



# District-Wide School Safety Plan (DWSSP)

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# **Table of Contents**

Table of Contents	1
Acknowledgements	
Preface	
Contact Information	
Community Partners Contact Information	5
<b>,</b>	
Base Plan	
Plan Fundamentals	6
Introduction	7
Roles and Responsibilities	
General Assumptions	11
Notifications	
Prevention and Mitigation	12
Preparedness	
Response to Incidents	
Disaster Recovery	22
A. Functional Annexes	
A.1 Automated External Defibrillators	27
A.2 Communications	
A.3 Assisted Evacuation & FORM	31
A.4 Crisis Support Services	33
B. Hazard Specific Appendices	
B.1 Harassment, Bullying, and Discrimination	34
B.2 Violent and Disruptive Behavior	
B.3 Public Health Emergency Plan	37
B.4 Radiological Emergency	47
B.5 Other Hazard-specific Scenarios [Abduction/Lost Student - Weapons]	48
C. Continuity of Operations Plan	49

# **Acknowledgements**

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#### **General Notes**

Each Acrobat file in the Guide is a stand-alone part of the overall document. This structure permits the manipulation of each file without conflicting with the other component parts. Because of this, each of the pages in the individual component parts is numbered independent of all the other files. When an Emergency Operations Plan (EOP) is assembled as a single file, it is recommended that before inserting a component file into the main file all page numbers in the contributing file are deleted. When the single EOP document file is complete, it can then be renumbered as a single file. This will eliminate numbering conflicts that would occur.

Files should be printed in 2-sided copy mode. Refer any questions about any aspect of this Plan to the CiTi Administrative Services Office at msheperd@oswegoboces.org. Assistance is also available on the CiTi webpage at <a href="https://www.CiTiboces.org">www.CiTiboces.org</a>.

It is the intention of **CiTi** that the component parts of this Guide will be continuously updated as required. This is a comprehensive plan that is broken into the following three sections:

The **Base Plan** provides an overview of CiTi preparedness and response strategies. It describes expected hazards, outlines agency roles and responsibilities, and explains how CiTi keeps the plan current.

The **Functional Annexes** are individual sections that focus on specific response and recovery missions, such as Communications and Damage Assessment. These annexes describe the actions, roles, and responsibilities that participating organizations have for completing tasks for a function. They discuss how the jurisdiction manages the function before, during, and after the emergency and identify the group that implements that function. However, each Functional Annex addresses only general strategies used for any emergency.

The **Hazard-Specific Appendices** describe strategies for managing preparedness and response missions for a specific hazard. Attached to the end of each functional annex, they explain the procedures that are unique to that annex for a hazard type. These appendices may be short or long, depending on the details needed to explain the actions, roles, and responsibilities. Strategies already outlined in a Functional Annex should not be repeated in a Hazard-Specific Appendix.

The most up to date copy of this plan exists for employees on the **CiTi** Intranet at <a href="http://portal.CiTiboces.org">http://portal.CiTiboces.org</a>. Hard copies of the plan exist in the following locations:

District Office - Safety & Risk Department – Room 112 of Stern Building

### **Preface**

Although most critical incidents and emergencies will be handled by personnel and resources that are located within close proximity to the incident site, there is that less than one percent of incidents that will overwhelm local resources and require a coordinated response on the part of campus officials and other emergency responders.

Since the impact of Hurricane Katrina was felt on the gulf coast states in the summer of 2005, it has become apparent that a number of issues need to be addressed by emergency response planners at all levels.

First, school emergency responders should anticipate and plan for all foreseeable events that can negatively affect campus populations or infrastructure. Given the limited availability of planning resources, special attention should be given to prior planning; extensive training and operational exercises, including the use of cost-effective tabletop exercises. Consideration should be given to the pre-positioning and storage, as needed, of food, water, and other critical supplies and equipment. The primary purpose of a campus emergency response effort should be the protection of lives and the physical integrity of the campus including the ability to continue the business and functions of the institution.

Secondly, not every incident will be manageable to the degree intended to affect all desired outcomes. Even the Federal government may not have enough personnel and other resources to be effective all of the time. Decisions will have to be made as to if, when, and how to deploy the resources available to neutralize the impact of an emergency or disaster.

The New Orleans experience revealed that emergency response personnel and institutions, from the Federal government on down to the lowest local levels, including private sector agencies, must be able to effectively communicate and operate during an emergency or disaster. One of the critical elements that will permit seamless cooperative efforts requires that the concepts of the federal Incident Command System must be institutionalized and thoroughly practiced at all levels before, during and after any emergency or disaster.

Guidelines in this document were developed by members of the CiTi Readiness and Emergency Management Committee. They are intended to provide guidelines to assist faculty, staff, administrators and students to prevent, mitigate the danger of, prepare for, respond to and recover from crisis that may occur. They are also designed to align themselves with the requirements of federal directives that were published or adopted on or after 2004, including the National Incident Management System (NIMS) and the National Response Framework (NRF), Homeland Security Presidential Directive-5 (HSPD-5), and Homeland Security Presidential Directive-8 (HSPD-8), and others.

Because of federal mandates beginning in 2006, that all public agencies that depend on federal training funds and/or federal emergency incident management support become NIMS compliant, it is imperative that institutions that rely on such funding and support demonstrate the intention and the ability to meet these mandates. At this time, private sector institutions are only encouraged to adopt these policies, but the character and quality of a private institution's response capabilities is dependent on an ability to be able to work effectively with local, state, regional, and federal responders.

Generally, depending on the nature of the incident, the Incident Commander (IC) will be a senior fire or police official on the scene. However, this may not always be the case.

In many cases, the <u>Program Administrator</u> of a particular building or the <u>District Superintendent</u> will be designated as the IC. The reason for this decision is that an IC should be knowledgeable about campus buildings and facilities and should know how the institution "works." He or she should be able to delegate responsibilities to accomplish tasks and be able to effectively interact with other managers of the institution.

# **District-Wide School Safety Plan Advisory Committee Contact Information**

Contact	Position	Department/Division
Todd, Christopher	District Superintendent	District Superintendent's Office
Bayne, Roseann	A/S for Instruction	Instructional Support Services
Foland, Kristen	A/S for Human Resources	Human Resources Department
Hartford, Aleisha	Coordinator of Safety and Risk	Safety & Risk Department
Sheperd, Michael	A/S for Administrative Services	Administrative Services Office
Cerio, James	Director of Facilities	Operations & Maintenance
Landy, Julie	Director of Exceptional & Alternative Education	Exceptional & Alternative Ed.
Marla Berlin	Director of College and Career Education	Career & Technical Ed.
Allard, Melissa	Secretary to District Superintendent	District Superintendent's Office
Spencer, Lisa	Secretary to A/S for Human Resources	Human Resources Department
Thurlow, Michael	Principal of Career & Technical Education	CiTi Main Campus – Career & Technical Ed.

# **Community Partners Contact Information**

Contact	Phone Number
McFee Ambulance Service	911 315-963-7244
Mexico Fire Department	911 315-963-7494
New York State Education Department – Office of Innovation, Organizational Effectiveness Group – Disaster and Emergency Preparedness	518-486-7336 518-210-1269 (cell)
New York State Emergency Management Region IV	315-438-8907
New York State Police	911 315-298-1444
Oswego County E-911	911 315-349-8215
Oswego County Emergency Management Office	315-591-9150
Oswego County Mental Health	315-963-5361
Oswego County Public Health	315-349-3540
Oswego County Sheriff Department	911 315-349-3411
Poison Control	1-800-222-1222
APW Central School Superintendent Lynn Rhone Transportation Supervisor Nate Metcalf	W= 315-625-5251 W= 315-625-5242
Central Square Central Schools Superintendent, Thomas Colabufo Transportation Supervisor John Pierce	W= 315-668-4220 W= 315-668-3771
Fulton City School Superintendent, Brian Pulvino Transportation Supervisor Greg Henrie	W= 315-593-5510 W= 315-593-5526
Hannibal Central Schools Superintendent, Christopher Staats Transportation Supervisor Robert Pakish	W= 315-564-8100 press "8" W= 315-564-8100 press "6"
Mexico Academy & Central School Superintendent, Donna Runner Transportation Supervisor Julie Bradish or current Supervisor	W= 315-963-8400, ext.5403 W= 315-963-8400, ext 4500
Oswego City School Superintendent, Mathis Calvin III Transportation Supervisor Thomas Gunn	W= 315-341-2001 W= 315-341-2900
Phoenix Central Schools Superintendent, Christopher Byrne Transportation Supervisor Deborah Gerace	W= 315-695-1555 W= 315-695-1551
Pulaski Academy and Central School Superintendent, Thomas Jennings Transportation Supervisor Bryan Philips	W= 315-298-5188 W= 315-298-7378
Sandy Creek Central School Superintendent Kyle Faulkner Transportation Supervisor Robin Cashel	W= 315-387-3445, ext 1510 W= 315-387-3445 ext. 3330

### **Base Plan**

#### 1.0 PLAN FUNDAMENTALS

#### 1.1 Purpose

The purpose of this DWSSP is to offer faculty, staff, administration, students, and parents the overall policies and procedures for the preparedness and response efforts with respect to any potential man-made, technological, or natural disasters or crises at any of the campus locations of CiTi.

#### 1.2 Scope

This DWSSP is designed to provide guidance to faculty, staff, students and visitors to CiTi campuses located at: 1. 179 County Route 64, Mexico, New York; 2. 80 Dutch Ridge Road; Oswego, New York; 3. Fourth Street Educational Building – 167 S. Fourth Street, Fulton, NY. This plan is in effect during the normal school year and during summer programs.

#### 1.3 Authority

This plan was developed in accordance and with guidance from §155.17 of the Regulations of the Commissioner of Education for the State of New York. The regulation aligns itself with New York State Executive Law Article 2-B, which authorizes county government to prepare plans to protect citizens and properties within their jurisdiction.

#### 1.4 Date of Effect

The CiTi Board of Education accepted and adopted this Plan effective October 21, 2009. Updates and revisions adopted by the CiTi Board of Education effective 2014, 2019, 2020 and 2021.

#### 1.5 Periodic plan review

This plan is to be reviewed at least annually by members of the CiTi District-Wide School Safety Team (See Table 1).

The annual planning cycle begins with exercises created to test the plan and identify weakness or areas for refinement. A prioritized list of areas for improvement based on gaps identified from these exercises. This will also occur during the year whenever gaps are identified, and the resulting mitigation plans and corrective actions will be incorporated into the plan. The DWSSP is then reviewed for public and law enforcement comment and then must be approved by the Board.

#### 1.5.1 Public Review and Comment

Pursuant to Commissioner's Regulation, Section 155.17(e)(3), this Plan is made available annually to law enforcement and the public for a thirty-day comment period, and a public hearing is held to allow the Board of Education to address any significant comments regarding the plan. A copy of the DWSSP is made publicly available on the CiTi Website by October 1 of each year.

#### 2.0 INTRODUCTION

#### 2.1 Statement of Policy

The DWSSP is a basic guide to providing a response system, by CiTi Administration, to a major crisis or emergency occurring on the CiTi Campus or directly impacting CiTi. All personnel designated to carry out specific responsibilities are expected to know and understand the policies and procedures outlined in this plan. The response to any major crisis or disturbance will be conducted within the framework of this plan.

#### 2.2 Plan Implementation

#### 2.2.1 Phase I

In the initial development of the plan, participation was solicited from all stakeholder representatives at CiTi. Planners were sure to include representatives of faculty, students, staff, and administrators.

#### 2.2.2 Phase II

Staff, faculty, and administrators will receive annual training including discussions of prevention, mitigation, preparedness, response, and recovery. Specifically, how to prepare and respond to various emergency scenarios. In the initial version of the plan, representatives of Oswego County Emergency Management Office, Oswego County Fire Coordinator's Office and the New York State Police provided participants. Annually, this plan is made available to NYS Education Department, New York State Police, and the public. All new staff receive an introduction to the Incident Command System (I-100) training.

#### 2.2.3 Phase III

The third phase of this planning process included the creation (and subsequent annual maintenance) of the Building Level Emergency Response Plans (BLERPs) for each CiTi campus, along with the training of all personnel in those locations regarding the functional annexes and the hazard-specific annexes (briefly explained in this plan). CiTi personnel working within a client/host school district will follow the emergency planning CiTi School Building, regular drills and exercises will be conducted. Where gaps are identified, additional training will be conducted.

#### 2.3 Plan Procedures should be Flexible

Circumstances surrounding a crisis differ with every incident. Just as circumstances surrounding incidents are different, responses may need to adjust for particular needs.

#### 2.4 Exceptions to Plan Functions and Responsibilities

It may be necessary for administrators to take exception to parts of the plan as they address challenges of preparedness, response, and recovery. When these exceptions occur, they should be evaluated in the after-action process and if necessary, plans should incorporate these changes into future documents.

#### 2.5 Plan Changes and Recommendations

Unless necessary, changes to plans should be made during the annual planning review process. As changes are made, annual training will occur to share the latest revisions with staff, faculty and students.

