

**NAAG Task Force on School Safety**  
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**Response Issues, Part II**  
**Supplemental Background Materials**

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  - Dated July 30, 2007

# I

GAO Testimony Before  
House Homeland Security  
Committee –  
“Emergency Management:  
Status of School Districts’  
Planning and  
Preparedness”

**GAO**

Testimony

Before the Committee on Homeland  
Security, House of Representatives

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**EMERGENCY  
MANAGEMENT**

**Status of School Districts'  
Planning and Preparedness**

Statement of Cornelia M. Ashby, Director  
Education, Workforce, and Income Security





Highlights of [GAO-07-821T](#), a testimony before the Committee on Homeland Security, House of Representatives

### Why GAO Did This Study

Events such as the recent shootings by armed intruders in schools across the nation, natural disasters, the terrorist attacks of September 11, 2001, and potential pandemics have heightened awareness for the need for school districts to be prepared to address a range of emergencies within and outside of schools buildings. Congress has raised concerns over school preparedness, with a particular interest in how federal agencies provide assistance to school districts.

This testimony discusses preliminary findings related to GAO’s review of emergency management in school districts, including (1) the roles of federal and state governments in establishing requirements and providing resources to school districts for emergency management planning, (2) what school districts have done to plan and prepare for emergencies, and (3) the challenges school districts have experienced in planning for emergencies, and communicating and coordinating with first responders, parents, and students.

To obtain this information, GAO interviewed federal officials, surveyed a stratified random sample of all public school districts, surveyed state agencies that administer federal grants that can be used for school emergency management planning, conducted site visits to school districts, and reviewed relevant documents.

[www.gao.gov/cgi-bin/getrpt?GAO-07-821T](http://www.gao.gov/cgi-bin/getrpt?GAO-07-821T).

To view the full product, including the scope and methodology, click on the link above. For more information, contact Cornelia Ashby at (202) 512-7215 or ashbyc@gao.gov.

## EMERGENCY MANAGEMENT

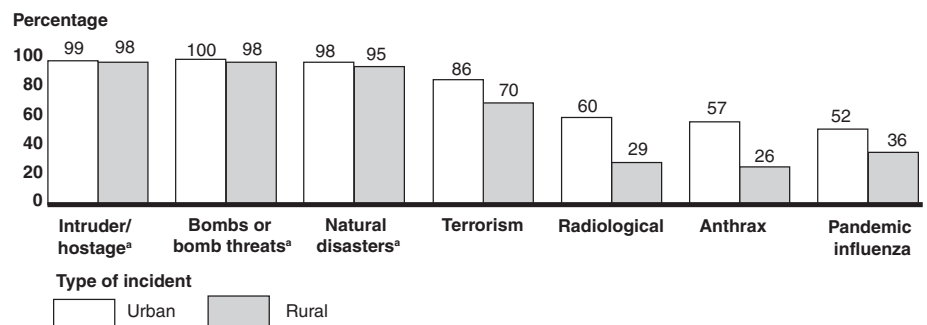
### Status of School Districts’ Planning and Preparedness

#### What GAO Found

Federal and state governments have a role in supporting emergency management in school districts. While no federal laws require school districts to have emergency management plans, 32 states reported having laws or policies requiring school districts to have such plans. The Departments of Education and Homeland Security (DHS) provide funding for emergency management planning in schools. However, some DHS program guidance, for specific grants, does not clearly identify school districts as entities to which state and local governments may disburse grant funds. Thus, states receiving this funding may be uncertain as to whether such funding can be allocated to school districts or schools and therefore may not have the opportunity to benefit from this funding. States also provide funding and other resources to school districts to assist them in planning for emergencies.

School districts have taken steps to plan for a range of emergencies, as most have developed multi-hazard emergency management plans; however some plans and activities do not address federally recommended practices. For example, based on GAO’s survey of a sample of public school districts, an estimated 56 percent of all school districts have not employed any procedures in their plans for continuing student education in the event of an extended school closure, such as might occur during a pandemic, and many do not include procedures for special needs students. Fewer than half of districts with emergency plans involve community partners when developing and updating these plans. Finally, school districts are generally not training with first responders or community partners on how to implement their school district emergency plans.

**Estimated Percentages of Urban and Rural Districts’ Multi-Hazard Emergency Management Plans that Include Specific Types of Incidents**



Source: GAO analysis of survey data.

<sup>a</sup>Differences between urban and rural districts are not statistically significant.

Many school district officials said that they experience challenges in planning for emergencies and some school districts face difficulties in communicating and coordinating with first responders and parents, but most said that they do not experience challenges in communicating with students. For example, in an estimated 62 percent of districts, officials identified challenges stemming from a lack of equipment, training for staff, and personnel with expertise in the area of emergency planning as obstacles to implementing recommended practices.

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Mr. Chairman and Members of the Committee:

I am pleased to be here today to discuss emergency management in public school districts. The nation's more than 17,000 school districts are responsible for maintaining the safety and security of approximately 49 million public school students. Events such as the recent shootings by armed intruders in schools across the nation, natural disasters such as Hurricanes Katrina and Rita in 2005, the terrorist attacks of September 11, 2001, and potential pandemics have heightened awareness of the need for school districts to be prepared to address a range of emergencies within and outside of school buildings.

My testimony today is drawn from ongoing work we have conducted for this Committee and other congressional requesters on emergency management in school districts. We anticipate completing the report in June 2007. "Emergency management" refers to the range of efforts involved in building the capacity to prevent, protect against, respond to, and recover from an incident. Planning for such incidents varies by the type and scale of the incident. The federal government's role in emergency management is principally to support state and local activities and develop the federal capabilities to respond effectively when state and local governments require federal assistance. Some federal support comes in the form of guidance and recommendations. Because the federal government serves as a partner to all states, it is uniquely positioned to observe and evaluate the range of emergency management activities across states and local governments, including school districts, and disseminate information on recommended practices and successful strategies.

My testimony today will focus on (1) the role of the federal and state governments in establishing requirements and providing resources to school districts for emergency management planning, (2) what school districts have done to plan and prepare for emergencies, and, briefly, (3) the challenges school districts have experienced in planning for emergencies and communicating and coordinating with first responders, parents, and students. When discussing the federal government, I am primarily referring to the three agencies included in our report—the Departments of Homeland Security (DHS), Education (Education), and Health and Human Services (HHS).

