

June 2007

EMERGENCY MANAGEMENT

Most School Districts
Have Developed
Emergency
Management Plans,
but Would Benefit
from Additional
Federal Guidance





Highlights of [GAO-07-609](#), a report to congressional requesters

Why GAO Did This Study

Congress has raised concerns over emergency management in school districts, with a particular interest in how federal agencies provide assistance to school districts. GAO was asked to assess (1) the roles of federal and state governments and school districts in establishing requirements and providing resources to school districts for emergency management planning, (2) what school districts have done to plan and prepare for emergencies, and (3) the challenges, if any, school districts have experienced in planning for emergencies, and communicating and coordinating with first responders, parents, and students. To obtain this information, GAO interviewed federal officials, surveyed a stratified random sample of all public school districts, surveyed state education agencies and state administering agencies, conducted site visits to school districts, and reviewed relevant documents.

What GAO Recommends

GAO is making several recommendations to DHS, Education, and HHS aimed at improving school district emergency management planning and preparation. Education and HHS generally agreed with GAO's recommendations. DHS generally agreed with the intent of GAO's recommendations.

www.gao.gov/cgi-bin/getrpt?GAO-07-609.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Cornelia Ashby at (202) 512-7215 or ashbyc@gao.gov or William O. Jenkins, Jr. at (202) 512-8757 or jenkinsw@gao.gov.

EMERGENCY MANAGEMENT

Most School Districts Have Developed Emergency Management Plans, but Would Benefit from Additional Federal Guidance

What GAO Found

Although there are no federal laws requiring all school districts to have emergency management plans, most states and school districts reported having requirements for such planning, and federal and state governments and school districts provide financial and other resources. Thirty-two states reported having laws or other policies requiring school districts to have emergency management plans. The Departments of Education (Education) and Homeland Security (DHS) and state governments as well as school districts provide funding for emergency management planning in schools. DHS awards grants to states and local jurisdictions that may provide some of these funds to school districts and schools for emergency management planning. However, DHS program guidance for certain grants does not clearly identify school districts as entities to which state and local governments may disburse grant funds. Thus, states receiving DHS funding may not be aware that such funding could be allocated to school districts or schools.

Most school districts have taken federally recommended steps to plan and prepare for emergencies, including the development of emergency management plans, but many plans do not include recommended practices. Based on GAO's survey of school districts, most school districts, those with and without plans, have undertaken a variety of recommended practices to prepare for emergencies such as conducting school drills and exercises. In addition, based on GAO's survey of school districts, an estimated 95 percent of all school districts have written emergency management plans, but the content varies. While most school districts have procedures in their plans for staff roles and responsibilities, for example, school districts have not widely employed such procedures as, academic instruction via local radio or television, for continuing student education in the event of an extended school closure, such as might occur during a pandemic. Likewise, while many districts have procedures for special needs students, GAO found during site visits that some of these procedures may not fully ensure the safety of these students in an emergency. Finally, while most school districts practice their emergency management plans annually within the school community, GAO estimates that over one-quarter of school districts have never trained with any first responders and over two-thirds of school districts do not regularly train with community partners on how to implement their school district emergency management plans.

Many school districts experience challenges in planning for emergencies, and some school districts face difficulties in communicating and coordinating with first responders and parents, but most do not have such challenges with students. Based on GAO's survey of school districts, in many school districts officials struggle to balance priorities related to educating students and other administrative responsibilities with activities for emergency management and consider a lack of equipment, training for staff, and personnel with expertise in the area of emergency planning as challenges. In an estimated 39 percent of school districts with emergency management plans, officials experienced a lack of partnerships, limited time or funding to plan, or lack of interoperability between equipment used by school districts and first responders. In interviews, about half of the officials in the 27 school districts GAO visited reported difficulty in ensuring that parents received consistent information from the district during an emergency.

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Abbreviations

CBSA	Core Based Statistical Area
CCD	Common Core Data
CDC	Centers for Disease Control and Prevention
CSA	Consolidated Statistical Area
DHS	Department of Homeland Security
Education	Department of Education
EMS	Emergency Medical Services
ERCM	Emergency Response and Crisis Management
FEMA	Federal Emergency Management Agency
HHS	Health and Human Services
ICS	Incident Command System
IDEA	Individuals with Disabilities Education Act
LEP	Limited-English Proficient
NIMS	National Incident Management System
NOAA	National Oceanic & Atmospheric Administration
SHSP	State Homeland Security Program
SRO	School Resource Officer
UASI	Urban Areas Security Initiative

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June 12, 2007

The Honorable Joseph Lieberman
Chairman
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Bennie Thompson
Chairman
Committee on Homeland Security
House of Representatives

The Honorable Bob Etheridge
The Honorable Sheila Jackson-Lee
House of Representatives

Maintaining the safety and security of the over 49 million students in the nation's more than 17,000 public school districts has been a focus of federal, state, and local government for years. Federal and state governments and school districts have generally focused on crime in and around schools and violence among students. However, school districts must be prepared for a range of emergencies within and outside of school buildings. Events such as the terrorist attacks of September 11, 2001, natural disasters such as Hurricanes Katrina and Rita in 2005, recent shootings by armed intruders in schools across the nation, and potential pandemics have heightened the awareness of the range of events for which schools should be prepared. In addition, environmental and other types of hazards can exist in areas near school districts. For example, school buildings can reside near nuclear plants, electric power plants, railways that transport hazardous materials, major airports, or major interstates.

