treatment records”)                              |
| Records on services and accommodations provided to students under <i>Section 504 of the Rehabilitation Act of 1973</i> , and <i>Title II and Title III of the ADA</i> | Records created or received by an institution after an individual is no longer in attendance and that are not directly related to the individual’s attendance at the institution |
| Records on a student who is employed as a result of his or her status as a student (i.e., work-study)   | Grades on peer-graded papers before they are collected and recorded by an instructor   |
|   | Information obtained through a school official’s personal knowledge or observation and not from the student’s education records  |
|   | Employment records (unless the individual is employed as a result of his or her status as a student)   |

<sup>17</sup> Under *FERPA*, “personally identifiable information” is a term that includes, but is not limited to the student’s name; the name of the student’s parent or other family members; the address of the student or student’s family, a personal identifier, such as the student’s social security number, student number, or biometric record; other indirect identifiers, such as the student’s date of birth, place of birth, and mother’s maiden name; other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or information requested by a person who the educational agency reasonably believes knows the identity of the student to whom the education record relates. (See 34 CFR 99.3.)

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Additionally, records created and maintained by the institution's law enforcement unit are not likely to fall into the protected definition of "education records." See the discussion under "Balancing Safety and Privacy" below for more detail on law enforcement units under *FERPA*, what constitutes a law enforcement unit record, and how these records may be used.

*Treatment records* are also not considered to be education records. The term "treatment records" generally applies to records involving students who are at least 18 years old or who are attending an institution of postsecondary education, and means records that are

- ❖ Made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in his or her professional capacity or assisting in a paraprofessional capacity;
- ❖ Made, maintained, or used only in connection with treatment of the student; and
- ❖ Disclosed only to individuals providing the treatment.

Treatment does not include remedial educational activities or activities that are part of the program of instruction at the institution. In a college setting, treatment records typically include those created and maintained at the campus health clinic.

### **Who May Access *FERPA*-Protected Education Records?**

**"School officials with a legitimate educational interest" may access *FERPA*-protected education records.** Institutions determine the criteria for who is considered a school official with a legitimate educational interest under *FERPA* regulations. In a postsecondary context, there is a wide variety of individuals in different functions at the institution who could meet this definition. For example, faculty, administrators, and support staff, including law enforcement unit personnel, health center personnel, students serving on an official committee, the board of trustees, and others could be considered school officials with a legitimate educational interest.

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

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

In addition, institutions must notify eligible students of their rights under *FERPA*, and must include in this notification the criteria for who constitutes an IHE official and what constitutes a

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legitimate educational interest. The U.S. Department of Education provides model notification statements on its website at <http://www2.ed.gov/policy/gen/guid/fpco/ferpa/ps-officials.html>.<sup>18</sup>

This means that if an institution wishes to consider non-employee members of its threat assessment team, its contracted counseling, nursing, service, or security staff, campus safety officials, and other non-employees as “school officials” who may have access to education records, the institution must ensure that these individuals meet the criteria in the bullets above and the criteria in the IHE’s annual notification of *FERPA* rights.

**Parents of an eligible student may, in some cases and at the discretion of the institution, access *FERPA*-protected records.** When a student turns 18 years old or enters a postsecondary institution, all rights afforded to parents under *FERPA* transfer to the student (the “eligible student”). However, institutions *may* – but are not required to – share information from an eligible student’s records with parents, without the eligible student’s consent, if an exception to the general requirement of consent is applicable, such as

- ❖ If the student is claimed as a dependent for tax purposes;
- ❖ If the student is under 21 at the time of disclosure and if the student has violated any law or institutional rule or policy concerning the use or possession of alcohol or a controlled substance, and the postsecondary institutions determines that the student has committed a disciplinary violation with respect to that use or possession;
- ❖ Information based on that official’s personal knowledge or observation of the student; or
- ❖ During a health or safety emergency involving their child.

### **Balancing Safety and Privacy**

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

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

*FERPA* generally requires written consent before the IHE may disclose PII from the student’s education records. However, the *FERPA* regulations permit IHE officials to disclose PII from education records without consent to appropriate parties only when there is an actual, impending, or imminent emergency, such as an articulable and significant threat. Information may be disclosed only to protect the health or safety of students or other individuals. In applying the health and safety exception, note that:

- ❖ Institutions determine what constitutes a health or safety emergency.

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<sup>18</sup> See 34 CFR § 99.7(a)(3)(iii) for further information. Available at <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=ea1af3867103d06eb14b239518b24822&rgn=div8&view=text&node=34:1.1.1.1.33.1.132.7&idno=34/>.

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- ❖ “Appropriate parties” typically include law enforcement officials, first responders, public health officials, trained medical personnel, and parents, including parents of an eligible student.
  - ❖ This *FERPA* exception is temporally limited to the period of the emergency and does not allow for a blanket release of PII. It does not allow disclosures to address emergencies that might occur, such as would be the case in emergency preparedness activities.
  - ❖ The information that may be disclosed is limited to only PII from an education record that is needed based on the type of emergency.
  - ❖ Disclosures based on this exception must be documented in the student’s education records to memorialize the
  - ❖ Emergency that formed the basis for the disclosure; and
  - ❖ Parties with whom the IHE shared the PII.

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

For more information on the health and safety exception, see *Addressing Emergencies on Campus*, June 2011, available at <http://www2.ed.gov/policy/gen/guid/fpco/pdf/emergency-guidance.pdf> and see 34 CFR §§ 99.31(a)(10) and 99.36 available at <http://www2.ed.gov/policy/gen/guid/fpco/pdf/ferparegs.pdf> and <http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=a6d8c41c13e4156f3e961aaa1be8f9df&n=34y1.1.1.1.33.1&r=SUBPART&ty=HTML>.

### **The Law Enforcement Unit Records Exemption to the Definition of Education Records**

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

- (i) Enforce any local, state, or federal law, or refer to appropriate authorities a matter for enforcement of any local, states, or federal law against any individual or organization other than the agency or institution itself; or
- (ii) Maintain the physical security and safety of the institution.

Significantly, to be considered a “law enforcement unit” under this definition, an individual or component must be officially authorized or designated to carry out the functions listed above by the institution. IHEs may designate a traditional law enforcement entity (such as a campus safety department, campus police officer, or other IHE security personnel), or opt to designate another

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non-law-enforcement school official to serve as their law enforcement unit, such as a provost or other school official.

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

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

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

Law enforcement unit records do NOT include

- ❖ Records created by a law enforcement unit for a law enforcement purpose that are maintained by a component of the institution other than the law enforcement unit, such as a provost, dean, disability services coordinator, or health clinic;
- ❖ Records received from another component of the IHE, such as health records, PII collected about or related to the disability of a student, and disciplinary records; and
- ❖ Records created and maintained by a law enforcement unit exclusively for a non-law enforcement purpose, such as an institutional disciplinary action or proceeding.