To determine the role of the federal and state governments, planning requirements for school districts and schools, and the types of resources provided to districts, we conducted interviews with officials representing

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DHS, Education, and HHS and reviewed relevant federal laws. We also administered two surveys, one to state education agencies and one to state administering agencies (the state agencies to which DHS disburses emergency management funding) in all 50 states and the District of Columbia. To better understand how school districts plan and prepare for emergencies, we administered a mail survey to a stratified random sample of school districts in the 50 states and the District of Columbia. Using a 95 percent confidence interval, all percentage estimates included in this statement have a margin of error of plus or minus 10 percent or less, unless otherwise noted. To further understand the experiences districts have had in planning for emergencies and communicating and coordinating with first responders<sup>1</sup>, parents, and students, we visited selected districts in the states of Florida, Iowa, Massachusetts, North Carolina, Ohio, and Washington. In total, we conducted semi-structured interviews, either in person or by telephone, with officials in 27 school districts. We are conducting the review in accordance with generally accepted government auditing standards.

In summary, federal and state governments support emergency management in school districts with a range of resources and most school districts have developed emergency management plans despite facing challenges; however not all of these plans incorporate recommended practices. Federal and state governments provide funding, guidance, training, and equipment; and many states require school districts to develop emergency management plans or engage in other planning activities. However, funding guidance for some federal grant programs does not clearly identify school districts as entities to which state and local governments may disburse these grant funds. Therefore, some states receiving this funding may be uncertain as to whether such funding can be

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<sup>1</sup>In both our site visits and our survey of school districts, we focused on the traditional definition of first responders—law enforcement, fire, and EMS. However, the Homeland Security Act as amended includes a broader definition of emergency response providers, including “Federal, State, and local governmental and nongovernmental emergency public safety, fire, law enforcement, emergency response, emergency medical (including hospital emergency facilities), and related personnel, agencies, and authorities.” Homeland Security Act of 2002, Pub. L. No. 107-296, § 2, (codified at 6 U.S.C. § 101(6)). Homeland Security Presidential Directive 8 defined the term “first responder” as “individuals who in the early stages of an incident are responsible for the protection and preservation of life, property, evidence, and the environment, including emergency response providers as defined in section 2 of the Homeland Security Act of 2002 (6 U.S.C. 101), as well as emergency management, public health, clinical care, public works, and other skilled support personnel (such as equipment operators) that provide immediate support services during prevention, response, and recovery operations.”

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allocated to school districts or schools; and as a result, school districts may not have the opportunity to benefit from this funding. At the local level, school districts have taken a number of important steps to plan for a range of emergencies, most notably developing emergency management plans; however, in many districts these plans, or their implementation, do not align with federally recommended practices. For example, many school districts do not include procedures for special needs students in their plans and many districts have not employed any procedures in their plans for continuing student education in the event of an extended school closure, such as might occur during a pandemic. Additionally, school districts are generally not training with their first responders (i.e., law enforcement, fire, and Emergency Medical Services [EMS]) and community partners (such as the local head of government and local public health agency), which are both federally recommended practices. Finally, many school district officials said that they experience challenges in planning for emergencies due to a lack of equipment, training for staff, and expertise and some school districts face difficulties in communicating and coordinating with first responders and parents, but most said that they do not experience challenges in communicating emergency procedures to students. We are currently considering recommendations that federal agencies clarify and improve guidance to states and school districts to better enable school districts to incorporate recommended practices for emergency management.

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## Background

The Homeland Security Act of 2002 created DHS and consolidated most of the federal programs and agencies with responsibilities for emergency management into that agency.<sup>2</sup> DHS serves as a federal partner to state and local governments in emergency management.<sup>3</sup> DHS provides technical assistance and homeland security grant funding to states and local governments to enhance their emergency management efforts. States and local governments have the responsibility for spending DHS grant funds in

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<sup>2</sup>Pub. L. No. 107-296.

<sup>3</sup>The Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. No. 100-707, provides the legal framework for this partnership. The Stafford Act is the principal federal statute governing federal disaster assistance and relief and primarily establishes the programs for and processes by which the federal government may provide major disaster and emergency assistance to states and local governments. The Stafford Act also provides emergency assistance to tribal nations, individuals and qualified private non-profit organizations. The Federal Emergency Management Agency (FEMA) is the principal federal agency responsible for implementing the Stafford Act.

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accordance with DHS guidelines to meet local emergency management needs. In fiscal year 2006, DHS awarded \$1.7 billion to states, urban areas, and territories to prepare for and respond to terrorist attacks and other disasters. States and local governments may then provide a portion of this funding to a range of entities, as specified in DHS's program guidance.

As we have noted in prior reports, emergency management requires coordinated planning and implementation by a variety of participants. Effective emergency management requires identifying the hazards for which it is necessary to be prepared (risk assessments); establishing clear roles and responsibilities that are effectively communicated and well understood; and developing, maintaining, and mobilizing needed capabilities, such as people, skills, and equipment.<sup>4</sup> The plans and capabilities should be tested and assessed through realistic exercises that identify strengths and areas that need improvement, with any needed changes made to both plans and capabilities.

The hazards that school districts may face will vary across the country depending upon the natural hazards to which their particular areas are prone and an assessment of other risks for which they need to be prepared, such as pandemic influenza or the discharge of hazardous substances from nearby chemical or nuclear plants. Similarly, who should be involved in emergency planning and response for schools, and the roles of the various participants will vary by type and size of the emergency incident. For large-scale emergencies, effective response is likely to involve all levels of government—federal, state, and local—nongovernment entities, such as the Red Cross, and the private sector.

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<sup>4</sup>GAO, *Homeland Security: Preparing for and Responding to Disasters*, [GAO-07-395T](#) (Washington, D.C.: Mar. 9, 2007); and *Catastrophic Disasters: Enhanced Leadership, Capabilities, and Accountability Controls Will Improve the Effectiveness of the Nation's Preparedness, Response, and Recovery System*, [GAO-06-618](#) (Washington, D.C.: Sept. 6, 2006).