#### 2.6 Plan Conflicts

While implementing or exercising this plan there may be cases where other plans conflict. Efforts have been made to align this plan with CiTi School Board policies. This document should be considered the most current and up to date information and is intended to serve as the over-arching policy document regarding emergency preparedness and response. Building-level Emergency Response Plans (BLERPs) are considered site-specific plans, and the controlling procedural document for each specific CiTi campus.

#### 2.7 NIMS and the Emergency Operations

CiTi has made every effort to align its planning and preparedness to Local, State and Federal guidelines. This plan is intended to work in concert with the Oswego County Comprehensive Emergency Management Plan. Also, in accordance with Homeland Security Presidential Directive (HSPD) #5 – CiTi has adopted the use of the Incident Command System and other components of the National Incident Management System (NIMS).

#### 3.0 ROLES AND RESPONSIBILITIES

#### 3.1 District Superintendent (or Designee)

- Serves as the chief emergency officer and district incident commander (IC) and has overall responsibility for the plan and response.
- Directs all operations in the management of an emergency. If onsite, would be the
  incident commander for the incident or designate someone to act on his behalf and
  establishes a fixed command post.
- Gathers information from all aspects of the emergency for use in making appropriate decisions about the management of the incident.
- Assesses the emergency and assigns tasks based on overall needs for managing the incident.
- Stays in routine contact with leaders of emergency agencies, support agencies, and sister-schools.
- Notifies the Board of Education of emergency incidents and keeps them apprised of changing situations. Notifies the NY Commissioner of Education (when the situation so warrants).
- Has authority to make emergency funding decisions.
- Authorizes the release of public information.
- Facilitates updates to the DWSSP.
- Facilitates meetings to address prevention, mitigation, and preparedness.
- Arranges for exercises to test Plan and identifies areas for improvement.
- Coordinates training of staff and personnel in preparedness efforts.

#### 3.2 Assistant Superintendents

- Act on the behalf of the District Superintendent in his/her absence.
- Fulfill roles of command or general staff during an incident.
- Report to the Command Post or a secondary communications center when an incident is declared.

#### 3.3 Director of College and Career Education

- Collects information and completes an After-Action report (AAR) following all drills, exercises, events, incidents, or close calls.
- Identifies areas for improvement (i.e. procedures, training or equipment).
- Provides the report and recommendations to the District Superintendent.

#### 3.4 School Monitor/Greeter

- Monitors the main school entryways for any potentially hazardous conditions or questionable visitors.
- Greets, vets, and assists all visitors by connecting them with whomever they intend to meet.
- Notifies building administration of any perceived dangerous situations/individuals on school property and notifies authorities (via 911) if necessary.

#### 3.5 Medical Services Coordinator (typically held by a Nurse or Mental Health Professional)

- Assures that during an emergency, that medical assistance is available to injured or those students (or staff) needing medical or mental health assistance.
- In the event of an evacuation from school, establishes a medical triage/care area in the new safe location (as needed).
- Reports to the Incident Commander regarding medical/mental health situations.

#### 3.6 Director of Facilities

- Utilizes manpower and resources to control traffic flow during and after an event at any CiTi campus.
- Is responsible for the overall preparedness/operation/alteration of the physical plant.
- Is responsible for the readiness/operation of protective systems and emergency power and water.
- Reports to the Command Post when an incident is declared.

#### 3.7 School Resource Officer / Security Staff

- School Resource Officer provides a law enforcement presence.
- Builds and maintains rapport with building staff and student body.
- Investigates and reports violations of security, all rules and laws, and school policy.
- Advises school administrators of situations which may create harm or exposure.
- Summons additional law enforcement, fire service, and EMS as needed.
- Attends and participates in REMS and ICS trainings.

#### 3.8 District-Wide School Safety Team

- The team is comprised of key administrators and staff that play an integral role in the safety and security of CiTi campuses.
- The team is responsible for content and revisions to the plan.
- Upon approval of this Plan, the members listed below are deemed appointed by the CiTi Board of Education as the District-wide School safety team.

District-Wide School Safety Team (Table 1)		
Christopher J. Todd  District Superintendent	Kristen Foland A/S for Human Resources	Aleisha Hartford Safety Coordinator
Erin Simmons Principal, Fourth Street Campus	Gary Brisson Principal, Dutch Ridge Campus	Michael Thurlow Principal, CiTi CTE (Main Campus)
Michael Sheperd  A/S for Administrative  Services	Randall Griffin Readiness and Emergency Management Planner	James Cerio Director of Facilities
Jennifer Poindexter Principal, Alt. Ed.	Julie Landy Director of Exc. and Alt.Ed	Marla Berlin Director of College & Career Education
Robyn Proud Principal, CARE Plus	Stephanie Maturo Director of IT Services.	

#### 3.9 Faculty

- Are responsible for the safety of students under their direction.
- Provide leadership and direction to students during an incident.
- Provide insight into the applicability and accuracy of the plan.
- Maintain readiness through review of their role and assignment(s) within the plan.

#### 3.10 Staff and Administrators

- Provide insight into the applicability and accuracy of the plan.
- Staff without student responsibilities or predetermined duties should report to the designated staging area during an incident.
- Maintain readiness through review of their role and assignment(s) within the plan.

#### 3.11 Students

- Follow direction of teaching staff during an incident.
- Review and support the plan to ensure readiness.

#### 3.12 Parents

- Support the plan and encourage the student to follow guidelines.
- Review plan with students to ensure readiness.
- Cooperate with school officials and follow direction.
- Wait for direction of how and when to respond. This notification will come from local media releases. Parents and guardians will require proper identification when picking up a student. Telephone authorizations will not be accepted during a crisis for security purposes.

#### Center for Instruction, Technology and Innovation

#### **District-Wide School Safety Plan**

#### 4.0 GENERAL ASSUMPTIONS

#### 4.1 An emergency may occur at any time

A critical incident, crisis, or disaster may occur at any time of the day or night, weekend, or holiday, with little or no warning.

#### 4.2 Most incidents are handled locally

Almost all incidents are handled locally, but some incidents may require the support and resources of local, county, state, federal governments, and/or private institutions, non-government organizations (NGO's) and other entities.

#### 4.3 Incident plans must be flexible

The succession of events in any incident are not fully predictable, therefore, this DWSSP and any other plans and protocols devised prior to or at the time of the event, will serve primarily as a guide or checklist, and may require modifications in the field to mitigate injuries, damages and/or to recover from the incident.

#### 4.4 Outside resources and assistance may be delayed

An emergency or a disaster may additionally affect residents within close proximity to the campus. As such, town, county, state, and federal emergency services, or resources may not be immediately available. In these instances, a delay in the delivery of effective and sufficient off-campus emergency services may typically be expected for a period of up to 30 minutes or more.

#### 5.0 NOTIFICATIONS

#### 5.1 Declaration of an Emergency

Staff, faculty, administrators, or students may identify an emergency or crisis situation. For imminent threats, such as fires or true medical emergencies, 911 should be called immediately from the nearest phone, with follow-up to the main office.

Less hazardous situations should be reported to the School Resource Officer (or Security Officer) and main office by dialing zero (0), from any CiTi phone, or via radio. Administrative personnel will make the initial determination of the response and determine a course of action, which may likely be those listed in a functional annex or hazard-specific annex of the Building Level Emergency Response Plan (BLERP).

#### 5.2 Administrative Notifications

The District Office Administration will be notified and advised when an incident occurs. Building Administrators will notify the District Superintendent's Office of major events (i.e. Lockdown, Evacuation, etc..) since those types of events likely will require use of district resources and personnel outside of the affected campus.

#### 6.0 PREVENTION AND MITIGATION

Prevention is the elimination of a hazard or threat. Mitigation is a process of reducing the potential impact of an incident if it cannot be completely prevented. Mitigation is designed to assess and address the safety and integrity of the facilities, security, culture, and climate of the school. It is an ongoing process that is directly linked with other phases of emergency planning.

#### 6.1 Hazard Assessments

Hazard assessments are completed internally and externally at differing periods using the following approaches:

#### 6.1.1 INTERNAL AUDITS

Classroom Safety

Crime Prevention through Environmental Design (CPTED) -

Site Access Control Review -

Staff Comments and Surveys

After Action Reports

Security Assessment

Safety Audit

#### 6.1.2 EXTERNAL VULNERABILITY ASSESSMENTS

New York State Police Vulnerability Assessment

New York State Police K-9 Sweeps (Drugs and Explosives)

Insurance Carrier Audit

#### 6.1.3 IDENTIFICATION OF SITES OF POTENTIAL EMERGENCY

CiTi is within the 10-mile emergency zone for three nuclear power plants (see Appendix on Radiological Emergency)

#### 6.2 Engineering Controls

Engineering controls eliminate or reduce exposure to hazards through the use or substitution of engineered machinery or equipment.

#### 6.2.1 Limited access

All exterior doors except the main entrance of each building shall always remain locked to the outside.

#### 6.3 Work Practices

Work practices are ways one would perform a task, or ways in which something is done. Generally, they are not implemented by technologies, but rather are processes and practices dependent upon people.

#### 6.3.1 Code of Conduct / Anti-Bullying

CiTi has adopted a student code of conduct that each student receives along with training on its contents. Students are held to the standards set forth in the code of conduct and can receive counseling, discipline or even expulsion for non-compliance.

#### 6.3.2 Background checks / Finger Printing

Every employee hired after the SAVE Legislation of 2001 (Education Law § 3004-b [1] and the NYS Education Commissioners Regulation [8 NYCRR § 87.6]) must be fingerprinted prior to the start of work. Subsequently, if any employee is fingerprinted as the result of a finger-printable offense, the New York State Department Education notifies the CiTi <u>Assistant Superintendent for Personnel</u> of the arrest.

#### 6.3.3 Access Control/Visitation

Visitors to the school we encourage parents, community members, component school district personnel and representatives of business and industry to be involved in the educational process. School is a place of work and learning; therefore certain limits must be set for such visits. CiTi uses visitor management systems at designated locations for visitor verification.

- 1. Visitors will be defined as anyone in the school building(s) or on the premise(s) who do not possess official CiTi credentials (i.e. badge).
- 2. All visitors to the school must report to the main office upon arrival, sign in and receive a visitor's identification badge. This badge must always be worn while in the school or on the school premises. The visitors must return the badge to the main office and sign out before leaving.
- 3. Parents or Citizens who wish to observe a class while school is in session are required to arrange such visits in advance with the classroom teacher(s) and administration so that class disruption is kept to a minimum.
- 4. Those who visit a shop area for service are expected to leave the shop area(s) as soon as their business is completed. There must be no interference with regular schoolwork and prolonged visits are discouraged.
- 5. No class time shall be taken to discuss individual matters with visitors by teachers.
- 6. Any unauthorized person(s) on school property will be reported to the security office, Principal's Office, or District Office (if first two have no answer). Unauthorized person(s) will be asked to leave. The police may be called if the situation warrants.
- 7. All visitors are expected to abide by the rules for public conduct on school property contained in this Code of Conduct.

#### 6.3.4 Surveillance Systems

The CiTi uses IP-based surveillance camera systems at designated locations to monitor conduct and CiTi properties.

#### 6.4 Mitigation Plan (Also See 1.5)

Issues identified from internal or external assessments are prioritized primarily by impact to life safety and infrastructure protection. Those priorities become the basis for the planning focus for the planning period, generally the school year. These priorities are set by the School Safety Committee and are communicated to the <u>District Superintendent</u> and as warranted, the Board of Education. Mitigation plans are developed for the identified hazards / areas of improvement. Plans are then evaluated in exercises to identify any new weaknesses or gaps. and the cycle begins again.

#### 7.0 PREPAREDNESS

Preparedness refers to actions taken to create and maintain the capacity to respond to and recover from natural disasters and other emergencies. This is achieved through measures such as planning, exercises, training, community education, information management, communications, and warning systems.

#### 7.1.1 Local Fire Department Accessibility

In its efforts to ensure speedy response to fires, disasters and other emergencies, the Mexico Volunteer Fire Department (MVFD) has instituted a "Knox Box" program for facilities in its jurisdiction. These consist of a small wall-mounted safe that holds building keys for the fire department to retrieve in emergency situations. The MVFD holds master keys to all Knox Boxes in its response area allowing firefighters to enter buildings without breaking doors or windows. CiTi has joined this program and has had a Knox Box installed.

#### 7.2 Sister Schools Agreement

Recognizing the potential need for an offsite evacuation of students and staff, CiTi and its component school districts have developed a collaborative master memorandum of understanding (MOU). Should CiTi need evacuation space or resources in the event of an emergency, CiTi personnel can rely on other area districts to provide aid. (i.e.: CiTi can approach Mexico Central Schools to provide shelter, staging and an area for reunification of students and guardians if in need of evacuation). The MOU should be reviewed and refreshed on an annual basis to ensure awareness, continuity and allow for updates of contact information. (Note: the evacuation MOU is located the BLERP for CiTi's Mexico campus).

#### 7.3 Training

#### 7.3.1 Incident Command Training

Incident Command Training is highly recommended for all employees of the CiTi. Basic training includes the I-100sc, Course. Staff may find and complete training sessions training at http://www.fema.gov.

#### 7.3.2 Safety Training

#### 7.3.2.1 Safety Training for New Hires

All new employees receive campus safety training at the beginning of their employment. Training may be implemented by in-seat or on-line methods.

