



March 2016

# EMERGENCY MANAGEMENT

## Improved Federal Coordination Could Better Assist K-12 Schools Prepare for Emergencies

Accessible Version

## Why GAO Did This Study

The 2012 school shootings in Newtown, Connecticut and the 2013 tornado in Moore, Oklahoma stress the need for schools to prepare for emergencies to help protect the 50 million students in K-12 public schools. In 2007, GAO found that most districts developed emergency operations plans and GAO made recommendations to improve school emergency planning. In 2013, the President directed Education, DHS, HHS, and Justice to help schools with their plans. GAO was asked to report on these efforts.

This report examines (1) how federal agencies support school emergency management planning and the extent to which they coordinate efforts; (2) the extent to which states require and support efforts to plan for school emergencies; and (3) what districts have done to plan and prepare for school emergencies and challenges faced. GAO interviewed federal officials and surveyed relevant state agencies in all 50 states and the District of Columbia. GAO also surveyed a generalizable random sample of 573 districts (70 percent response rate), and visited 5 districts and 12 schools in 3 states selected to reflect diverse locations and characteristics.

## What GAO Recommends

GAO recommends that Education convene its federal interagency partners to develop a strategic approach to interagency collaboration on school emergency preparedness, consistent with leading practices. Education agreed that such improved federal coordination will better assist schools in preparing for emergencies.

View [GAO-16-144](#). For more information, contact Jacqueline M. Nowicki at (202) 512-7215 or [nowickij@gao.gov](mailto:nowickij@gao.gov).

## EMERGENCY MANAGEMENT

### Improved Federal Coordination Could Better Assist K-12 Schools Prepare for Emergencies

## What GAO Found

The Departments of Education (Education), Health and Human Services (HHS), Homeland Security (DHS), and Justice (Justice) support K-12 schools in preparing for emergencies with various resources, including training, technical assistance, and funding, but their efforts are not strategically coordinated. Since jointly issuing a *Guide for Developing High-Quality School Emergency Operations Plans* in 2013 in response to a presidential plan, individual agencies have continued to work on a range of emergency preparedness initiatives, sometimes collaboratively; however, with the guide completed and no strategic coordination of agency efforts particular to schools, federal agencies have taken a piecemeal approach to their efforts. GAO found gaps in coordination that suggest recent efforts are insufficient: not all relevant agencies and officials are included in collaborative efforts or are aware of related efforts and resources, and agencies are offering different interpretations of the same federal guidance—all of which risks wasting limited federal resources on duplicative, overlapping, or fragmented efforts. Education officials said that although agencies discussed the need to continue coordinating following the guide, the presidential plan did not designate a lead agency going forward, nor give any agency direct authority or responsibility over an interagency effort, or require agency participation. However, these officials said Education has general authority to collaborate with other federal agencies to maximize the efficiency and effectiveness of its programs and to serve as the lead agency, where warranted and agreed upon. Leading practices on federal interagency collaboration include identifying leadership, relevant participants, and resources, and agreeing on outcomes. Absent a well-coordinated effort, agencies will continue to determine their priorities individually, which may hinder assistance to schools.

In GAO's survey of 51 state educational agencies, 32 states reported that they require districts to have emergency operations plans, 34 reported they require schools to have plans, and almost all states reported providing training, technical assistance, or guidance to support districts in developing or implementing plans. GAO's survey also found that 32 states reported requiring districts to conduct emergency exercises, such as drills, and 40 states reported requiring individual schools to do so. In addition, many states reported allowing districts and schools to determine specific plan content, with fewer than half reporting that they required districts or states to review district or school plans.

GAO's generalizable survey of school districts estimates that most districts updated and practiced their emergency operations plans with first responders, but struggled to balance emergency planning with other priorities. GAO's survey results also found that most districts had plans addressing multiple hazards and emergency procedures, such as evacuation. However, GAO estimates about half of districts included procedures on continuing operations or recovering after an incident. GAO also found most districts conducted emergency exercises, such as fire drills, and about half did so annually with police and fire department officials. However, an estimated 59 percent of districts had difficulty balancing emergency planning with higher priorities, such as classroom instruction time.

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### **Abbreviations**

DHS	Department of Homeland Security
Education	Department of Education
FBI	Federal Bureau of Investigation
FEMA	Federal Emergency Management Agency
HHS	Department of Health and Human Services
Justice	Department of Justice
OMB	Office of Management and Budget
REMS TA Center	Readiness and Emergency Management for Schools Technical Assistance Center
TSA	Transportation Security Administration

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March 10, 2016

The Honorable Michael T. McCaul  
Chairman  
Committee on Homeland Security  
House of Representatives

The Honorable Daniel M. Donovan, Jr.  
Chairman  
The Honorable Donald M. Payne, Jr.  
Ranking Member  
Subcommittee on Emergency Preparedness, Response, and  
Communications  
Committee on Homeland Security  
House of Representatives

The Honorable Martha McSally  
Chairman  
Subcommittee on Border and Maritime Security  
Committee on Homeland Security  
House of Representatives

The Honorable Susan W. Brooks  
House of Representatives

Events in recent years, notably the 2012 shootings at Sandy Hook Elementary School in Newtown, Connecticut, and several instances since, as well as the tornado in 2013 in Moore, Oklahoma, continue to underscore the importance of school emergency management planning to help protect the approximately 50 million children annually entrusted to the nation's K-12 public schools.<sup>1</sup> It is important for school districts to be

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<sup>1</sup>On December 14, 2012, 20 children and 6 adult staff members were fatally shot by an assailant after he broke into Sandy Hook Elementary School in Newtown, Connecticut, in the deadliest mass shooting at a K-12 school. On May 20, 2013, a tornado struck Moore, Oklahoma, and adjacent areas, killing 24 people, including 7 at an elementary school. The Department of Education reported that about 50 million students attended public elementary and secondary schools in school year 2012-13. These are the most recent data available. U.S. Department of Education, National Center for Education Statistics, *The Condition of Education 2015*, NCES 2015-144 (Washington, D.C.: May 2015).

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prepared to confront a range of threats and hazards, from man-made to natural. At the same time, many entities, including federal, state, and local agencies, support school emergency management planning efforts designed to prevent, respond to, and recover from an incident. We previously reported on the status of school emergency preparedness in 2007 and found that while no federal laws required school districts to have emergency operations plans in place, 32 states reported having laws or other policies requiring them, and that an estimated 95 percent of school districts nationwide had also developed emergency operations plans.<sup>2</sup>

In 2013, the Departments of Education (Education), Health and Human Services (HHS), Homeland Security (DHS), including the Federal Emergency Management Agency (FEMA), and Justice (Justice), including the Federal Bureau of Investigation (FBI), jointly issued guidance for schools to help them develop emergency operations plans in response to a presidential call for action to increase school safety.<sup>3</sup> Federal agencies have also developed additional tools and administered new grant programs aimed at helping schools prepare for emergencies. You asked us to provide an update on the status of school emergency management planning, given continued incidents that threaten the safety and security of the nation's children while in school.

This report examines (1) how federal agencies support school emergency management planning and the extent to which they coordinate their efforts, (2) the extent to which states require and support efforts to plan for school emergencies, and (3) what school districts have done to plan and prepare for emergencies and what challenges, if any, they have faced.

To answer these questions, we used a variety of methodologies. To address objective 1, we conducted interviews with officials from Education, DHS, HHS, and Justice and with staff at the Office of Management and Budget; and reviewed relevant federal documents. We

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<sup>2</sup>GAO, *Emergency Management: Most School Districts Have Developed Emergency Management Plans, but Would Benefit from Additional Federal Guidance*, [GAO-07-609](#) (Washington, D.C.: June 12, 2007).

<sup>3</sup>In addition to the *Guide for Developing High-Quality School Emergency Operations Plans* for K-12 schools, the same federal agencies developed emergency management planning guides for institutions of higher education and houses of worship.



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also reviewed leading practices on interagency collaboration to assess the collaborative efforts of these agencies.<sup>4</sup> To address objective 2, we administered two web-based surveys to all 50 states and the District of Columbia: one to state educational agencies and another to state administrative agencies.<sup>5</sup> We administered these surveys from April through July 2015, and all state agencies responded for 100 percent response rates. To address objective 3, we administered a third web-based survey to a stratified random sample of 573 school districts—the results of which were nationally generalizable.<sup>6</sup> We administered this survey from April through July 2015, and 403 districts, or 70 percent of the districts in our sample, responded to the survey.<sup>7</sup> The district survey estimates are subject to sampling error because they are based on a random sample. All percentage estimates used in this report have 95 percent confidence intervals and margins of error of within +/-7 percentage points, unless otherwise noted. To address both objectives 2 and 3, we visited Massachusetts, Texas, and Washington, which we selected because they represent geographic diversity and vary across characteristics, such as type of federal funding received for emergency preparedness as well as whether there was a state school safety center, which provides training and guidance to enhance school safety and security. Within these states, we interviewed state education officials as well as officials from five school districts, selected to reflect a mix of urban, suburban, and rural areas. In each district, we interviewed officials from at least two schools of varying student ages. In one state, we also interviewed officials from a charter school that received federal funding for school emergency preparedness. Information obtained during these interviews is not generalizable, but provides insight into school emergency management planning at the state, district, and school level. For more detailed information on our scope and methodology, see appendix I.

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<sup>4</sup>GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, [GAO-14-220](#) (Washington, D.C.: Feb. 14, 2014) and *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012).

<sup>5</sup>State administrative agencies are the state agencies to which the Department of Homeland Security disburses emergency preparedness funding.

<sup>6</sup>In this report, we use the term school districts or districts to refer to local education agencies.

<sup>7</sup>The weighted response rate for our district survey is 67 percent. Nonresponse error may occur when failing to collect data on members of the sample or answers to individual questions from respondents. We use statistical weighting adjustments to compensate for possible nonresponse errors.

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We conducted this performance audit from October 2014 to March 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### Federal Role in Emergency Management Planning for Districts and Schools

State and local laws and requirements continue to guide districts and schools when planning for and managing emergencies.<sup>8</sup> The federal government's role in school emergency management has been to support state and local activities, by providing guidance, training, equipment, and funding to help districts and schools respond to emergencies effectively. DHS is responsible for most federal emergency management programs, including some that allow funds to be used for school emergency preparedness. In fiscal year 2015, DHS awarded \$989 million to states, urban areas, and territories to prepare for and respond to terrorist attacks and other disasters.<sup>9</sup>

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<sup>8</sup>This aligns with the federal role in K-12 education in general, whereby states, districts, and schools are primarily responsible for developing curricula, determining enrollment and graduation requirements, and funding schools. The federal government plays a more limited role, which is tied to the receipt of federal funding. We did not examine all state laws as part of this review.

<sup>9</sup>Out of these funds, about \$402 million was provided through the State Homeland Security Program, and \$587 million was provided through the Urban Area Security Initiative. The 2015 data are the most recently available. The objective of the State Homeland Security Program is to assist state, Tribal, and local preparedness activities that address high-priority preparedness gaps. The objective of the Urban Area Security Initiative is to assist high-threat, high-density Urban Areas in efforts to build and sustain the capabilities necessary to prevent, protect against, mitigate, respond to, and recover from acts of terrorism.

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Since our 2007 report, the federal government has taken additional steps to help districts and schools plan for and manage emergencies.<sup>10</sup> In March 2011, the White House issued *Presidential Policy Directive 8*, aimed at strengthening the security and resilience of the United States through systematic preparation for the threats that pose the greatest risk to the country's security.<sup>11</sup> It also directed DHS to develop, in coordination with other federal agencies, a national preparedness goal that identifies the core capabilities necessary for preparedness and a national preparedness system to guide activities to achieve that goal.

In response to the directive, DHS released in September 2011 the *National Preparedness Goal* that identified capabilities to prevent, protect against, mitigate, respond to, and recover from threats and hazards.<sup>12</sup> The Goal defined success around these five mission areas, which occur before, during, or after an incident (see fig. 1). The Goal recognized that preparedness is a shared responsibility of the whole community, which FEMA, as a component of DHS, notes includes schools, among others.<sup>13</sup> As stated in the Goal, threats and hazards may include acts of terrorism, cyberattacks, pandemics, and catastrophic natural disasters.

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<sup>10</sup> GAO's 2007 report made several recommendations to Education, DHS, and HHS aimed at improving school district emergency management planning. These recommendations included, among others, identifying and sharing with school districts successful procedures for addressing the needs of special needs students during an emergency, and developing strategies for addressing factors that prevent school districts, first responders, and community partners from training together on the implementation of district emergency operations plans. The agencies implemented all of GAO's recommendations. [GAO-07-609](#).

<sup>11</sup> The White House, *Presidential Policy Directive 8: National Preparedness (PPD-8)* (Washington, D.C.: March 2011).

<sup>12</sup> The U.S. Department of Homeland Security, *National Preparedness Goal: First Edition*. (Washington, D.C.: September 2011). We refer to the *National Preparedness Goal* as "The Goal." The Department of Homeland Security released a second edition of the *National Preparedness Goal* in late 2015.

<sup>13</sup> The Federal Emergency Management Agency (FEMA) is responsible for leading and supporting the nation's preparedness through a risk-based and comprehensive emergency management system of preparedness, protection, response, recovery, and mitigation. This comprehensive emergency management system is intended to reduce the loss of life and property, and protect the nation from all hazards. These hazards include natural and accidental man-made disasters, and acts of terrorism.

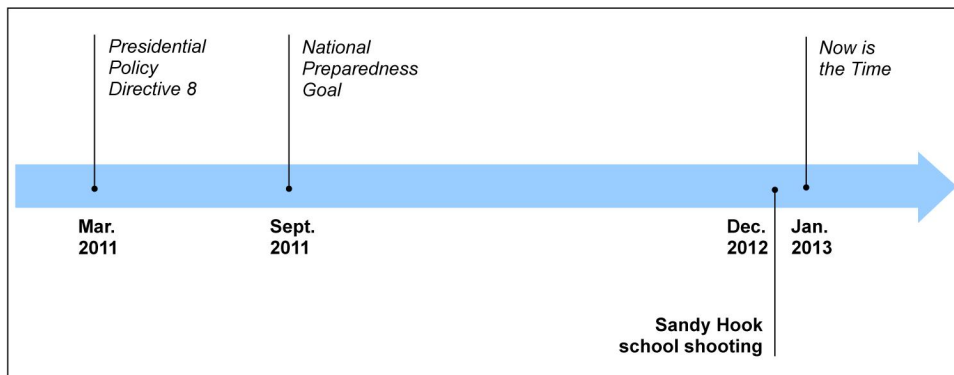
**Figure 1: National Preparedness Goal's Five Emergency Preparedness Mission Areas**



Source: GAO analysis based on National Preparedness Goal, U.S. Department of Homeland Security. | GAO-16-144

In January 2013, following the shootings at Sandy Hook Elementary School, the White House developed a plan, *Now is the Time*, to protect children and communities from gun violence which called, in part, for all schools to have comprehensive emergency operations plans (see fig. 2).<sup>14</sup> This plan also directed Education, DHS, HHS, and Justice to release a set of model, high-quality emergency operations plans for schools by May 2013.<sup>15</sup>

**Figure 2: Timeline of Recent Federal Initiatives on Emergency Management Planning**



Source: GAO analysis of federal documents. | GAO-16-144

<sup>14</sup>The White House, *Now is The Time: The President's plan to protect our children and our communities by reducing gun violence* (Washington, D.C.: Jan. 16, 2013).