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## Federal and State Governments Provide Resources to School Districts for Emergency Management Planning, While Only States Have Laws that Require School Emergency Management Planning

Although no federal laws exist requiring school districts to have emergency management plans, most states reported having requirements for school emergency management planning; however, the federal government, along with states, provides financial and other resources for such planning. Education, DHS, and state governments provide funding for emergency management planning in schools. However, DHS program guidance does not clearly identify school districts as entities to which states and local governments may disburse grant funds. Not all states receiving DHS funding are aware that such funding could be disbursed to school districts. In addition to providing funding, the federal government assists school districts and schools in emergency management planning by providing other resources such as guidance, training, and equipment.

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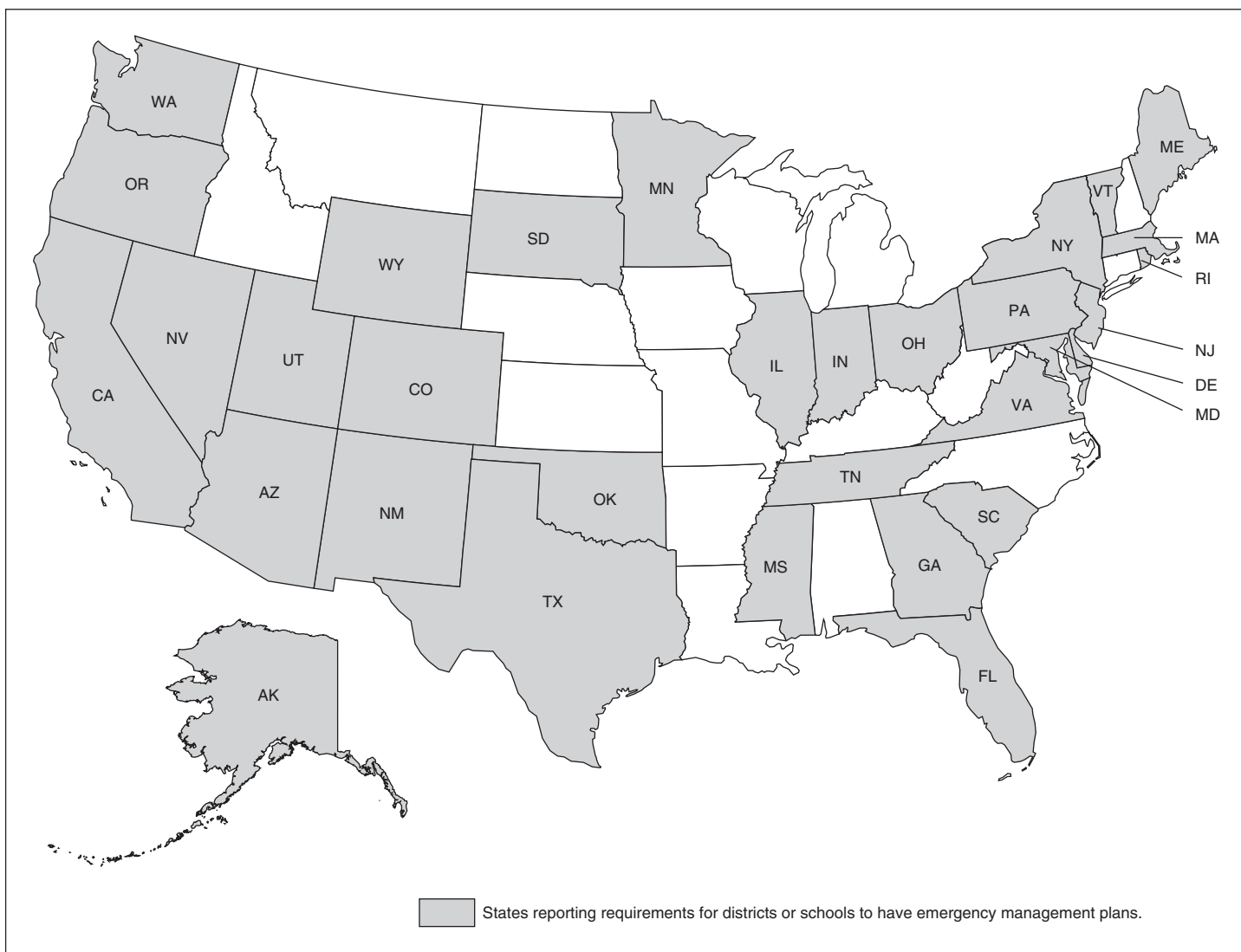
## Although No Federal Laws Exist Requiring School District Emergency Management Planning, the Majority of States Have Requirements

Although there are no federal laws requiring school districts to have emergency management plans, many states reported having laws or other policies that do so. Congress has not enacted any broadly applicable laws requiring all school districts to have emergency management plans. While the No Child Left Behind Act of 2001 provides that local education agencies (LEAs or school districts) applying for subgrants under the Safe and Drug Free Schools and Communities Program include in their grant applications an assurance that either they or their schools have “a plan for keeping schools safe and drug-free that includes...a crisis management plan for responding to violent or traumatic incidents on school grounds”, Education has not issued any regulations imposing such a requirement on all school districts.<sup>5</sup> However, 32 of the states responding to our survey of state administering agencies and state education agencies reported having laws or other policies requiring school districts or schools to have a written emergency management plan (see fig. 1). Several state laws identify a broad range of specific emergencies that schools or districts are required to address in their plans, while many other states do not identify particular kinds of crises or use more general language to refer to the kinds of emergencies that plans must incorporate.

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<sup>5</sup>20 U.S.C. § 7114(d)(7)(D). However, these plans are not required to address multiple hazards; therefore, for purposes of this report, we do not consider this to be a requirement for an emergency management plan.

**Figure 1: States That Reported Having Laws or Other Policies Requiring School Districts or Schools to Have Emergency Management Plans**



Source: GAO analysis of survey data.

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## Federal Agencies and States Provide Funding for School Districts' Emergency Management Planning

Education and DHS provided some funding to school districts for emergency management. Education provides funding to some school districts specifically for emergency management planning through its Emergency Response and Crisis Management (ERCM) Grant Program.<sup>6</sup> Since fiscal year 2003, Education dispersed \$130 million in such grants to over 400 of the over 17,000<sup>7</sup> school districts in the United States. These grant awards ranged from \$68,875 to \$1,365,087.