#### 7.3.2.2 Ongoing Safety Training

#### 7.3.2.2.1 Mandatory Training:

- a. <u>Right to Know and Blood-Borne Pathogens</u> (in-seat or online)
  - CiTi employees may come into contact with certain hazardous materials or become exposed to other people's bodily fluids in the course of their work. Employees are trained to recognize the hazards in the workplace and to take steps to mitigate the hazard.
- b. <u>Fire Safety</u>: CiTi employees have been identified as those that may come into contact with fire more often than others in the routine course of their work. These employees are trained to recognize the hazard in the workplace and to take steps to mitigate it.
- c. <u>Emergency Management</u>: All staff, students, and visitors need to know what to do in the case of an emergency. This training covers protocols to be followed in the case of human-related crises, or adverse acts of nature.

#### 7.3.2.2.1 Mandatory Training (continued)

- d. Mental Health During/After a Crisis: All staff need to be aware of how the mind can respond during disaster situations, such as during an active shooter situation, or in the wake of a natural disaster. This training shall be completed no later than September 15<sup>th</sup> of each year.
- e. <u>Dignity for All Students Act (DASA)</u>: This training covers the definition of bullying, in all its different forms (i.e., cyberbullying, deliberate exclusion, etc...) This training is an annual requirement or updated as laws and regulations change.

#### Recommended Training (continued):

- a. <u>Cardiopulmonary Resuscitation (CPR):</u> According to NYSED Commissioner's Regulations CR 136.4, every public school must have a means of providing CPR to a person needing it during after school extracurricular, arts, and sporting events. Since CiTi BOCES also has Public Access for Defibrillation (PAD) Program on its campuses, the more persons who know CPR, the better.
- <u>Basic First Aid:</u> Much like CPR, having the skills to offer assistance to a student or staff member until they can be seen by a Nurse or Physician is of great value.

#### 7.4 Exercises

#### 7.4.1 Annual Exercise

Exercises should be conducted at least annually to evaluate the effectiveness and identify gaps or overlaps in the plan. Exercises may focus on specific parts of the plan and should include important components such as communications.

#### 7.4.2 Early Dismissal

CiTi will conduct an early dismissal exercise in conjunction with component districts, in accordance with applicable law as stated below:

8 NYCRR §115, 17(j) requires that "each school district and board of cooperative educational services shall, at least once every school year, and where possible in cooperation with local county emergency preparedness plan officials, conduct one test of its emergency plan or its emergency response procedures under each of its building-level school safety plans, including sheltering or early dismissal, at a time not to occur more than 15 minutes earlier than the normal dismissal time."

#### 7.4.3 Evacuation Drills

CiTi will hold evacuation drills in accordance with applicable law as stated below:

NYS Education Law Section 807 requires that the Principal or person in charge of every public school within the state must instruct and train their pupils on how to exit the building in the shortest possible time without confusion or panic. This instruction must be in the form of drills or rapid dismissals. A minimum of 12 emergency drills must be held each school year, eight of which must be held prior to December 31<sup>st</sup>. Of the 12 required drills, four (4) must be Lockdown Drills. Summer school must hold two additional drills, one of which must be held during the first week of the summer session. It is suggested that at least one be a Lockdown drill.

Drills will require everyone occupying the building to leave when an alarm sounds and report to an evacuation area as prescribed by the room chart posted in offices and classrooms on the CiTi campus. It shall be the responsibility of the Teacher or person in charge to inform the occupants of any space of the exit routes and evacuation area location for the room being evacuated.

It shall be the goal of CiTi to conduct evacuation drills for campus buildings and complete a full accounting of staff and students.

#### 7.5 Annual Start-Up Procedures

At the beginning of each school year the following should be updated:

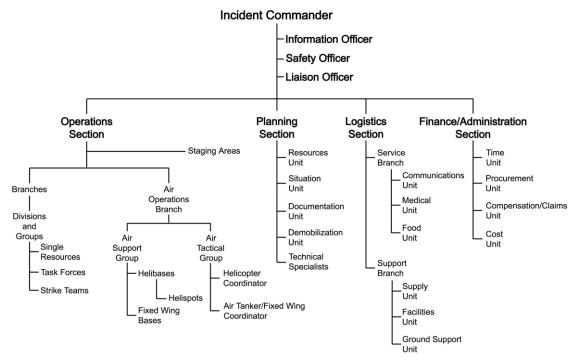
- 7.5.1 Confirm membership of the District-Wide School Safety Team and Emergency Response Team (ERT)
- 7.5.2 Ensure all contact information is current and up to date.
- 7.5.3 All teaching staff has been identified for training in crisis response.
- 7.5.4 Evacuation Area Supervisors and two alternates have been identified and a verbal commitment has been made for the upcoming school year.
- 7.5.5 Update and distribute S.H.E.L.L. Procedures during opening conference day.

#### 8.0 RESPONSE TO INCIDENTS

Response is the systematic approach to dealing with crisis and disasters that disrupt the normal activity of a facility.

#### 8.1 Incident Command System

In accordance with local, state, and federal guidelines, CiTi will utilize the Incident Command System (ICS) to manage crisis as well as routine events. The ICS builds its structure progressively from minor incidents to major disasters. Any operational incident may be managed by the ICS by activating the resources or functions appropriate to a specific level of emergency or type of incident. The primary tasks are established as supervisory or functional positions to provide a systematic structure, enabling the Incident Commander to delegate tasks and responsibilities so more time may be spent managing the overall incident.



#### 8.1.1 Definitions

- a. <u>Branch</u> The organizational level with functional or geographic responsibility for implementing major parts of the incident operations.
- b. <u>Command</u> The act of directing, ordering and/or controlling resources by virtue of explicit legal, organizational, or delegated authority.
- c. <u>Command Post</u> The location from which primary command functions are executed, usually co-located with the incident base; it may also be referred to as the Incident Command Post (ICP). The Command Post should be in an unexposed area that is sufficient in size and facilities to conduct command functions.
- d. <u>Division</u> The organizational level that is responsible for operations within a defined geographic area, or with functional responsibility.
- e. <u>Division/Group Supervisor</u> The individual who is responsible for implementing the assigned portion of the Incident Action Plan (IAP), assigning resources within

the Division/Group, and reporting on the progress of control operations and resource status within the Division/Group.

- f. <u>Finance/Administration Section Chief</u> The individual who is responsible for tracking and processing all financial transactions for the incident, including the time unit, procurement unit, compensation/claims unit, and the cost unit.
- g. <u>Group</u>- The organizational level that is responsible for a specified functional assignment at an incident, e.g., evacuation, student accountability.
- h. <u>Incident Commander</u> The individual who is responsible for overall management of all incident operations.
- <u>Liaison Officer</u> Member of the command staff who is the point of contact for assisting or coordinating agencies.
- j. <u>Logistics Section Chief</u> The individual who is responsible for providing facilities, services and materials for the incident.
- k. Operations Section Chief The individual who is responsible for all tactical operations at the incident.
- I. <u>Planning Section Chief</u> The individual who is responsible for collecting, evaluating, disseminating, and using information about the development of the incident and the status of resources.
- m. <u>Public Information Officer</u> (PIO) Member of the command staff who is responsible for developing and disseminating timely, factual reports to the news media and other appropriate agencies that require information directly from the incident scene.
- n. <u>Safety Officer</u> Member of the command staff who is responsible for monitoring and assessing safety hazards, addressing unsafe situations, and developing measures to ensure personnel safety (at times a Nurse or Nurse Aide).

#### 8.1.2 Identification of Functional Areas and Positions

Complex incident situations often exceed the capability of one person to effectively manage the entire operations. Assignment of Divisions/Groups reduce the span of control of the overall command function to more manageable units and allows command to communicate Principally with Divisions/Groups, rather than with individual units, providing an effective command structure and incident organization.

When effective Divisions/Groups have been established, Command can concentrate on overall strategy and resource allocation. Command determines strategic objectives and assigns available resources to Divisions/Groups where they are most needed. Division/Group Supervisors are responsible for tactical deployment of the units and resources assigned to that Division/Group and communicating its needs and progress to Command or the Branch Director.

Command should begin to assign Divisions/Groups:

- a. When the Incident Commander foresees a situation, which will eventually involve several companies beyond Command's capability to directly control.
- b. When Command can no longer effectively manage the number of resources currently involved in the operation.
- c. When resources are operating from tactical positions over which Command has little or no control; or
- d. When the situation demands that close resource control is required because of a dangerous situation.

#### 8.1.2.1 Division

A division is a geographic designation. The incident may be broken down into geographic areas and the supervisor of those areas would be designated a Division Supervisor. The most common way to divide division is by the sides of a building (A, B, C, D)

#### 8.1.2.2 Group

A group is a functional designation. The incident may be broken down into functional components and the supervisor of these areas would be designated a Group Supervisor.

#### 8.1.2.3 Branch

A branch is a designation given to the next level above a division or group. Although not required, a branch may be established when a division or group grows to become too large or is too complex to manage as a division or group. The person in charge of a branch is a Branch Director.

#### 8.2 Incident Priorities

At every incident, decision makers shall act based on the following overall incident priorities:

- a. <u>Life Safety</u> the primary mission should be to protect life more than any other goal. Decisions shall be made to protect as many lives as possible. The individual operating at emergency incidents shall do whatever is necessary to primarily protect their own life first, and then others.
- b. <u>Incident Stabilization</u> the secondary goal when operating at incidents is to bring the incident under control.
- <u>Property Conservation</u> the third goal at incidents shall be to protect property from further damage once life safety and incident stabilization considerations have been made.

#### 8.2.1 Line of Succession

In the absence of the District Superintendent the following, in order, will have the responsibility and authority to assume or delegate the role of Incident Commander:

Michael Sheperd	Asst. Superintendent for Administrative Services
Roseann Bayne	Asst. Superintendent for Instruction
Marla Berlin	Director of College and Career Education

#### 8.3 General Response Categories

#### 8.3.1 Normal Campus Operations – No Emergency

The operation of campus programs and activities without significant changes that would inhibit meeting objectives.

#### 8.3.2 Unusual Occurrences

An insignificant event, or other internal event, which can be handled by campus personnel using standard operating procedures. It is not visible off-campus, requires no external emergency services response team, and requires no reporting to local, State or Federal regulatory authorities.

#### 8.3.3 Critical Incident

An adverse incident or series of events that have the potential to severely damage students, staff, and faculty on campus; operations; environment; and its long-term prospects and/or reputation.

#### 8.3.4 Crisis

A significant event that has the potential to severely injure people or campus operations, environment, or reputation.

#### 8.3.5 Major Event (Severe Emergency)

A serious event such as a fatality, serious injury, fire, explosion, material release, natural occurrence, or local incident, which involves the activation of internal emergency response, and/or external emergency response teams. It may also be another event that has occurred or is imminent, which poses a threat to third parties and/or seriously affects operations. The crisis may or may not be under control, and action by off-campus personnel is necessary.

#### 8.4 Protective Action Options – Functional Responses [Ed Law 155.17 (e)(1)(ii)]

#### 8.4.1 Shelter-In-Place

This action is taken to place and/or keep students indoors to provide a greater level of protection and control. Specific response actions can be found in the Building Level Emergency Response Plan. Normal teaching activity and support functions should continue. No students or staff should leave their areas during a stay in place.

#### 8.4.2 Hold-in Place

This response action is used in situations such as when a chemical spill, structural building failure, or a hallway fight occurs. It is a measure taken to keep students and staff inside their classrooms (or wherever they are) until the situation is

addressed and conditions are considered safe for free movement within the building.

#### 8.4.2 Evacuation (see Annex A.3)

8.4.3.1 – 8.4.3.4 On-site evacuation – Evacuation during construction and renovation projects

This action is taken when conditions in one of the buildings make it unsafe to remain. Specific response actions can be found in the Building Level Emergency Response Plan. In this case, students and staff may be moved to an alternate building on campus until transportation arrangements back to their component schools are made or until reunification can be made with students, families, or guardians.

#### 8.4.3 Lock Down

This action is taken when the threat of violence or gunfire is identified or when directed by law enforcement and it is necessary to prevent the perpetrator(s) from entering occupied areas. Specific response actions can be found in the Building Level Emergency Response Plan.

#### 8.4.4 **L**ock-out

This response action is necessary when it is safer for staff, students, and approved visitors to stay inside the building. Situations where this action would be used might be in the case of a wild rabid animal on school grounds, or an armed individual running around the neighborhood. All doors and ways of entry to the building are secured/locked (i.e.: nobody may enter or leave) until the local authorities have eliminated the threat. Normal school activities (except outdoor ones) are allowed to resume.

#### 8.4.3.2 Reverse Evacuation

This action is taken after an evacuation, when it has been determined that conditions inside a building are safer than those outside of the building.

#### 8.4.4 Campus Closures

Under certain circumstances it may become necessary to close campus and cancel classes. This is especially true during winter months and winter storms. The decision may be made when experiencing severe weather and in some cases in anticipation of severe weather.

#### 8.4.4.1 Snow Day Closures

Once declared by the <u>District Superintendent</u>, or <u>designee</u>, notification will be made first via local television media and followed up by radio stations. Notifications are broadcast on all major local Central New York television and radio stations.

