Implementation Guidance:
Arizona Minimum Requirements
for School Emergency Operations Plans

In compliance with A.R.S. 15-341(A)(31)

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Introduction

Purpose

The purpose of this document is to provide actionable guidance for how to develop and implement an emergency operations plan that meets the state minimum requirements prescribed under Arizona Revised Statute 15-341 (A)(31).

A.R.S. 15-341 (A)(31)

"In conjunction with local law enforcement agencies and emergency response agencies, develop an emergency response plan for each school in the school district in accordance with minimum standards developed jointly by the department of education and the division of emergency management within the department of emergency and military affairs. Any emergency response plan developed pursuant to this paragraph must address how the school and emergency responders will communicate with and provide assistance to students with disabilities."

Overview of the Minimum Requirements for School EOPs

The minimum requirements detail expectations for how Arizona K-12 public school districts will develop plans for managing emergency operations. These requirements detail the minimum standards for emergency operations framework, emergency operations plan content, and plan maintenance, training, and exercises.

Of important note, any school that has a developed emergency operations plan but does not maintain accurate documentation of the actions that occur to implement the emergency operations plan, including but not limited to incident command system training, drill compliance, and actions to meet the needs of students and staff with disabilities and/or other access and functional needs, is not in compliance with the minimum standards.

Additional Resources

Information and resources for developing and strengthening emergency operations plans, as well as locating course offerings of the Multi-Hazard Emergency Planning for Schools course, may be found on the Arizona Department of Education website: School Preparedness | Arizona Department of Education (azed.gov)

More school resources may be found at:

Arizona Department of Emergency and Military Affairs, Division of Emergency Management

Arizona Department of Health Services

Arizona Department of Public Safety

Readiness for Emergency Management for Schools Technical Assistance Center

Federal Emergency Management Agency, Emergency Management Institute

Part 1: Incident Command System

- Increase school community stakeholder familiarity with the Incident Command System.
- Ensure that the Incident Command System is incorporated into and approved for your school policies and procedures.
- To determine roles and responsibilities, as well as determine who must take training as required by Part I, identify what roles will fill the following posts. It is recommended, but not required, to identify alternates for these roles in the case of turnover/unavailability during an emergency:
  - Incident Commander
    - At the site level, this may be Principal or Assistance Principal.
    - At the district level, this may be the Superintendent or Deputy Superintendent.
  - Public Information Officer
    - At the site level, this may be your Communications Coordinator or Principal.
    - At the district level, this may be your District Communications Director or Public Relations Officer.
  - Safety Officer
    - At the site level, this may be a School Resource Officer (SRO), School Security Officer (SSO), Head of Security, or Assistant Principal.
    - At the district level, this may be your District Safety/Security Director or Risk Management Coordinator.
  - Liaison Officer
    - At the site level, this may be an Assistant Principal, Administrative Coordinator, or other administrative role.
    - At the district level, this may be a Deputy Superintendent, Chief Operations Officer, or District Liaison Officer.
  - Operations Section Chief
    - At the site level, this may be a Lead Teacher, the Head of Facilities, or Assistant Principal.
    - At the district level, this may be your Director of Operations, Facilities Manager, or District Security Manager.

》》 **Important Note**

The primary and backup Incident Command System organizational chart assignments detailed in the emergency operations plan may vary depending on the type of emergency and the level of human resources available in the school community.

- For individuals who are assigned a specific function with the school or district ICS organizational structure, the required training options may be accessed or requested below:

- o IS-100.C
  - o IS-362.A
  - o PREPaRE Workshop 1
  - o G0360
  - o G0361
- For individuals who must complete a refresher training every 10 years, they may access or request the trainings below:
  - o IS-100.C
  - o IS-200.C
  - o IS-362.A
  - o IS-366.A
  - o IS-368.A
  - o IS-700.B
  - o PREPaRE Workshop 1
  - o G0360
  - o G0361
- After completion of training for Incident Command System responsible roles, please retain a digital and/or virtual copy of your training certificate. This *does not* need to be stored with your emergency operations plans, but it should be readily accessible upon request. It is *highly recommended* that schools have a method for retaining up-to-date certificates for all individuals who fill a role in the ICS organizational chart.