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

- ❖ To be given access to PII from a student's education records, law enforcement unit officials who are employed by the institution must meet the criteria set forth in the institution's *FERPA* notification for "school officials with a legitimate educational interest." While law enforcement unit officials are not required to be an institution's officials under *FERPA*, many institutions have found that it is useful for them to be their officials so that they may access education records that may be necessary to ensure IHE safety. For instance, if a student has been barred from campus for a period of time (a fact that would be recorded in the student's education records), the law enforcement unit might need to know this in case the student attempts to enter a campus building when not permitted to do so.
- ❖ An institution's law enforcement unit officials must protect the privacy of education records they receive and may disclose them only in compliance with *FERPA*. For that reason, we recommend that law enforcement unit records be maintained separately from education records.



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For more information on law enforcement unit records and *FERPA*, refer to the following sources:

- ❖ “Addressing Emergencies on Campus,” June 2011, available at <http://www2.ed.gov/policy/gen/guid/fpco/pdf/emergency-guidance.pdf>
- ❖ The discussion in the preamble to the final rule in the Federal Register published Dec. 9, 2008, starting on page 74,815 addresses law enforcement unit records and starting on page 74,834, discusses *FERPA* (available at <http://www2.ed.gov/legislation/FedRegister/finrule/2008-4/120908a.pdf>).
- ❖ The Family Policy Compliance Office website at <http://www.ed.gov/policy/gen/guid/fpco/index.html>
- ❖ The regulatory definition of “Law Enforcement Unit” under *FERPA* in 34 CFR § 99.8(a) available at <http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=ae535d41f8bb03bedfef79634883360f&n=34y1.1.1.1.33&r=PART&ty=HTML#34:1.1.1.1.33.1.132.8>.

### **Common *FERPA* Misunderstandings**

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

### **Sharing Personal Observation or Knowledge**

Misinterpreting *FERPA* can lead institutional administrators to miss opportunities to share crucial information that could prevent an emergency situation. For instance, some institutions incorrectly believe that information obtained from a school official’s personal observations or knowledge is protected by *FERPA*. In fact, personal observation or knowledge is generally not considered to be part of the student’s education records (see “What Are Education Records” above) and therefore may be disclosed. For example, if a faculty member overhears a student making threatening remarks to other students or is concerned after having a discussion with a student that the student may be violent, the faculty member is not prohibited from sharing that information with appropriate authorities, including the parents of the students who were threatened and the student’s parents. While *FERPA* would not prohibit the sharing of such information with others, there may be state laws or institutional policies and procedures that would preclude the faculty member from sharing the information.

However, if a school official learns of information about a student through his or her official role in creating or maintaining an education record, then that information would be covered by *FERPA*. For instance, if an institutional disciplinary panel takes action against a student, then an individual serving on the panel would not be permitted to non-consensually disclose that information because he or she gained personal knowledge of that information in making the disciplinary determination and the determination is maintained in an education record.

### **The *Clery Act*’s Timely Warning Requirement and *FERPA***

The *Clery Act* requires institutions to, among other things, give timely warnings of crimes that represent a threat to the safety of students or employees (see the “A Closer Look” section on the

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*Clery Act* for more information about it). These warnings are intended to enable members of the campus community to protect themselves. While the *Clery Act* does not specify what information should be included in a timely warning,<sup>19</sup> it should include all information that would promote safety and that would aid in the prevention of similar crimes. Institutions often incorrectly believe that *FERPA* conflicts with this timely warning requirement. It does not. *FERPA* allows the release of PII from education records in the case of an emergency without consent when needed to protect the health and safety of others. In addition, if institutions utilize the law enforcement unit records of a campus law enforcement unit to issue a timely warning, *FERPA* is irrelevant as those records are not protected by *FERPA*. (See *Clery Act*, 20 U.S.C. §1092(f),<sup>20</sup> with implementing regulations at 34 CFR § 668.46.)<sup>21</sup>

### Releasing Directory Information

In some circumstances, institutions may be able to disclose “directory information” to prevent an emergency situation. Directory information means information contained in a student’s education record that would not generally be considered harmful or an invasion of privacy if disclosed. Some examples of directory information include a student’s name, address, telephone number, or e-mail address. Institutions must follow certain requirements in publicly designating “directory information,” and they may not disclose directory information from a student’s education record if the eligible student has opted out of allowing that disclosure. (See 34 CFR §99.37.) For example, an institution could disclose properly designated directory information to first responders for emergency-preparedness exercises if the eligible students have not opted out of the disclosure.

### Additional Situations With *FERPA* Considerations

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

#### ❖ Infectious Disease

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

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<sup>19</sup> Beginning in March 2014, the *Clery Act* will prohibit the release of victims’ names in timely warning notifications and crime logs.

<sup>20</sup> 20 U.S.C. 1092(f) is available at <http://www.gpo.gov/fdsys/pkg/USCODE-2011-title20/html/USCODE-2011-title20-chap28-subchapIV-partF-sec1092.htm>.

<sup>21</sup> 34 CFR § 668.46 is available at <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=676893907309b77d0c88954dcce41914&rgn=div8&view=text&node=34:3.1.3.1.34.4.39.6&idno=34>.

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must instead determine what information to disclose on a case-by-case basis depending on the particular threat.

❖ **Threat Assessment Teams**

Some institutions may need assistance in determining whether a health or safety emergency exists for purposes of complying with *FERPA*. Federal agencies encourage institutions to implement a threat assessment program, including the establishment of a multi-disciplinary TAT that utilizes the expertise of representatives from mental health service providers, persons familiar with emergency procedures, and law enforcement agencies in the community, as well as from the major areas of the institutions, such as student affairs, academic affairs, the campus security department, and other appropriate professionals.

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

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

❖ **Security Videos**

Institutions are increasingly using security cameras as a tool to monitor and improve student safety. Images of students captured on security videotapes that are created and maintained by the IHE’s law enforcement unit for a law enforcement purpose, are not considered education records under *FERPA*. Accordingly, these videotapes may be shared with outside authorities, such as local law enforcement authorities, as appropriate.

❖ **Transfer of Education Records**

*FERPA* permits school officials to disclose any and all education records, including disciplinary records, to another institution at which the student seeks or intends to

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enroll.<sup>22</sup> While student consent is not required for transferring education records in this scenario, the institution's annual *FERPA* notification should indicate that such disclosures are made. In the absence of information about disclosures in the annual *FERPA* notification, school officials must make a reasonable attempt to notify the student about the disclosure, unless the student initiates the disclosure. Additionally, upon request, the institution must provide a copy of the information disclosed and an opportunity for a hearing to address information the student believes to be inaccurate, misleading, or in violation of the student's rights of privacy.