DHS provides funding to states and local jurisdictions for emergency management planning, some of which can be provided to school districts or schools for emergency management planning. DHS officials told us that such funds are available through the State Homeland Security Program, Urban Areas Security Initiative, and Citizen Corps grants.<sup>8</sup> Five states—Florida, Hawaii, Michigan, Mississippi, and Wyoming—reported that they provided approximately \$14 million in DHS funding directly to school districts in these states during fiscal years 2003–2006. In addition, eight states and the District of Columbia reported that they provided DHS funding to local jurisdictions that then provided a portion of these funds to school districts or schools for emergency management planning.<sup>9</sup>

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<sup>6</sup>The purpose of the ERCM grant program is to provide funds for local education agencies to improve and strengthen their emergency response plans. School districts receiving grant funds under this program may use them to develop improved plans that address all four phases of crisis response: prevention/mitigation, preparedness, response, and recovery. In April 2007, Education announced that it was renaming the ERCM grant as the Readiness and Emergency Management for Schools grant program (REMS) to reflect terminology used in the emergency management field. 72 Fed. Reg. 17,139 (April 6, 2007)

<sup>7</sup>As reported by the states to the Department of Education and contained in the Common Core Data (CCD), there were over 17,000 school districts in the United States in school year 2003-04. This number includes school districts in Puerto Rico; four outlying areas (American Samoa, Guam, Northern Marianas, and the U.S. Virgin Islands); the Bureau of Indian Affairs; and the Department of Defense, which were eligible for funds but we excluded from the sample for our survey of school districts. Department of Defense schools are included in the CCD count of school districts, but according to Education officials, such schools are not eligible to receive funding under the ERCM/REMS grant program.

<sup>8</sup>The State Homeland Security Program provides funds to enhance the emergency preparedness of state and local governments. The Urban Areas Security Initiative grant is awarded to some states with high threat and high density urban areas that need planning, exercises, equipment, and training to respond to acts of terrorism. Citizen Corps funds are provided to states to promote volunteer efforts.

<sup>9</sup>A ninth state distributed DHS funding to its state education agency, which then provided the funding to public schools in its state.

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Although DHS officials told us that these three grant programs allow for the use of funds at the district or school level, the department's program guidance does not clearly specify that school districts are among the entities to which state and local governments may disburse funds.<sup>10</sup> As a result, some states may not be aware of their availability.

State governments also provide state funds to school districts. Eleven of the 49 states<sup>11</sup> responding to surveys we sent to state education and state administering agencies reported providing state funding to school districts for emergency management planning.

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## Federal Agencies and States Provide Guidance, Training, and Equipment for Emergency Management in School Districts

The federal government also provides guidance, training, and equipment to school districts to assist in emergency management planning (see table 1).

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<sup>10</sup>DHS guidance for these grant programs provides that state administering agencies are the only agencies eligible to apply for funding and that they are responsible for disbursing grant funds to local units of government and other designated recipients. The guidance identifies a definition of "local unit of government" that was used in the Conference Report accompanying the DHS Appropriations Act of 2006, and which includes "any county, city, village, town, district, borough, parish, port authority, transit authority, intercity rail provider, commuter rail system, freight rail provider, water district, regional planning commission, council of government, Indian tribe with jurisdiction over Indian country, authorized Tribal organization, Alaska Native village, independent authority, special district, or other political subdivision of any State."

<sup>11</sup>We included the District of Columbia in our state education and state administering agency surveys.

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**Table 1: Examples of Guidance, Training, and Equipment the Federal Government Provides to School Districts**

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**Examples of guidance**

- Education publishes a guide for schools and communities titled Practical Information on Crisis Planning, which explains, among other things, how schools can prepare for an emergency.
- DHS created a Web site, How Schools Can Become More Disaster Resistant, that provides guidance for teachers and parents regarding how to prepare emergency management plans. The site also discusses identifying and mitigating hazards, developing response and coping plans, and implementing safety drills.

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**Examples of training**

- The Federal Emergency Management Agency (FEMA), within DHS, offers on-line courses including one on emergency management planning for schools.
- Education offers two 1-½ day Emergency Management for Schools training sessions that provide school personnel with critical training on emergency management issues, resources, and practices. Emphasis for these trainings is placed on emergency management plan development and enhancement within the framework of four phases of emergency management: prevention and mitigation, preparedness, response, and recovery.

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**Examples of equipment**

- With funding from DHS and support from Education, the Department of Commerce's National Oceanic & Atmospheric Administration (NOAA) distributed 96,000 NOAA radios to almost all public schools in the United States in 2005 and 2006. These radios are intended to notify school officials of hazards in their area 24 hours a day/7 days a week, even when other means of communication are disabled.<sup>a</sup>

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Source: Education, DHS, and HHS.

<sup>a</sup>Schools receiving NOAA radios included those in six states that, according to DHS, mandate that public schools have radios. These states are Washington, Tennessee, North Carolina, Maryland, Florida, and Mississippi. DHS told us that they have procedures in place to allow a school to request a radio if it did not receive one. DHS officials also told us that they plan to distribute NOAA radios to non-public schools (private, independent, and parochial and other faith-based institutions), postsecondary education facilities, and district offices in 2007.

Education, DHS, and HHS have collaborated and developed recommended practices to assist in preparing for emergencies that can be applied to school districts.<sup>12</sup> Some of these practices are shown in table 2.

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<sup>12</sup>Education, for example, also obtained input from state and local school and emergency management officials and associations in developing these recommended practices.

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**Table 2: Selected Practices that Education, DHS, and HHS Recommend School Districts Take to Prepare for Emergencies**

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**Recommended practices**

- Allocate time to emergency management planning.
- Conduct an assessment of vulnerabilities.
- Conduct regular drills.
- Identify and acquire equipment to mitigate and respond to emergencies.
- Identify a storage location and replenish emergency supplies on a regular basis.
- Develop an emergency management plan and update the plan on a regular basis. In developing and updating this plan, school districts should:
  - Identify and address a range of events and hazards specific to the district or schools.
  - Develop roles and responsibilities and procedures for school community members.
  - Develop roles and responsibilities for first responders and community partners.
  - Develop procedures for communicating with key stakeholders such as parents and students, including those who are limited-English proficient.
  - Develop procedures for special needs students.
  - Develop procedures in the plan for recovering from an incident, including continuing student education during an extended school closure.
  - Determine lessons learned after an incident or training.
  - Develop multi-purpose manuals, with emergency management information, that can be tailored to meet individual school needs.
- Include community partners such as local government and public health agencies in planning.
- Coordinate the school district's emergency procedures with state and local governments.
- Practice the emergency management plan with first responders and community partners on a regular basis.