<sup>15</sup>The President's plan also called for agencies to develop model high-quality emergency operations plans for institutions of higher education and houses of worship.

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Federal Agencies  
Provide Resources to  
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Federal Agencies Provide  
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Emergencies, but Most  
School Districts Reported  
Not Using Federal  
Guidance and Other Non-  
Financial Resources

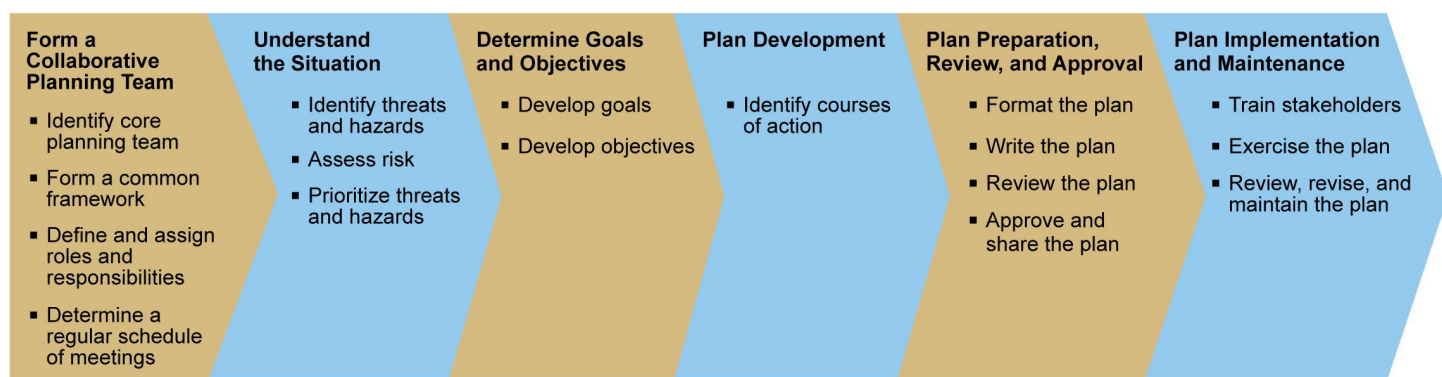
Education, DHS, HHS, and Justice each provide assistance to school districts and schools with preparing for emergencies. In response to the President's call for model, high-quality emergency operations plans for schools, among other things, in his 2013 plan to reduce gun violence, the federal agencies jointly developed a *Guide for Developing High-Quality School Emergency Operations Plans* (Federal Guide)—the primary federal resource designed to help schools develop, implement, and revise their emergency operations plans.<sup>16</sup> The Federal Guide, which identifies key planning principles for developing school emergency operations plans, states that it is considered informal guidance and schools and school districts are not required to adopt it. These principles include considering all threats and hazards and all settings and times, and call for following a collaborative process when creating and revising a plan.

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<sup>16</sup>U.S. Department of Education, Office of Elementary and Secondary Education, Office of Safe and Healthy Students, *Guide for Developing High-Quality School Emergency Operations Plans* (Washington, D.C.: 2013). For the purposes of this report, we refer to the *Guide for Developing High-Quality School Emergency Operations Plans* as the Federal Guide. FEMA, within DHS, and the Federal Bureau of Investigation within Justice, were also involved in developing the Federal Guide.

The Federal Guide suggests that schools use a six-step planning process, similar to the process established by FEMA for state and local emergency management planning, to develop, maintain, and revise their emergency operations plans.<sup>17</sup> According to Education officials, this represents a shift in guidance from an emphasis on plan content to an emphasis on the planning process (see fig. 3).

**Figure 3: Recommended Planning Process in the Federal Guide for Developing High-Quality School Emergency Operations Plans**



Source: Guide for Developing High-Quality School Emergency Operations Plans. | GAO-16-144

Education, DHS, HHS, and Justice also separately develop and provide resources such as guidance, training, technical assistance, and funding, in line with their respective missions, to help districts and schools prepare for emergencies. These include resources that directly support emergency operations plan development as well as those that more generally can be used to enhance districts' and schools' ability to prevent, protect against, mitigate, respond to, or recover from threats and hazards (see table 1).

<sup>17</sup>U.S. Department of Homeland Security, Federal Emergency Management Agency, *Developing and Maintaining Emergency Operations Plans: Comprehensive Preparedness Guide (CPG) 101, Version 2.0* (Washington, D.C.: November 2010).

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**Table 1: Examples of Federal Agency Resources Available to School Districts and Schools for Emergency Preparedness, Including Prevention, Protection, Mitigation, Response and Recovery**

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**Department of Education**

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- Readiness and Emergency Management for Schools Technical Assistance (REMS TA) Center serves as a clearinghouse of information for districts and schools to assist in the development of high-quality emergency operations plans, offering various virtual and in-person trainings, technical assistance, and practitioner tools, including downloadable software to help education officials develop customized plans with their community partners.
  - The Grants to States for School Emergency Management Program awarded approximately \$13 million in one-time competitive grants to 25 state educational agencies and a set-aside for the Bureau of Indian Education in fiscal year 2014. The funds are to increase state educational agencies' capacity to assist districts in developing and implementing high-quality emergency operations plans through training and technical assistance. Officials from one state we visited, for example, said they plan to hold 20 regional training sessions for districts throughout the state by February 2016.
  - The Project Prevent Grant Program awarded about \$14 million to 22 grantees in fiscal year 2014 to help districts, in part, to identify, assess, and serve students exposed to pervasive violence in order to reduce the likelihood that these students will later commit violent acts.
  - The Project School Emergency Response to Violence grant program awarded about \$7 million in fiscal year 2014 and about \$300,000 in fiscal year 2015 to school districts to help them recover from violent or traumatic events where the learning environment was disrupted. Officials in one district we visited said they used a grant to reimburse transportation expenses and to fund substitute teachers so staff could get counseling following a natural disaster.
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**Department of Homeland Security (DHS)**

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- Federal Emergency Management Agency (FEMA) offers a series of courses for school emergency planning officials, including *Multi-hazard Emergency Planning for Schools*. According to officials, these courses provide participants with hands-on opportunities to review their emergency operations plans and identify plan strengths and weaknesses.
  - The Homeland Security Grant Program, administered by FEMA, awarded approximately \$989 million to states and territories in fiscal year 2015 for emergency preparedness activities, including for districts and schools to develop emergency operations plans or conduct related training and exercises. Based on our survey of state administrative agencies, in fiscal year 2014, a total of 18 states reported providing State Homeland Security Program funds to districts and/or schools for emergency planning activities, either directly or through local jurisdictions. The amounts states reported providing directly ranged from \$25,000 to about \$1.2 million.
  - Transportation Security Administration (TSA) developed School Transportation Security Awareness DVDs in English and Spanish designed to provide information to school bus drivers and others on how to identify and report perceived security threats to buses, passengers, and facilities, and to appropriately respond to a security incident. In July 2011, TSA distributed these DVDs to more than 14,000 school districts, according to TSA officials.
  - TSA's Baseline Assessment for Security Enhancement program conducts on-site pupil transportation assessments, providing findings and recommendations to help districts reduce security risks. According to officials, the lack of viable security plans and training are among their most common findings. They added that the agency developed a step-by-step guide, the Transportation Security Template and Assessment Review Toolkit, in 2013.
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**Department of Health and Human Services (HHS)**

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- Centers for Disease Control and Prevention offers guidance and other resources to school administrators to help prevent the spread of viruses, for example, by building flu prevention into operations and planning. In 2014, the agency developed guidance about the risk of Ebola transmission in schools.
  - Substance Abuse and Mental Health Services Administration's Project AWARE (Advancing Wellness and Resilience in Education) provided about \$55 million in funds in fiscal year 2014, according to HHS officials, to increase awareness of and response to children's mental health issues. Project AWARE is composed of two components: Project AWARE State Educational Agency grants and Mental Health First Aid grants to school districts. Officials in one district we visited said they plan to use the funding for training staff in identifying and recognizing potential behavioral issues in students so they can receive services before behaviors escalate and become safety issues.
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**Department of Justice**

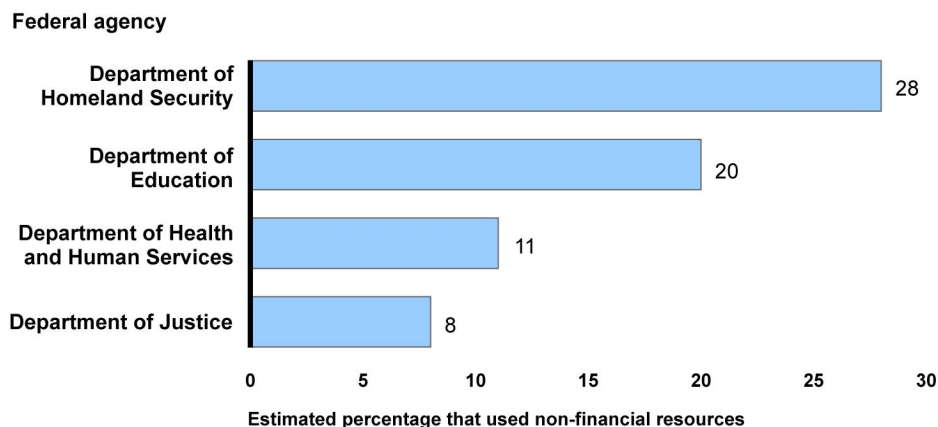
- The Comprehensive School Safety Initiative aims to increase the safety of schools and students nationwide by developing, supporting, and evaluating school safety programs, practices, and strategies. In fiscal year 2015, the initiative awarded about \$70 million to 25 research projects.
- The Community Oriented Policing Services Hiring Program provides funding, training, and other resources, in part, to support school resource officers—specially trained law enforcement officers that work in schools. In fiscal year 2015, Justice awarded 59 grants to support school-based policing. Officials in one school we visited said their school resource officer, who visits the school twice weekly, is an active member of the emergency planning team and participates in emergency drills.
- The Federal Bureau of Investigation’s (FBI) Active Shooter Initiative provides resources and support to law enforcement at the state and local levels, including guidance and lessons learned from previous active shooter incidents. The FBI provides training to school district administrators, among others, on the assessment of targeted school violence, according to officials, and in 2014 released *A Study of Active Shooter Incidents in the United States Between 2000 and 2013*, which includes information on those that have occurred in schools.

Source: Interviews with federal agency officials, agency web sites, and related agency documents. | GAO-16-144

Note: Information on funding awards represents data most recently available.

Despite the availability of resources from Education, DHS, HHS, and Justice for school emergency preparedness, our nationally representative survey of school districts found that an estimated 69 percent of districts did not rely on non-financial resources from any of these agencies to develop or implement their plans in recent years. Further, as shown in figure 4, we estimate that about one-third of districts or fewer relied on such resources from the agencies individually.

**Figure 4: Estimated Percentage of School Districts That Used Federal Non-Financial Resources for Developing or Implementing an Emergency Operations Plan, School Years 2012-13, 2013-14, 2014-15**



Source: GAO analysis of school district survey. | GAO-16-144

Note: All estimates have 95 percent confidence intervals of within +/- 7 percentage points.

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Our survey of school districts and visits to districts and schools suggest that limited awareness of federal non-financial resources and reliance on local resources may be factors in districts' limited use of such federal resources. For example, based on our survey, an estimated 37 percent of districts are aware of the Federal Guide or related resources from the REMS TA Center. Similarly, officials in 2 of the 12 schools we visited were familiar with the Federal Guide, though it is targeted to schools. In one school we visited, an official who was familiar with the Federal Guide told us that it was not user-friendly given its length (e.g., 67 pages).<sup>18</sup> In addition, officials in two districts said they rely on their state for guidance, rather than on the federal government directly, as, for example, some federal standards and guidance may not be as tailored to them. According to our survey of state educational agencies, 35 states, representing a majority of school districts, provide the Federal Guide to their districts to assist in developing or implementing emergency operations plans.<sup>19</sup> With this number of states doing so, it is unclear why there is limited awareness of the Federal Guide by districts nationwide.

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### Federal Agency Collaboration to Support School Emergency Preparedness Is Ongoing, but Gaps Exist

Education, DHS, HHS, and Justice collaborate on a number of individual agency initiatives to support district and school efforts to prepare for emergencies. According to federal officials, following the significant interagency collaboration required to produce the Federal Guide in 2013, as facilitated by the Office of the Vice President and National Security Council, Education has continued to collaborate with the agencies to develop resources to facilitate use of the Federal Guide, including by leading development of a related guide for school districts. Education and the agencies also developed resources that, though not necessarily explicitly prepared as an emergency preparedness resource, can be used to assist schools with other aspects of emergency preparedness, including prevention. For example, Education and Justice jointly

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<sup>18</sup>Readiness and Emergency Management for Schools Technical Assistance (REMS TA) Center and Education officials told us they have several efforts underway to promote preparedness and use of the Federal Guide, including webinars, online training courses, and interactive tools, and recently developed a Twitter profile to publicize related resources. In addition, Education officials said they continue to provide trainings and technical assistance to state educational agencies, in part, as a means to pass federal resources on to districts and schools.

<sup>19</sup>The percentage of school districts represented by the 35 states is based on Department of Education data from school year 2012-2013, the data most recently available.