❖ ***FERPA* and Student Health Information**

Postsecondary institutions that provide health or medical services to students may disclose an eligible student's treatment records to health care professionals who are providing treatment to the student, including health care professionals who are not part of or not acting on behalf of the institution (i.e., third-party providers), as long as the information is being disclosed only for the purpose of providing treatment to the student. In addition, an eligible student's treatment records may be disclosed to a third-party provider when the student has requested that his or her records be reviewed by a physician or other appropriate professional of the student's choice.

While, by definition, treatment records are not available to anyone other than professionals providing treatment to the student, this does not prevent an institution from disclosing these records for other purposes. However, once such a disclosure is made, the treatment records are no longer excluded from the definition of "education records" and are subject to all of the *FERPA* requirements as "education records" under *FERPA*. For example, if the institution chooses to do so, it may make a disclosure to the eligible student's parents, under one of the exceptions to the general consent requirement. The records may also be disclosed to appropriate parties in connection with a health or safety emergency.

❖ ***FERPA* and Student and Exchange Visitor Information System (SEVIS)**

*FERPA* permits institutions to comply with information requests from the U.S. Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE) in order to comply with the requirements of SEVIS. Officials who have specific questions about this and other matters involving international students should contact the U.S. Department of Education's Family Policy Compliance Office at 400 Maryland Avenue SW, Washington, DC 20202-8520 or by calling 1-800-872-5327 (1-800-USA-LEARN).

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<sup>22</sup> Please note that civil rights laws may apply. For instance, Section 504 of the Rehabilitation Act prohibits pre-admission inquiries about an applicant's disability. See 34 CFR § 104.42(b)(4) available at <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=ec9ff20a16040ddc021d2d0b60f6f668&rgn=div8&view=text&node=34:1.2.1.1.3.5.132.2&idno=34>.

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### ❖ **Disciplinary Records**

While student disciplinary records are protected as education records under *FERPA*, there are certain circumstances in which specified information contained in disciplinary records may be disclosed without the student's consent. Under the *Clery Act*, an IHE must disclose to the accuser and the accused the outcome of an institutional disciplinary proceeding alleging a sex offense. For this purpose, the outcome of a disciplinary hearing means the institution's final determination with respect to the alleged sex offense and any sanction imposed against the accused. The final results must include the name of the alleged perpetrator, the violation committed, and any sanction imposed by the institution against the alleged perpetrator. An institution may disclose to anyone—not just the victim—the final results of a disciplinary proceeding, if it determines that the student is an alleged perpetrator of a crime of violence or non-forcible sex offense, and with respect to the allegation made against him or her, the student has committed a violation of the institution's rules or policies.

### ❖ **Missing Students**

The *Clery Act*, as amended, requires postsecondary institutions that maintain on-campus student housing facilities to establish, for students who reside in on-campus student housing, a missing student notification policy that includes notifying students that they may register “confidential” contact information for an individual to be contacted if the student is determined to be missing. Although missing student contact information would be considered PII from a student's education records under *FERPA*, under the *Higher Education Act*, only authorized campus officials and law enforcement officers in furtherance of a missing person investigation may have access to this confidential contact information. This means that an institution may not disclose a student's confidential contact information to a student's parent or guardian or any other person other than authorized campus officials and law enforcement officers. A student's identification of a confidential contact is accepted as permission for law enforcement personnel to contact the identified individual if the student is determined to be missing.

## **Incorporating *FERPA* into Your Emergency Planning Process**

Below are critical questions and concepts that institutions should discuss with their community partners (e.g., first responders, emergency managers, public and mental health officials) while in the process of developing or revising an emergency management plan. While building partnerships is critical, in gathering information to support these partnerships, institutions must also take steps to balance student privacy with their mission of safety. Be sure to refer to the sections elsewhere in this guidance to review any concepts with which you are unfamiliar.

## **What Information is *FERPA*-Protected, and When May the Institution Share It?**

Education records are protected by *FERPA*, and institutions may generally disclose PII from those records only with written consent from an eligible student, unless a *FERPA* exception to consent applies. (See “What Are ‘Education Records’” above.) The following are examples of how *FERPA* would apply in a variety of situations.

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

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

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

*Example:* Two students have an altercation in their residence hall, and one student is stabbed in the abdomen and falls unconscious. A bystander calls 911 for an ambulance and contacts the resident-life director. When the ambulance arrives, the resident-life director discloses to the EMS practitioner the PII from the student’s education record

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related to the stabbed student with hemophilia without obtaining the wounded student's consent under the health or safety emergency exception. (See "The Health or Safety Emergency Exception" above.)

*Example:* A parent of a student at your institution calls requesting PII from their child's education records after learning that the student has been disciplined by the institution for underage drinking. Because you know that you *may* share information without the student's consent because the student is under 21 and has violated a law concerning the use or possession of alcohol, and there has been a disciplinary finding, you comply with the parent's request. (See "Who May Access *FERPA*-Protected Records" above.)

### **What Information Is Not *FERPA*-Protected, and When May the IHE Share It?**

Records that are created and maintained by an IHE's law enforcement unit for law enforcement purposes are not protected by *FERPA*, and there are no *FERPA* restrictions on the sharing of information in law enforcement unit records. (See "What Are 'Education Records'?" and "Balancing Safety and Privacy" above.)

*Example:* Your institution contracts with a security company to provide campus security, and you properly designate the security officer as your institution's law enforcement unit. You also properly designate the officer as a "school official with a legitimate educational interest." (See "Who May Access *FERPA*-Protected Records" above.) The officer knows that he may not redisclose PII from education records to anyone unless there is a health or safety emergency or another *FERPA* exception to consent applies. However, he shares his law enforcement unit records about a student who was arrested for smoking marijuana on campus with the other law enforcement officials because he knows that law enforcement unit records are not protected by *FERPA*.

### **Are Processes and Protocols, Including Memoranda of Understanding (MOUs), in Place for Information Sharing and Record Keeping That Comply With *FERPA*?**

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

### **Frequently Asked Questions Pertaining to *FERPA***

#### **Q: To what entities does *FERPA* apply?**

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

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

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

**Q: Under the health and safety emergency exception, may an IHE non-consensually disclose PII from education records to the media?**

A: No. You generally may not disclose *FERPA*-protected information to the media, unless the PII disclosed is directory information on eligible students who have not opted out. While the media play a role in alerting the community of a health epidemic or violent incident, they do not generally have a role in protecting the health or safety of individual students or others at the institution.

**Q: When would the health or safety exception apply?**

A: Under *FERPA*, an emergency means a situation in which there is an articulable and significant threat to the health or safety of students or other individuals. This determination must be made by the institution.