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Source: GAO analysis of Education, DHS, and HHS guidance and training documents.

The type of guidance available from the federal government on topics related to these recommended practices varies significantly; in some instances, federal agencies provide detailed instructions on how to implement recommended practices while, in other instances, guidance is less detailed.

We have also recognized the importance of certain of these practices in our prior reports on emergency management.<sup>13</sup> We have noted the importance of realistic training exercises followed by a careful assessment

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<sup>13</sup>See [GAO-07-395T](#) and [GAO-06-618](#).

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of those exercises. Those with whom the school districts should coordinate and train will vary by the type and size of the emergency. For example, for a potential pandemic flu or other major infectious outbreak, planning and working with local health authorities is critical.

In addition to the federal government, states provide guidance and training to school districts. Based on our survey of state administrative agencies and state education agencies, 47 states reported providing guidance and 37 states reported providing training. Some states also reported providing online resources that include guidance and training.

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## Most Districts Have Taken Steps to Prepare for Emergencies, but Some Plans and Activities Do Not Address Recommended Practices

Almost all school districts have taken steps to prepare for emergencies, including developing written plans, but some plans do not address federally recommended practices such as establishing procedures for special needs students and procedures for continued student education in the event of an extended closure. Additionally, many school districts do not have procedures for training regularly with first responders and community partners.

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## Most School Districts Have Undertaken Some Emergency Management Activities

Many school districts, those with and without emergency management plans, have undertaken activities to prepare for emergencies. Based on our survey of school districts, we estimate that 93 percent of all school districts conduct inspections of their school buildings and grounds to identify possible vulnerabilities in accordance with recommended practices. Of those school districts, 87 percent made security enhancements to their school facilities and grounds as a result of these inspections. Security enhancements included adding or enhancing equipment to communicate with school employees, strengthening the perimeter security of the school, and enhancing access controls.

In addition to conducting vulnerability assessments, many school districts carry out a number of other activities to prepare for emergencies such as conducting some type of school drill or exercise and maintaining a storage location for and replenishing emergency supplies such as food, water, and first-aid supplies, as recommended. Additionally, school districts took

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responsibility for a number of activities to prepare for emergencies at the district level such as negotiating the use of school buildings as community shelters and identifying security needs in schools. These activities can vary by locality depending on community needs and include oversight, coordination with other entities, and training.

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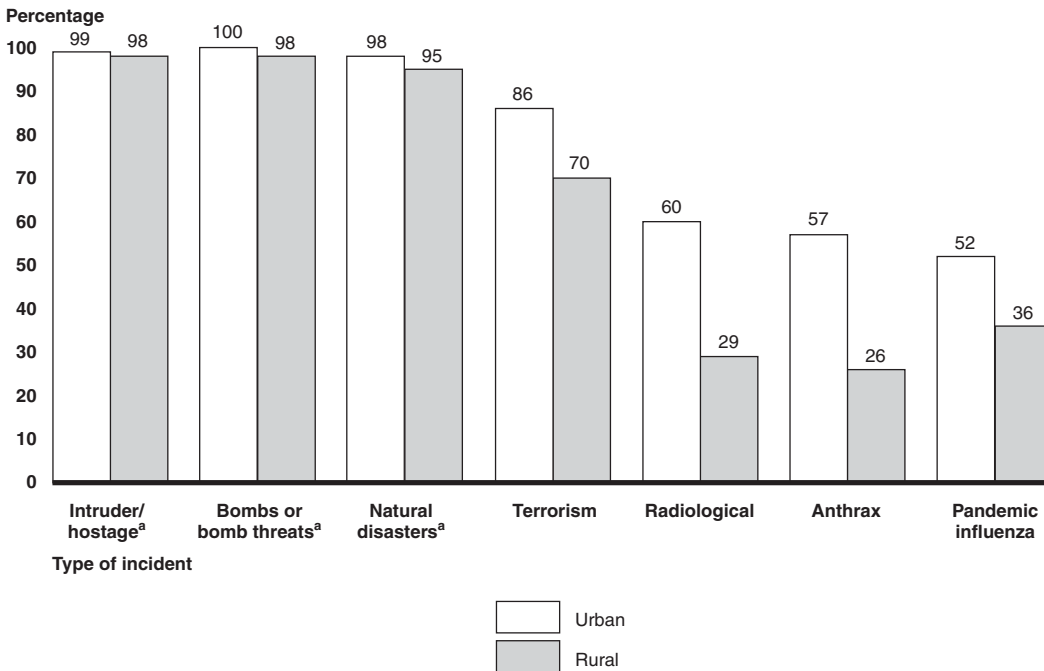
**Most Districts Have  
Emergency Management  
Plans That Address  
Multiple Hazards, but the  
Content of Plans Varies  
Significantly**

Most school districts have developed written emergency management plans that address multiple hazards. Based on our survey of school districts, we estimate that 95 percent of all school districts have written emergency management plans with no statistical difference between urban and rural districts.<sup>14</sup> Of those school districts that have written emergency plans, nearly all (99.6 percent) address multiple hazards in accordance with recommended practices to prepare for emergencies. However, the specific hazards addressed by plans vary. (See fig. 2.) In some instances, the hazards included in emergency plans are specific to local conditions, which is to be expected.

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<sup>14</sup>Those school districts that did not have a written emergency management plan cited several reasons for the lack of such plans that included (1) no requirement to have a written plan, (2) inadequate resources for experienced personnel to develop emergency plans, and (3) schools, not the district, have individual plans.

**Figure 2: Estimated Percentages of Urban and Rural Districts' Multi-Hazard Emergency Management Plans that Include Specific Types of Incidents**



Source: GAO analysis of survey data.