The office of the <u>Assistant Superintendent for Administrative Services</u> sends out updated school closing procedures to all staff annually. This information includes specific operational guidelines for staff to follow relative to their specific circumstances.

#### 8.4.5 All Clear

Once an incident is remedied the campus may be return to normal operation. The <u>Building Administrator</u> makes this decision after the consent and approval from the fire department, law enforcement, and/or code enforcement official, if applicable and in consultation with CiTi security and building operations and maintenance personnel.

#### 8.5 Student / Parent Reunification

- 8.5.1 Reunification Group Supervisor this individual will be assigned by the incident commander when it becomes necessary to reunite students and guardians. This individual will be responsible for the verification of the identity of the person taking custody of the student.
- 8.5.2 Location The location shall be determined when deemed necessary. The location should be an area where parents/guardians can be assembled to verify identity prior to releasing students and far enough away from the incident that it is determined to be safe. Students shall be gathered in a different area other than the pick-up location. This is to assure that all student's parents and guardians proceed through the verification process. A special exit shall be designated to only allow reunited students and parents/guardians to leave the area. A secondary check of parent/guardian identification and student's identity shall occur at this point.
- 8.5.3 Reunification Process Once the parent/guardian has signed out the student on the sign-out form and identification has been verified, a check will be made to determine if any custody restrictions exist for the student. If a restriction exists for the parent/guardian, then the student will not be released. Without restriction the student will be called down to the reunification area via telephone, intercom or by two-way radio. The student will be asked to verify any known custody restriction prior to release.

#### 9.0 DISASTER RECOVERY

Disaster recovery is the coordinated process of supporting disaster-affected communities in the reconstruction of physical infrastructure and restoration of economic, physical, and emotional wellbeing. It is preferred that individuals and communities are supported in the management of their own recovery through this process because they are in the best position to know what their needs are and how they can be met. It is considered that this approach is most likely to build community capacity and sustainability.

#### 9.1 Restoration of facilities

Operations and Maintenance (O&M) staff will return utilities with the concurrence of the utility provider and the fire department prior to switching utilities on. Efforts should be made to limit continuing damage to facilities. It may be necessary to temporarily shore walls and roofs, seal openings and clear debris until such time as the building may be returned to an operational condition.

#### 9.2 IT Disaster Recovery Plan:

Data systems have been made resilient using virtual servers and software to be able to stand up systems in suitable locations that have proper energy sources and connectivity. Prior to, during and, ultimately, after an incident, IT personnel will perform assessments as to the severity of the potential or as actual damage to the system occurs.

CiTi has developed an IT Disaster Recovery Plan which is distributed to key administration and Technology Department Employees. This plan is confidential in nature and will be used in the event of a power fluctuation, natural disaster that affects the system, or a cyber-attack.

#### 9.3 Assessment of Emotional Impact

Counseling staff, appointed by the incident commander, may perform an assessment of the emotional impact of an incident on not only students, but also faculty and staff as well to determine possible courses of action. Employee Assistance Program assistance may also be available to help employees work through issues.

#### 9.4 Debriefings / Counseling

<sup>1</sup>Teachers are among the most important adults in the transition and recovery of students impacted by a natural disaster or other crisis. Their efforts will begin to give students a sense of stability, security and belonging. Not only will students look to Teachers for support, but the learning process and social environment of the classroom can all contribute to their ability to cope.

Some students may cope well early on yet might have difficulty in the weeks or months ahead. Still others will be resilient when surrounded by caring and supportive adults. Some students may have difficulty concentrating, may feel need for success or may exhibit anger. It is important to ensure that displaced students feel welcomed and supported and that they are not bullied or ostracized. Teachers should make sure that students understand that bullying will be taken seriously and not be tolerated. It is helpful to establish clear expectations against bullying and to discuss those expectations with students.

Students will also benefit from Teachers who:

- Care and reassure students that they will be okay.
- Avoid using television programs to watch disaster-related events (especially for younger elementary school students).
- Maintain consistent and fair discipline.
- Provide flexibility such as extra time to do work, extra support for challenging subjects and different ways of showing competence.
- Show empathy for what they are going through and make time to listen.
- Help them feel welcomed and part of a social group.
- Allow them to keep in contact with others who survived the disaster.
- Provide a variety of methods and opportunities to express their reactions to the disaster and to tell their stories of survival.
- Create opportunities to do something to help others, even in small ways. Group
  activities such as fundraising events are ideal because they also reinforce a sense
  of connectedness.

Teachers may already have students in their schools that are experiencing life stress and are not receiving the support provided to those who have been displaced by a natural

 $<sup>^{</sup>m 1}$  Tips for Helping Students Recovering from Traumatic Events, U.S. Department of Education, September 2005.

disaster. This can provide fuel for contention, so Teachers should try to ensure fairness and help for all students including those coping with distressing events.

- National Association of School Psychologist http://www.nasponine.org/resources/crisis\_safety/memorials\_general.aspx
- National Center for School Crisis and Bereavement http://www.cincinnatichildrens.org/svc/alpha/s/school-crisis/

#### 9.5 After Action and Lessons Learned

After drills, exercises, actual incidences or close calls, an after-action report (AAR) should be completed. The <u>Director of College and Career Education</u> is charged with collecting the information and completing the report. The process aims at identifying areas for improvement (i.e. procedures, training, equipment, etc.). Areas for improvement identified in the AAR should be incorporated into the Mitigation Plan and be made part of the larger planning process.

#### 9.6 Government Assistance

Once an event overwhelms local resources, state and federal resources may be called upon (i.e.: the New York National Guard, FEMA, etc.). Local, State and Federal resources must be requested through the Chief Local Official, such as the Village Mayor, Town Supervisor and/or the Chairman of the Oswego County Legislature. CiTi may also be eligible for federal assistance if the crisis is declared presidentially.

After an event, a damage assessment must be conducted to determine the extent of the damage, the clean up, reconstruction and time necessary to return to normal operations. Included in this must be a realistic estimate of the cost of completing these tasks.

#### 9.6.1 Federal Assistance Program and Process

When all eligible public and individual damages have been assessed, and the request for a Presidential Disaster Declaration has been prepared and approved, a variety of federal programs can be made available to public and private entities and individuals. These programs are designed to bring a community, and its residents, back to a pre-disaster condition. The following is a brief explanation of the federal assistance program and process.

#### 9.6.1.1 Public Assistance

Public assistance is that part of disaster relief through which the federal government supplements the efforts of state and local governments to return the disaster area to pre-disaster conditions. These efforts primarily address the repair and restoration of public facilities, infrastructure, or services, which have been damaged or destroyed. There are two types of public assistance authorized: "emergency" and "permanent" work.

#### 9.6.1.1.1 Emergency Work

Emergency work includes debris removal as well as emergency protective measures for the public safety and health or for the protection of improved property. Also, FEMA may provide assistance to maintain operation of essential facilities. Emergency work assistance can be extended beyond six months after the Declaration Date of the Disaster if approved by the state and/or FEMA as applicable.

#### 9.6.1.1.2 Restoration of Disaster Damages

The restoration of disaster damages to public infrastructure includes repair or replacement of roads and bridges, water control facilities, buildings, contents, and/or equipment, public utility systems, etc., and may also include assistance to other governmental related facilities (like schools). Extensions for completion of projects beyond the statutory deadline of 18 months after the Disaster Declaration Date may be approved by the State or FEMA upon justification.

In the aftermath of a disaster, both public and private non-profit and individual damage assessments must be performed, because of the corresponding types of federal/state assistance available. Each type of assessment is designed to quantify the eligible amounts of damages a community incurred.

"Public damages" can include any damage incurred by a structure or facility which is owned by a public or private non-profit entity. This could include roads, bridges, buildings, utilities, etc. To be eligible, the damages must fall in one of the following seven basic categories:

Category A - <u>Debris Clearance</u> - This category includes all storm induced debris on non-federal public roads, including the right-of-way, non-federal public waterways, other public property, and private property when undertaken by local government forces. It can also cover the cost of demolition of public structures if those structures were made unsafe by the disaster.

Category B - <u>Emergency Protective Measures</u> - This category addresses the need to provide appropriate emergency measures designed to protect life, safety, property, and health (i.e., barricades, sandbags and safety personnel).

Category C - <u>Road System</u> - This category addresses damages to non-federal roads, bridges, streets, culverts, and traffic control devices.

Category D - <u>Water Control Facilities</u> - Eligible damages under this category include costs to repair or replace dikes, dams, drainage channels, irrigation works, and levees.

Category E - <u>Building and Equipment</u> - Eligible damages under this category include costs to repair public buildings and equipment, supplies/inventories that were damaged and transportation systems such as public transit systems.

Category F - <u>Public Utility Systems</u> - Under this category, assistance is available for damaged water systems, landfills, sanitary sewerage systems, storm drainage systems, and light/power facilities.

Category  $G - \underline{Other}$  - The "other" category includes park and recreational facilities, or any other public facility damages that do not reasonably fit in one of the other six categories.

#### Center for Instruction, Technology and Innovation

#### **District-Wide School Safety Plan**

#### 9.7 Resilient Reconstruction

After a crisis, attempts should be made to not simply reoccupy a similar footprint, but rather replace the damaged structure with one that is resilient to a similar or worse event in the future. This can be done by incorporating new design and materials into the construction that can help lessen damage. Utilities that were vulnerable should be relocated out of harms way. Areas that are prone to flood may be relocated to higher ground or berms may be constructed to lessen damage from water.

# **Functional Annexes (A)**

### A.1 Automated External Defibrillators (AED)

CiTi has elected to provide Public Access Defibrillation (PAD). AED units have been placed various locations within each school building.

Location	Number of AED Units
Main Campus	8
Fourth Street Education Center	2
Dutch Ridge Road (Bridges Pgm.)	1
Scenic Ave (CARE Program)	1
Phoenix Extension	1

#### A.1.2 Training (see 7.3.2.2.1 of this plan)

Designated personnel will be trained in accordance with American Heart Association standards in cardiopulmonary resuscitation and the use of an external automated external defibrillator.

Training will be offered to maintain requisite knowledge and understanding of AED use.

#### A.1.3 Statutory Requirements

In the State of New York, the benefits of access to early defibrillation are allowed under provisions of Chapter 552 of the Laws of 1998 authorizing Public Access Defibrillation (PAD). In accordance with NYS Education Law § 917, AEDs are required in educational facilities and providers must be trained in their use.

Medical oversight for the use of the AED comes under the Central New York Public Access Defibrillation (PAD) program (NYS DOH Policy Number 09-03) and is made possible through a collaborative agreement with an Emergency Health Care Provider (EHCP).

#### A.1.3.1 Reporting of Use

If the AED is used on campus, written notification must be made to the Regional Emergency Medical Services Council (REMSCO) and should be made to the EHCP within 48 hours, with the following information:

- 1. Name of the PAD program
- 2. Location of incident
- 3. Date and time of incident
- 4. Age and gender of the patient
- 5. Estimated time from arrest to 1st CPR and the 1st AED shock
- 6. The number of shocks administered to the patient
- 7. The name of the EMS agency that responded, and
- 8. The hospital to which the patient was transported.

#### The REMSCO for the CiTi is:

CNY Regional EMS Council Jefferson Tower – Suite L1 50 Presidential Plaza Syracuse, NY 13202 (315) 701-5707 phone (315)701-5709 fax

#### A.1.3.2 Changes to AED Program

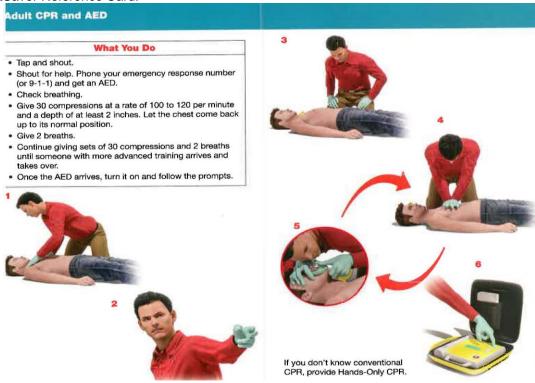
It may become necessary from time to time to make significant changes to the AED program at CiTi. When the changes relate to changes to the EHCP or the EMS response agency, a new *Notice of Intent to Provide PAD* (DOH 4135) and a copy of the collaborative agreement shall be filed with the REMSCO.