**Q: Do I need to tell eligible students or otherwise document when I have disclosed information from their education records without consent under a health or safety emergency or other exception?**

A: When an educational agency or institution makes a disclosure under this exception, an institution must record in the student's education records the articulable and significant threat that formed the basis for the disclosure, and the parties to whom the information was disclosed. Eligible students have a right to inspect and review the record of disclosure but do not need to be proactively informed that records have been disclosed.

**Q: Can members of our TAT have access to student education records?**

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

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



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For example, a representative from the city police force who serves on an IHE's TAT generally could not redisclose, without consent, PII from the student's education records to the city police during the initial discussions about a particular student. However, once the TAT determines that a health or safety emergency exists, as defined under *FERPA*, the representative may redisclose, without consent, PII from a student's education records on behalf of the institution to appropriate officials. (See the discussion under "Additional Situations With *FERPA* Considerations" above.)

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

A: The U.S. Department of Education and the U.S. Department of Health and Human Services (HHS) jointly developed guidance on the application of *FERPA* and *HIPAA*. This guidance explains that records that are protected by *FERPA* are exempt from the *HIPAA* Privacy Rule. Accordingly, school officials must follow the requirements of *FERPA* with regard to the disclosure of records protected by *FERPA*. For more information, please see the guidance at <http://www2.ed.gov/policy/gen/guid/fpco/doc/FERPA-HIPAA-guidance.pdf>, as well as the *HIPAA* information in this "A Closer Look" section.

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

A: As noted in the introduction to this "A Closer Look" section, IHEs may also be subject to federal and state civil rights laws that protect the disclosure of information about students. IHEs and their community partners should review guidance from the U.S. Departments of Education and Justice on any applicable civil rights or other statutes governing privacy and information sharing, and discuss their implications for emergency management and related planning processes. At a minimum, in determining what constitutes an "emergency," IHEs and their community partners must base their decisions on actual risks and not on assumptions, stereotypes, fears, or myths about people with disabilities (including mental health-related disabilities) or people of a particular race, color, ethnicity, national origin, religion, sex, sexual identity, or gender identification.<sup>23,24</sup>

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<sup>23</sup> See Title 28 of the Code of Federal Regulations, Section 35.139 available at <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=c6b7e6addf8451d18de7740dffed1706&rgn=div8&view=text&node=28:1.0.1.1.36.2.32.10&idno=28>.

<sup>24</sup> In enacting *ADA*, Congress relied on *School Board of Nassau County, Florida v. Arline*, 480 U.S. 273, 284 (1987) to "acknowledge[] that society's accumulated myths and fears about disability and disease are as handicapping as are the physical limitations that flow from actual impairment." As explained in the preamble to the U.S. Department of Justice's 1991 *ADA* regulation, codification of the *Arline* standard was deemed essential if the *ADA* is to achieve its goal of protecting disabled individuals from discrimination based on prejudice, stereotypes, or unfounded fear, while giving appropriate weight to legitimate concerns, such as the need to avoid exposing others to significant health and safety risks. See 28 C.F.R. pt. 36, app. C, sec. 36.208 available at <http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=01903fc38a7bdb19c90e9c2e84fa788e&n=28y1.0.1.1.37&r=PART&ty=HTML#28:1.0.1.1.37.2.32.8/>. This rationale applies with equal force to making determinations based on stereotypes about other characteristics protected by *Titles IV* and *VI* of the *Civil Rights Act of 1964*.

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**Q: Whom should I contact for more information related to *FERPA*?**

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

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

In addition, please see the U.S. Department of Education’s website at <http://www2.ed.gov/policy/gen/guid/fpc/index.html> for the most recent guidance.

***FERPA* Guidance and Resources**

The Family Policy Compliance Office (FPCO) at the U. S. Department of Education administers *FERPA*. FPCO has developed, and continues to develop, extensive guidance pertaining to the implementation of *FERPA* and emergency situations. For more detailed information or additional guidance, please see the documents below and the FPCO website at [www.ed.gov/fpc](http://www.ed.gov/fpc). In addition, please see the Navigating Information Sharing Toolkit, developed by the National Center for Mental Health Promotion and Youth Violence Prevention, at <http://sshs.promoteprevent.org/nis>.

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## Health Insurance Portability and Accountability Act of 1996 (HIPAA)

### In this section:

- ❖ What Is *HIPAA*?
- ❖ How Does *HIPAA* Apply in Schools?
- ❖ *HIPAA* Guidance and Resources

### What Is *HIPAA*?

The *Health Insurance Portability and Accountability Act of 1996 (HIPAA)* and its implementing regulations, commonly known as the *HIPAA Privacy Rule* and the *HIPAA Security Rule*, protect the privacy and security of individually identifiable health information, called “protected health information” or “PHI.” Such information is held by health plans, health care clearinghouses, and most health care providers, collectively known as “covered entities,” and their business associates (entities that have access to individuals’ health information to perform work on behalf of a covered entity).

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

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

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

The U.S. Department of Health and Human Services Office for Civil Rights has responsibility for administering and enforcing the Privacy and Security Rules.

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## How Does *HIPAA* Apply in Institutions of Higher Education?

**Basic Principle.** A major purpose of the Privacy Rule is to define and limit the circumstances in which an individual's protected health information may be used or disclosed by covered entities. A covered entity may not use or disclose protected health information, except either: (1) as the Privacy Rule permits or requires; or (2) as the individual who is the subject of the information (or the individual's personal representative) authorizes in writing.

Generally, *HIPAA* does not apply to health information in student records maintained by an IHE. While IHEs may maintain student health records, these records are in most cases not protected by *HIPAA*. Rather, student health information maintained at an IHE would be considered education or treatment records protected by *FERPA*.

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

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

### ***HIPAA* Guidance and Resources**

The Office for Civil Rights has developed, and continues to develop, extensive guidance pertaining to the implementation of *HIPAA* Privacy Rule and emergency situations. The Office for Civil Rights website has guidance about the intersection between *HIPAA* and *FERPA*, and the release of PHI for common emergency preparedness issues and public health purposes, such as terrorism preparedness and outbreak investigations. For more detailed information or additional guidance, please see the Office for Civil Rights website at <http://www.hhs.gov/ocr/privacy/index.html>.

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### 3. Incorporating International Students into IHE Emergency Management and Planning

Each year, approximately 800,000 international students and scholars come to the United States to study at our colleges and universities. While here, these students and their family members become members of campus communities, participating in activities in and outside of the classroom. As members of a campus community, international students are affected, as all students are, during crises. They also present a set of unique needs for IHEs to consider in planning for and responding to crises. IHE and community preparedness can be enhanced by IHEs incorporating these unique needs into their emergency management plans. When a crisis occurs, IHE officials must be able to quickly communicate with international students and help manage their individual situations.