<sup>a</sup>Differences between urban and rural districts are not statistically significant.

The extent to which school districts' emergency management plans and planning activities are consistent with other recommended practices varies:

**Develop Roles and Responsibilities for School Community Members.** Based on our survey of school districts, most districts have written roles and responsibilities in their plans for staff such as superintendents, building engineers or custodians, principals, teachers, and nurses.

**Develop Roles and Responsibilities for First Responders and Community Partners.** Based on our survey, we estimate that 43 percent of school districts use the Incident Command System (ICS)—established

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by DHS as part of the National Incident Management System (NIMS)<sup>15</sup>— to establish the roles and responsibilities of school district officials, local first responders, and community partners during an emergency, in accordance with recommended practices.

**Develop Procedures for Communicating with Key Stakeholders.**

Central to district emergency plans is the inclusion of procedures for communicating with key stakeholders such as staff, parents, and students, including those who are Limited-English Proficient. Our survey finds that roughly three-quarters of all school districts have not included written procedures in their plans for communicating with Limited-English Proficient parents and students, in accordance with federally recommended practices.

**Develop Procedures for Special Needs Students.** Although the number of special needs students in the schools is growing, our survey finds that an estimated 28 percent of school districts with emergency management plans do not have specific provisions for them in their emergency management plans. Education officials told us that because there is no agreement among disability groups on what the best practices are for special needs students in an emergency, districts usually devise their own procedures. According to these officials, some of these procedures such as keeping special needs students in their classrooms during some emergencies may not ensure the students' safety in an emergency.

**Develop Procedures for Recovering from an Incident.** Over half of all school districts with written emergency plans include procedures in their plans to assist with recovering from an incident, in accordance with recommended practices. School districts' plans include such procedures as providing on-site trauma teams, restoring district administrative

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<sup>15</sup>The Incident Command System is a standard incident management system to assist in managing all major incidents. The Incident Command System also prescribes interoperable communications systems and preparedness before an incident happens, including planning, training, and exercises. The Incident Command System was developed in the 1970s following a series of catastrophic fires. Specifically, researchers determined that response problems were more likely to result from inadequate management rather than from any other reason. The Incident Command System was designed so that responders from different jurisdictions and disciplines could work together better to respond to natural disasters and emergencies, including acts of terrorism. NIMS includes a unified approach to incident management: standard command and management structures, and emphasis on preparedness, mutual aid, and resource management.

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functions, and conducting assessments of damage to school buildings and grounds.

**Develop Procedures for the Continuation of Student Education.**

Few school districts' emergency plans contain procedures for continuing student education in the event of an extended school closure, such as a pandemic outbreak, although it is a federally recommended practice. Based on our survey, we estimate that 56 percent of school districts do not include any of the following procedures (see table 3) in their plans for the continuation of student education during an extended school closure. Without such procedures school districts may not be able to educate students during a school closure that could last from several days to a year or longer.

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**Table 3: Percentages of School Districts with Written Plans that Include Certain Types of Procedures to Continue Student Educational Instruction in the Event of an Extended School Closure**

Types of procedure to continue student educational instruction	Estimated percentage of school districts with written plans that include procedure
Electronic or human telephone trees to communicate academic information to students	30
Web-based distance instruction	12
Mailed lessons and assignments	10
Academic instruction via local radio or television stations	7

Source: GAO analysis of survey data.

Note: Responses are not mutually exclusive.

**Determine Lessons Learned.** Based on our survey of school districts, we estimate that 38 percent of districts have emergency management plans that contain procedures for reviewing lessons learned to analyze how well the plans worked in responding to a drill or emergency. Of the remaining school districts, 53 percent indicated they have procedures but those procedures are not included in their plans and 7 percent have no such procedures.

**Develop Multi-Purpose Manuals.** Some school districts have multi-purpose manuals that contain various types of information such as roles and responsibilities for staff, descriptions of how to respond to different

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types of emergencies, as well as site specific information for individual schools to complete in order to tailor their plan. In contrast, other districts provide less information. For example, one district's plan consisted of a flipchart with contact information on whom to call during an emergency.

**Involve Local Government and Public Health Agencies in Developing and Updating Plans.** School districts differed in the extent to which they involve community partners in the development and updating of their plans.<sup>16</sup> Fewer than half of school districts with emergency management plans involve community partners such as the local head of government (43 percent) or the local public health agency (42 percent) when developing and updating their emergency management plans, as recommended by HHS.<sup>17</sup> According to written guidance provided by Education, those school districts that do not include community partners in the development and updating of their plans may limit their opportunity to exchange information with local officials, take advantage of local resources, and identify gaps in their plan. More than half (52 percent) of all school districts with emergency management plans report regularly (i.e., at least once a year) updating their emergency management plans in accordance with recommended practices. However, 10 percent of all school districts had never updated their plans.

**Train with First Responders.** Based on our survey, we estimate that 27 percent of all school districts with emergency management plans have never trained with any first responders on how to implement the plans, in accordance with federally recommended practices. The reasons why school districts are not training with first responders are not readily apparent. As we have previously reported, involving first responder groups in training and exercise programs can better familiarize first responders with and prepare first responders for their roles in an emergency as well as assess the effectiveness of a school or district emergency plan.<sup>18</sup>

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<sup>16</sup>In our survey, community partners included representatives from public health, mental health, local head of government, transportation, hospitals, Red Cross, faith-based community, and the business community.

<sup>17</sup>Twelve percent of school districts do not know whether public health agencies were included in the development and update of plans. Thirteen percent of districts do not know whether the local head of government was included in the development and update of plans.

<sup>18</sup>See [GAO-06-618](#).

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**Train with Community Partners.** School districts report training with community partners—such as local government and local public health entities—on activities to prepare for an emergency with similar frequency. Specifically, we estimate that 29 percent of all school districts train with community partners. As with first responders, the reasons for the lack of training with community partners are not readily apparent. In our work on Hurricane Katrina, we reported that involving local community partners in exercise programs and training could help prepare community partners and enhance their understanding of their roles in an emergency as well as help assess the effectiveness of a school district’s emergency plan.<sup>19</sup> Without such training, school districts and their community partners may not fully understand their roles and responsibilities and could be at risk of not responding effectively during a school emergency.