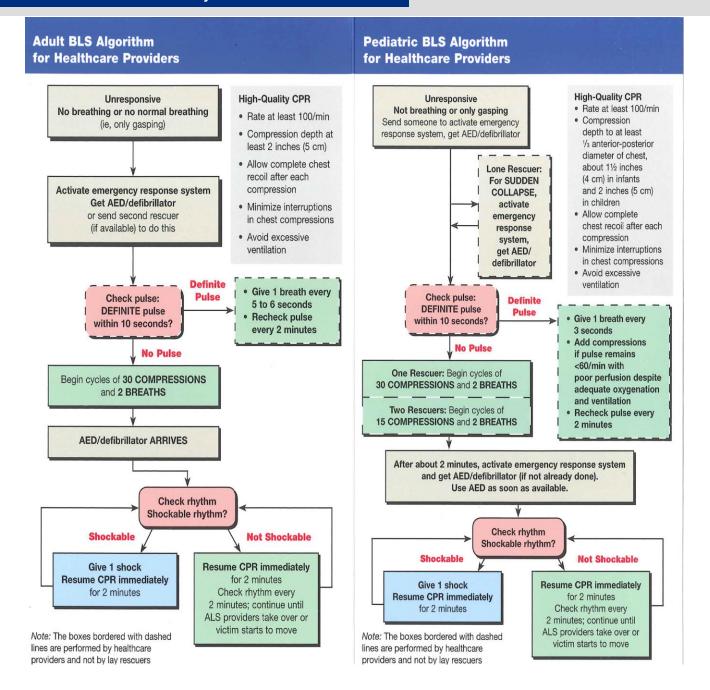
Changes of location of AEDs on campus and training changes do not require the filing of a new Notice of Intent form.

#### A.1.4 Use of the AED

When activated by someone sent from the scene or carried to the incident by security, facilities or teaching staff, the AED should be used in accordance with current guidelines from the American Heart Association.

#### AHA HeartSaver Reference Card:





#### A.2 Communications

Communications are critical during a crisis. The primary mode of notifying personnel and students of a crisis is the overhead public address system of each CiTi Campus. Alerts and addresses are primarily delivered from the main office. Secondarily, notification may be made from any campus phone with the proper authorization code.

The best and most accurate communication is done on a face-to-face basis. During a crisis this may not be possible due to geographic location. Portable radios have been issued to key administrative, custodial, and teaching personnel at CiTi campuses, who will be manning evacuation check points.

#### 1. Radio Communications – At Each Campus

a. During an emergency it is essential that communication channels are not jammed by excessive and conflicting radio traffic. For this reason, the staff assigned a hand radio will use specified channel designations. Channels designated as Emergency and ICS sector shall be used exclusively for that purpose. Auxiliary frequencies have been assigned to facilitate non-emergency communications between departments or other function groups, or to be used as designated by the Incident Commander during an emergency.

Persons assigned radio communications at each CiTi Campus is described in the Building Level Emergency Response Plan (BLERP) specifically. The District Office will maintain contact with county and local emergency management offices.

#### 2. Dealing with the Media and Questions from Emotional Parents/Guardians

#### a The Media

If a staff member receives a request, in person, by phone, or via electronic communications from a media source (i.e., T.V. Station, radio station, etc...) asking for comment regarding a recent event or crisis at any campus, they should direct any and all inquiries to the CiTi Public Relations Office by Calling: Main – (315) 963-4412 OR (315) 963-4263

#### b. Parents/Guardians

It is very likely that when a crisis happens at one of CiTi campuses, word will get out to parents/guardians just due to cell phone activities from people involved with the crisis. Response to this situation is typically heavy phone call traffic to the District Office and/or the affected building. Staff member will be designated to answer phones and route calls appropriately. General information, actions and reassurances will be shared by Public Relations on the CiTi website and social media as appropriate.

#### A.3. Evacuation of Students and Staff with Access and Functional Needs

The CiTi has many students and staff members with access and functional needs who may require assistance during an evacuation. To ensure that these individuals receive the assistance they need to exit during an emergency or a drill, CiTi has added this Assisted Evacuation Plan (AEP) protocol to its District-Wide School Safety Plan.

The purpose of an AEP is to establish, rehearse and have on record individualized evacuation plans for students and staff who have conditions which impede their ability to evacuate from a school building. AEPs shall be created when a student or staff member first joins CiTi. Thereafter, AEPs for that individual shall be updated annually, or whenever changing circumstances merit updating.

To create an AEP for a student or employee with access or functional needs, the person directly assigned to supervise that individual shall complete an AEP form located in the supplemental appendices section of this document. Department administrators are responsible for initiating AEPs by providing copies of this form to assigned staff.

An AEP will identify the student or employee requiring assistance, the reason the person needs assistance, the type of assistance to be provided, the person(s) responsible for providing the assistance and two alternates. It will describe any special arrangements and equipment required to move the individual to the evacuation assembly area specified for their location within the building. Other pertinent information shall be noted in the space provided.

Any student AEP shall have a class schedule and a schedule of any out-of-class services attached to it. Copies of these forms shall be distributed to the following as is applicable:

- Principal/Supervisor
- District Office
- Nurse
- Classroom/Homeroom/Resource Teacher
- Substitute Information Folder
- Security Office (to be incorporated into the DERP folder)
- Evacuation Area Supervisor Attendance Roster

# ASSISTED EVACUATION PLAN For Person with Access or Functional Needs

Person's Name:	
Building: Teacher/Supervisor:	Room:
Reason Student/Employee Needs Assistance:	
Assistance Given:	
Person Responsible:	
First Alternate Person Responsible:	
Second Alternate Person Responsible:	
Special Arrangement Needed at Assembly Area:	
Other Pertinent Information:	
Attach copy of student/employee class schedule or schedule of	out-of-classroom services.
Signature of Person Who Prepared Plan	Date
Copies on File: Principal/Supervisor District Office Nurse Classroom/ Teacher District Eme	Substitute Information Folder ergency Response Plan -Security

Circulate information to all special area or class Teachers.
Copy of plan should be kept with class attendance roster/staging area supervisor.

#### A.4 Crisis Support Services

- 1. All disasters have some effect on the mental well being of their victims.
- 2. Normal communications channels may be disrupted, and victims may not be able to contact their relatives.
- 3. Following a disaster, many victims have intense feelings of guilt, anger, frustration, etc., and may require crisis intervention and/or emotional support to deal with the situation.
- Rapid deployment of mental health counselors to assist disaster victims and/or grieving family members is essential to address what has happened and to implement effective recovery actions.
- 5. All crisis-counseling services are voluntary for victims and rescue personnel.

#### Key Concepts in Disaster Mental Health which this Plan recognizes:

- Everyone is affected.
- Normal people/abnormal situation and circumstances.
- Past coping is a good predictor of current and future behavior.
- Most people pull together.
- Need for practical help/assistance, not "clinical/psychological/therapeutic."
- Reactions may be delayed.
- People do not seek mental health assistance.
- Most people respond to concern.
- Early intervention is key.
- Family/support systems are crucial.
- Flexibility of workers is essential.
- Basic survival.
- Grief over loss of loved ones and possessions.
- Separation anxiety and fear for safety of significant others.
- Need to express thoughts and feelings about their experiences.
- Need to feel one is part of the community and its rebuilding efforts.
- Desire to help others cope.
- Sense of frustration (disaster "bureaucracies" rules, red tape, delays, impersonal, etc.)
- All disasters are local (and political).

Most people are experiencing a **normal response to an abnormal situation.** A specific mental health support response assists disaster survivors to understand their current situation and reactions, review their options, address their need for emotional support and link them with other individuals and agencies who provide services they need. It does not include treatment or medication for people with mental illnesses and/or substance abuse problems. The mental health response principles assume, unless there are contradictory indications, the disaster survivor can resume a productive and fulfilling life following the disaster experience if given support, assistance, and information at a time and in a manner appropriate for the person's experience, age, education, and ethnicity. Mental Health Responders help disaster survivors to understand defense mechanisms such as anger, displacement, etc., and to maximize skills in such domains as communications, problem solving, conflict resolution, time and stress management. Children and adults may have physical, emotional, and psychological reactions to traumatic events, particularly when the events are ongoing. Children may experience the effects of violent or traumatic events differently than adults. Also, for some individuals it may be days or weeks before the effects of such events begin to surface. These could be seen by increased levels of fear, nervousness, anger and/or irritability, sadness, increased use of alcohol in adults, and regressed behavior in children.

## **B. Hazard Specific Appendices**

#### B1. Harassment, Bullying, and Discrimination:

The <u>District Superintendent</u>, <u>Principal</u>, <u>or designee</u> will lead and/or supervise a thorough investigation of all reports of harassment, bullying, and/or discrimination, and ensure that these investigations are completed promptly after receipt of any such reports. All investigations will be conducted in accordance with law, CiTi 's <u>Code of Conduct</u>, and applicable CiTi policies and procedures. In the event allegations involve harassment, bullying, and/or discrimination on the basis of race, color, religion, national origin, sex, sexual orientation, or disability, CiTi may utilize the procedures set forth in Policy #3420 -- <u>Non-Discrimination and Anti-Harassment in the District</u>, and its implementing regulations. Where appropriate, the DAC or other individual conducting the investigation, may seek the assistance of the CiTi Civil Rights Compliance Officer in investigating, responding to, and remedying complaints of harassment, bullying, and/or discrimination.

In the event any investigation reveals harassment, bullying, and/or discrimination, CiTi will take prompt action reasonably calculated to end the harassment, bullying, and/or discrimination, eliminate any hostile environment, create a more positive school culture and climate, prevent recurrence of the behavior, and ensure the safety of the student or students against whom the harassment, bullying, and/or discrimination was directed. These actions will be taken consistent with applicable laws and regulations, CiTi policies and administrative regulations, and collective bargaining agreements, as well as CiTi's *Code of Conduct* and any and all applicable guidelines approved by the Board.

The <u>District Superintendent</u>, <u>Principal</u>, <u>or designee</u> will notify the appropriate local law enforcement agency when it is believed that any incident of harassment, bullying, and/or discrimination constitutes criminal conduct.

The <u>Principal</u> of each primary and secondary program will provide a regular report (at least once during each school year) on data and trends related to harassment, bullying, and/or discrimination to the <u>District</u> Superintendent. This report will be submitted in a manner prescribed by CiTi.

CiTi will annually report material incidents of harassment, bullying, and/or discrimination which occurred during the school year to the State Education Department. This report will be submitted in a manner prescribed by the Commissioner, on or before the basic educational data system (BEDS) reporting deadline, or other date as determined by the Commissioner.

#### **B2.** VIOLENT AND DISRUPTIVE BEHAVIOR – [Excerpts from CiTi's Code of Conduct]

<u>Definition:</u> A disruptive student is defined as any student who is substantially interfering with the educational process, the Teacher's ability to teach, or other students' ability to learn.

A student's behavior can affect a teacher's ability to teach and can make it difficult for other students in the classroom to learn. In most instances the classroom Teacher can control a student's behavior and maintain or restore control over the classroom by using good classroom management techniques. These techniques may include practices that involve the Teacher directing a student to briefly leave the classroom to give the student an opportunity to regain his or her composure and self-control in an alternative setting. Such practices may include but are not limited to: (1) short-term "time out" in an elementary classroom or in an administrator's office; (2) sending a student to the Principal's office for the remainder of the class time only; or (3) sending a student to a guidance counselor or other district staff member for counseling. Time-honored classroom management techniques such as these do not constitute disciplinary removals for purposes of this Code.

On occasion, a student's behavior may become disruptive. For purposes of this Code of conduct, a disruptive student is a student who is substantially disruptive of the educational process, or substantially interferes with the teacher's authority over the classroom. A substantial disruption of the educational process, or substantial interference with a teacher's authority, occurs when a student demonstrates a persistent unwillingness to comply with the teacher's instructions, or repeatedly violates the teacher's classroom behavior rules.

A classroom Teacher may remove a disruptive student from the disrupted class for up to two instructional days under the following conditions. Failure to comply with reasonable directions of the teacher, after appropriate warnings, and the student:

- a. Continually makes unreasonable noise.
- b. Argues excessively with the Teacher.
- c. Uses language or gestures that are profane, lewd, vulgar or abusive.
- d. Harasses other students.
- e. Poses a danger to self or others or commits acts of violence.
- f. Throws objects that endanger the safety of others.

If the disruptive student does not pose a danger or ongoing threat of disruption to the academic process, the Teacher must provide the student with an explanation for why he or she is being removed and an opportunity to explain his or her version of the relevant events before the student is removed. Only after the informal discussion may a teacher remove a student from class.

If the student poses a danger or ongoing threat of disruption, the teacher may order the student to be removed immediately. The teacher must, however, explain to the student why he or she was removed from the classroom and give the student a chance to present his or her version of the relevant events within 24 hours.

## VIOLENT AND DISRUPTIVE BEHAVIOR (continued)

The Teacher must complete a district-established disciplinary removal form and meet with the Principal or their designee as soon as possible, but no later than the end of the school day, to explain the circumstances of the removal and to present the removal form. If the Principal or designee is not available by the end of the same school day, the Teacher must leave the form with the secretary and meet with the Principal or designee prior to the beginning of classes on the next school day.

Within 24 hours after the student's removal, the program administrator or coordinator, or another district administrator designated by the program administrator or coordinator, must notify the student's parent(s) in writing, that the student has been removed from class and why. The notice must also inform the parents/guardians that in accordance with The CiTi CODE OF CONDUCT they have the right, upon request, to meet informally with the Principal or the Principal's designee to discuss the reasons for the removal.

The notice must be provided by phone, personal delivery, express mail delivery, or some other means that is reasonably calculated to assure receipt of the notice within 24 hours of the student's removal. If notice is provided by telephone, a follow-up written notification will follow. The Principal may require the Teacher who ordered the removal to attend the informal conference.