IHEs must also have procedures in place to ensure proper reporting with federal authorities. All international students who come to the United States in F, M, or J visa classes are monitored by the U.S. Department of Homeland Security through its online database, SEVIS. Colleges and universities certified by the ICE Student and Exchange Visitor Program (SEVP) to enroll international students must have Designated School Officials on campus. Designated School Officials maintain responsibility for advising international students and inputting data into SEVIS regarding student programs, location, and status to assist the U.S. Department of Homeland Security in monitoring compliance with immigration law. During emergencies, IHEs maintain the responsibility of making timely updates to SEVIS to reflect the status and location of international students. Likewise, international students need to know how to maintain their immigration status and other timely information about their options, such as transferring, if they are unable to continue their studies at their current IHEs.

To aid in appropriate and timely handling of international student issues during emergencies, prior to any emergency, it is important that IHEs consider the following actions:

- ❖ **Understand** the key issues related to international students in emergency management scenarios outlined above;
- ❖ **Incorporate** the Principal Designated School Official (PDSO), the IHE's international student office, and appropriate law enforcement points of contact into its EOP;
- ❖ **Define** IHE policies for staff and international students to support continuity of operations during crises;
- ❖ **Establish** processes for international students to communicate to the IHE their location, safety concerns, and short- and long-term plans;
- ❖ **Incorporate** the PDSO and/or other key international student contacts into the crisis response process;
- ❖ **Develop** the ability to access SEVIS from alternate facilities or remote locations; and

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- ❖ **Support** the PDSO and/or other key international student contacts in understanding the principles of emergency management and their role(s) in the IHE's emergency management plans.

There may be instances in which an international student is a victim of an event or an alleged perpetrator. In this scenario, IHEs may have to coordinate with local, state, and federal law enforcement officials on administrative or criminal matters. Understanding the IHE's role and accompanying rules for communication can lead to swifter and more efficient resolution by the appropriate authorities.

Examples such as Hurricane Katrina and the April 2013 Boston Marathon bombing illustrate the need to incorporate international students into higher ed EOPs. During Hurricane Katrina, many IHEs in the Gulf Coast region suffered damage and were forced to close in its aftermath. This left thousands of international students displaced, requiring timely communication to address immediate safety concerns and coordination between IHEs and DHS to resolve immigration status issues. One of three victims killed in the Boston Marathon bombing was a Chinese graduate student, requiring notification to SEVP and the U.S. Department of State. Each situation required action by an IHE and coordination with local, state, and federal authorities.

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## 4. Campus Public Safety

The characteristics of security and police services on the nation's college and university campuses vary considerably. However, the following four primary types of campus public safety services are most common:

1. **Campus police department:** An integral part of the IHE that provides law enforcement and other services (e.g., traffic control, building security) to the IHE. All the members of the department are employed by the IHE, and the sworn law enforcement officers of the department also have authority to enforce federal, state, local, and tribal laws, as authorized.
2. **Security department or operation:** An agency whose members are employed by the IHE, but whose members are not sworn officers. Because the members do not have sworn authority, the IHE relies on federal, state, local, and tribal law enforcement for support in criminal matters.
3. **Contract security personnel:** A private firm contracted to provide security services to the IHE. The IHE relies on federal, state, local, and tribal law enforcement for support in criminal matters.
4. **Local, state, or tribal police:** A local, state, or tribal police agency that provides law enforcement services to the IHE by contract or agreement.

On some campuses, police and security operations may be provided by a combination of the above services, with some services contracted to private vendors while others are maintained as the responsibility of the campus public safety agency (which can include a fire department or emergency medical services unit).

Regardless of the type of public safety model utilized by the IHE, the planning team must take into consideration the authority granted to federal, state, local, and tribal first responders to act on campus as permitted by law for each agency (e.g., law enforcement agency, fire department, and public health office).

The type of police or security operation may vary within the same system or campus. Among major state university systems the police or security operations may differ from campus to campus. Individual campuses may have separate police or security departments for different components of the campus, such as the hospital, graduate school, or athletic facility. These different departments may have their own uniforms, insignia, training operations, and policies.

The type of security operation also may vary between on- and off-campus facilities. Many IHEs are decentralized, with remote centers and facilities located away from the main campus. Off-campus sites may house important research and data records. Off-campus residences may house thousands of students. Some campus public safety agencies are responsible for patrolling areas that surround campuses pursuant to legislation or through formal agreement with the federal, state, local, or tribal law enforcement authority. At some IHEs, students are not required to live on campus, and off-campus housing sites may not fall within the IHEs policing or security

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jurisdiction. This may create legal, jurisdictional, and operational conflicts in preventing and responding to crimes and managing emergencies.

Regardless of these variations, campus public safety officials should be intricately involved in the creation of the higher ed EOP, as they have critical responsibilities before, during, and after an emergency. To effectively develop and implement a high-quality EOP, the planning team should work with the campus public safety agency to

- ❖ Inform federal, state, local, and tribal agencies about the characteristics, strengths, vulnerabilities, and needs of the campus;
- ❖ Develop mutual-aid agreements and memoranda of understanding with other public safety partners (e.g., those adjoining the IHE's public safety entities, nearby fire departments);
- ❖ Participate in federal, state, local, and tribal activities, including exercises, that address the range of campus public safety needs;
- ❖ Meet with other IHEs to foster information sharing, common prevention and response strategies, and consistency in working with federal, state, local, and tribal public safety partners;
- ❖ Improve interagency coordination, create coalitions, and develop partnerships with federal, state, local, and tribal emergency management agencies; and
- ❖ Adopt common incident response strategies, policies, and procedures for use across multiple campuses and sites, as recommended by the National Incident Management System (NIMS).



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## 5. Active Shooter Situations

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

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

“*Active shooter situations*” are defined<sup>25</sup> as those where an individual is “actively engaged in killing or attempting to kill people in a confined and populated area.”<sup>26</sup> Unfortunately, IHEs face *active shooter situations* as well.

The better first responders and IHE personnel are able to discern these threats and react swiftly, the more lives can be saved. This is particularly true in an *active shooter situation* where law enforcement responds to a 911 call of shots fired. Many innocent lives are at risk in concentrated areas. This is why it is critical that IHEs work with their community partners (e.g., first responders, emergency managers) to identify, prepare, prevent, and effectively respond to an *active shooter situation* in a coordinated fashion.

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

While this “A Closer Look” section addresses how IHEs should plan for *active shooter situations*, IHEs should also plan for other gun-related incidents (e.g., a single shot fired, possession of a weapon on campus).

### Preparing for an Active Shooter Situation

#### Planning

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

- ❖ How to evacuate or lock down students, staff, and visitors. (Personnel involved in such planning should pay attention to disability-related accessibility concerns when advising on shelter sites and evacuation routes.)