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## School Districts Report Challenges in Planning for Emergencies and Difficulties in Communicating with First Responders and Parents

In planning for emergencies, many school districts face challenges resulting from competing priorities, a lack of equipment, and limited expertise; some school districts experience difficulties in communicating and coordinating with first responders and parents, but most do not have such challenges with students.

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## Competing Priorities, Lack of Equipment, and Limited Expertise Are Obstacles to Incorporating Recommended Practices in Emergency Management Planning

School district officials who responded to our survey reported difficulty in following the recommended practice of allocating time to emergency management planning, given the higher priority and competing demand on their time for educating students and carrying out other administrative responsibilities. Based on our survey of school districts, we estimate that in 70 percent of all districts, officials consider competing priorities to be a challenge to planning for emergencies.

In an estimated 62 percent of districts, officials cited a lack of equipment and expertise as impediments to emergency planning. For example,

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<sup>19</sup>See [GAO-06-618](#).

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officials in one Massachusetts school district we visited reported that they do not have adequate locks on some of the doors to school buildings to implement a lockdown procedure. In a North Carolina district we visited, officials said a lack of two-way radios for staff in the elementary schools hinders their ability to communicate with one another and with first responders during an emergency.<sup>20</sup> As demonstrated in these school districts, the lack of equipment would prevent districts from implementing the procedures in their plans and hinder communication among district staff and with first responders during emergencies. In addition to not having sufficient equipment, school district officials we spoke with described a shortage of expertise in both planning for and managing emergencies. These officials said their districts lacked specialized personnel and training with which to develop needed expertise. For example, district officials in 5 of the 27 districts we interviewed noted that they do not have sufficient funding to hire full-time emergency management staff to provide such training or take responsibility for updating their district plans. These officials noted that the lack of expertise makes it difficult to adequately plan for responding to emergencies.

School districts we interviewed also reported challenges in incorporating special needs students in emergency management planning. According to officials in about half (13 of 27) of the districts in which we conducted interviews, a lack of equipment or expertise poses challenges for districts—particularly in the area of evacuating special needs students. For example, an official in one school district, said that the district tracks the location of special needs students, but many of the district's schools do not have evacuation equipment (e.g., evacuation chairs used to transport disabled persons down a flight of stairs) to remove students from buildings and staff need more training on how to operate the existing equipment

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<sup>20</sup>Two-way radios, commonly known as walkie-talkies, are radios that can alternate between receiving and transmitting messages. Cellular telephones and satellite telephones are also two-way radios but, unlike walkie-talkies, simultaneously receive and transmit messages.

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## Some School Districts Reported Difficulty in Communicating and Coordinating with First Responders

Based on our survey of school districts, an estimated 39 percent of districts with emergency plans experience challenges in communicating and coordinating with local first responders.<sup>21</sup> Specifically, these school districts experience a lack of partnerships with all or specific first responders, limited time or funding to collaborate with first responders on plans for emergencies, or a lack of interoperability between the equipment used by the school district and equipment used by first responders. For example, the superintendent of a Washington school district we visited said that law enforcement has not been responsive to the district's requests to participate in emergency drills, and, in addition to never having had a districtwide drill with first responders, competition among city, county, and private first responders has made it difficult for the school district to know with which first responder entity it should coordinate. According to guidance provided by Education, the lack of partnerships, as demonstrated in these school districts, can lead to an absence of training that prevents schools and first responders from understanding their roles and responsibilities during emergencies. Additionally, in 8 of the 27 districts we interviewed, officials said that the two-way radios or other equipment used in their school districts lacked interoperability with the radios used by first responders.<sup>22</sup>

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## School Districts Have Methods to Communicate With Parents, but Face Challenges in Ensuring Parents Receive Consistent Information during Incidents

In keeping with recommended practices that call for school districts to have a way to contact parents of students enrolled in the district, all of the 27 school districts we interviewed had ways of communicating emergency procedures to parents prior to (e.g., newsletters), during (e.g., media, telephone), and after an incident (e.g., letters). Eleven of these districts have a system that can send instant electronic and telephone messages to parents of students in the district. Despite having these methods, 16 of the 27 districts we interviewed experience difficulties in implementing the

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<sup>21</sup>Thirteen percent of school districts reported not knowing whether the district has challenges related to first responders.

<sup>22</sup>GAO has reported on the range of issues associated with the lack of interoperability among first responders and the implications of these issues for emergency management. For a fuller discussion of these issues see the following GAO reports: *First Responders: Much Work Remains to Improve Communications Interoperability*, [GAO-07-301](#) (Washington, D.C.: Apr. 2, 2007); *Catastrophic Disasters: Enhanced Leadership, Capabilities, and Accountability Controls Will Improve the Effectiveness of the Nation's Preparedness, Response, and Recovery System*, [GAO-06-618](#) (Washington, D.C.: Sept. 6, 2006); and *Homeland Security: Federal Leadership and Intergovernmental Cooperation Required to Achieve First Responder Interoperable Communications*, [GAO-04-740](#) (Washington, D.C.: July 20, 2004).

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recommended practice that school districts communicate clear, consistent, and appropriate information to parents regarding an emergency. For example, officials in a Florida school district said that with students' increased access to cellular telephones, parents often arrive on school grounds during an incident to pick up their children before the district has an opportunity to provide parents with information. Thus, according to these officials, the district experiences challenges in simultaneously maintaining control of both the emergency situation and access to school grounds by parents and others. Representatives of three education associations<sup>23</sup> also noted that school districts have much to do to ensure that their emergency management efforts diffuse confusion during emergencies and provide parents with consistent information.

Based on our survey of school districts, an estimated 39 percent of all school districts provide translators to communicate with Limited-English Proficient parents during emergencies, but fewer—an estimated 23 percent of all districts—provide translations of emergency management materials. Officials in eight of the 27 districts we interviewed discussed challenges in retaining bilingual staff to conduct translations of the districts' messages or in reaching parents who do not speak the languages or dialects the district translates. Our findings, are consistent with the observations of some national education groups that have indicated that districts, in part due to limited funding, struggle to effectively communicate emergency-related information to this population of parents.