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developed a school discipline resource package designed, in part, to assist schools in creating safer environments, which can be an important step for prevention. Federal agency officials also told us they collaborate through various groups that address, to varying degrees, certain needs of schools and school children. For example, several agencies participate in the Comprehensive School Safety Initiative interagency working group, and a federal interagency policy sub-committee on active shooters, though this entity is not specific to schools and does not address the full range of threats and hazards schools face. Some agencies are also involved with the National Advisory Council on Children and Disasters. However, none of these entities primarily focus on the needs of schools for emergency management planning, which, given the presence of young children, can differ significantly from those of other institutions. Federal officials told us the partnerships that resulted from the Federal Guide have been valuable: one official said federal interagency collaboration is the best she has experienced in her 18 years with her agency.

However, we identified gaps in recent federal agency coordination that suggest these efforts are insufficient in fully addressing the needs of schools. Insufficient coordination may compromise the ability of federal agencies to effectively support district and school emergency preparedness efforts, and risks hindering such planning to help protect students and staff in emergencies. We found:

- **Not all relevant federal agencies are included in collaboration efforts.** Transportation Security Administration (TSA) officials said the agency is not involved in federal interagency collaboration on school emergency management planning, including with the REMS TA Center, despite TSA having developed multiple resources on school transportation security, and knowing through its Baseline Assessment for Security Enhancement program that security for school bus transportation is often left out of district planning. Additionally, TSA officials told us they were also not involved in developing the Federal Guide because they were unaware of the effort—even though DHS, of which TSA is a part, was one of the agencies involved in developing the Federal Guide. Due to their lack of involvement in federal interagency efforts for school emergency management planning, other federal agencies may be unaware of TSA resources and unable to share TSA information with local stakeholders. Recognizing the

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importance of addressing transportation in school emergency management planning, the Federal Guide makes multiple references to it.<sup>20</sup> Moreover, the REMS TA Center has elaborated on the importance of addressing transportation in planning, stating in informal guidance that effective emergency operations plans must include procedures for students and staff to follow during non-instructional times, including time when students are on a school bus. Leading practices on interagency collaboration state that it is important to ensure that all relevant participants have been included in the collaborative effort.<sup>21</sup>

- **Relevant agency officials are not always aware of each other's efforts and resources, including within their own agency.**

Education and FEMA officials said they collaborate on various school emergency management planning initiatives. For example, Education officials said that FEMA was among its federal partners involved in developing a REMS TA Center tool designed to help districts and schools create and customize emergency operations plans, and the head of FEMA's Emergency Management Institute (EMI) told us that staff provide such tools to their training participants. However, EMI officials we spoke with who are responsible for training courses for district and school staff on developing emergency operations plans said they were unfamiliar with these tools, raising concerns about communication and coordination within the agency. In another case, a FEMA official responsible for the Office of Counterterrorism and Security Preparedness, to whom we were referred by FEMA officials we interviewed about issues of coordination with DHS, said his office was not involved in the development of related guidance from DHS' Office of Infrastructure Protection issued in April 2013 on developing a comprehensive K-12 school security program, which discusses how to develop an emergency operations plan.<sup>22</sup> Further, the official indicated that he was unaware of the DHS guidance until its release. As a result, officials from DHS and FEMA were simultaneously involved in

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<sup>20</sup> For example, the Federal Guide states that the core planning team should include representatives from a wide range of school personnel, including transportation managers, among others. The Federal Guide also states that emergency operations plans must comply with the Americans with Disabilities Act, among other prohibitions on disability discrimination, across the spectrum of emergency management services, programs, and activities, including evacuation and transportation.

<sup>21</sup> [GAO-12-1022](#).

<sup>22</sup> Department of Homeland Security, Office of Infrastructure Protection, *K-12 School Security Practices Guide* (April 2013) and Department of Homeland Security, Office of Infrastructure Protection, *K-12 School Security Checklist* (April 2013).

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### Run, Hide, Fight

According to the Federal Guide, during an active shooter situation, there are three basic options: run, hide, or fight.

*Run:* If it is safe to do so for yourself and those in your care, the first course of action that should be taken is to run out of the building and far away until you are in a safe location.

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

*Fight:* If neither running nor hiding is a safe option, as a last resort when confronted by the shooter, adults in immediate danger should consider trying to disrupt or incapacitate the shooter by using aggressive force and items in their environment, such as fire extinguishers, and chairs.

Source: Guide for Developing High-Quality School Emergency Operations Plans. | GAO-16-144

developing multiple resources for K-12 schools—including the Federal Guide, issued in June 2013—to prepare for emergencies without sufficiently coordinating these efforts. In reviewing the DHS guidance, we also found it makes no specific mention or reference to FEMA’s six-step planning process—the process on which the Federal Guide is based—though it includes a number of the same steps. Gaps in effective coordination and communication within and across agencies raise questions about the efficient use of resources, and the extent to which these related resources may be overlapping, duplicative, or fragmented. Officials from Education and FEMA told us greater collaboration is needed and welcome, particularly in light of limited resources. Leading practices state that the challenges posed by continuing federal budget constraints call for agencies to work together more closely to leverage limited resources to achieve their missions.<sup>23</sup>

- **Agencies that collaborate offer different interpretations of the same federal guidance.** Education and the FBI were partners, among others, in producing the Federal Guide; but, since its completion, these agencies now publicly offer different positions on the Federal Guide’s Run, Hide, Fight model. This model describes—in order of preference—the steps adults should take when confronted by an active shooter (see sidebar). Specifically, an Education official said in producing the Federal Guide the federal agencies agreed to exclude students from involvement in the option of fighting an active shooter and instead included language that focused solely on adults.<sup>24</sup> In contrast, an FBI official stated that the Federal Guide is designed to allow each community to determine whether to discuss with high school students the option of fighting, and set its own standards on how to discuss the Run, Hide, Fight model with school-age children—views which have been reported publicly.<sup>25</sup> The FBI official also said the goal of the Federal Guide is not to develop a one-size-fits-all plan, but rather, to have district officials, principals, teachers, parents, and local

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<sup>23</sup>GAO-14-220.

<sup>24</sup>The Federal Guide states that if neither running nor hiding is a safe option, as a last resort when confronted by a shooter, *adults* [emphasis added] in immediate danger should consider trying to disrupt or incapacitate the shooter by using aggressive force and items in their environment, such as fire extinguishers and chairs.

<sup>25</sup>Ryan Quinn, “Kanawha students receiving controversial new training to counter school shootings,” *Charleston Gazette-Mail*, September 27, 2015, accessed October 5, 2015, <http://www.wvgazette.com/article/20150927/gz01/150929522/1101>.

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first responders decide what is best for their community. The FBI official stated that, though student involvement in the option of fighting is not included in the Federal Guide, the FBI does not take a position on whether or not school districts should teach children to consider the option of fighting. In addition, the official told us the FBI's position aligns with Federal Guide and noted that adults should consider the option to fight and be trained accordingly. Given that the Federal Guide explicitly refers only to adults when discussing the fight portion of Run, Hide, Fight, conflicting views from federal agencies may create confusion for districts and schools in interpreting this aspect of the federal recommendations. Leading practices on interagency collaboration state that it is important to address the differences created by diverse organizational cultures to enable a cohesive working relationship and create the mutual trust required to enhance and sustain a collaborative effort.<sup>26</sup> Education and FBI officials told us they meet regularly with other federal partners through a federal interagency policy sub-committee on active shooters, facilitated by White House staff; however, their collaboration through this mechanism—which is not exclusively focused on school emergencies—has not yielded a consistent federal message to the public about whether and how students should be involved in Run, Hide, Fight.<sup>27</sup>

In the absence of a well-coordinated strategy for school emergency management planning efforts, federal agencies have taken a piecemeal approach to these efforts, which contributes to the gaps we have identified. Education officials said that, especially since the issuance of the Federal Guide, federal agencies currently face challenges around coordination, resulting in efforts that have developed organically and incidentally and without a strategic focus. Specifically, with their limited resources, agencies determine their priorities and initiatives—and the resources devoted to them—on an individual agency basis; meanwhile, the emergency management and safety needs of schools are numerous and complex. Acknowledging the value of interagency collaborative efforts, these Education officials also said that such efforts help avoid duplicative and inconsistent efforts across agencies. While officials from

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<sup>26</sup> [GAO-12-1022](#).

<sup>27</sup> As part of this collaborative effort, an FBI official said that federal agencies have developed, circulated, and updated individual agency work plans to help facilitate the involvement of federal partners and minimize duplication.

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FEMA and Justice did not identify specific challenges with federal agency coordination in this area, these agencies focus more generally on emergency planning and not specifically on the needs of school districts and school emergency management planning—the area in which Education identified issues.

As efforts to develop the Federal Guide came to a close, Education officials told us that the agencies discussed the need to continue to coordinate federal school emergency preparedness efforts moving forward. According to these officials, the presidential plan that required development of the Federal Guide did not designate a lead agency going forward or give any agency direct authority or responsibility to convene an interagency working group or require the participation of other federal agencies. However, they said that the Department of Education Organization Act provides the agency the general authority to collaborate with other federal agencies to maximize the efficiency and effectiveness of its programs and, where warranted and agreed upon, to serve as the lead agency in such collaborations.<sup>28</sup> Importantly, Education officials also stressed that the ability to successfully carry out such activities relies to a large degree on other federal agencies' cooperation as well. Staff from the Office of Management and Budget (OMB)—the agency responsible for, among other things, communicating the President's directions to Executive Branch officials regarding specific government-wide actions—told us that while they may become involved in federal interagency efforts absent clear leadership, federal efforts around school emergency preparedness are best handled by agencies and monitored by OMB through, for example, review of administration policy.

The absence of an interagency body to coordinate related federal efforts may hinder the ability of federal agencies to successfully address the complex emergency management needs of schools. Leading practices such as (1) identifying leadership for collaborative efforts; (2) defining and agreeing to common outcomes, and assigning accountability for these collaborative efforts; (3) identifying all relevant participants; and (4) identifying necessary resources have been shown to improve the likelihood of success for federal interagency efforts.<sup>29</sup> Further, the Government Performance and Results Act of 1993 (GPRA), as updated by

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<sup>28</sup> 20 U.S.C. §§ 3402(5), (6), 3471. See also 20 U.S.C. § 1231.

<sup>29</sup> [GAO-12-1022](#) and [GAO-14-220](#).

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the GPRA Modernization Act of 2010, establishes a framework for a crosscutting and integrated approach by agencies to focus on results and improve government performance.<sup>30</sup> This framework includes identifying how an agency is working with other agencies to achieve its performance goals, in that well-coordinated strategies can reduce potentially duplicative, overlapping, and fragmented efforts.

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## Most States Reported Requiring Emergency Operations Plans and Exercises, and Providing Training or Other Support

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## Most States Reported Requiring District or School Emergency Operations Plans, and Many Also Allowed Districts and Schools to Determine Plan Specifics

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According to our survey of state educational agencies in the 50 states and the District of Columbia, 32 states reported requiring that districts have emergency operations plans and 34 states reported requiring that schools have plans, and 25 states reported requiring plans for both (see fig. 5).<sup>31</sup> Additionally, many states also allowed districts and schools to determine the specific content of these plans.<sup>32</sup> The states that reported they have requirements for districts and/or schools represent about 88 percent of K-12 students nationwide.<sup>33</sup> Thus, even though not all states reported requiring plans, our district survey found an estimated 97 percent of districts nationwide had a plan, which can help schools plan for potential

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<sup>30</sup>Pub. L. No. 103-62, 107 Stat. 285 and Pub. L. No. 111-352, 124 Stat. 3866.

<sup>31</sup> Throughout this report, when we refer to GAO's survey findings from 51 state educational agencies, we include the District of Columbia as one of these 51 states.

<sup>32</sup> Similarly, in our June 2007 report, we found that 32 states reported having laws or other policies requiring districts to have emergency operations plans, and based on our survey of school districts, we estimated that 95 percent of districts had these plans. [GAO-07-609](#).

<sup>33</sup> As noted earlier, we administered two state surveys as part of our review. The state survey of state educational agencies is a separate survey from the survey of state administrative agencies.



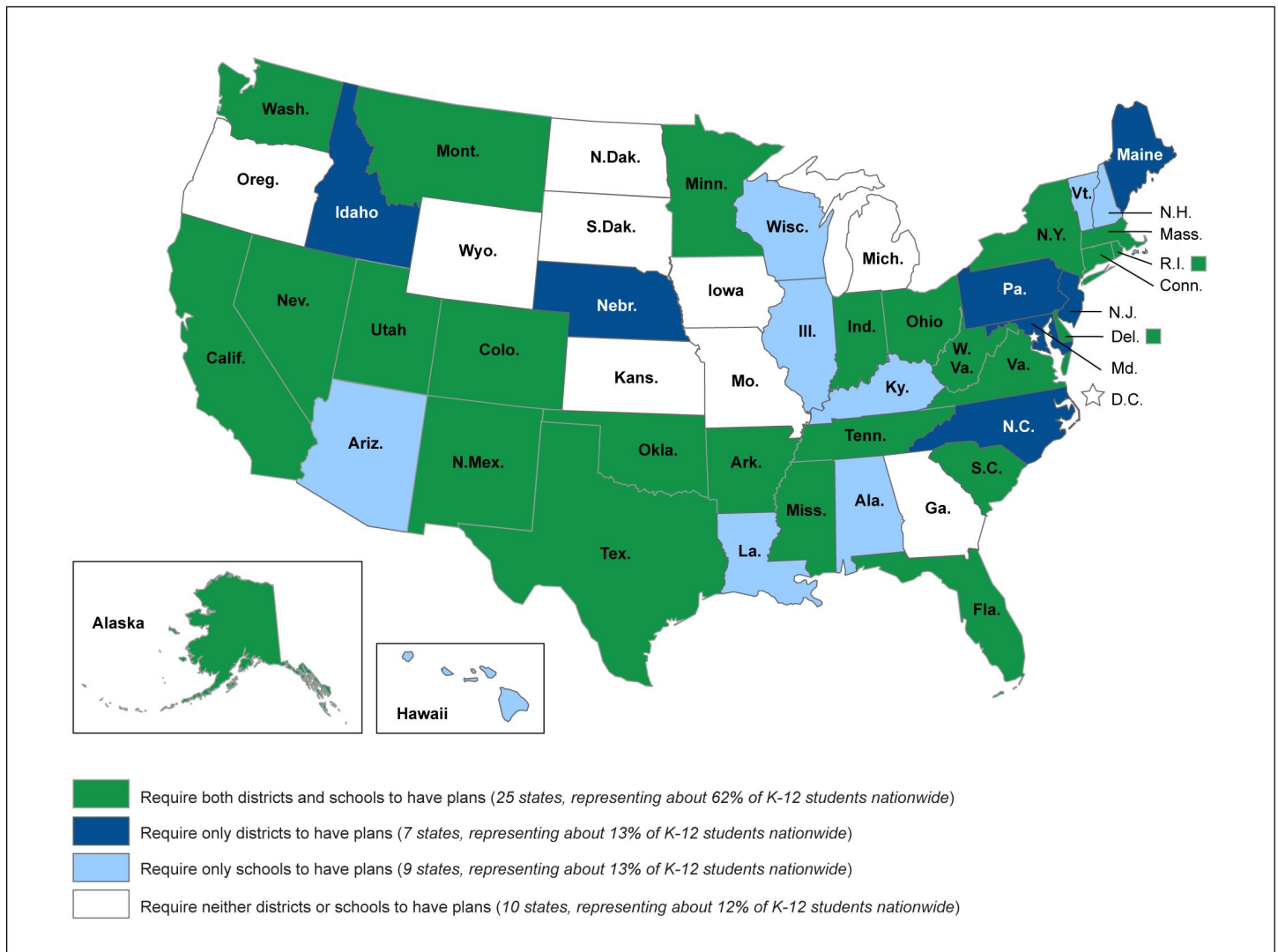
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emergencies as noted by the *Guide for Developing High-Quality School Emergency Operations Plans* (Federal Guide).<sup>34</sup>

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<sup>34</sup>The *Guide for Developing High-Quality School Emergency Operations Plans* recommends key principles and practices to help schools develop, implement, and revise their emergency operations plans. While the Federal Guide is considered informal guidance and does not establish any federal requirements for states, it can be used as a resource for states in their efforts to help districts and schools plan for emergencies.