“Emergency management” refers to the range of efforts involved in building the capacity to prevent, protect against, respond to, and recover from an incident. Planning for such incidents vary by the type and scale of the incident. The federal government’s role in emergency management is principally to support state and local activities and develop the federal capabilities to respond effectively when state and local governments require federal assistance. Some federal support comes in the form of guidance and recommendations. Because the federal government serves as a partner to all states, it is uniquely positioned to observe and evaluate the range of emergency management activities across states and local

governments, including school districts, and disseminate information on recommended practices and successful strategies. In addition, the federal government, largely through the Department of Homeland Security (DHS), provides billions of dollars each year in grants and other forms of assistance to help state and local emergency managers and first responders (such as law enforcement, fire departments, and emergency medical services). Other agencies such as the Departments of Education (Education) and Health and Human Services (HHS) also play a part in supporting state and local emergency management activities with regard to education and public health, respectively.

Emergency management for large-scale incidents generally requires partnerships among federal, state, and local governments, nongovernment organizations, and the private sector. For example, school districts may need the assistance of other organizations, including nongovernmental ones, in evacuating schools and finding shelter for students when an earthquake renders a school structurally unsafe.

The Congress has raised concerns about whether school districts are prepared to address a range of emergencies, particularly acts of terrorism, and how three federal agencies—DHS, Education, and HHS—provide assistance to school districts. In addition, the Congress has expressed an interest in getting a better understanding of whether school districts have emergency management plans that address the needs of students and parents who are classified as Limited-English Proficient (LEP), and students with special needs such as those with mental, physical, motor, developmental, or sensory impairments.

In response to your request to examine the state of emergency management in the nation's school districts, this report addresses the following questions: (1) What are the roles of federal and state governments and school districts in establishing requirements and providing resources to school districts for emergency management planning? (2) What have school districts done to plan and prepare for emergencies? (3) What challenges, if any, have school districts experienced in planning for emergencies and communicating and coordinating with first responders, parents, and students?

To obtain the information to address our research objectives, we conducted interviews, surveys, site visits to school districts, and reviews of relevant documents and laws identified through surveys and site visits. To determine the roles and requirements of federal and state governments and the types of resources provided to districts, we conducted interviews

with officials with Education, HHS, and DHS and reviewed relevant federal laws. We also administered two surveys, one to state education agencies and one to state administering agencies (the state agencies to which DHS disburses emergency management funding¹) in all 50 states and the District of Columbia. We received responses from 49 of 51 state education agencies and from 40 of 51 state administering agencies. In the survey to state administering agencies, we asked specifically about whether states or local governments provided school districts with federal funding from the State Homeland Security Program (SHSP), Urban Areas Security Initiative (UASI), and Citizen Corps grants.² To better understand how school districts plan and prepare for emergencies, we administered a mail survey to a stratified random sample of school districts in the 50 states and the District of Columbia. We used the Department of Education's locale coding system in the Common Core Data (CCD) to identify urban and rural school districts. Locale codes are based on the specific conditions of schools and refer to very small geographic areas and circumstances, such as population density and size. Although several criteria are used by Education to classify school districts including the percentage of students located in particular locale codes (assigned to individual schools), generally, urban districts are located within "large" (equal to or greater than 250,000 population) or "mid-sized" (less than 250,000 population) cities and rural districts are located in areas designated as rural by the Census Bureau. Appendix I includes a more detailed discussion of how urban and rural districts are defined in the CCD. We received 444 of the 554 surveys we mailed to school districts for a response rate of 80 percent, including responses from 24 of the 26 largest school districts in the country. Using a 95 percent confidence interval, all percentage estimates included in this report have a margin of error of plus or minus 10 percent or less, unless otherwise noted. We did not survey individual schools within school districts. To further understand the experiences districts have had in planning for emergencies and

¹For purposes of this report, we use the term "emergency management funding" to describe emergency preparedness funding DHS provides to states.