Officials in all but one of the districts in which we conducted interviews said that the district did not have problems communicating emergency procedures to students. While some of these officials did not provide reasons; as we previously discussed, most districts regularly practice their emergency management plans with their students and staff.

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## Concluding Observations

The federal government plays a critical role in assisting school districts to prepare for emergencies by providing funding, giving states flexibility to target federal funding for emergency management to areas of greatest need, disseminating information on best practices and other guidance, and providing training and equipment. School districts have taken a number of important steps to plan for a range of emergencies, most notably

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<sup>23</sup>National Education Association, American Association of School Administrators, and National Association of Secondary School Principals.

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developing emergency management plans; however, in many districts these plans or their implementation do not align with federally recommended practices. Given the challenges many school districts face due to a lack of necessary equipment and expertise, they do not have the tools to support the plans they have in place and, therefore, school districts are left with gaps in their ability to fully prepare for emergencies. Additional clarity regarding access to federal resources and improved guidance may enhance the ability of school districts to plan and prepare for emergencies. We are currently considering recommendations to address these issues.

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## GAO Contacts

For further information regarding this testimony, please contact me on (202) 512-8403 or William O. Jenkins, Jr. on (202) 512-8757. Individuals making contributions to this testimony include Kathryn Larin, Debra Sebastian, Tahra Nichols, and Kris Trueblood.

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# II

## NAAG Interoffice Memorandum: Government Accountability Office Report Summary

## INTEROFFICE MEMORANDUM

**DATE:** July 30, 2007

**TO:** Nick Alexander

**FROM:** Jacqueline N. Fernandez

**RE:** Government Accountability Office Report Summary

The U.S. Government Accountability Office (GAO) released a report on May 17, 2007 entitled, *Emergency Management: Status of School Districts' Planning and Preparedness*. This report, prepared as the written testimony of Cornelia M. Ashby<sup>1</sup> before the House of Representatives Committee on Homeland Security, is a compilation of information retrieved from interviews with federal officials, surveys involving random samples of all public school districts, visits to some school districts, relevant documents, and surveys of state agencies that administer federal grants to enhance school safety by way of emergency planning. GAO examines federal and state government aid and regulation in the school safety and emergency preparedness and response area. The report also highlights the actions that have been taken thus far by school districts throughout the nation to plan and prepare for emergencies as well as the challenges such school districts have experienced in both planning and response, especially in the areas of implementation and practice of developed safety plans. In so doing, GAO determines possible actions for improving school safety at federal, state and local levels.

### I. The role played by the federal government

GAO provided a profile of the federal government's role in ensuring school emergency planning preparedness by way of funding and/or regulation by laws and policies. While there is no federal law thus far requiring school districts to have emergency plans,<sup>2</sup> the Department of Education and the Department of Homeland Security do provide funding for this purpose as well as other resources, such as guidance, training, and equipment. The Department of Education developed the Emergency Response and Crisis Management Grant Program, which has disbursed \$130 million to approximately 400 school districts across the U.S since FY 2003.

The GAO report suggests that there is room for improvement on the funding front, however, as the aid is only reaching a small portion of the 17,000 school districts in the U.S. – an approximate number determined by the reporting of states to the Department of Education in the school year 2003-2004. The report also finds that some states have encountered problems with taking advantage of the availability of funds through the Department of Homeland Security as program guidance does not specifically delineate school districts as one of the entities to which homeland security funds may be allocated.

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<sup>1</sup> Cornelia M. Ashby is the director of Education, Workforce, and Income Security at GAO.

<sup>2</sup> There are currently numerous legislative proposals pending in Congress which would mandate safety plans for both institutions of higher education that receive federal funding, as well as K-12 schools.

As a result, some states, and therefore school districts, have not benefited from federal funding.

The Departments of Education, Homeland Security, and Health and Human Services also compiled recommendations to school districts for emergency preparedness. Among the recommended practices are:

- allocating time to emergency management planning;
- assessing vulnerabilities;
- regularly practicing safety drills;
- identifying and obtaining useful emergency response equipment;
- identifying a storage location and replenishing emergency supplies on a regular basis;
- developing an emergency management plan and updating the plan periodically, including
  - identifying and addressing a range of events and hazards specific to the district or schools;
  - a plan for communication with, and developing roles for, first responders, school community members, community partners, parents and students;
  - developing procedures for special needs students;
  - developing procedures for recovery after an incident as well as determining lessons learned; and
  - developing multi-purpose manuals, with emergency management information, tailored to individual school needs;
- including community partners in planning;
- coordinating the school district's emergency procedures with state and local governments; and
- practicing the emergency management plan with first responders and the community periodically.

These recommendations are intended to serve as a general framework for emergency planning – the specifics of which can be tailored to particular school districts and their needs.

## II. The role played by state governments

GAO found that thirty-two (32) state governments reported having laws or policies requiring school districts to have written emergency management plans. Those states are: AK, AZ, CA, CO, DE, FL, GA, IL, IN, MA, MD, ME, MN, MS, NJ, NM, NV, NY, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, and WY. In addition to these state laws, states also provide funding and other resources to school districts for emergency preparedness and response – 11 of the 49 states (including the District of Columbia) responding to the surveys reported providing state funding to school districts for this purpose. In addition, 47 states reported providing guidance and 37 states reported providing training to school districts.

### III. The role played by school districts

Almost all school districts have developed emergency preparedness procedures, whether through a written plan or otherwise, albeit sometimes not in complete accordance with federal recommendations. The report suggests that among the challenges faced by school districts in fully implementing federal recommendations – which may explain the disparity between federal recommendations and school safety policies – are competing priorities (specifically educating students and other administrative responsibilities), difficulty in communicating and coordinating with first responders and parents, limited expertise, and lack of equipment. District officials in 5 of the 27 school districts interviewed noted that their district lacked sufficient funding to hire full-time emergency management staff to provide training in planning and managing emergencies or to take on the role of updating district safety plans. As a result of these challenges, many school districts are not able to practice and fully implement the plans they have in place, much less develop and comply with more comprehensive plans that encompass federal recommendations.

The report concludes by reiterating the finding that many school districts lack resources to implement emergency preparedness plans. Further stated is the possibility of the problem being remedied by enhancing the clarity in the Department of Homeland Security program guidance regarding access to federal funding and other resources.