**Figure 5: State-Reported Requirements for School District and School Emergency Operations Plans**



Source: GAO analysis of state educational agencies survey; and Department of Education, Common Core Data, 2012-13 School Year. | GAO-16-144

Notes: While the state survey data results were collected from April to July 2015, the percentages of K-12 students nationwide represent Department of Education data from school year 2012-2013, the data most recently available.

The District of Columbia is counted as one of the 10 states that reported requiring neither districts nor schools to have plans.

Of the 10 states that reported requiring neither districts nor schools to have plans, 9 instead recommend districts have plans and 7 recommend schools have plans.

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Even though most states reported requiring districts and/or individual schools to have plans, our state survey found that many do not set forth specific requirements on plan content, and that the degree to which states require plans to contain specific content varies widely. For example, as shown in figure 6, 29 states reported requiring schools to address lockdown procedures in their plans while 10 reported requiring school plans to address continuity of operations. Similarly, 25 states reported requiring district plans to address evacuation procedures while 9 reported requiring district plans to address continuity of operations.

**Figure 6: State-Reported Requirements for Emergency Operations Plans to Address Specific Procedures**

Number of States with Requirements		
Requirements for districts		Requirements for schools
<b>26</b>	<b>Communications and warning</b> Communication of emergency protocols before an emergency as well as internal and external communication and coordination before, during, and after emergencies	<b>28</b>
<b>25</b>	<b>Evacuation</b> Students, staff, and visitors evacuate buildings and grounds	<b>28</b>
<b>24</b>	<b>Lockdown</b> Students, staff, and visitors are secured in rooms away from immediate danger	<b>29</b>
<b>21</b>	<b>Accounting for all persons</b> Actions to identify the whereabouts and well-being of students, staff, and visitors	<b>24</b>
<b>17</b>	<b>Shelter-in-place</b> Students, staff, and visitors are required to remain indoors for a period of time	<b>22</b>
<b>17</b>	<b>Recovery</b> Actions schools implement to recover from an emergency, including academic, physical, financial, psychological, and emotional recoveries	<b>20</b>
<b>13</b>	<b>Security</b> Actions schools implement, in conjunction with law enforcement, on a routine, ongoing basis to secure the school from criminal threats	<b>16</b>
<b>12</b>	<b>Family reunification</b> Actions to reunite students with their families or guardians	<b>14</b>
<b>11</b>	<b>Public health, medical, and mental health</b> Actions schools implement to address medical, public emergency health, and mental health counseling issues	<b>13</b>
<b>9</b>	<b>Continuity of operations</b> Actions to ensure that essential district and school functions, such as teaching and learning, continue during and after an emergency for up to 30 days	<b>10</b>

Source: GAO analysis of state educational agencies survey. | GAO-16-144

Our state survey also asked about requirements that district or individual school plans address the needs of specific populations of students, including those with disabilities, and found that fewer than half of states reported having such requirements; however, our district survey shows that most districts included these procedures in their plans. Specifically, 21 states reported requiring district or school plans to address the needs

of individuals with disabilities or special needs.<sup>35</sup> Separately, our district survey shows that an estimated 69 percent of districts nationwide reported having procedures in their district or school plans that support the access and needs of the whole school community, including these individuals. For example, in one of the elementary schools we visited, the school calls for a “buddy system” to help each special needs student evacuate during an emergency. The school’s plan also notes that special equipment, such as lights or horns, might be required to alert students with certain sensory disabilities during emergencies. In a similar trend, according to our state survey, fewer than 10 states reported requiring either districts or schools to address the needs of individuals with limited English proficiency.<sup>36</sup> Our district survey shows that an estimated 45 percent of districts had procedures in their district or school plans for communicating with parents or students who are limited English proficient.

Another example of an area where states allowed districts and schools to determine the content of their plans is threats or hazards. According to our state survey, fewer than half of states reported requiring districts or individual schools to have plans that address certain specific threats or hazards, such as active shooter, infectious diseases, or food safety, but our district survey found that most districts have plans that do so. However, for fires and natural disasters, our state survey shows that about half or more of states reported requiring that plans address these specific threats and hazards (see table 2).

**Table 2: State-Reported Requirements for Emergency Operations Plans to Address Specific Threats or Hazards**

Threats or hazards	Number of states that reported requiring plans to address specific threats or hazards	
	District plans	School plans
Fire	32	37
Natural disasters	25	29

<sup>35</sup>The 21 states that reported requiring district plans to address the needs of individuals with disabilities or special needs are not necessarily the same 21 states that reported requiring school plans to do so.

<sup>36</sup>Six states reported requiring that district plans address the needs of individuals with limited English proficiency and 8 states reported requiring this for school plans.

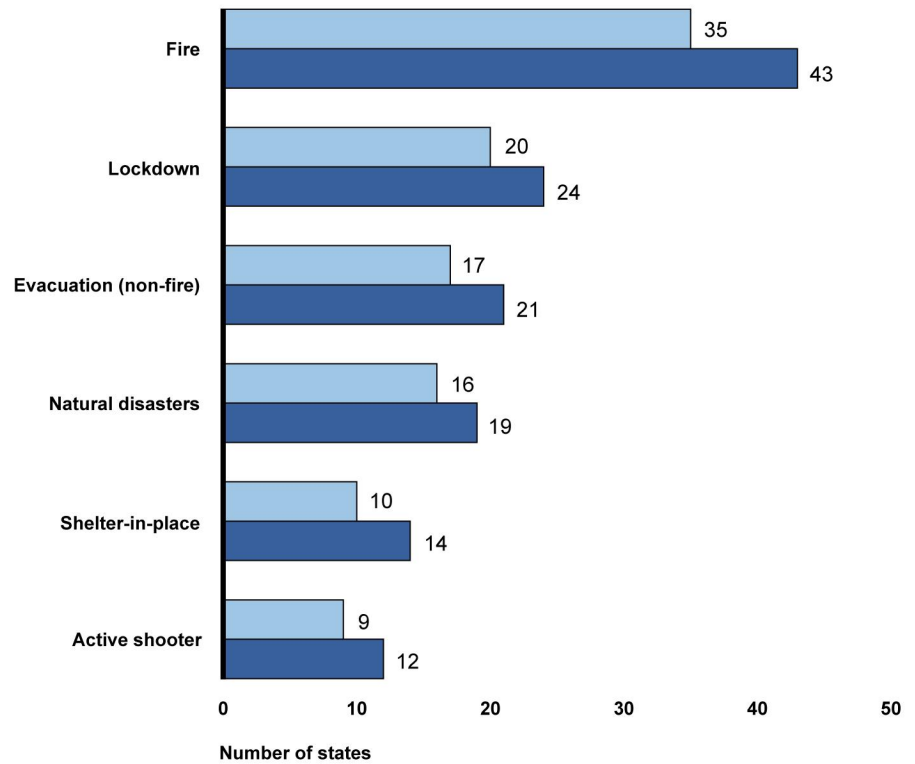
Threats or hazards	Number of states that reported requiring plans to address specific threats or hazards	
	District plans	School plans
Bombs or bomb threats	17	21
Chemical, biological, or radiological threats or incidents	17	20
Active shooter	15	19
School bus accident	15	18
Intruder	14	17
Suicide threat or incident	14	15
Infectious disease	12	14
Food safety	12	12
Technological failure	12	12
Hostage situation	9	11
Police activity nearby	8	10

Source: GAO analysis of state educational agencies survey. | GAO-16-144

## More Than Half of States Reported Requiring That Districts or Schools Conduct Emergency Exercises, Particularly Fire Drills

According to our state survey, 32 states reported requiring that districts conduct emergency exercises of their plans, such as drills, while 40 reported requiring that individual schools conduct them. The states that reported having requirements for districts and/or schools to conduct exercises represent about 83 percent of K-12 students nationwide. An estimated 96 percent of districts or their schools conducted emergency drills during school years 2012-13, 2013-14, and/or 2014-15, according to our district survey. Our state survey found that district and school fire drills were most frequently required, and active shooter drills significantly less so (see fig. 7). While our survey did not ask why certain drills were required more than others, Education officials told us that as part of emergency management planning, schools need to assess the likelihood of active shooter incidents, which present a smaller risk than other emergencies.

**Figure 7: State-Reported Requirements for District or School Emergency Drills and Exercises, by Purpose**



Require districts to conduct exercises of plans  
Require schools to conduct exercises of plans

Source: GAO analysis of state educational agencies survey. | GAO-16-144

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## Nearly All States Provided Support to Plan for Emergencies, and Fewer Than Half Reported Requiring States or Districts to Review Emergency Operations Plans

### State School Safety Centers

School safety centers work to provide school districts, district and school staff, parents, and students with training, tools, and technical assistance to enhance the safety and security of U.S. schools. Some of these centers are supported by or part of state educational agencies, while others are part of other state agencies or institutions, such as state emergency management agencies or public universities.

The Texas School Safety Center is a nonprofit organization funded in part through a state appropriation to Texas State University with additional funding secured through grants and contracts from other state funding sources. The center's responsibilities include providing training, technical assistance, and research on K-12 and higher education school safety and security to students, educators, administrators, law enforcement, community organizations, state agencies, and colleges and universities.

The Washington State School Safety Center is a component of the state educational agency, and supports student learning by assisting districts and schools in creating and promoting emotionally and physically safe schools for staff, students, and visitors. The center provides school safety resources, training, and tools to help districts and schools develop emergency operations and safety plans, and prepare for emergencies.

Source: GAO analysis of information from the National Crime Prevention Council, the Texas School Safety Center, and the Washington State School Safety Center. | GAO-16-144

Based on our survey of 51 state educational agencies, nearly all states provided training, technical assistance, or guidance to districts to assist in developing or implementing emergency operations plans.<sup>37</sup> In addition, nine states provided state funds to districts in one or more fiscal years 2013 through 2015 and five of the nine provided funding in all three years.<sup>38</sup> Officials in one of the states we visited said their state offers technical assistance and training to some districts and schools, and their state educational agency website has links to state and federal resources on planning for emergencies. In addition, two of the states we visited have state school safety centers that provide technical assistance and guidance to districts and schools (see sidebar).

As part of their efforts to provide districts with support for developing or implementing plans, 47 state educational agencies collaborated with their state emergency management agency, according to our state survey.<sup>39</sup> In addition, in the three states we visited, state officials discussed collaboration among state agencies on school emergency management planning. The state educational agency officials we met with in these three states said they work with other state agencies on school emergency management issues. For example, in one state we visited, the state educational agency worked with the state departments of public safety, and health and human services on a school safety and security task force that set forth recommendations to districts and schools on making schools safe without compromising educational goals.

State education officials we met with also cited challenges they face when supporting district and school efforts to plan for emergencies. Officials in two of the three states we visited said limited resources, staff, and funding

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<sup>37</sup>Forty-eight states provided technical assistance, 46 provided training, 46 provided tools, 45 provided web pages, 45 provided written publications, 32 provided training curricula, and 36 provided onsite training.

<sup>38</sup>Six of these 9 states provided funding in fiscal year 2013, 8 in fiscal year 2014, and 8 in fiscal year 2015.

<sup>39</sup>Our survey shows varied results on the degree that state educational agencies collaborated with entities other than their state emergency management agency when developing or implementing plans. The number of states that reported their state educational agencies collaborate with specified agencies were: state homeland security agency (37), state administrative agency (33), state school board association (31), state school administrators association (30), state school safety center (25), state attorney general's office (17), state school safety membership association (15), and state parent teacher association (7).



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are challenges. More specifically, officials in one of these states said their office does not have sufficient staff or resources to provide emergency management planning assistance and training to schools on a wide scale. In another state, officials told us that limited funding and staff hinder the state's ability to help districts and schools plan for emergencies.

Over half of states reported requiring districts or individual schools to have plans, as noted above, and fewer than half of states reported requiring that either district or school plans be reviewed at least every 2 years, according to our state survey.<sup>40</sup> Similarly, fewer than half also reported requiring that either districts or state educational agencies review district or school plans.<sup>41</sup> For those states that did report having requirements to review plans, 24 states required that districts review their own plans, and 24 states required that districts review school plans.<sup>42</sup> Further, an estimated 79 percent of districts that required their schools to have plans also required their schools to submit these plans for district review, according to our district survey.<sup>43</sup>

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<sup>40</sup>These states are those that responded that they require a plan review at least once a year or at least once every 2 years. These states do not include those that responded that they require a review after an incident, at least once every 3 years, or after any significant revisions.

<sup>41</sup>More specifically, fewer than half of states reported requiring that districts review district or school plans, and fewer than half of states reported requiring that state educational agencies review district or school plans.

<sup>42</sup>The 24 states that reported requiring that districts review district plans are not the same 24 states that reported requiring that districts review school plans. There is an overlap of 18 states between the two groups.