If at the informal meeting the student denies the charges, the Principal or the Principal's designee must explain why the student was removed and give the student and the student's parents a chance to present the student's version of the relevant events. The informal meeting must be held within 48 hours of the student's removal. The timing of the informal meeting may be extended by mutual agreement of the parent and Principal.

The program administrator or coordinator may overturn the removal of the student from class if the Principal finds any one of the following:

- 1. The charges against the student are not supported by substantial evidence.
- 2. The student's removal is otherwise in violation of law.
- 3. The conduct warrants suspension from school pursuant to Education Law §3214 and a suspension will be imposed.

The program administrator or coordinator may overturn a removal at any point between receiving the referral form issued by the Teacher and the close of business on the day following the 48-hour period for the informal conference if a conference is requested. No student removed from the classroom by the classroom Teacher will be permitted to return to the classroom until the Principal makes a final determination, or the period of removal expires, whichever is less.

Any disruptive student removed from the classroom by the classroom Teacher shall be offered continued educational programming and activities until permitted to return to the classroom. Each Teacher must keep a complete log (on a district provided form) for all cases of removal of students from their class.

The program administrator or coordinator must keep a log of all removals of students from class. More on Student Minimum Suspensions: A student will be suspended for a minimum of three (3) school days if they: Suspensions http://www.p12.nysed.gov/sss/lawsregs/3214.html 1. Are repeatedly and/or substantially disruptive. This is defined as being removed from a classroom by a teacher more than four (4) times during a semester or three (3) times during a trimester. 2. Commit acts that would qualify the student as a "violent pupil" under the law

# **B3. Public Health Emergency Plan**

# **Promulgation**

This plan has been developed in accordance with the amended New York State Labor Law section 27-c and New York State Education Law paragraphs k and I of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable. This plan has been developed with the input of the Supportive Staff Employees, Middle Managers, and Coordinators Associations, as required by the amended New York State Labor Law.

No content of this plan is intended to impede, infringe, diminish, or impair the rights of us or our valued employees under any law, rule, regulation, or collectively negotiated agreement, or the rights and benefits which accrue to employees through collective bargaining agreements, or otherwise diminish the integrity of the existing collective bargaining relationship.

As the authorized official of CiTi, I hereby attest that this plan has been developed, approved, and placed in full effect in accordance with S8617B/A10832 which amends New York State Labor Law section 27-c and New York State Education Law paragraphs k and I of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable, to address public health emergency planning requirements.

# **Record of Changes**

Date of Change	Description of Change	Implemented by
12/9/2020	Initial committee meeting to review requirements and sample plan	M. LaFountain, M. Sheperd, J. Cerio, J. Raflowski, M. Berlin, J. Landy, S. Maturo, G. Benigno, E. Wemmer
1/4/2021	Second committee meeting to review first draft of plan	M. LaFountain, M. Sheperd, J. Raflowski, M. Berlin, J. Landy, S. Maturo, G. Benigno, E. Wemmer
1/5/2021	Second draft of plan reviewed by committee.	Committee above
3/17/2021	BOE Public hearing and adoption	District Superintendent and BOE

# Purpose, Scope, Situation Overview, and Assumptions

## **Purpose**

This plan has been developed in accordance with the amended New York State Labor Law section 27-c and New York State Education Law paragraphs k and I of subdivision 2 of section 2801-a (as amended by section 1 of part B of chapter 56 of the laws of 2016), as applicable. These laws were amended by the passing of legislation S8617B/A10832 signed by the Governor of New York State on September 7, 2020, requires public employers to adopt a plan for operations in the event of a declared public health emergency involving a communicable disease. The plan includes the identification of essential positions, facilitation of remote work for non-essential positions, provision of personal protective equipment, and protocols for supporting contact tracing.

## Scope

This plan was developed exclusively for and is applicable to CiTi. This plan is pertinent to a declared public health emergency in the State of New York which may impact our operations; and it is in the interest of the safety of our employees and contractors, and the continuity of our operations that we have promulgated this plan.

## **Situation Overview**

On March 11, 2020, the World Health Organization declared a pandemic for the novel coronavirus which causes the COVID-19 severe acute respiratory syndrome. This plan has been developed in accordance with amended laws to support continued resilience for a continuation of the spread of this disease or for other infectious diseases which may emerge and cause a declaration of a public health emergency. The health and safety of our employees and contractors is crucial to maintaining our mission essential operations. We encourage all employees and contractors to use <a href="CDC Guidance for Keeping Workplaces">CDC Guidance for Keeping Workplaces</a>, <a href="Schools">Schools</a>, <a href="Homes">Homes</a>, and <a href="Commercial Establishments Safe">Commercial Establishments Safe</a>. The fundamentals of reducing the spread of infection include:

- Using hand sanitizer and washing hands with soap and water frequently, including:
  - After using the restroom
  - After returning from a public outing
  - After touching/disposing of garbage
  - After using public computers, touching public tables, and countertops, etc.
- Practice social distancing when possible.
- If you are feeling ill or have a fever, notify your supervisor immediately and go home.
- If you start to experience coughing or sneezing, step away from people and food, cough, or sneeze into the crook of your arm or a tissue, the latter of which should be disposed of immediately.
- Clean and disinfect workstations at the beginning, middle, and end of each shift.

Other guidance which may be published by the CDC, the State Department of Health, or County health officials.

# **Planning Assumptions**

This plan was developed based on information, best practices, and guidance available as of the date of publication. The plan was developed to largely reflect the circumstances of the current Coronavirus pandemic but may also be applicable to other infectious disease outbreaks.

The following assumptions have been made in the development of this plan:

- The health and safety of our employees and contractors, and their families, is of utmost importance.
- The circumstances of a public health emergency may directly impact our own operations.

## **District-Wide School Safety Plan**

- Impacts of a public health emergency will take time for us to respond to, with appropriate safety measures put into place and adjustments made to operations to maximize safety.
- The public and our constituency expect us to maintain a level of mission essential operations.
- Resource support from other jurisdictions may be limited based upon the level of impact the public health emergency has upon them.
- Supply chains, particularly those for personal protective equipment (PPE) and cleaning supplies, may be heavily impacted, resulting in considerable delays in procurement.
- The operations of other entities, including the private sector (vendors, contractors, etc.), non-profit organizations, and other governmental agencies and services may also be impacted due to the public health emergency, causing delays or other disruptions in their services.
- Emergency measures and operational changes may need to be adjusted based upon the specific circumstances and impacts of the public health emergency, as well as guidance and direction from public health officials and the governor.
- Per S8617B/A10832, 'essential employee' is defined as a public employee or contractor that is required to be physically present at a work site to perform their job.
- Per S8617B/A10832, 'non-essential employee' is defined as a public employee or contractor that is not required to be physically present at a work site to perform their job.

# **Concept of Operations**

The <u>District Superintendent of CiTi, their designee</u>, or their successor holds the authority to execute and direct the implementation of this plan. Implementation, monitoring of operations, and adjustments to plan implementation may be supported by additional personnel, at the discretion of the <u>District Superintendent</u>.

Upon the determination of implementing this plan, all employees and contractors of CiTi shall be notified through multiple modalities (including phone call, email, and/or web posting) with details provided as possible and necessary, with additional information and updates provided on a regular basis. All stakeholders (faculty, staff, parents, students, and component district personnel) will also be notified of pertinent operational changes by way of multiple modalities (including phone call, email, and/or web posting). Other interested parties, such as vendors, will be notified by phone and/or email as necessary. The <a href="District Superintendent">District Superintendent</a> will maintain communications with the public and constituents as needed throughout the implementation of this plan.

The <u>District Superintendent</u> of CiTi or their designee will maintain awareness of information, direction, and guidance from public health officials and the Governor's office, directing the implementation of changes as necessary.

Upon resolution of the public health emergency, the <u>District Superintendent of CiTi, their designee</u>, or their <u>successor</u> will direct the resumption of normal operations or operations with modifications as necessary.

# Mission Essential Functions

When confronting events that disrupt normal operations, CiTi is committed to ensuring that essential functions will be continued even under the most challenging circumstances.

Essential functions are those functions that enable an organization to:

- 1. Maintain the safety of employees, contractors, and our constituency.
- 2. Provide vital services.
- 3. Provide services required by law.
- 4. Sustain quality operations.
- 5. Uphold the core values of CiTi.

### **District-Wide School Safety Plan**

CiTi has identified as critical only those priority functions that are required or are necessary to provide vital services. During activation of this plan, all other activities may be suspended to enable the organization to concentrate on providing the critical functions and building the internal capabilities necessary to increase and eventually restore operations. Appropriate communications with employees, contractors, our constituents, and other stakeholders will be an ongoing priority.

Essential functions are prioritized according to:

- The time criticality of each essential function
- · Interdependency of a one function to others
- The recovery sequence of essential functions and their vital processes

Priority 1 identifies the most essential of on-site functions, with priority 2 identifying functions that are essential, but mostly able to be performed remotely if needed.

The following are the mission essential functions for CiTi that will continue even if the district suspends all other activity.

<b>Essential Function</b>	Description	Priority
Communications	The District Superintendent or Designee will lead all communications with all stakeholders to keep them informed on a weekly/bi-weekly basis.	1
Health & Safety	The organization will review the number of staff and students allowed to work in-person safely. CiTi will take into consideration factors including CDC and DOH guidance, social distancing, personal protective equipment, safe transportation, hygiene practices, cleaning and disinfectant supplies, and building safety and security.	1
Technology	The organization will provide all hardware and software for students and staff so that they may work in-person or virtually to provide a rigorous educational program aligned to state standards and in compliance with federal and state regulations.	1
Business Office	The organization will maintain administrative functions including payroll, purchasing, accounts payable, billing, and grant reporting. Printing and courier services will continue as needed.	1
Human Resources	The organization will continue to operate its Human Resources Department so that it can fill faculty and staff positions as needed and ensure that current employees are provided with necessary information and support.	2
Teaching and Learning	The organization will provide all students with a rigorous and aligned educational program that provides all required services to all students, including those with IEPs and 504 plans, through in-person, hybrid, or remote learning models individualized to each student's needs.	2
Student Support	The organization will prioritize social-emotional wellbeing for both students and staff. CiTi will coordinate with component districts to ensure students receive all necessary services while working remotely.	2

### **Essential Positions**

Each essential function identified above requires certain positions on-site to effectively operate. The table below identifies the positions or titles that are essential to be staffed on-site for the continued operation of each essential function. Note that while some functions and associated personnel may be essential, some of these can be conducted remotely and do not need to be identified in this section. As circumstances dictate, other staff members may be required to work in-person as determined by program administrators and supervisors.

Essential Function	Essential Positions/Titles	Justification for Each
Health & Safety	<ul> <li>Director of Facilities</li> <li>Safety &amp; Risk Coordinator</li> <li>Custodial Workers</li> <li>Maintenance Mechanics</li> </ul>	Organization buildings will need to be thoroughly cleaned and sanitized.  CiTi staff will distribute PPE, care for PPE supplies, and provide training on the proper use of PPE.  CiTi properties will need to be maintained.
Business Office Operations	<ul> <li>Coordinator of Business Operations</li> <li>Principal Account Clerks &amp; Senior Account Clerks</li> <li>Treasurer</li> <li>School Purchasing Officer</li> <li>Printer's Assistant / Messenger</li> <li>Assistant Print Machine Operator</li> </ul>	The Business Office's essential functions will continue without interruption, including: Payroll, Billing, Accounts Payable, Financial Aid, Grants Filing & Reporting, Purchasing, Bid Preparation & Distribution, and Printing and Courier services.  At times, these employees may work remotely.
Day-to-Day Operations	<ul><li>Program Administrators</li><li>Clerical Staff</li></ul>	CiTi will staff offices on an as-needed basis to ensure the organization and buildings are running properly and to facilitate communication with stakeholders.  At times, these employees may work remotely.
Technology Coordination	<ul> <li>Director of Instructional Technology</li> <li>Project Manager</li> <li>LAN Administrator</li> <li>Assistant LAN Administrators</li> <li>LAN Technicians</li> <li>CSA Technicians</li> </ul>	The IT Director establishes all priorities for IT tasks and organizes staff.  IT staff members provide support in distributing and setting up hardware and software, as well as maintain network management and HelpDesk services.  At times, these employees may work remotely.

# Reducing Risk Through Remote Work and Staggered Shifts

Through assigning certain staff to work remotely and by staggering work shifts, we can decrease crowding and density at work sites and on public transportation.

## **Remote Work Protocols**

Non-essential employees and contractors able to accomplish their functions remotely will be enabled to do so at the greatest extent possible. Working remotely requires:

1. Identification of staff who will work remotely.

All staff members not identified in the Essential Positions chart above can work remotely, subject to approval.

- 2. Approval and assignment of remote work
  - a. Under the general direction of the <u>District Superintendent</u>, <u>immediate supervisors and</u> administrators will approve faculty and staff to work remotely.
  - b. Faculty and staff may be required to work a select number of days or hours in-district based upon need.
  - Hours per week for remote work will be determined based on need for in-person / remote work.
- 3. Equipping staff for remote work, which may include:
  - a. Internet capable laptop.
  - b. Necessary peripherals.
  - c. Access to VPN and/or secure network drives.
  - d. Access to software and databases necessary to perform their duties.
  - e. A solution for telephone communications
    - i. Note that phone lines may need to be forwarded to off-site staff.