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<sup>25</sup> 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.

<sup>26</sup> U.S. Department of Homeland Security, *Active Shooter, How to Respond*. Washington, DC: Author, October 2008. Available at [http://www.dhs.gov/xlibrary/assets/active\\_shooter\\_booklet.pdf](http://www.dhs.gov/xlibrary/assets/active_shooter_booklet.pdf).

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- ❖ How to evacuate when the primary evacuation routes are unusable.
  - ❖ How to select effective shelter-in-place locations (optimal locations have thick walls, solid doors with locks, minimal interior windows, first-aid emergency kits, communication devices, and duress alarms).
  - ❖ How the IHE community will be notified that there is an *active shooter* on campus as required by the *Clery Act*.<sup>27</sup> This could be done through the use of familiar terms, sounds, lights, and electronic communications, such as text messages or e-mails. Include in the courses of action how to communicate with those who have language barriers or need other accommodations, such as visual signals or alarms to advise deaf students, staff, and parents about what is occurring. IHE-wide “reverse 911-style” text messages sent to pre-determined group distribution lists can be very helpful in this regard. Planners should make sure this protocol is readily available and understood by those who may be responsible for sending out or broadcasting an all-IHE announcement. Rapid notification of a threat can save lives by keeping people out of harm’s way.
  - ❖ How students and staff will know when buildings and campus grounds are safe.

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

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

### Sharing Information with First Responders

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

Providing the detailed information listed above to first responders allows them to rapidly move through an IHE during an emergency, to ensure areas are safe, and to tend to people in need. It is critically important to share this information with law enforcement and other first responders before an emergency occurs. Law enforcement agencies have secure websites where this

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<sup>27</sup> See in this guide “A Closer Look: The *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act*.”

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information is stored for many IHEs, businesses, public venues, and other locations. All of these can be provided to first responders and viewed in drills, exercises, and walk-throughs.

Technology and tools with the same information (e.g., a portable USB drive that is compatible with computers used by first responders) should be maintained in secured locations around campus from which IHE officials can immediately provide it to responding officials or from which first responders can directly access it. The locations of these materials at the IHE should be known by and accessible to a number of individuals to ensure ready access in an emergency. Every IHE should have more than one individual charged with meeting first responders to provide them with the IHE site assessment, the IHE EOP, and any other details about IHE safety and the facility.<sup>28</sup> All parties should know who these key contacts are.

### Exercises

Most IHEs practice evacuation drills for fires and protective measures for tornadoes, but far fewer IHEs practice for *active shooter situations*. To be prepared for an *active shooter* incident, IHEs should train their staff, students, and families, as appropriate, in what to expect and how to react. In a study of 84 *active shooter* events which occurred between 2000 and 2010, 34 percent involved schools or IHEs.<sup>29</sup>

Good planning includes conducting drills that must include first responders and campus public safety. Exercises with these valuable partners are one of the most effective and efficient ways to ensure that everyone knows not only her or his role(s) but also the role(s) of others at the scene. These exercises should include walks through IHE buildings to allow law enforcement officials to provide input on shelter sites as well as familiarize first responders with the campus, including accessible shelter locations and evacuation routes for people with disabilities and others with access and functional needs.

#### **Each person carries a three-fold responsibility.**

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

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<sup>28</sup> See also <http://www.ready.gov/>.

<sup>29</sup> J. Pete Blair and M. Hunter Martaindale, *United States Active Shooters Events from 2000 to 2010: Training and Equipment Implications*. San Marcos, Texas: Texas State University, 2013. Available at <http://policeforum.org/library/critical-issues-in-policing-series/Blair-UnitedStatesActiveShooterEventsfrom2000to2010Report-Final.pdf>.

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## Preventing an *Active Shooter Situation*

### Warning Signs<sup>30</sup>

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

By highlighting common pre-attack behaviors displayed by past offenders, federal researchers have sought to enhance the detection and prevention of tragic attacks of violence, including *active shooting situations*. Several agencies within the federal government continue to explore incidents of targeted violence in the effort to identify these potential “warning signs.” In 2002, the Federal Bureau of Investigation (FBI) published a monograph on workplace violence, including problematic behaviors of concern that may telegraph violent ideations and plans.<sup>31</sup> 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.<sup>32</sup> The report was published in 2010, and featured several key observations related to pre-attack behaviors, including the following:

- ❖ In only 13 percent of the cases did subjects make verbal and/or written threats to cause harm to the target. These threats were both veiled and direct, and were conveyed to the target or to a third party about the target.
- ❖ In 19 percent of the cases stalking or harassing behavior was reported prior to the attack. These behaviors occurred within the context of a current or former romantic relationship, or in academic and other non-romantic settings. They took on various forms, including written communications (conventional and electronic), telephonic contact, and harassment of the target and/or the target’s friends and/or family. Subjects also followed, visited, or damaged property belonging to target(s) or their families prior to the attack.
- ❖ In only 10 percent of the cases did the subject engage in physically aggressive acts toward the targets. These behaviors took the form of physical assaults, menacing actions with weapons, or repeated physical violence to intimate partners.

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<sup>30</sup> For information on warning signs of violence at schools, see *The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States* (Washington, DC: U.S. Department of Education and U.S. Secret Service, 2002) available at

<http://www2.ed.gov/admins/lead/safety/preventingattacksreport.pdf>. See also, U.S. Secret Service and the U.S. Department of Education, “Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates”, May 2002, available at

<http://www2.ed.gov/admins/lead/safety/threatassessmentguide.pdf>.

<sup>31</sup> U.S. Department of Justice FBI Academy, *Workplace Violence: Issues in Response*. Quantico, Va.: Author, 2002. Available at <http://www.fbi.gov/stats-services/publications/workplace-violence>.

<sup>32</sup> U.S. Secret Service, U.S. Department of Education, and Federal Bureau of Investigation, *Campus Attacks: Targeted Violence Affecting Institutions of Higher Education*. Washington, DC: Author, 2010. Available at [http://rems.ed.gov/docs/CampusAttacks\\_201004.pdf](http://rems.ed.gov/docs/CampusAttacks_201004.pdf). A second phase of the project focuses exclusively on grievance-based attacks that occurred from 1985 to 2010.