Part II: EOP Required Sections and Content

Supporting Students and Staff with Disabilities and Other Access and Functional Needs

- *All sections* of the emergency operations plan must indicate what measures will be taken to promote the safety of students and staff with disabilities and other access and functional needs. Examples of sections that may include these details include:
  - o Completing the Individual Emergency Safety Plan and Aggregate Emergency Safety Plan for students who require additional support.
  - o Throughout the plan, identify how notification, communication, or warning will occur for students with disabilities and other access and functional needs. Some examples include:
    - ▪ Intercom announcement
    - ▪ Flashing lights
    - ▪ Closed captioning
- Additional considerations include:
  - o Practicing evacuation routes for individuals with mobility needs in drills
  - o Notifying families and students about planed exercises and drills
  - o Preparing go-kits with necessary medication, sensory toys, and other supplies to support their documented needs.

- o   Accounting for sensory needs during trainings and emergency events.
- o   Anticipating for unique supports following a drill or emergency event, including transitioning back to typical school activities and routines.
- The Aggregate Summary – Supporting DAFN in Emergencies Spreadsheet may be a useful resource for tracking the population of students and staff members who have disabilities or others with access and functional needs in addition to the recommended number of support staff to assist with building/campus/district needs.

S1: Basic Plan Template

- Identify leaders from each function that operates in your school site. These individuals will comprise the school safety planning team (or school safety assessment and prevention team [SSAPT]) and provide related subject matter expertise to safety planning conversations.
    - o   Schedule meetings that allow for district administrator participation to align individual site initiatives with district initiatives, identify opportunities for district administrators to fill a role in emergency response support (rural districts), and ensure that planned actions align with district policies.
- Find a template that works best for your respective school district or campus.
    - o   You are not required to use the ADE Basic Plan template, but completing this template in full will promote alignment with the minimum standards.

≫≫ Important Note

1. Developing an emergency operations plan is only one component of the requirements detailed in the minimum standards. Local education agencies must take actions that meet the requirements detailed in each of the three parts of the Minimum Requirements for School EOPs to be in full compliance with Arizona Revised Statute 15-341 (A) (31):
    (1) ICS
    (2) EOP Sections/Content
    (3) Plan Maintenance, Training, and Exercises

2. Emergency procedures and a roster of individuals being transported shall be made readily available to all school/district transportation personnel. The district may identify how this is done to assure prompt access to critical emergency response information.

- Ensure the template you find contains the following sections:
    - o   Introduction
    - o   Purpose
        - ▪   Consider what the emergency operations plan is supposed to do. Question to ask include:
            - •   What does each component of the emergency operations plan describe?

- How is each component supposed to integrate with the others that make up a comprehensive emergency operations plan?
  - Consider the scope of the emergency operations plan. Questions to ask include:
    - Who is responsible for knowing and understanding the contents of the emergency operations plan?
    - What infrastructure does the emergency operations plan apply to?
- Situation Overview
  - Consider the threats and hazards that pose a risk to the school and would lead to use of the emergency operations plan. Questions to ask include:
    - How does the surrounding geography play a role in emergencies that impact the school community?
  - Consider how the infrastructure of the campus plays a role in emergency preparedness and response.
  - Consider the capabilities of the individual school site. Describe the partnerships that will be relied upon for resource needs in emergencies.
  - Describe the population that makes up your school campus community. Consider how the school's population density may vary during a school day and during campus organized events. District: Describe the population that your district serves. JTED: Describe the population of your district community. Consider how the population may vary and how the emergency operations plan might be activated for emergencies. Questions to ask include:
    - How many students with disabilities and others with access and functional needs are on campus each day?
- EOP Activation Authority
  - Questions to ask include:
    - Who has the authority to activate the emergency operations plan?
    - When is it appropriate to activate the emergency operations plan in its entirety?
    - When is it appropriate to activate a portion of the emergency operation plan?
- Communication
  - Questions to ask include:
    - How will 9-1-1 be activated?
    - How will staff members be notified of an emergency?