# Staggered Shifts

Implementing staggered shifts may be possible for personnel performing duties which are necessary to be performed on-site but perhaps less sensitive to being accomplished only within core business hours. As possible, management will identify opportunities for staff to work outside core business hours as a strategy of limiting exposure. Regardless of changes in start and end times of shifts, CiTi will ensure that employees are provided with their typical or contracted minimum work hours per week. Staggering shifts requires:

1. Identification of positions for which work hours will be staggered.

Operations & Maintenance	O & M workers may be required to work shifts different than normally assigned when necessary.
District Level / Central Office Staff	The district will staff offices on an as-needed basis to ensure the district and program sites are running properly.
Instructional Technology Staff	The IT offices will be staffed to ensure the continuous operation of the network, infrastructure, and systems so the district and program sites can run properly.

- 2. Approval and assignment of changed work hours.
  - a. The <u>District Superintendent</u> will approve the above departments to work staggered hours.

# **Personal Protective Equipment**

The use of personal protective equipment (PPE) to reduce the spread of infectious disease is important to supporting the health and safety of our employees and contractors. PPE which may be needed can include:

- Masks
- Face shields and/or protective eyewear
- Gloves
- Disposable gowns and aprons

Note that while cleaning supplies are not PPE, there is a related need for cleaning supplies used to sanitize surfaces, as well as hand soap and hand sanitizer. The Coronavirus pandemic demonstrated that supply chains were not able to keep up with increased demand for these products early in the pandemic. As such, we are including these supplies in this section as they are pertinent to protecting the health and safety of our employees and contractors.

Protocols for providing PPE include the following:

1. Identification of need for PPE based upon job duties and work location.

Nurses & staff with health conditions	Face masks, eye protection, face shields, disposable gloves, disposable gowns, and N95 or P100 respirators as needed
All other faculty and staff	Face masks and eye protection, face shields, disposable gloves, and disposable gowns as needed depending on assignment
Contractors	Face masks
Students	Face masks

#### 2. Procurement of PPE

- As specified in the amended law, CiTi will provide at least two pieces of each required type
  of PPE to each essential employee and contractor during any given work shift for at least six
  months
- b. The CiTi Board of Education will adopt resolutions as needed to facilitate emergency purchases.
- 3. Storage of, access to, and monitoring of PPE stock
  - a. PPE will be stored in a manner which will prevent degradation, as determined by the Director of Facilities.
  - b. Employees and contractors must have immediate access to PPE in the event of an emergency
  - c. The supply of PPE will be monitored by the Director of Facilities to ensure integrity and to track usage rates.
  - d. Additional PPE will be ordered when supplies decrease and/or supply chains are operational.

# Staff Exposures, Cleaning, and Disinfection

# Staff Exposures

Staff exposures are organized under several categories based upon the type of exposure and presence of symptoms. Following CDC guidelines, we have established the following protocols:

A. If employees or contractors are exposed to a known case of communicable disease that is the subject of the public health emergency (defined as a 'close contact' with someone who is confirmed infected, which is a prolonged presence within six feet with that person):

- 1. Potentially exposed employees or contractors who do not have symptoms should remain at home or in a comparable setting and practice social distancing for the lesser of 14 days or other current CDC/public health guidance for the communicable disease in question.
  - a. When possible, these employees will be permitted to work remotely during this period.
  - b. Employees or contractors should inform their supervisors as soon as possible to discuss and allow the supervisor to arrange for a substitute, if needed.
  - c. Supervisors must inform CiTi's COVID Coordinator and relevant Directors and/or administrators immediately.
  - d. The COVID Coordinator will ensure that correct protocols are followed.
  - e. See the section titled Documentation of Work Hours and Locations for additional information on contact tracing.
- B. If an employee or contractor exhibits symptoms of the communicable disease that is the subject of the public health emergency:
  - 1. Employees and contractors who exhibit symptoms in the workplace should be immediately separated from other employees, students, and visitors. They should immediately be sent home with a recommendation to contact their physician.
  - 2. Employees and contractors who exhibit symptoms outside of work should notify their supervisor and stay home, with a recommendation to contact their physician.
  - 3. Employees should not return to work until they have met the criteria to discontinue home isolation per CDC/public health guidance and have consulted with a healthcare provider.
  - 4. CiTi will not require sick employees to provide a negative test result for the disease in question or healthcare provider's note to validate their illness, qualify for sick leave, or return to work; unless there is a recommendation from the CDC/public health officials and/or a healthcare professional to do so.
  - CDC criteria for COVID-19 provides that persons exhibiting symptoms may return to work if at least 72 hours have passed since the last instance of fever without the use of fever-reducing medications. If the disease in question is other than COVID-19, CDC and other public guidance shall be referenced.
  - 6. The COVID Coordinator must be informed of any employee or contractor's related illness or symptoms to ensure that all required protocols are followed.
- C. If an employee or contractor has tested positive for the communicable disease that is the subject of the public health emergency:
  - 1. Apply the steps identified in item B, above, as applicable.
  - 2. Areas occupied for prolonged periods of time by the subject employee or contractor will be closed off.
    - a. CDC guidance for COVID-19 indicates that a period of 24 hours is ideally given before cleaning, disinfecting, and reoccupation of those spaces will take place. If this timeframe is not possible, a period of as long as possible will be given. CDC/public health guidance for the disease in guestion will be followed.
    - b. Any common areas entered, surfaces touched, or equipment used shall be cleaned and disinfected immediately.
    - c. See the section on Cleaning and Disinfection for additional information on that subject.
  - 3. Identification of potential employee and contractor exposures will be conducted.
    - If an employee or contractor is confirmed to have the disease in question, the COVID Coordinator or their designee should inform all contacts, including the local DOH, of their

- possible exposure. Confidentiality shall be maintained as required by the Americans with Disabilities Act (ADA).
- b. Apply the steps identified in item A, above, as applicable, for all potentially exposed personnel.
- c. <u>The COVID Coordinator, the COVID Coordinator Supervisor, Student Program Directors, and the Assistant Superintendent of Student Programs</u> must be notified in these circumstances to ensure that these protocols are followed.

The organization recognizes there may be nuances or complexities associated with potential exposures, close contacts, symptomatic persons, and those testing positive. CiTi will follow CDC/public health recommendations and requirements and coordinate with the local public health office for additional guidance and support as needed.

# **Cleaning and Disinfecting**

CDC/public health guidelines will be followed for cleaning and disinfection of surfaces/areas. Present guidance for routine cleaning during a public health emergency includes:

- 1. As possible, employees and contractors will clean their own workspaces in the beginning, middle, and end of their shifts, at a minimum.
  - a. High traffic/high touch areas and areas which are accessible to the public/constituents will be disinfected at least hourly.
  - b. The Director of Facilities will supervise the cleaning of all common areas and determine the frequency of cleaning these areas.
- 2. Staff tasked with cleaning and disinfecting areas will be issued and required to wear PPE appropriate to the task.
- 3. Soiled surfaces will be cleaned with soap and water before being disinfected.
- 4. Surfaces will be disinfected with products that meet EPA criteria for use against the virus in question and which are appropriate for that surface.
- 5. Staff will follow instructions of cleaning products to ensure safe and effective use of the products.

# **Employee and Contractor Leave**

Public health emergencies are extenuating and unanticipated circumstances in which CiTi is committed to reducing the burden on our employees and contractors. This policy may be altered based upon changes in law or regulation, as applicable. Any mandated leave policies from NY State or the federal government will be communicated and extended to CiTi employees. In applicable circumstances, employees may use their contractual leave time.

Additional provisions may be enacted based upon need and the guidance and requirements in place by federal and state employment laws, FMLA, executive orders, and other potential sources.

Contractors, either independent or affiliated with a contracted firm, are not classified as employees of CiTi, and as such are not provided with paid leave time by Oswego County BOCES, unless required by law.

# **Documentation of Work Hours and Locations**

In a public health emergency, it may be necessary to document work hours and locations of each employee and contractor to support contact tracing efforts. Identification of locations shall include on-site work, off-site

### **District-Wide School Safety Plan**

visits. This information may be used by CiTi to support contact tracing within the organization and will be shared with the local DOH as required.

Employees are required to use tracking tools provided by CiTi to assist with contact tracing.

# **Housing for Essential Employees**

There are circumstances within a public health emergency when it may be prudent to have essential employees lodged in such a manner which will help prevent the spread of the subject communicable disease to protect these employees from potential exposures, thus helping to ensure their health and safety and the continuity of CiTi's essential operations.

If such a need arises, hotel rooms are expected to be the most viable option. If hotel rooms are for some reason deemed not practical or ideal, or if there are no hotel rooms available, CiTi will coordinate with the Oswego County Department of Health Emergency Management Office to help identify and arrange for these housing needs. The <u>District Superintendent or appointee</u> will communicate with the DOH as needed to arrange for emergency housing.

# **B4.** Radiological Emergency

Note: This response action is detailed in the Building Level Emergency Response Plan.

There are three nuclear reactors within ten miles of the CiTi campus. These guidelines are consistent and made in conjunction with the Oswego County Radiological Emergency Preparedness Plan (REPP). CiTi Administration receives regular updates to the plan from the Oswego County Emergency Management Office.

In the event of an incident at one of the three reactors at Nine Mile Point, Oswego County Emergency Management Office will notify the <u>District Superintendent or designee</u>. Instructions will be given at that time on the need to shelter in place or evacuate.

#### 1. School in session

- a. If it becomes necessary to shelter in place; students, faculty and staff will be notified via an announcement.
- b. Staff should be instructed to close any open window, door, and the heating and air conditioning system should be shut down.
- c. Information alerts shall be monitored.
- d. Potassium Iodide (KI)
  - i. When the <u>District Superintendent or designee</u> has been advised via the Emergency Alert System or Oswego County Emergency Management Office through the School Liaison Officer have been advised to distribute.

## Potassium Iodide (KI) Information and Dosage:

Potassium iodide (KI) is a chemical compound that can be used to protect the thyroid gland from possible radiation injury caused by radioactive iodine (radioiodine). Some radiological emergency may release large amounts of radioiodine into the environment. Since iodine concentrates in the thyroid gland, inhalation or ingestion of food contaminated with radioiodine can lead to radiation injury to the thyroid. This includes the risk of thyroid cancer and other thyroid diseases. Infants and children are the group with the highest risk. Pregnant and lactating women are also at high risk. Adults between 18 and 40 have a slightly lower risk and adults over 40 have the lowest risk. Potassium iodide should not be administered to those with an allergy to iodine or shellfish and those students who have been opted out by their parents.

Recommended dosages (NYSDOH) are shown in the table below:

Recommended Doses of KI for Different Risk Groups						
Age Group	KI Dosage	Number of ml liquid (65 mg/ml)	mg	Number of 130- mg tablets		
Adults over 18 years	130 mg	2	2	1		
Over 12 -18 years and over 150 pounds	130 mg	2	2	1		
Over 12 -18 years and less than 150 pounds	65 mg	1	1	1/2		
Over 3 -12 years	65 mg	1	1	1/2		
Over 1 month to 3 years	32 mg	0.5	1/2	1/4		
Birth to 1 month	16 mg	0.25	1/4	1/8		

### **District-Wide School Safety Plan**

A sufficient amount of KI is stockpiled by CiTi to cover the immediate needs of all students, adult staff and faculty. At the beginning of the school year each student will receive a Potassium Iodide (KI) Form for their parents to fill out. Students enrolling later in the year will also receive a form. The purpose of this form is to certify whether or not the parent wishes their child to receive potassium iodide in the event of a radiological emergency. If the form is not returned and KI use is recommended by health officials, the student will receive KI.

# **B5.** Other Hazard-specific Scenarios

Note: Scenarios listed below are not exclusive and response actions for these are detailed in the Building Level Emergency Response Plan.

- a. ABDUCTION / LOST STUDENT
- b. BOMB THREAT
- c. BUS COLLISION
- d. CHEMICAL OR BIOHAZARDOUS MATERIAL
- e. EARTHQUAKE
- f. FIRE / EXPLOSION
- g. GAS LEAK
- h. HOSTAGE SITUATION
- i. MEDICAL EMERGENCIES
- i. POWER FAILURE
- k. TORNADO/SEVERE THUNDERSTORMS
- I. TRESSPASSER / INTRUDER (ARMED)
- m. WEAPONS

# C. Continuity of Operations Plan (COOP)

## **Preface**

This Continuity of Operations (COOP) Plan (herein referred to as the "COOP" provides approved guidance for personnel of the CiTi to ensure that the District maintains the capability to fulfill all of its assigned essential functions during and after crisis situations.

This plan is consistent with the DWSSP and does not supersede any part of that plan. Recommended changes to this plan may be made in writing to the Safety Coordinator for potential inclusion during the annual review process.

### 1.0 INTRODUCTION

## 1.1 Purpose

The purpose of this Continuity of Operations Plan (COOP) is to guide Readiness and Emergency Management Planning Team members and Safety Team members in reducing threats from man-made and natural hazards and help sustain the functions identified as critical for the CiTi.