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

Specialized units in the federal government (such as the FBI’s Behavioral Analysis Unit) continue to support behaviorally based operational assessments of persons of concern in a variety of settings (e.g., IHEs, workplaces, places of worship) who appear to be on a trajectory toward a violent act. A review of current research, threat assessment literature, and active shooting incidents, combined with the extensive case experience of the Behavioral Analysis Unit, suggest that there are observable pre-attack behaviors that, if recognized, could lead to the disruption of a planned attack.<sup>33</sup> While checklists of various warning signs are often of limited use in isolation, the FBI has identified some behavioral indicators that should prompt further exploration and attention from law enforcement and/or campus safety stakeholders. These behaviors often include:

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

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<sup>33</sup> See, Frederick Calhoun and Stephen Weston, *Contemporary Threat Management: A Practical Guide for Identifying, Assessing, and Managing Individuals of Violent Intent* (San Diego, CA: Specialized Training Services, 2003); Gene Deisinger, Marisa Randazzo, Daniel O’Neill, and Jenna Savage, *The Handbook for Campus Threat Assessment and Management Teams* (Stoneham, MA: Applied Risk Management, 2008); Robert Fein, Bryan Vossekuil, and Gwen Holden, *Threat Assessment: An Approach to Prevent Targeted Violence* (Washington, DC: U.S. Department of Justice, Office of Justice Programs, National Institute of Justice, 1995); John Monahan, Henry Steadman, Eric Silver, Paul Appelbaum, Pamela Robbins, Edward Mulvey, Loren Roth, Thomas Grisso, and Steven Banks, *Rethinking Risk Assessment: The MacArthur Study of Mental Disorder and Violence* (New York, NY: Oxford University Press, 2001); Bryan Vossekuil, Robert Fein, Marisa Reddy, Randy Borum, and William Modzeleski., *The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States*. (Washington D.C.: U.S. Department of Education and U.S. Secret Service, 2004).

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## Threat Assessment Teams

As described in the previous section, research shows that perpetrators of targeted acts of violence engage in both covert and overt behaviors preceding their attacks. They consider, plan, prepare, share, and, in some cases, move on to action.<sup>34</sup> One of the most useful tools an IHE can develop to identify, evaluate, and address these troubling signs is a multidisciplinary IHE TAT. A TAT with diverse representation often will operate more efficiently and effectively. TAT members should include IHE administrators, counselors, current employees, medical and mental health professionals, and residential life, public safety, and law enforcement personnel.

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

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

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

The TAT may also identify any potential victims with whom the individual may interact. TATs are increasingly common in IHE settings, pushed to the forefront of concern following the 2007 shooting at Virginia Polytechnic Institute and State University in Blacksburg, Va., where 32 individuals were killed. In some cases, state funding mandates that IHEs create threat assessment teams.<sup>35</sup>

Law enforcement can help assess reported threats or troubling behavior and reach out to available federal resources as part of the TAT process or separately. The FBI's behavioral

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<sup>34</sup> See *Threat Assessment Teams: Workplace and School Violence Prevention*. <http://www.fbi.gov/stats-services/publications/law-enforcement-bulletin/february-2010/threat-assessment-teams/>.

<sup>35</sup> See *Recommended Practices for Virginia Colleges Threat Assessments*, available at [http://www.threatassessment.vt.edu/resources/tat\\_info/VArecommended\\_practices.pdf](http://www.threatassessment.vt.edu/resources/tat_info/VArecommended_practices.pdf).

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experts in its National Center for the Analysis of Violent Crimes at Quantico, Va., are available on a 24/7 basis to join in any threat assessment analysis and develop threat mitigation strategies for persons of concern. The law enforcement member of the IHE TAT should contact the local FBI office for this behavioral analysis assistance.

Each FBI field office has a NCAVC representative available to work with IHE TATs and coordinate access to the FBI's Behavioral Analysis Unit, home to the National Center for the Analysis of Violent Crimes. It focuses not on how to respond tactically to an *active shooter situation* but rather on how to prevent one. Early intervention can prevent a situation from escalating by identifying, assessing, and managing the threat. The TAT should consult with its IHE administration and develop a process to seek these additional resources.

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

### **Responding to an Active Shooter Situation**

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

Law enforcement officers may not be present when a shooting begins. Providing information on how staff and students can respond to the incident can help prevent and reduce the loss of life. No single response fits all *active shooter situations*; however, making sure each individual knows his or her options for response and can react decisively will save valuable time. Depicting scenarios and considering response options in advance will assist individuals and groups in quickly selecting their best course of action.

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

During an *active shooter situation*, the natural human reaction, even if you are highly trained, is to be startled, feel fear and anxiety, and even experience initial disbelief and denial. You can expect to hear noise from alarms, gunfire, and explosions, and people shouting and screaming. Training provides the means to regain your composure, recall at least some of what you have learned and commit to action. There are three basic options: run, hide, or fight. You can run

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away from the shooter, seek a secure place where you can hide and/or deny the shooter access, or incapacitate the shooter in order to survive and protect others from harm.<sup>36</sup>

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

### Respond Immediately

It is not uncommon for people confronted with a threat to first deny the possible danger rather than respond. An investigation by the National Institute of Standards and Technology (2005) into the collapse of the World Trade Center towers on September 11, 2001, found that people close to the floors impacted waited longer to start evacuating than those on unaffected floors.<sup>37</sup> Similarly, during the Virginia Tech shooting, individuals on campus responded to the shooting with varying degrees of urgency.<sup>38</sup> These studies highlight this delayed response or denial. For example, some people report hearing firecrackers, when in fact they heard gunfire.

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

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

### Run

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

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<sup>36</sup> As part of its preparedness mission, *Ready Houston* produces “Run, Hide, Fight” videos, handouts, and trainings to promote preparedness among residents of the Houston region. These materials may or may not be relevant to IHEs, as they are not for an IHE setting. These videos are not recommended for viewing by minors. All of these items are available free-of-charge and many are available at <http://www.readyhouston.tx.gov/videos.html>.

<sup>37</sup> Occupants of both towers delayed initiating their evacuation after World Trade Center 1 was hit. In World Trade Center 1, the median time to initiate evacuation was 3 minutes for occupants from the ground floor to floor 76, and 5 minutes for occupants near the impact region (floors 77 to 91). See National Institute of Standards and Technology, *Federal Building and Fire Safety Investigation of the World Trade Center Disaster Occupant Behavior, Egress, and Emergency Communications*. Washington, DC: Author, 2005. Available at <http://www.mingerfoundation.org/downloads/mobility/nist%20world%20trade%20center.pdf>.

<sup>38</sup> Report of the Virginia Tech Review Team, available at <http://www.governor.virginia.gov/tempContent/techPanelReport-docs/FullReport.pdf> and <http://www.governor.virginia.gov/tempContent/techPanelReport-docs/12%20CHAPTER%20VIII%20MASS%20MURDER%20AT%20NORRIS%20HALL.pdf>.