<sup>43</sup>This percentage estimate has a 95 percent confidence interval of within +/- 7.5 percentage points.

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**Most Districts  
Reported Updating  
and Practicing  
Emergency  
Operations Plans with  
First Responders, but  
Struggled to Balance  
Emergency Planning  
with Other School  
Priorities**

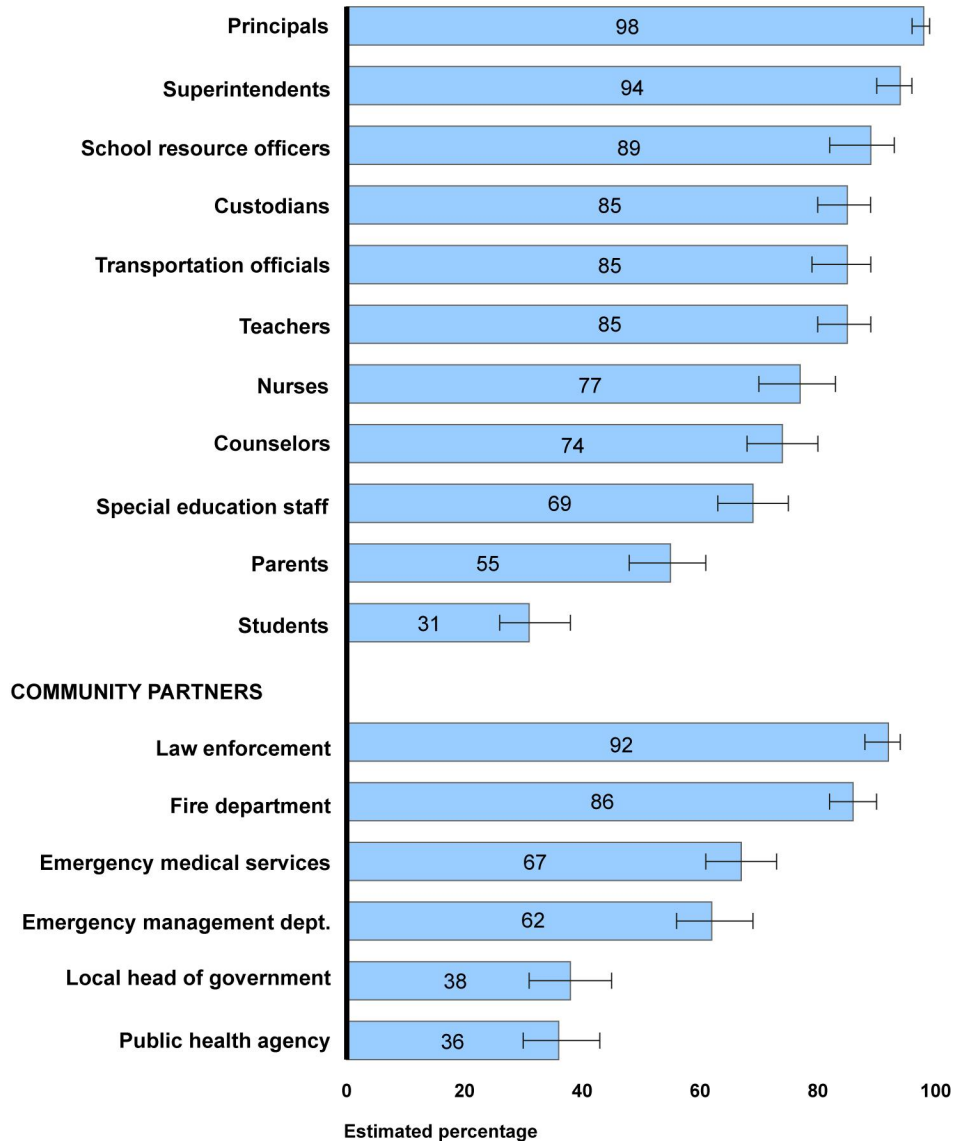
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**Most Districts Involved  
School Personnel and  
First Responders in  
Developing and Updating  
Their Emergency  
Operations Plans**

Most school districts involved a wide range of community members, particularly school personnel and first responders, when developing and updating their emergency operations plans, according to our nationally representative survey of school districts (see fig. 8).

**Figure 8: Estimated Percentage of School Districts That Involved Specific Community Members in Developing or Updating Their Emergency Operations Plans**

**SCHOOL COMMUNITY MEMBERS**



Source: GAO analysis of school district survey. | GAO-16-144

Note: Error bars display 95 percent confidence intervals for estimates.

Our prior work has shown similar levels of involvement with one notable difference: engagement of school resource officers, who are sworn law enforcement officers working in a school setting, increased from 42

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percent in 2007 to 89 percent in 2015.<sup>44</sup> Our district survey also found that an estimated 92 percent of districts recently updated their plans. Further, we estimate that almost all of the districts that require schools to have plans also require schools to update and review those plans.

School and district officials at the sites we visited also noted that school personnel and first responders were involved in their plan development. Officials in all five districts we visited in three states told us they had staff committed to emergency management planning. Further, officials at 9 of the 12 schools we visited also said they had teams responsible for such planning, many of which met regularly and included a variety of members. Officials from two schools added that their parent-teacher associations are supportive of emergency preparedness efforts and have provided funding for emergency supplies.

These practices align with a recommendation in the Federal Guide, specifically, that school emergency management planning not be done in isolation.<sup>45</sup> The Federal Guide also notes that such collaboration makes more resources available and helps ensure the seamless integration of all responders. Relatedly, we found that an estimated 68 percent of districts incorporated their district plans into the broader community's emergency management system. For example, officials from one district we visited said their school district is a part of the city's emergency operations plan and has responsibility for providing shelter during emergencies.

As part of developing and updating an emergency operations plan, the Federal Guide recommends that districts and schools assess the risks posed to them by specific threats and hazards. Based on our survey data, we estimate that more than three-quarters of districts recently conducted such assessments of their vulnerabilities (see fig. 9).<sup>46</sup>

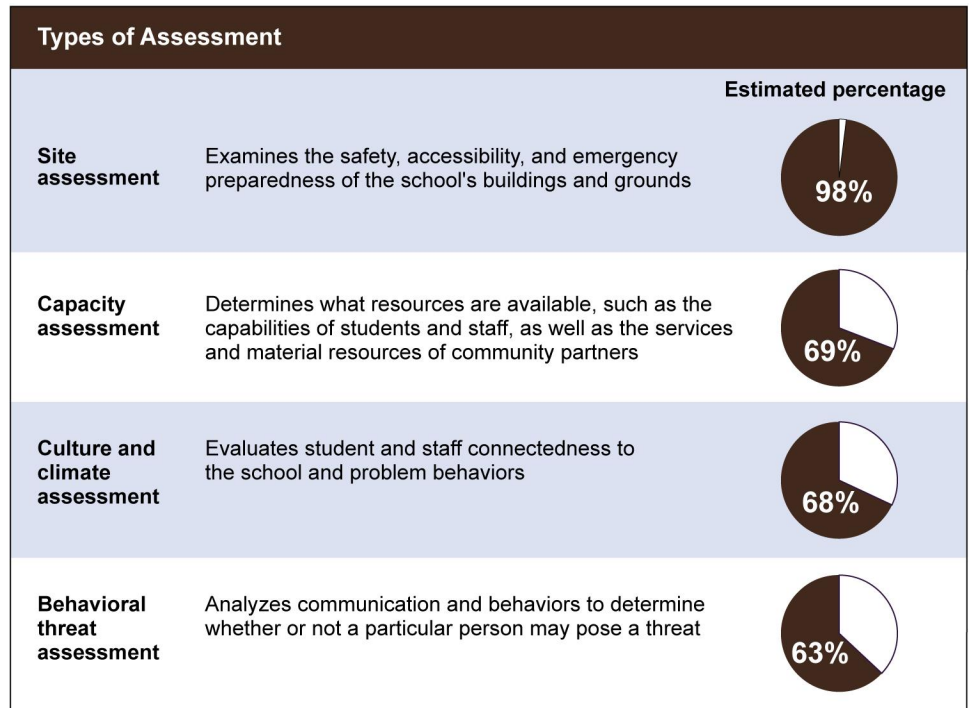
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<sup>44</sup>[GAO-07-609](#).

<sup>45</sup>Compliance with the Federal Guide is not required. Further, while designed for school use, it specifically notes that school districts may also find the information useful.

<sup>46</sup>For this and many other survey questions, districts were directed to consider both the district and its schools when answering. Statements should generally be interpreted as such, unless otherwise noted.

**Figure 9: Estimated Percentage of School Districts That Conducted Specific Types of Safety Assessments in School Years 2013-14 or 2014-15**



Source: GAO analysis of school district survey. | GAO-16-144

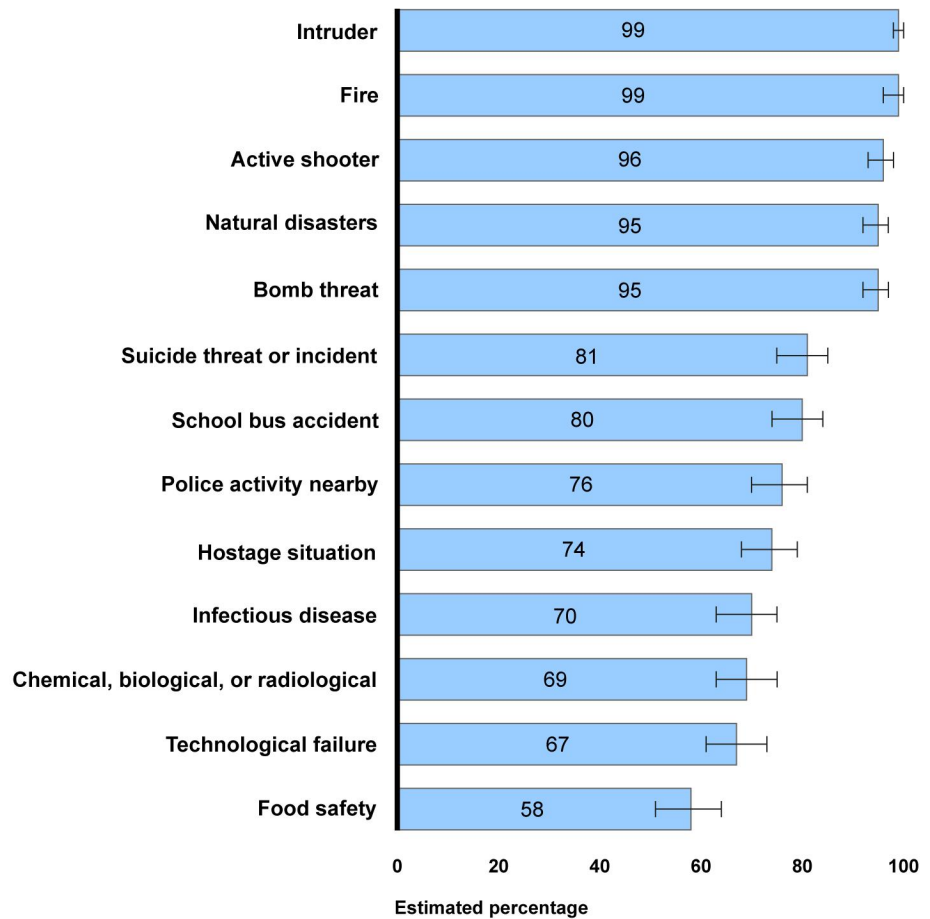
Note: These estimates have 95 percent confidence intervals of within +/- 7.25 percentage points. They are based on approximately 80 percent of districts that reported they or their schools conducted an assessment.

For example, officials from one district told us that they conduct an annual safety assessment of each school. In doing so, they assess physical and access control, such as fences and locks. Officials from another district said assessments led to security enhancements, such as adding fences to sports fields, panic buttons that connect office staff to emergency officials, and software to run instant background checks.

**Most Districts Reported Having Emergency Operations Plans That Address Threats and Hazards, While Half Did Not Include Certain Recovery Procedures**

Our district survey found that most school districts had emergency operations plans that address multiple threats and hazards, such as intruders, fires, active shooters, natural disasters, and bomb threats (see fig. 10). We also observed during visits to schools that a school’s particular circumstances, such as location, affect the threats and hazards they face. For example, officials from one school said their plan includes not only common threats and hazards, such as fires, but also those associated with facilities nearby, including an airport and chemical plant.

**Figure 10: Estimated Percentage of School Districts with Emergency Operations Plans That Addressed Specific Threats or Hazards**



Source: GAO analysis of school district survey. | GAO-16-144

Note: Error bars display 95 percent confidence intervals for estimates. These district survey responses reflect the content of either district or school plans.