## 1.2 Scope

This COOP is designed to provide guidance to faculty, staff, and students to the CiTi campus located at 179 County Route 64, Mexico, New York. This plan primarily focuses on the first 24 hours surrounding a disaster. Those CiTi employees working in alternative locations should follow local school district and building guidelines. This plan supersedes older planning documents.

## 1.3 Planning Process

The District-Wide School Safety team has adopted a planning process that addresses an all hazards planning approach. The CiTi is at risk for natural as well as man-made crisis. The DWSS team has identified critical functions that are necessary to the sustainment of the CiTi mission and campus.

Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	Phase 6	Phase 7	Phase 8
Create plans & procedures that address all-hazards assumptions	Identify critical functions and services	Identify key personnel and orders of succession	Provide data support systems/vital records	ldentify alternate facilities	Identify communica- tion systems and emergen- cy contact information	Reinforce by education, training and exercise programs	REVIEW COOP ANNUALLY

#### 1.4 Plan Maintenance

Periodic plan review will occur annually in conjunction with the needs assessment for the mitigation plan. The risk assessment and mitigation process should be conducted annually to assess threat and develop strategies to prevent and/or mitigate that risk. A more specific maintenance schedule can be found in APPENDIX 1.3.

## 1.5 Responsibilities

### 1.5.1 District Superintendent

The <u>District Superintendent</u> is responsible for participating in the planning for major events and supporting the Continuity of Operations Plan (COOP). This includes policy direction, guidance, and objectives during an incident for the implementation of the COOP.

### 1.5.2 District Superintendent's Designee

The <u>designee of the District Superintendent</u> is responsible for the preparation, relevance, and accuracy of the plan. They work closely with internal and external stakeholders to prepare for the activation of the plan. This also includes development, coordination and management of all activities required for CiTi to perform its essential functions during an event or other situation that would disrupt normal operations.

#### 1.5.3 COOP Coordinator

The <u>COOP</u> Coordinator, appointed by the <u>District Superintendent</u> during an event, is responsible for the implementation of the COOP plan and initiating appropriate notifications inside and outside of the institution when the plan is put into affect. The Coordinator provides direction in preparing the alternate site in an effort to provide for the smooth transition of supervision and operations from the primary location(s) to the alternate location. They also coordinate appropriate lodging, food, and other arrangements with the alternate facility location, if appropriate, for faculty, staff and students.

### 2.0 GOALS AND OBJECTIVES

- 2.1 The primary goal of this COOP is to continue the school mission, minimize damage to school property, and protect the environment from cascading effects of a crisis. This plan is designed to establish guidelines for the continuation of essential functions and to identify threats and vulnerabilities to the CiTi. The results of these findings will supplement the development of the Mitigation Plan. It is the mitigation plan that will prioritize vulnerabilities and provide a strategy to mitigate risk.
- 2.2 The objectives to meet this goal are to:
  - 2.2.1 Maintain a current and accurate list of responsible individuals for every critical function and list at least one successor.
  - 2.2.2 Establish redundant systems, when appropriate, to maintain continuity of operations.
  - 2.2.3 Protect essential facilities, equipment, records, and other assets.
  - 2.2.4 Foster employee mitigation efforts to expedite the recovery process and minimize impact and duration of incidents.

## 3.0 ESSENTIAL FUNCTIONS

- 3.1 The essential functions section includes a list of the organization's prioritized essential functions and activities that must be continued under any circumstances.
- 3.2 List of Essential Functions

Figure 3.2a

igure 3.2a				
Responsible Party	Function	Significance		
ALL	Accountability	Quickly and accurately accounting for all staff and students.		
Administration	Leadership	Provide insight, guidance and approval.		
Instructional Technology	Server back-up	Information retention, Data for critical functions such as payroll.		
	Hardware replacement	Acquisition of hardware to allow for completion of critical functions		
<b>Business Office</b>	Procurement	Allows for the acquisition of needed resources.		
	Payroll	Allows for the continuous pay of employees to aid in personal recovery and maintain focus.		
	Accounts Receivable	Maintains business continuity and allows for the processing of funds.		
	Accounts Payable	Supports procurement in meeting obligations.		
Operations and Maintenance	Power distribution	Maintaining critical functions such as potable water supply, telephone and fire detection service.		
	Heat and hot water	Critical function required for occupation of the building		
	Fire detection system	Critical function required for occupation of the building		
	Communications: Telephones	Critical function required for occupation of the building		
	Snow Removal	Critical function required to maintain occupation of the building.		

### 4.0 CONCEPT OF OPERATIONS

#### 4.1 Activation and Relocation

4.1.1 The COOP may be activated by the <u>District Superintendent</u> when it is deemed necessary. In the absence of the <u>District Superintendent</u>, the decision for the implementation of the COOP shall be made in accordance with the District-wide School Safety Plan Line of Succession (8.2.1). Any student or staff member may activate an emergency evacuation by pulling the nearest fire alarm when they deem it necessary to protect lives of others.

Su	Successors to the Superintendent during a crisis.				
1.	Michael Sheperd	Asst. Superintendent for Admin. Services			
2.	Roseann Bayne	Asst. Superintendent for Instruction			
3.	Marla Berlin Director of College and Career Education				

- 4.1.2 When an evacuation of an area, building or the campus becomes necessary, students and staff will be notified via the fire alarm system or a general announcement. Students, staff, and administrators shall exit their respective spaces in an orderly fashion, assisting anyone who requires additional help as needed. Students and staff shall report to their respective evacuation areas and be counted for the personal accountability report.
- 4.1.3 The <u>District Superintendent</u> understands that they may not always be available to manage an incident and has expressly delegated the authority to procure necessary goods and services to provide for the safety and security of students and staff, facilitate emergency operations, provide critical educational and support services, and restore normal operations.
- 4.2 Relocation and Alternate Facilities Operation
  - 4.2.1 Depending on which CiTi Campus is affected by an emergency, evacuation locations will differ. Specific evacuation and relocations instructions are in each campus's building-level emergency response plan (BLERP).
  - 4.2.2 Go Kits will be created by those personnel identified for critical functions in the COOP operation. These go-kits will be stocked and checked for readiness periodically and in conjunction with changes in the Preparedness Advisory Level,
  - 4.2.3 Vital records, file and databases must be accessible at the alternate location. The schedule of vital records can be found in appendix 1.2.
  - 4.2.4 During an activation, the district needs to identify the core functions and processes that must be maintained to ensure the ongoing operation of the organization. Some functions may be placed on hold in the event of a pandemic to sustain a base level of operations. Core functions are listed in figure 3.2a.

#### 4.3 Reconstitution

- 4.3.1 The <u>District Superintendent or other authorized person</u> determines when the emergency has ended, and that reoccupation of the facility is safe and lawful. This may include a certificate of occupancy from local code enforcement officials.
- 4.3.2 The <u>Assistant Superintendent of Administrative Services, or designee,</u> will serve as the Reconstitution Manager to work with the operations and maintenance and business office staff responsible for the reconstitution process. The Reconstitution Manager will develop a plan and schedule of activities to ensure the orderly transition of all district functions, personnel, equipment, and records from the alterative location back to campus.
- 4.3.3 The <u>District Superintendent</u> will coordinate with appropriate state and local agencies to ensure continued financial support from the state during a district-wide emergency closure or a school emergency closure.
- 4.3.4 When personnel, equipment, and documents are in place at the new or restored facility, the remaining staff at the alternate site shall transfer essential functions, cease operations, and deploy to that new or restored facility as directed.

### 4.4 Communications

- 4.4.1 The <u>District Superintendent will designate a Communications Manager</u> who will coordinate all internal and external communications and advise the team of communications needs.
- 4.4.2 Communications with staff will be done face-to-face, via public address or other electronic means to provide guidance, announcements, and direction.
- 4.4.3 Communications with the media will be handled by the CiTi Public Relations Department.

### 5.0 SCENARIOS

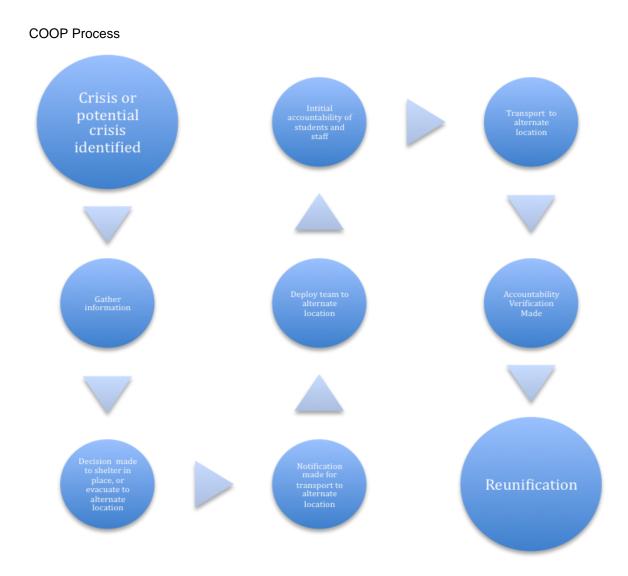
The CiTi campus is vulnerable to a full range of hazards (man-made, natural, and technological disasters).

- 5.1 Loss of service due to a lack of facility access.
  - 5.1.1 In the event that the campus is no longer tenable due to conditions that cannot be mitigated in a reasonable time, it may be necessary to conduct an offsite evacuation.
  - 5.1.2 District Administration and staff will continue to recognize their responsibilities to student and staff safety and exercise their authority to implement this plan in a timely manner when confronted with disasters.
  - 5.1.3 Participate fully with New York State and Oswego County Emergency Management direction and disseminate that information CiTi staff and students as needed, as well as to the component school districts.

- 5.1.4 Offsite evacuation plans for the purposes of reunification are established in the District-wide Emergency Management Plan. It may also be become necessary to use an alternate location, such as the New York State Fairgrounds in the event of a crisis that also involves the designated sister school, such as in a radiological event requiring the evacuation of central Oswego County.
- 5.2 Loss of service due to failure of critical equipment or systems
  - 5.2.1 In the event of a loss of critical infrastructure, the <u>District Superintendent or designee</u> will be required to, with consultation with Operation and Maintenance and Security staff, decide if continued operation of the campus can be done safely. If this cannot be done, an early dismissal may be necessary either from campus or from an alternate location.
- 5.3 Loss of service due to a reduction in available staff.
  - 5.3.1 Participate fully with both the New York State and Oswego County public health officials to institute their recommendations and facilitate the dissemination of health communications.
  - 5.3.2 Partner closely with the Oswego County Health Department to establish efficient and effective communication mechanisms to inform students and staff of credible threats and actions to take.
  - 5.3.3 Identify a chain of command for the CiTi and each of its program locations, utilizing established emergency response and crisis management procedures, and the District Incident Command Team.
  - 5.3.4 Facilitate link of communications to component schools from external sources regarding infectious diseases. Coordinate the dissemination of information between component schools and Oswego County Health and Oswego County Emergency Management.
  - 5.3.5 Exposure to students and other staff should be limited to reduce the spread of the illness.
- 5.4 In the event of a long-term closure, teachers may continue to deliver their curriculum remotely.

### 6.0 TRAINING AND EXERCISES

- 6.1 Personnel shall be trained in their roles of continuity of operations and remain current in their primary responsibilities, but also maintain an understanding and capability of fulfilling roles that they may have to assume during and after a crisis.
- 6.2 An exercise will be conducted at least annually to evaluate the effectiveness and identify gaps or overlaps in the plan. The exercise may focus on specific parts of the plan and should include important components such as communications.



Appendix 1.2 COOP Vital Records Schedule

Vital File, Record, or Database	Form of Record	Pre- Positioned at Alternate Location	Hand Carried to Alternate Location	Backed up Offsite
Attendance Record (CTE & PTECH)	Electronic			x
Attendance Records (Ex Ed & Alt Ed)	Electronic			x
Attendance Records (Adult Ed)	Hardcopy/Electronic		x	
DWSSP(3)	Hardcopy/Electronic		x	
KI+ Opt out Forms	Hardcopy/Electronic		x	
Potassium Iodide KI+ Tablets			x	
Staff Contact Information – Phone Trees	Hardcopy/Electronic		x	
Student Contact Record	Hardcopy/Electronic		х	
Student Medical Record	Hardcopy/Electronic		х	
Credit Card - Business Office	Hardcopy/Electronic		х	
Architectural Drawings	Hardcopy/Electronic	x		X
Asset Inventory	Electronic			X

# Appendix 1.3 COOP Plan Maintenance Schedule

Activity	Tasks	Frequency
Plan update and certification	Review entire plan for accuracy. Incorporate lessons learned and changes in policy and philosophy. Manage distribution.	Annually
Maintain orders of succession and delegations of authority	Identify current incumbents. Update rosters and contact information.	Annually
Maintain alternate location readiness	Check all systems. Verify accessibility. Cycle supplies and equipment, as necessary.	Semiannually
Monitor and maintain vital records program	Monitor volume of materials. Update and remove files.	Ongoing
Revise COOP Checklists and contact information for essential personnel	Update and revise COOP Checklists. Confirm and update essential personnel information.	Ongoing