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Students and staff should be trained to

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

### Hide

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

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

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

### Fight

If neither running nor hiding is a safe option, as a last resort when confronted by the shooter, adults in immediate danger should consider trying to disrupt or incapacitate the shooter by using aggressive force and items in their environment, such as fire extinguishers, chairs, etc. In a study of 41 *active shooter* events that ended before law enforcement arrived, the potential victims

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stopped the attacker themselves in 16 instances. In 13 of those cases, they physically subdued the attacker.<sup>39</sup>

While talking to staff about confronting a shooter may be daunting and upsetting for some staff, they should know that they may be able to successfully take action to save lives. To be clear, confronting an *active shooter* should never be a requirement of any IHE employee's job; how each individual 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.

### **Interacting with First Responders**

Staff should be trained to understand and expect that law enforcement's first priority must be to locate and stop the person or persons believed to be the shooter(s); all other actions are secondary. One comprehensive study found that in more than half (57 percent) of *active shooter* incidents where a solo officer arrived on the scene, shooting was still underway when the officer arrived. In 75 percent of those instances, that solo officer had to confront the perpetrator to end the threat. In those cases, the officer was shot one-third of the time.<sup>40</sup>

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

### **After an Active Shooter Incident<sup>41</sup>**

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

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

Within an on-going and/or evolving emergency, where the **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 can also escalate the emotions of the entire group. When families are reunited, it is critical that there are child release processes in

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<sup>39</sup> J. Pete Blair with M. Hunter Martaindale, *United States Active Shooter Events from 2000 to 2010: Training and Equipment Implications*. San Marcos, TX: Texas State University, 2013. Available at <http://alerrt.org/files/research/ActiveShooterEvents.pdf>.

<sup>40</sup> Ibid.

<sup>41</sup> Also see the section of the Guide on Considerations for the Recovery Annex.

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place where minors might be involved (e.g., childcare) to assure that no child is released to an unauthorized person, even if that person well-meaning.

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

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

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

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

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

The higher ed EOP should consider printed and age-appropriate resources to help families recognize and seek help in regard to a variety of reactions that they or their loved ones can experience during and after an emergency. For example, a family that has lost a child may have other family members in the area or at the IHE. It is critical that these families and loved ones are supported as they both grieve their loss and support their surviving family members.

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

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## 6. Psychological First Aid (PFA)

PFA is an evidence-informed modular approach used by mental health and disaster response workers to help individuals of all ages in the immediate aftermath of disaster and terrorism. PFA is designed to reduce the initial distress caused by traumatic events and to foster short- and long-term adaptive functioning and coping.

PFA does not assume that all survivors will develop mental health problems or long-term difficulties in recovery. Instead, it is based on an understanding that disaster survivors and others affected by such events will experience a broad range of early reactions (e.g., physical, psychological, behavioral, spiritual). Some of these reactions will cause enough distress to interfere with adaptive coping and recovery may be helped by support from compassionate and caring disaster responders.

PFA is designed for delivery by mental health and other disaster response workers who provide early assistance to affected children, families, and adults as part of an organized disaster response effort. These providers may be embedded in a variety of response units, including first responder teams, the ICS, primary and emergency health care, incident crisis response teams, faith-based organizations, Community Emergency Response Teams (CERT), Medical Reserve Corps, the Citizens Corps, and other disaster relief organizations.

Basic objectives of PFA are:

- ❖ Establish a human connection in a non-intrusive, compassionate manner.
- ❖ Enhance immediate and ongoing safety and provide physical and emotional comfort.
- ❖ Calm and orient emotionally overwhelmed or distraught survivors.
- ❖ Help survivors tell you specifically what their immediate needs and concerns are, and gather additional information as appropriate. Offer practical assistance and information to help survivors address their immediate needs and concerns.
- ❖ Connect survivors as soon as possible to social support networks, including family members, friends, and neighbors.
- ❖ Support adaptive coping, acknowledge coping efforts and strengths, and empower survivors; encourage adults, children, and families to take an active role in their recovery.
- ❖ Provide information that may help survivors cope effectively with the psychological impact of disasters.
- ❖ When appropriate, link the survivor to another member of a disaster response team or to local recovery systems, mental health services, public-sector services, and organizations.

PFA is designed for delivery in diverse settings. Mental health and other disaster response workers may be called upon to provide PFA in:

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- ❖ General population shelters
  - ❖ Special need shelters
  - ❖ Field hospitals and medical triage areas
  - ❖ Acute care facilities (e.g., emergency departments)
  - ❖ Staging areas or respite centers for first responders or relief workers
  - ❖ Emergency operations centers
  - ❖ Crisis hotlines or phone banks
  - ❖ Mobile dining facilities
  - ❖ Disaster assistance service centers
  - ❖ Family reception and assistance centers
  - ❖ Homes
  - ❖ Businesses
  - ❖ Other community settings

Content taken from *Psychological First Aid Field Operations Guide*  
[http://www.nctsn.org/sites/default/files/pfa/english/1-psyfirstaid\\_final\\_complete\\_manual.pdf](http://www.nctsn.org/sites/default/files/pfa/english/1-psyfirstaid_final_complete_manual.pdf).

### **Training on Psychological First Aid**

PFA Training can be provided face-to-face or online. The online version (<http://learn.nctsn.org/>) is vastly utilized and is a 6-hour interactive course that puts the participant in the role of a provider in a post-disaster scene. This professionally narrated course is for individuals new to disaster responses who want to learn the core goals of PFA, as well as for seasoned practitioners who want a review. It features innovative activities, video demonstrations, and mentor tips from the nation's trauma experts and survivors. PFA online also offers a Learning Community where participants can share about experiences using PFA in the field, receive guidance during times of disaster, and obtain additional resources and training.

The *Psychological First Aid: Field Operations Guide* provides information for adults, families, first responders, disaster relief workers, crisis counselors, and volunteers to help survivors immediately in the aftermath of a traumatic event. Available online at <http://www.nctsn.org/content/psychological-first-aid>, the guide describes key steps for providing PFA including how to approach someone in need, how to talk to them, how to help stabilize someone, and how to gather information. Appendices include resources about service delivery sites and settings, provider care, and worksheets and handouts.

Following disasters or emergencies, the PFA Mobile app can assist responders who provide PFA) to adults, families, and children. Materials in PFA Mobile are adapted from the

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*Psychological First Aid Field Operations Guide* (2nd Edition).  
(<http://www.nctsn.org/content/pfa.mobile>)  
([http://www.ptsd.va.gov/professional/pages/pfa\\_mobile\\_app.asp](http://www.ptsd.va.gov/professional/pages/pfa_mobile_app.asp))

The app allows responders to:

- ❖ Read summaries of the 8 core PFA actions.
- ❖ Match PFA interventions to specific stress reactions of survivors.
- ❖ Get mentor tips for applying PFA in the field.
- ❖ Self-assess to determine their own readiness to conduct PFA.
- ❖ Assess and track survivors' needs to simplify data collection and referrals.

*Psychological First Aid – Field Operations Guide*  
<http://www.nctsn.org/content/psychological-first-aid>