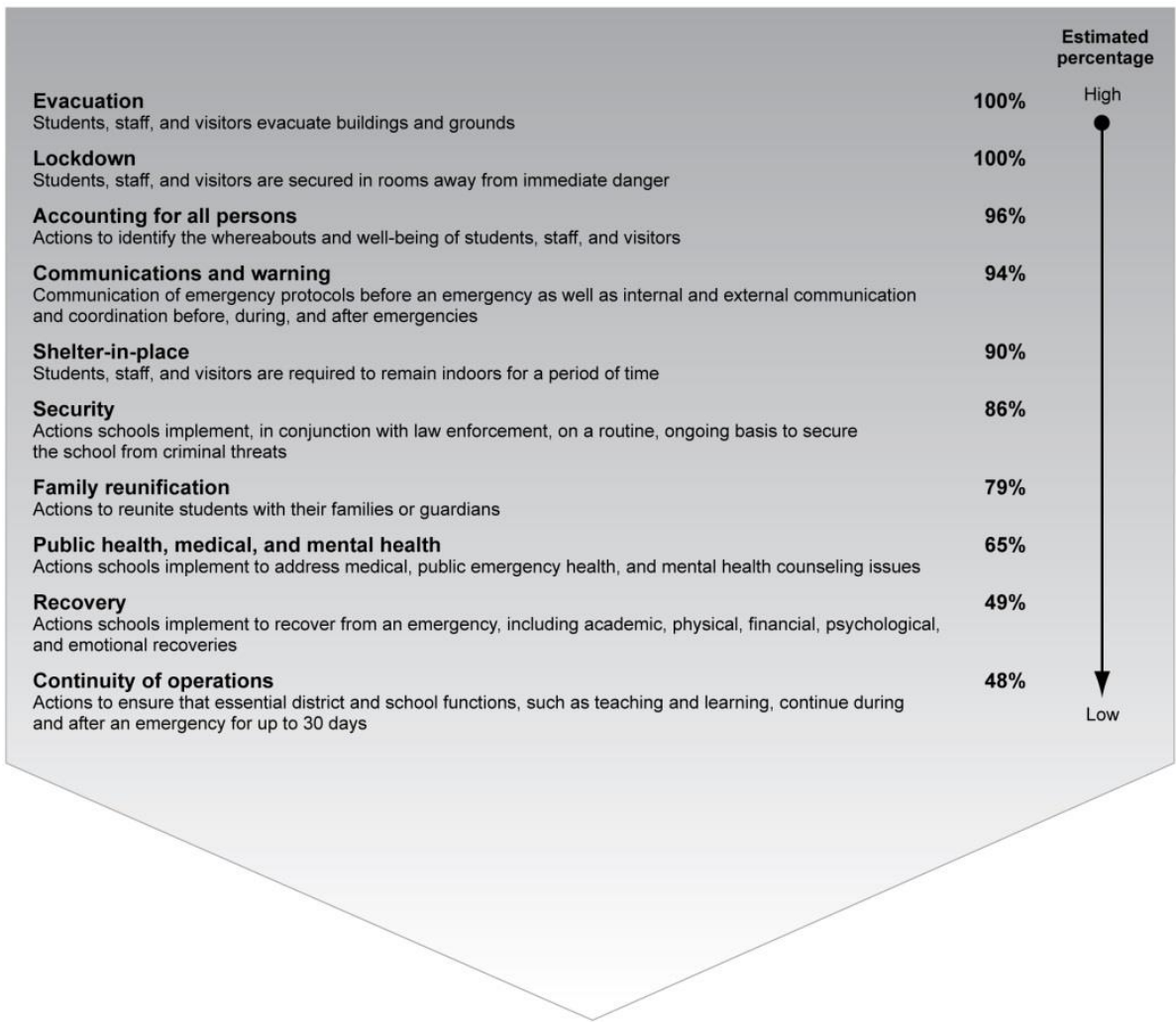
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According to our survey, districts generally had plans that address most of the emergency response procedures recommended in the Federal Guide, such as evacuation and shelter-in-place (see fig. 11).<sup>47</sup> For example, we estimate that almost all districts had procedures in place for evacuation, lockdown, and communication and warning. To illustrate, officials from five schools we visited said they use an automated messaging system to notify parents of an emergency.

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<sup>47</sup>The Federal Guide describes 10 procedures as some of the most important, but notes that others may be needed depending on the circumstances. While each function may be described separately in a plan, two or more may occur consecutively or concurrently during an emergency response. For example, during an evacuation, after everyone has exited the building, staff may begin to account for the whereabouts of all students and staff, while simultaneously providing necessary medical care.

**Figure 11: Estimated Percentage of School Districts with Emergency Operations Plans That Addressed Specific Procedures**



Source: GAO analysis of school district survey. | GAO-16-144

Note: All percentage estimates have 95 percent confidence intervals of within +/- 7 percentage points, but some estimates have an even smaller range. For example, the estimates for Evacuation and Lockdown vary less than +/-1 percentage point, making their range 99 to 100 percent. These two estimates differ from all other estimates in a statistically significant way because there is no overlap of confidence intervals. Also these district survey responses reflect procedures in either district or school plans.

In contrast, our district survey estimates that about half of districts specified how they would maintain continuous operations or recover after an incident. For example, officials we interviewed from one school said that while their plan does not comprehensively address how they would



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maintain continuous operations after an incident, it does specify some aspects: if the school needed to close for an extended period, lessons could continue via a web portal. It is not readily apparent why fewer districts included these types of procedures in their plans.<sup>48</sup> Education's REMS TA Center offers several resources on these topics such as an online course for developing continuity of operations procedures, among others.

The Federal Guide recommends that emergency operations plans provide for the access and functional needs of the whole school community, including persons with disabilities and people with limited English proficiency, among others. As previously noted, our district survey found that an estimated 69 percent of districts had plans with procedures supporting persons with disabilities. An additional 22 percent of districts also had such procedures outside of their plans. We also learned about such procedures in some of the schools we visited. For example, officials from one school said that they used specially colored markers on the walls to guide a visually impaired student toward the exit. Officials from another school told us that during fire drills students who are highly reactive to loud noises such as a fire alarm are proactively given noise-reducing headphones. As noted earlier, our district survey estimated that 45 percent of districts had plans that address procedures for communicating with students or parents who are limited English proficient. An additional 26 percent of districts also reported having such procedures outside of their plans. Our visits to schools revealed specific examples. Officials from one school said teachers of students with limited English proficiency walk through each step of a drill to ensure these students understand. Regarding communication with parents who are limited English proficient, officials from one school said they have a contract with a language translation service to connect a school administrator, translator, and parent via conference call, when necessary.

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### Most Districts Conducted Emergency Exercises and Many Did So Regularly with First Responders

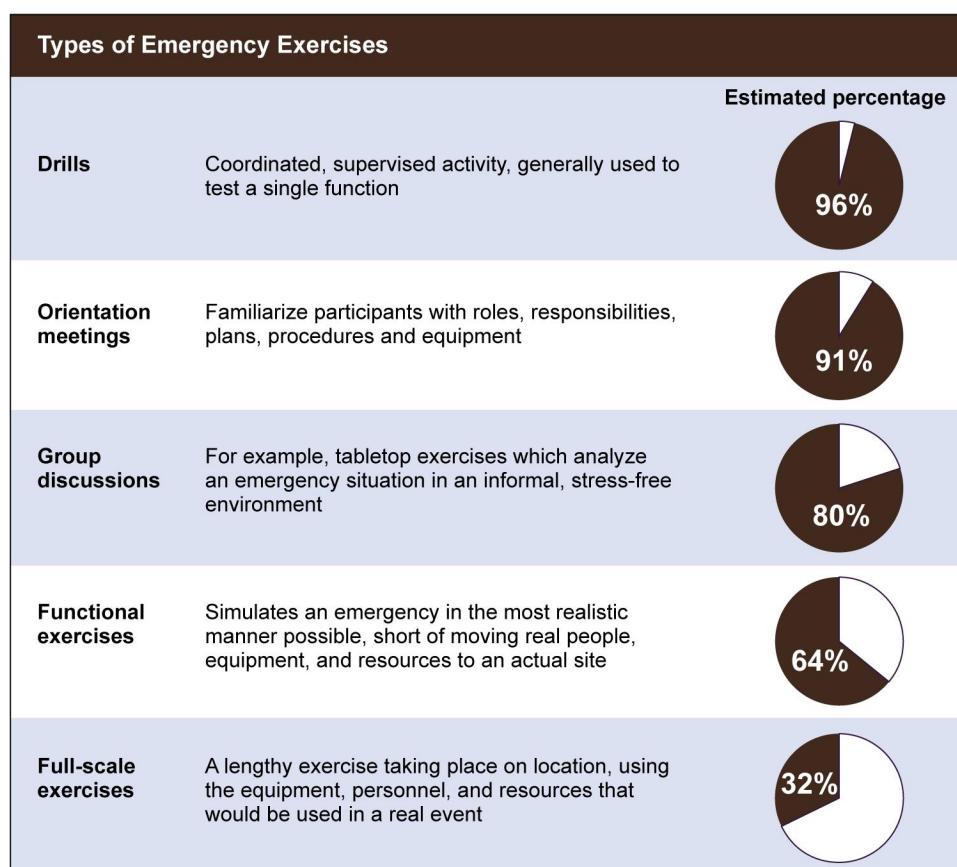
Our survey estimated that most school districts recently completed a variety of emergency exercises, such as drills and group discussions, and many did so regularly with first responders (see fig. 12). According to the survey, almost all districts conducted drills. Officials from four schools we visited said they explain drill procedures to students in an age-appropriate

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<sup>48</sup> Our district survey did not ask about why some plans did not include procedures for continuity of operations or recovery after an incident.

way, a practice recommended by the Federal Guide. For example, officials at one school we visited said that during a lockdown drill kindergarten teachers tell their students that a wild animal may be loose in the building.

**Figure 12: Estimated Percentage of School Districts That Conducted Emergency Exercises in School Years 2012-13, 2013-14, and/or 2014-15**



Source: GAO analysis of school district survey. | GAO-16-144

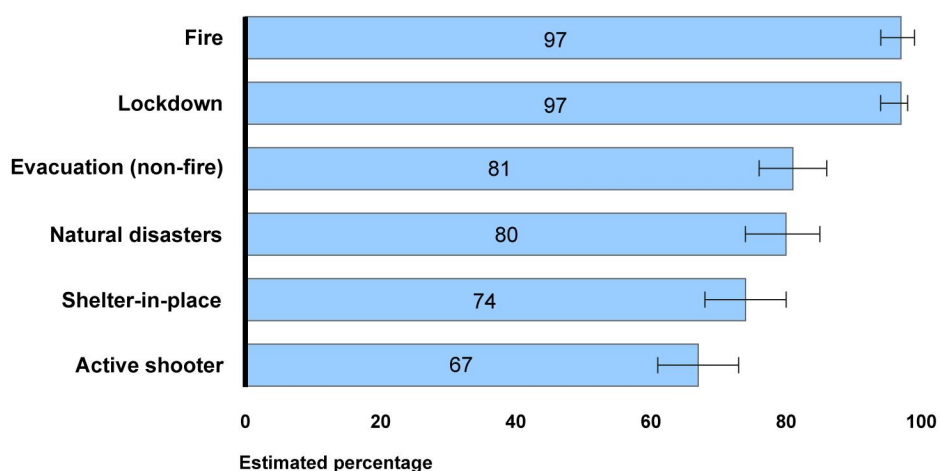
Note: All estimates have 95 percent confidence intervals of within +/- 7 percentage points. All differences are statistically significant except the difference between the estimates for orientation meetings and drills. Also these survey responses reflect exercises conducted by either districts or schools.

In contrast, our survey estimated that fewer districts completed functional and full-scale exercises, which require a significant amount of planning, time, and resources. For example, officials from one school district told us they participated in a city-wide functional exercise that involved various community partners, such as the public health department. They said the

8-hour session helped participants better understand their roles during an emergency, for example, the responsibilities of school principals.

Districts that conducted drills, functional exercises, or full-scale exercises did so for specific threats or for certain procedures. For example, our survey found that almost all performed such exercises for fires and lockdowns (see fig. 13). This aligns with our state survey findings that many states reported requiring districts or schools to conduct such exercises.<sup>49</sup>

**Figure 13: Estimated Percentage of School Districts That Performed Certain Exercises, by Purpose**



Source: GAO analysis of school district survey. | GAO-16-144

Note: Error bars display 95 percent confidence intervals for estimates. Responses include approximately 96 percent of districts that conducted drills, functional exercises, or full-scale exercises, which may have been performed by either districts or their schools.

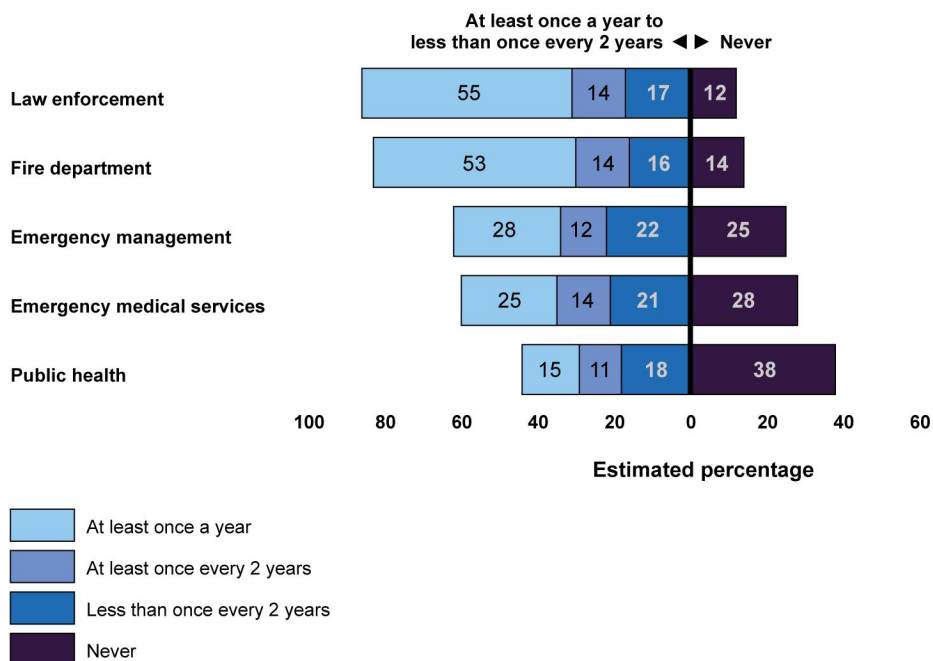
Our survey also found that fewer districts—an estimated 67 percent—conducted active shooter exercises. In the districts we visited, we heard about some reasons for this. Officials from two districts said these exercises can create anxiety within the school community, including among parents. Officials from one of these districts noted the difficulty of

<sup>49</sup> As previously mentioned, our state survey found that 43 states required schools and 35 states required districts to conduct fire-related exercises; it also found that 24 states required schools and 20 states required districts to conduct lockdown exercises.

striking a balance between providing knowledge and inciting fear, particularly at schools with younger children.

Based on our survey, we estimated that about half of districts practiced their emergency exercises annually with law enforcement and fire department officials (see fig. 14). Similar to the benefits cited in developing plans with community involvement, officials from two schools we visited told us that firefighters and police officers observe and provide feedback on their drills. Officials from one school cited the advantages of such interactions as strengthening community relationships as well as providing first responders with helpful information in advance of an emergency, such as a school’s layout. However, our survey estimated that about a quarter of districts reported having never practiced with emergency medical services or emergency management officials, and about a third never practiced with public health officials.

**Figure 14: Estimated Percentage of School Districts That Practiced Emergency Exercises with Community Partners, by Frequency and Partner**



Source: GAO analysis of school district survey. | GAO-16-144

Note: All estimates have 95 percent confidence intervals of within +/- 7 percentage points. Survey responses reflect frequency of practice with either districts or their schools and may not add to 100 percent given the additional response option of "don't know."