- How will student phone use be managed during emergencies requiring lockdown?
- What information will be communicated to each stakeholder group?
- How will external emergency communication be made to each stakeholder group?
  - Direction, Control, and Coordination
    - It is recommended that each ICS position shall have a minimum of two (2) persons who are most qualified with the organization to fill that position (one primary and one alternate).
    - For emergency notifications, it is recommended that the school site should not make more than two (2) calls. The first call is to 9-1-1 and the second call is to the district office.
    - Use common terminology for directing emergency actions with your school.
      - Familiarize local responding agencies with the terminology prescribed. Consider which agencies will respond to an emergency in the campus. Districts: Consider the agencies that will respond to each campus in the district. JTED: Consider the agencies that will respond to central, feeder, and satellite campuses.

≫ Important Note
It is imperative that code words are not used to direct emergency operations and response.

- Identify thresholds for when incident management will be handed over to responding agencies. While not a minimum requirement, it is best practice to coordinate this in partnership with the agencies that will respond to your campus.
  - The ADE Emergency Operations Plan Development Guidance provides details for how to develop the sections contained in a school Emergency Operations Plan.
- Connect with your internal and external stakeholders on the locations of your command posts, staging areas, and on-site/off-site evacuation areas. Questions to ask include:
  - Are these locations far enough away from where the incident may take place to be considered safe and out of the way of first responders?
  - Does this facility have A/C, heat, water, and restroom facilities?
  - Is this location open during typical school hours? If not, how quickly can you gain access (e.g., for houses of worship)?

- o Is this location also used by another school? If so:
  - Is this facility large enough to house all of the relocated children (for large-scale events)?
  - If multiple schools will use this as a relocation site, do you have plans in place to keep the different populations separated? How will reunification work?
  - How will the reunification area be secured to minimize impact to the reunification process or reunification site's population?
- Assess evacuation routes and reunification sites for accessibility. Questions to ask include:
  - o If the path is unpaved/gravel, can individuals with mobility needs (e.g., use wheelchairs/braces) navigate the path with limited/no assistance?
  - o Is the path well-maintained?
  - o Is the reunification site ADA-compliant?

S2: Functional Annexes

- Develop annexes for the following functions within your school environment. Templates for these annexes may be found here.
  - o On-site evacuation
    - Consider the following when developing your on-site evacuation annex:
      - How to safely move students and visitors to designated assembly areas from classrooms, outside areas, cafeterias, and other school locations.
      - How to evacuate when the primary evacuation route is unusable.
      - How to evacuate students who are not with a teacher or staff member.
      - How to evacuate individuals with disabilities (along with service animals and assistive devices, e.g., wheelchairs) and others with access and functional needs, including language, transportation, and medical needs.
      - How students will be protected from climate concerns (i.e., in the heat or cold).
  - o Off-site evacuation
    - Consider the points listed above for on-site evacuation, as well as the following:
      - How transportation will transfer all evacuees to the offsite location in a timely manner.

- When and how you will contact the off-site evacuation location to notify them of your impending arrival.
- o Lockdown
  - Consider the following when developing your lockdown annex:
    - How to lock all exterior doors, and when it may or may not be safe to do so.
    - How particular classroom and building characteristics (i.e., windows, doors) impact possible lockdown courses of action.
    - What to do when a threat materializes inside the school.
  - Note: If your district uses different variations of a lockdown (such as the Standard Response Protocol), consider how your response may differ (e.g., when outside activities are curtailed, doors are locked, and visitors are closely monitored, but all other school activities continue as normal).
- o Shelter-in-place
  - Consider the following when planning for a shelter-in-place event:
    - What supplies will be needed to seal the room and to provide for the needs of students and staff (e.g., water).
    - How a shelter-in-place can affect individuals with disabilities and others with access and functional needs, such as students who require the regular administration of medication, durable medical equipment, and personal assistant services.
    - How to move students when the primary route is unusable.
    - How to locate and move students who are not with a teacher or staff member.
    - Consider the need for and integration of "safe rooms" for protection against extreme wind hazards (such as a tornado or dust storms) in order to provide immediate life-safety protection when evacuation is not an option.
- o Parent-student reunification
  - Consider the following when planning for reunification:
    - How will you communicate about reunification with families and guardians? Consider how you will familiarize them with their roles and responsibilities in reunification.
    - Parent and guardian verification and pickup authorization.
    - Communication between the various areas of reunification (parent check-in, student assembly, reunion areas, site security).