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Following such exercises, the Federal Guide recommends that officials gather to evaluate how the process went, identify shortfalls, and document lessons learned. We found examples of this at the schools we visited. For example, officials from 7 of the 12 schools we visited said that they debrief after drills to determine what lessons could be learned. During our interviews with schools, we learned of such improvements. For example, officials at one school realized teachers could not lock their classroom doors without stepping into the hallway, potentially placing them in harm's way. Officials remedied the problem by placing a magnet over the door's locking mechanism which can be quickly removed to lock the door in an emergency. Another school discovered that all teachers need two-way radios during drills for effective communication.

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### Majority of Districts Reported Difficulty Balancing Emergency Management Planning with Other School Priorities

Based on our survey, an estimated 59 percent of districts reported difficulty balancing emergency management planning with higher priorities, such as instructional time. The survey also estimated that about half of districts reported that these competing priorities made it difficult to coordinate with community partners and organizations.<sup>50</sup> Relatedly, it also estimated that more than half of districts felt that they did not conduct enough training because of limited time. Our visits to states and schools revealed similar challenges. Officials from one state told us that district and school staff had inadequate time for emergency management planning. Similarly, officials from 6 of the 12 schools we visited reported difficulty finding sufficient time to plan for emergencies, train staff, or conduct drills, with several noting that such activities competed with other school priorities. Officials from one school suggested additional professional staff days were needed, but said that negotiating such days can be difficult.

According to our survey, an estimated 49 percent of districts cited a lack of staff expertise and an estimated 42 percent of districts reported insufficient equipment as impediments to emergency management planning. For example, officials from one state we visited said that teachers are not trained in emergency management, such as on how to conduct table top exercises. In addition, officials from several districts and schools said obstacles to emergency preparedness can include schools' physical aspects. For example, officials from one district said that schools

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<sup>50</sup>Few districts reported challenges stemming from a lack of partnerships with first responders and community organizations, an estimated 10 and 17 percent, respectively.

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with portable classrooms cannot use their intercom system to announce emergency drills, but rather must connect to those classrooms using a phone line.

Further, officials from two of the three states we visited and from Education said districts and schools have limited resources for emergency management planning. As mentioned previously, our state survey found that few states reported providing funding to help districts develop or implement their plans. Federal Education officials echoed a similar opinion stating that in an environment of constrained resources, districts and schools tend to focus almost exclusively on response activities, as opposed to the other four preparedness areas (prevention, protection, mitigation, and recovery). They suggested that this could have serious implications for schools and districts. For example, they said some districts and schools do not conduct thorough assessments of their risks and vulnerabilities and some school plans are not adequately customized because they are overly reliant on district-provided plan templates.

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## Conclusions

Confronting the range of threats and hazards to the nation's 50 million public school students necessitates careful and comprehensive emergency management planning by school districts and schools. We were encouraged to note that nearly all districts reported having emergency operations plans and, as recommended in the 2013 Federal Guide for school emergency planning, involve a range of school personnel and community partners in developing and updating them, recognizing the critical importance of collaborating with stakeholders both within and outside the school community.

However, a majority of districts confront competing priorities with limited resources, which could hamper emergency management planning efforts, thus reinforcing the value of state and federal support. Education and other federal agencies individually offer a breadth of resources that districts and schools can use in their emergency planning. Although individual agencies continue to work on a range of emergency preparedness issues, and, in some cases, have continued to collaborate with other agencies in doing so, current collaboration efforts are insufficient to comprehensively address the complex and unique needs of schools. For example, an existing federal interagency group on active shooters was not created to address the range of threats and hazards schools face, nor to be specific to schools' needs, which, given the presence of young children, can differ significantly from those of other

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institutions. Moreover, in the absence of a well-coordinated federal strategy for school emergency preparedness planning, federal agencies' piecemeal approaches to school emergency management planning contribute to the gaps we identified in timely, continued, and most importantly, strategic coordination, and risk wasting limited federal resources on efforts that may be overlapping, duplicative, or fragmented.

To help protect students entrusted to public schools from natural and man-made threats and hazards, it remains critical for federal agencies to address key considerations shown to improve the likelihood of success for interagency collaboration on a well-coordinated federal strategy. The Department of Education stated that it has the general authority to collaborate with other federal agencies to maximize the efficiency and effectiveness of its programs, and to serve as the lead agency in such collaborations where warranted and agreed upon. Absent agreement on a strategy consistent with leading collaboration practices, which include (1) identifying leadership for the effort; (2) defining and agreeing to common outcomes, and assigning accountability for these collaborative efforts; (3) identifying all relevant participants; and (4) identifying necessary resources; federal agencies may, over time, lose momentum and undermine the progress that has already been made, and risk providing support that is less effective than it otherwise could be.

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## Recommendation for Executive Action

Using its general authority to collaborate with other federal agencies, we recommend that the Secretary of Education convene its federal interagency partners to develop a strategic approach to interagency collaboration on school emergency preparedness. This group could include designees or delegates from the Secretaries of DHS, HHS, and the Attorney General, including representatives from relevant agency components, such as FEMA, TSA, and the FBI, and others as appropriate, and should incorporate leading federal interagency collaboration practices, for example, by:

- identifying leadership,
- defining outcomes and assigning accountability,
- including all relevant participants, and
- identifying necessary resources.

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## Agency Comments and Our Evaluation

We provided a draft of this report to the Departments of Education (Education), Health and Human Services (HHS), Homeland Security (DHS), and Justice (Justice) for review and comment. Education provided

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written comments that are reproduced in appendix II. Education, DHS, and Justice also provided technical comments, which we incorporated as appropriate. HHS did not provide comments.

In written comments, Education stated that it shares the view outlined in the report that improved federal coordination will better assist K-12 schools in preparing for emergencies, and noted that other federal agencies, including especially FEMA, play a significant role in school emergency preparedness. Additionally, Education cited the importance of involving other relevant agencies in obtaining agreement on the assignment of roles and responsibilities, including selecting a lead agency charged with primary responsibility for coordinating federal emergency preparedness assistance to K-12 schools. Given the roles of other agencies, Education encouraged us to modify the recommendation that was included in the draft that was provided to agencies for comment. Specifically, in that draft we recommended that Education convene and lead an interagency collaborative group on school emergency planning, consistent with leading practices.

In light of Education's response, which we agree is consistent with leading practices on federal interagency collaboration that, among other things, include identifying leadership for the collaborative mechanism and all relevant participants, we modified the recommendation and report accordingly. We believe that doing so will help increase the likelihood of achieving a well-coordinated federal strategy in which all relevant federal partners are identified, included, and invested—helping, ultimately, to reduce the risk of wasting limited federal resources on efforts that may be overlapping, duplicative, or fragmented.

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As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the Secretaries of Education, Health and Human Services, and Homeland Security, the Attorney General, and other interested parties. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

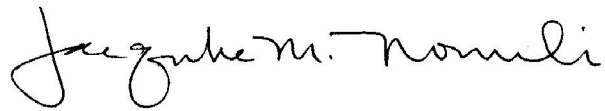
If you or your staffs should have any questions about this report, please contact me at (202) 512-7215 or [nowickij@gao.gov](mailto:nowickij@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



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Jacqueline M. Nowicki  
Director, Education, Workforce,  
and Income Security Issues

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# Appendix I: Objectives, Scope, and Methodology

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This report addressed the following questions: (1) how do federal agencies support school emergency management planning and to what extent do they coordinate their efforts; (2) to what extent do states require and support efforts to plan for school emergencies; and (3) what have school districts done to plan and prepare for emergencies and what challenges, if any, have they faced?

In addressing these objectives, we conducted interviews with officials from the Departments of Education, Homeland Security, Health and Human Services, and Justice and with staff at the Office of Management and Budget; and reviewed relevant federal documents, such as the *Guide for Developing High-Quality School Emergency Operations Plans*. We also reviewed leading practices on interagency collaboration to assess the collaborative efforts of these agencies.<sup>1</sup> We also deployed three web-based surveys: one to state educational agencies, another to state administrative agencies, and a third to a stratified random sample of school districts.<sup>2</sup> We also conducted site visits during which we interviewed state, district, and school officials in three states.

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## Surveys of States and Districts

To better understand the role of states in how school districts and schools prepare for emergencies, we administered two web-based surveys—one to state educational agencies and a separate one to state administrative agencies—to all 50 states and the District of Columbia.<sup>3</sup> We asked state educational agencies about their requirements of and recommendations for districts and schools regarding emergency management planning, among other things. We asked state administrative agencies about receipt and distribution of certain federal funds to districts or schools for emergency management planning activities. We administered these surveys from April through July 2015. For both surveys, all 51 state agencies responded, resulting in response rates of 100 percent.

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<sup>1</sup>GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, [GAO-14-220](#) (Washington, D.C.: Feb. 14, 2014) and *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012).

<sup>2</sup>In this report, we use the term school districts or districts to refer to local educational agencies.

<sup>3</sup>State administrative agencies are the state agencies to which the Department of Homeland Security disburses emergency preparedness funding.

To better understand how districts and schools plan and prepare for emergencies, we also administered a third web-based survey. We obtained data from Education’s National Center for Education Statistics, which maintains the Common Core of Data for public school districts, for the 2012-13 school year, which was the most recent data available. We originally selected a stratified random sample of 598 from a population of 16,284 school districts, with strata based on size and urban status, but ultimately excluded 25 districts from our original population and sample because they had closed, operated exclusively online, were located in a juvenile detention center, or had fewer than 5 students, and thus were not considered eligible for our survey. <sup>4</sup> This resulted in a sample of 573 from the eligible population of 16,259 districts (see table 3).

**Table 3: Description of the Eligible Population, Sample, and Respondents for the District Survey**

Stratum	Population/universe	Sample	Respondents
100 largest districts	100	100	95
City	2,430	147	88
Suburban	3,662	160	108
Rural	10,067	166	112
<b>Total</b>	<b>16,259</b>	<b>573</b>	<b>403</b>

Source: GAO analysis of school district survey. | GAO-16-144

We administered this survey to districts from April through July 2015 and 403 districts, or 70 percent of our sample, responded to the survey.<sup>5</sup>

Because we followed a probability procedure based on random selections, our sample is only one of a large number of samples that we might have drawn.

Since each sample could have provided different estimates, we expressed our confidence in the precision of our particular sample’s

<sup>4</sup>We arrived at our target population of 16,284 by eliminating certain types of school districts such as: local districts that are not a component of a supervisory union, state-operated institutions charged, at least in part, with providing elementary and/or secondary instruction or services to a special-need population; federally operated institutions charged, at least in part, with providing elementary and/or secondary instruction or services to a special-need population, districts with fewer than one student or one school, agencies run by the Department of Defense or Bureau of Indian Affairs, and districts in U.S. territories. Also because of the unique management and reporting structure for the New York City districts, we collapsed these into a single district.

<sup>5</sup>The weighted response rate for our district survey is 67 percent.

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results as a 95 percent confidence interval (e.g., plus or minus 7 percentage points). This is the interval that would contain the actual population value for 95 percent of the samples we could have drawn. Unless otherwise noted, all percentage estimates in this report have confidence intervals within plus or minus 7 percentage points. For other estimates, the confidence intervals are presented along with the estimates themselves. In the survey, we asked questions about the emergency operations plans of districts and their schools, such as about plan development and implementation, plan content, training and resources, and challenges to emergency management planning.

The quality of both the state and district survey data can be affected by nonsampling error, which includes, for example, variations in how respondents interpret questions, respondents' willingness to offer accurate responses, nonresponse error (failing to collect data on members of the sample or answers to individual questions from respondents), and data collection and processing errors. To minimize such error, we included the following steps in developing the survey and in collecting and analyzing survey data. We pre-tested draft versions of the instrument with state educational agency officials in four states, state administrative agency officials in two states, and officials in four districts to check the clarity of the questions and the flow and layout of the survey. On the basis of the pretests, we made revisions to all three surveys. Further, using a web-based survey and allowing state and district officials to enter their responses into an electronic instrument created an automatic record for each state and district and eliminated the errors associated with a manual data entry process. To increase response rates, we sent e-mails and placed phone calls to recipients of all three surveys. We conducted a nonresponse bias analysis to assess the potential difference in answers between those school districts that did participate in the survey and those that did not. We determined components of the sampling strata and school district size to be significantly associated with the propensity to respond. We adjusted the sampling weights for these characteristics using standard weighting class adjustments to compensate for possible nonresponse errors and treat the respondent analyses using the nonresponse adjusted weights as unbiased for the population of eligible school districts. In addition, the programs used to analyze the survey data were independently verified to ensure the accuracy of this work.

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## Site Visits

To understand emergency management planning at the local level, we conducted site visits in three states from February to May 2015. The states we visited included Massachusetts, Texas, and Washington. We

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selected states that represent geographic diversity and varied across characteristics, such as type of federal funding for emergency preparedness and whether there was a state school safety center, which provides training and guidance to enhance school safety and security. In each state, we interviewed state education officials, including staff from state school safety centers, if applicable. Within these states, we also interviewed officials from five school districts, which were selected to reflect a mix of urban, suburban, and rural areas. In each district, we interviewed officials from at least two schools of varying student ages. In one state, we also interviewed officials from a charter school that was independent of these five districts and received federal funding for school emergency preparedness. In total, we interviewed officials from 12 schools. Information obtained during these interviews is not generalizable, but provides insight into school emergency management planning at the state, district, and school level.

We conducted this performance audit from October 2014 to March 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

# Appendix II: Comments from the Department of Education



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

WASHINGTON, D.C. 20202

THE ASSISTANT SECRETARY

FEB 19 2016

Ms. Jacqueline M. Nowicki  
Director  
Education, Workforce, and Income Security Issues  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Nowicki:

I am writing in response to the recommendation made in the U.S. Government Accountability Office (GAO) draft report, "Emergency Management: Improved Federal Coordination Could Better Assist K-12 Schools Prepare for Emergencies" (GAO-16-144). I appreciate the opportunity to comment on the draft report on behalf of the U.S. Department of Education (Department).

We appreciate GAO's review of how Federal agencies address K-12 emergency planning and the efforts of state educational agencies to assist school districts in their emergency planning activities. The report acknowledged some of the successful work Federal agencies and interagency groups have done in this area. The report has offered a recommendation, and we provide our response to the recommendation below:

**Recommendation:** *Using its general authority to collaborate with other federal agencies, we recommend that the Secretary of Education convene and lead an interagency collaborative group on school emergency planning, consistent with leading practices, which include:*

- *defining outcomes and assigning accountability,*
- *including all relevant participants, and*
- *identifying necessary resources.*

**Response:** We are always interested in improving coordination across all levels of government, and we share the view outlined in the report that improved Federal coordination will better assist K-12 schools in preparing for emergencies.