- Consider how staff will prevent students from leaving the reunification site on their own. What accountability plans do you have for students who self-evacuate?
- Student and parent privacy in the media.
- Minimizing confusion with the reunification process.
- Time intervals at which updates will be provided to families.
- Accounting for potential technology barriers.
- Accounting for language barriers.
  - For those missing, injured, or killed, consider:
    - Who will provide this information to families? Notification is typically the responsibility of law enforcement but consider having trained personnel immediately available to talk to loved ones about death and injury. Counselors should also be on hand to assist family members.
    - Pre-identified points of contact to provide family assistance (counselors, law enforcement).
    - How will families be monitored for care in the long term? What plans can be made for siblings of the student?
    - How will families and children be supported if the prefer not to engage the media?
- Communication and Warning
  - Maintain up to date contact information for community emergency contacts [public health department, emergency managers, local hospital, poison control center], parents, guardians, responding agencies (law enforcement, fire, emergency medical services)
  - Consider how the school will effectively communicate with individuals with disabilities and others with access and functional needs.
  - Consider how the school's communication system integrates with community emergency responder (EMS, law enforcement, fire) communication processes.
  - Educate relevant staff on how to use emergency communication equipment and associated procedures.
  - Consider strategies for how to communicate with community members before, during, and after an emergency.
  - Develop accessible communication templates, including different languages.
  - Develop strategies to address technology barriers faced by the broader school community (parents/guardians, students, staff).

- o The REMS TA Center offers safety planners a [sample communication and warning annex.](#)

S3: Threat/Hazard-specific Annexes

- Complete the hazard assessment document in Appendix "A"
  - o Note: you are not required to use [ADE's Hazard Assessment Worksheet](#), but you must have documentation showing a hazard assessment document has been completed.
  - o Use the [Calculated Priority Risk Index (CPRI) template](#) to prioritize the impact and severity of specific threats or hazards.
    - The Arizona Department of Emergency and Military Affairs developed a document that details the [CPRI categories and associated risk levels.](#)
  - o Use [FEMA's National Risk Index](#) to identify the hazards that could impact your local community.
  - o Use resources from your local community to support your prioritization of threats and hazards.
    - [Apache County](#)
      - [2017 Hazard Mitigation Information](#)
    - [Cochise County](#)
    - [Coconino County](#)
    - [Gila County](#)
    - [Graham County](#)
    - [Greenlee County](#)
      - [Final draft as of 10/2024](#)
    - [La Paz County](#)
    - [Maricopa County](#)
    - [Mohave County](#)
    - [Navajo County](#)
    - [Pima County](#)
    - [Pinal County](#)
    - [Santa Cruz County](#)
    - [Yavapai County](#)
    - [Yuma County](#)
- Use the top two identified priorities to guide the topics for which you develop threat/hazard-specific annexes.
  - o Sample annexes can be found [here](#).
  - o If your plan documents an all-hazards approach, please indicate how the functions can support a specific response.
- Develop a communicable diseases/pandemic procedures annex
  - o A sample annex can be found [here](#).

Appendices/Attachments

- For emergency contacts, it is recommended to test these phone numbers/email addresses at least annually.

≫ **Important Note**

1. **Activating emergency services by dialing 9-1-1 is the first action that should be taken in a school emergency that threatens life safety.**
2. It is important to know which agencies will be responding to your school/district in an emergency. Having access to contacts at each of these agencies and engaging them during the planning process will minimize confusion.

- Acceptable forms of student roster storage include:
    - o Readily accessible via the technological platform the school/district partners with for student information management.
    - o Printed and stored in a pre-designated, secure location(s) at the campus/district.
    - o Housed on a drive that is stored in a pre-designated, secure location(s) at the campus/district.
- Take a screenshot of the campus layout on Google Maps.
    - o Develop a key containing the following:
        - ▪ Fire extinguishers (fire-fighting equipment)
        - ▪ Emergency utility shut-off valve
        - ▪ Heat plants
        - ▪ Boilers
        - ▪ Generators
        - ▪ Flammable liquid storage and other hazardous materials storage
        - ▪ Automatic External Defibrillators (AEDs)
        - ▪ Stop the Bleed kits
        - ▪ Opioid antagonist kits (Narcan, Naloxone, etc.)
        - ▪ First aid facilities
        - ▪ Building access points
        - ▪ Perimeter/property access points
- Acceptable forms of relocation site map storage include:
    - o Readily accessible via the technological platform the school/district partners with for interoperability in emergency response.
    - o Printed on paper and stored in a pre-designated, secure location(s) at the campus/district.
    - o Housed on a drive that is stored in a pre-designated, secure location(s) at the campus/district.
- The ADE EOP Appendix A template contains sample letters/statements.

<u>**Part III: Plan Maintenance, Training, and Exercise**</u>

- For your all-staff training on situational awareness and emergency preparedness practices, consider holding it prior to the start of the school year to acquaint everyone with the concept and importance of ICS.

>> **Important Note**
It is imperative that this training addresses how school staff will communicate with and assist students with disabilities during an emergency.

- Schedule regular (annual and as needed) EOP review meetings so that you have your calendar blocked to review identified areas for improvement.
- Consider the following during your annual EOP review:
    a. What shortfalls were documented in our drills, exercises, and emergency responses that could have been prevented with planning?
    b. What actionable steps can we incorporate into our EOP to mitigate those shortfalls next time?
    c. Are the roles and responsibilities currently defined realistic for my setting?
    d. Are the individuals assigned to ICS best suited for those positions?
- Schedule the drills for your school year at the beginning of the year. This ensures that they are pre-planned but allows you to reschedule if the need arises. A drill tracker can support these efforts.
    o 3 lockdowns
    o 1 shelter-in-place (crosswalk to related response actions)
    o Evacuations as required by your local fire marshal

>> **Important Note**
1. **The minimum number of required drills listed above may not be combined with any other required drill to receive credit for both.**
2. Schools may not document response to an actual incident as a drill. Annually required drills must be completed in addition to actual incidents that require activation of the EOP.
3. If the school/district has adopted a protocol, the terminology used to describe response actions being drilled may be adapted to fit the protocol adopted by the school/district. It is imperative that if this is done, code words are not used to describe the response action.

- Schedule emergency operations plan annual review at the beginning of each school year.
- Ensure you are training to the standard needed for a real emergency response. For example, are you practicing sealing air vents in a classroom in the event of a HAZMAT situation that requires a shelter-in-place?

- Debrief following drills and real incidents to identify successes, areas for improvement, and strategies. Drill notes and action items can be recorded using a [drill tracking spreadsheet](#).
  - o Reflecting on what actions were taken during either drills or a real incident can provide the school safety planning team with an opportunity to assess whether roles, responsibilities, and courses of action are appropriate or if they need to be modified.
  - o Use a [drill tracker spreadsheet](#)
- Establish metrics or benchmarks for how drills should be conducted within your individual campus.
- Invite local first responders to training, drill, and exercises so that operations can be more easily integrated during emergency response.
  - o Educate local first responders on how to effectively communicate with students with disabilities and others with access and functional needs.
  - o Consider strategies for how to promote first responders' ability to provide quality assistance to students with disabilities and others with access and functional needs in an emergency.