We note that other Federal agencies, particularly the Department of Homeland Security and within it the Federal Emergency Management Agency, address school emergency preparedness as one of many domains within their portfolios. As you note in your draft report, the Homeland Security Grant Program awarded more than \$989 million in FY 2015 to states and territories for emergency preparedness activities, including for districts and schools to develop emergency operations plans or conduct related training and exercises. In view of this significant role for other agencies in emergency preparedness, we would encourage GAO to modify its report to recommend improved collaboration

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*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

among the four main agencies involved, including the selection of a lead agency charged with primary responsibility for coordinating Federal emergency preparedness assistance to K-12 schools. Such an approach would allow the agencies involved to agree on the assignment of roles and responsibilities best suited for implementing GAO's recommendation.

We appreciate the opportunity to review the draft report and comment on the recommendation. I am enclosing a document with technical comments.

Sincerely,



Ann Whalen  
Senior Advisor to the Secretary Delegated  
the Duties of Assistant Secretary for the  
Office of Elementary and Secondary Education

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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

Jacqueline M. Nowicki, (202) 512-7215 or [nowickij@gao.gov](mailto:nowickij@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Kathryn Larin and Janet Mascia (Assistant Directors), Avani Locke (Analyst-in-Charge), Teresa Heger, Kathryn O'Dea Lamas, Sheila McCoy, Jean McSween, and James Rebbe made significant contributions to this report. Also contributing to this report were Susan Aschoff, Deborah Bland, Christopher Currie, Christopher Keisling, Ruben Montes de Oca, Mimi Nguyen, Erin O'Brien, William Reinsberg, Paul Schearf, Salvatore Sorbello, Sonya Vartivarian, and Sarah Veale.



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# Appendix IV: Accessible Data

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## Agency Comment Letter

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### Text of Appendix II: Comments from the Department of Education

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UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION  
WASHINGTON, D.C. 20202

THE ASSISTANT SECRETARY

FEB 19 2016

Ms. Jacqueline M. Nowicki

Director

Education, Workforce, and Income Security Issues

U.S. Government Accountability Office

441 G Street, NW

Washington, DC 20548

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Recommendation: Using its general authority to collaborate with other federal agencies, we recommend that the Secretary of Education convene and lead an interagency collaborative group on school emergency planning, consistent with leading practices, which include:

- defining outcomes and assigning accountability,
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Response: We are always interested in improving coordination across all levels of government, and we share the view outlined in the report that improved Federal coordination will better assist K-12 schools in preparing for emergencies.

We note that other Federal agencies, particularly the Department of Homeland Security and within it the Federal Emergency Management Agency, address school emergency preparedness as one of many domains within their portfolios. As you note in your draft report, the Homeland Security Grant Program awarded more than \$989 million in FY 2015 to states and territories for emergency preparedness activities, including for districts and schools to develop emergency operations plans or conduct related training and exercises. In view of this significant role for other agencies in emergency preparedness, we would encourage GAO to modify its report to recommend improved collaboration

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Page 2

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We appreciate the opportunity to review the draft report and comment on the recommendation. I am enclosing a document with technical comments.

Sincerely,

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Ann Whalen

Senior Advisor to the Secretary Delegated the Duties of Assistant Secretary for the Office of Elementary and Secondary Education

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## Data Tables/Accessible Text

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### Accessible Text for Figure 1: National Preparedness Goal's Five Emergency Preparedness Mission Areas

Preparedness Mission Areas				
Protection	Mitigation	Response	Recovery	Prevention
The capabilities to safeguard the United States against acts of terrorism and man-made or natural disasters.	The capabilities necessary to reduce loss of life and property by lessening the impact of disasters.	The capabilities necessary to save lives, protect property and the environment, and meet basic human needs after an incident has occurred.	The capabilities necessary to assist communities affected by an incident in recovering effectively.	The capabilities necessary to avoid, prevent, or stop a threatened or actual act of terrorism.

Source: GAO analysis based on National Preparedness Goal, U.S. Department of Homeland Security. | GAO-16-144

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### Accessible Text for Figure 2: Timeline of Recent Federal Initiatives on Emergency Management Planning

March 2011	September 2011	December 2012	January 2013
Presidential Policy Directive 8	National Preparedness Goal	Sandy Hook school shooting	Now is the Time

Source: GAO analysis of federal documents. | GAO-16-144

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### Accessible Text for Figure 3: Recommended Planning Process in the Federal Guide for Developing High-Quality School Emergency Operations Plans

Form a Collaborative Planning Team	Understand the Situation	Determine Goals and Objectives	Plan Development	Plan Preparation, Review, and Approval	Plan Implementation and Maintenance
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Form a Collaborative Planning Team	Understand the Situation	Determine Goals and Objectives	Plan Development	Plan Preparation, Review, and Approval	Plan Implementation and Maintenance
<ul style="list-style-type: none"> <li>Identify core planning team</li> <li>Form a common framework</li> <li>Define and assign roles and responsibilities</li> <li>Determine a regular schedule of meetings</li> </ul>	<ul style="list-style-type: none"> <li>Identify threats and hazards</li> <li>Form a common framework</li> <li>Assess risk</li> <li>Prioritize threats and hazards</li> </ul>	<ul style="list-style-type: none"> <li>Develop goals</li> <li>Assess risk</li> <li>Develop objectives</li> </ul>	<ul style="list-style-type: none"> <li>Identify courses of action</li> </ul>	<ul style="list-style-type: none"> <li>Format the plan</li> <li>Form a common framework</li> <li>Write the plan</li> <li>Review the plan</li> <li>Approve and share the plan</li> </ul>	<ul style="list-style-type: none"> <li>Train stakeholders</li> <li>Exercise the plan</li> <li>Review, revise, and maintain the plan</li> </ul>

Source: Guide for Developing High-Quality School Emergency Operations Plans. | GAO-16-144

**Data Table for Figure 4: Estimated Percentage of School Districts That Used Federal Non-Financial Resources for Developing or Implementing an Emergency Operations Plan, School Years 2012-13, 2013-14, 2014-15**

Federal agency	Estimated percentage that used non-financial resources
Department of Homeland Security	28%
Department of Education	20%
Department of Health and Human Services	11%
Department of Justice	8%

Source: GAO analysis of school district survey. | GAO-16-144

**Accessible Text for Figure 5: State-Reported Requirements for School District and School Emergency Operations Plans**

States coded as green	Require both districts and schools to have plans (25 states, representing about 62% of K-12 students nationwide) AK, AR, CA, CO, CT, DE, FL, IN, MA, MN, MS, MT, NV, NM, NY, OH, OK, RI, SC, TN, TX, UT, VA, WA, WV
States coded as dark blue	Require only districts to have plans (7 states, representing about 13% of K-12 students nationwide) ID, ME, MD, NE, NJ, NC, PA
States coded as light blue	Require only schools to have plans (9 states, representing about 13% of K-12 students nationwide) AL, AZ, HI, IL, KY, LA, NH, VT, WI

States coded as green	Require both districts and schools to have plans (25 states, representing about 62% of K-12 students nationwide) AK, AR, CA, CO, CT, DE, FL, IN, MA, MN, MS, MT, NV, NM, NY, OH, OK, RI, SC, TN, TX, UT, VA, WA, WV
States coded as white	Require neither districts or schools to have plans (10 states, representing about 12% of K-12 students nationwide) DC, GA, IA, KS, MI, MO, ND, OR, SD, WY

Source: GAO analysis of state educational agencies survey; and Department of Education, Common Core Data, 2012-13 School Year. | GAO-16-144

**Accessible Text for Figure 6: State-Reported Requirements for Emergency Operations Plans to Address Specific Procedures**

Number of States with Requirements		
Requirements for districts	Category	Requirements for schools
26	Communications and warning	28
	Communication of emergency protocols before an emergency as well as internal and external communication and coordination before, during, and after emergencies	
25	Evacuation	28
	Students, staff, and visitors evacuate buildings and grounds	
24	Lockdown	29
	Students, staff, and visitors are secured in rooms away from immediate danger	
21	Accounting for all persons	24
	Actions to identify the whereabouts and well-being of students, staff, and visitors	
17	Shelter-in-place	22
	Students, staff, and visitors are required to remain indoors for a period of time	
17	Recovery	20
	Actions schools implement to recover from an emergency, including academic, physical, financial, psychological, and emotional recoveries	
13	Security	16
	Actions schools implement, in conjunction with law enforcement, on a routine, ongoing basis to secure the school from criminal threats	
12	Family reunification	14
	Actions to reunite students with their families or guardians	
11	Public health, medical, and mental health	13
	Actions schools implement to address medical, public emergency health, and mental health counseling issues	
9	Continuity of operations	10
	Actions to ensure that essential district and school functions, such as teaching and learning, continue during and after an emergency for up to 30 days	

Source: GAO analysis of state educational agencies survey. | GAO-16-144

**Data Table for Figure 7: State-Reported Requirements for District or School Emergency Drills and Exercises, by Purpose**

	Number of states require districts to conduct exercises of plans	Number of states require schools to conduct exercises of plans
Fire	35	43
Lockdown	20	24
Evacuation (non-fire)	17	21
Natural disasters	16	19
Shelter-in-place	10	14
Active shooter	9	12

Source: GAO analysis of state educational agencies survey. | GAO-16-144

**Data Table for Figure 8: Estimated Percentage of School Districts That Involved Specific Community Members in Developing or Updating Their Emergency Operations Plans**

	Category	Estimated percentage	Confidence intervals	
SCHOOL COMMUNITY MEMBERS	Principals	98	96	99
	Superintendents	94	90	96
	School resource officers	89	82	93
	Custodians	85	80	89
	Transportation officials	85	79	89
	Teachers	85	80	89
	Nurses	77	70	83
	Counselors	74	68	80
	Special education staff	69	63	75
	Parents	55	48	61
	Students	31	25	38
COMMUNITY PARTNERS	Law enforcement	92	88	94
	Fire department	86	82	90
	Emergency medical services	67	61	73
	Emergency management dept.	62	55	68
	Local head of government	38	31	45
	Public health agency	36	30	43

**Data Table for Figure 9: Estimated Percentage of School Districts That Conducted Specific Types of Safety Assessments in School Years 2013-14 or 2014-15**

<b>Types of Assessment</b>	<b>Description</b>	<b>Estimated percentage</b>
Site assessment	Examines the safety, accessibility, and emergency preparedness of the school's buildings and grounds	98%
Capacity assessment	Determines what resources are available, such as the capabilities of students and staff, as well as the services and material resources of community partners	69%
Culture and climate assessment	Evaluates student and staff connectedness to the school and problem behaviors	68%
Behavioral threat assessment	Analyzes communication and behaviors to determine whether or not a particular person may pose a threat	63%

Source: GAO analysis of school district survey. | GAO-16-144

**Data Table for Figure 10: Estimated Percentage of School Districts with Emergency Operations Plans That Addressed Specific Threats or Hazards**

	<b>Estimated percentage</b>	<b>Confidence intervals</b>	
Intruder	99	98	100
Fire	99	96	100
Active shooter	96	93	98
Natural disasters	95	92	97
Bomb threat	95	92	97
Suicide threat or incident	81	75	85
School bus accident	80	74	84
Police activity nearby	76	70	81
Hostage situation	74	68	79
Infectious disease	70	63	75
Chemical, biological, or radiological	69	63	75
Technological failure	67	61	73
Food safety	58	51	64

Source: GAO analysis of school district survey. | GAO-16-144

**Data Table for Figure 11: Estimated Percentage of School Districts with Emergency Operations Plans That Addressed Specific Procedures**

<b>Category</b>	<b>Estimated percentage High to low</b>
Evacuation Students, staff, and visitors evacuate buildings and grounds	100%

<b>Category</b>	<b>Estimated percentage High to low</b>
Lockdown Students, staff, and visitors are secured in rooms away from immediate danger	100%
Accounting for all persons Actions to identify the whereabouts and well-being of students, staff, and visitors	96%
Communications and warning Communication of emergency protocols before an emergency as well as internal and external communication and coordination before, during, and after emergencies	94%
Shelter-in-place Students, staff, and visitors are required to remain indoors for a period of time	90%
Security Actions schools implement, in conjunction with law enforcement, on a routine, ongoing basis to secure the school from criminal threats	86%
Family reunification Actions to reunite students with their families or guardians	79%
Public health, medical, and mental health Actions schools implement to address medical, public emergency health, and mental health counseling issues	65%
Recovery Actions schools implement to recover from an emergency, including academic, physical, financial, psychological, and emotional recoveries	49%
Continuity of operations Actions to ensure that essential district and school functions, such as teaching and learning, continue during and after an emergency for up to 30 days	48%

Source: GAO analysis of school district survey. | GAO-16-144

**Data Table for Figure 12: Estimated Percentage of School Districts That Conducted Emergency Exercises in School Years 2012-13, 2013-14, and/or 2014-15**

<b>Types of Emergency Exercises</b>	<b>Estimated percentage</b>
Drills Coordinated, supervised activity, generally used to test a single function	96%



Types of Emergency Exercises	Estimated percentage
Orientation meetings Familiarize participants with roles, responsibilities, plans, procedures and equipment	91%
Group discussions For example, tabletop exercises which analyze an emergency situation in an informal, stress-free environment	80%
Functional exercises Simulates an emergency in the most realistic manner possible, short of moving real people, equipment, and resources to an actual site	64%
Full-scale exercises A lengthy exercise taking place on location, using the equipment, personnel, and resources that would be used in a real event	32%

Source: GAO analysis of school district survey. | GAO-16-144

**Data Table for Figure 13: Estimated Percentage of School Districts That Performed Certain Exercises, by Purpose**

	Estimated percentage	Confidence intervals	
Fire	97	94	99
Lockdown	97	94	98
Evacuation (non-fire)	81	76	86
Natural disasters	80	74	85
Shelter-in-place	74	68	80
Active shooter	67	61	73

Source: GAO analysis of school district survey. | GAO-16-144

**Data Table for Figure 14: Estimated Percentage of School Districts That Practiced Emergency Exercises with Community Partners, by Frequency and Partner**

	At least once a year	At least once every 2 years	Less than once every 2 years	Never
Law enforcement	55%	14%	17%	12%
Fire department	53%	14%	16%	14%
Emergency management	28%	12%	22%	25%
Emergency medical services	25%	14%	21%	28%
Public health	15%	11%	18%	38%

Source: GAO analysis of school district survey. | GAO-16-144

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