²Under its Homeland Security Grant Program, DHS provides a range of grants to states and local governments for emergency management. Based on our analysis and discussions with DHS officials, the State Homeland Security Program, Urban Areas Security Initiative, and Citizen Corps grants are the only grants for which states and local governments can disburse funds to school districts. The State Homeland Security Program provides funds to enhance the emergency preparedness of state and local governments. The Urban Areas Security Initiative grant is awarded to some states with high threat and high density urban areas that need planning, exercises, equipment, and training to respond to acts of terrorism. Citizen Corps funds are provided to states to promote volunteer efforts.

communicating and coordinating with first responders³, parents, and students, we visited selected districts in the states of Florida, Iowa, Massachusetts, North Carolina, Ohio, and Washington. We selected a geographically diverse group of states and school districts, some of which had been identified by national education associations as having implemented recommended practices in the area of emergency management, some that did and others that did not receive federal funding for emergency management, and we included both urban and rural districts. In total, we conducted semi-structured interviews, either in person or by telephone, with officials in 27 school districts. For more detailed information on our scope and methodology, see appendix I. Our work was conducted between April 2006 and April 2007 in accordance with generally accepted government auditing standards.

Results in Brief

Although there are no federal laws requiring all school districts to have emergency management plans, most states and school districts reported having requirements for such planning, and federal and state governments and school districts provide financial and other resources for such plans. Thirty-two states reported having laws or other policies requiring school districts to have emergency management plans. Based on our survey, we estimate that 85 percent of school districts have requirements for school emergency management planning. Education, DHS, and state governments as well as school districts provide funding for emergency management planning in schools. DHS awards grants to states and local jurisdictions that may provide some of these funds to school districts and schools for emergency management planning. However, DHS program guidance for the State Homeland Security Program, Urban Areas Security Initiative, and Citizen Corps grants does not clearly identify school districts as entities to

³In both our site visits and our survey of school districts, we focused on the traditional definition of first responders—law enforcement, fire, and EMS. However, the Homeland Security Act, as amended, includes a broader definition of emergency response providers, including “Federal, State, and local governmental and nongovernmental emergency public safety, fire, law enforcement, emergency response, emergency medical (including hospital emergency facilities), and related personnel, agencies, and authorities.” Homeland Security Act of 2002, Pub. L. No. 107-296, § 2, (codified at 6 U.S.C. § 101(6)). Homeland Security Presidential Directive 8 defined the term “first responder” as “individuals who in the early stages of an incident are responsible for the protection and preservation of life, property, evidence, and the environment, including emergency response providers as defined in section 2 of the Homeland Security Act of 2002, as well as emergency management, public health, clinical care, public works, and other skilled support personnel (such as equipment operators) that provide immediate support services during prevention, response, and recovery operations.”

which state and local governments may disburse grant funds; therefore, some states receiving DHS funding may be uncertain as to whether such funding can be allocated to school districts or schools. As a result, school districts in these states may not have the opportunity to benefit from this funding. Federal and state governments and school districts also assist school districts and schools in emergency management planning by providing other resources such as guidance, training, and equipment. However, in some instances, federal guidance does not include detailed information on how school districts can implement recommended practices.

Most school districts have taken federally recommended steps to plan and prepare for emergencies including the development of emergency management plans; while the content of plans vary, many do not include recommended practices. Based on our survey of school districts, we found that most school districts, those with and without plans, have undertaken a variety of recommended practices to prepare for emergencies such as conducting inspections to identify potential vulnerabilities of school facilities and grounds and holding school drills and exercises. In addition, we estimate that 95 percent of all school districts have written emergency management plans. Nearly all of those plans address multiple hazards such as natural disasters, intruders, and bombs but few address pandemic influenza or radiological hazards. The content of school district plans varies significantly. While most school districts have outlined roles and responsibilities for staff in their plans, for example, over half of all school districts with emergency management plans have not employed procedures for continuing student education in the event of an extended school closure, such as might occur during a pandemic. Likewise, while many districts have procedures for special needs students, we found during our site visits that procedures vary in the extent to which they ensure the safety of special needs students in an emergency. A higher percentage of urban school districts' plans included procedures for special needs students and for communicating with Limited-English Proficient parents and students compared to rural districts. Fewer than half of all school districts have involved the local head of government and fewer than half involved the local public health agency in the development of their plans. While half of all school districts update their emergency management plans at least once a year, an estimated 10 percent had never updated their plans. Finally, while most school districts practice their emergency management plans annually within the school community, we estimate that over one-quarter of school districts have never trained with first responders and over two-thirds of school districts do not regularly train with community partners on how to implement their school district

emergency management plans. The reasons why school districts do not train with first responders or community partners are not readily apparent.

Many school district officials said that they experience challenges in planning for emergencies and some school districts face difficulties in communicating and coordinating with first responders and parents, but most said that they do not experience challenges in communicating with students. Based on our survey of districts, we estimate that in 70 percent of all school districts, officials struggle to balance priorities related to educating students and other administrative responsibilities with activities for emergency management. For example, in some of the districts we visited, administrators were reluctant to allocate teacher development training time to emergency management because of other training priorities. In an estimated 62 percent of all school districts, officials identified challenges stemming from a lack of equipment, training for staff, and personnel with expertise in the area of emergency planning. Officials noted that a lack of equipment and expertise can impact many aspects of emergency management, including planning for special needs students. For example, a school district official in Washington said that the district lacks equipment to evacuate special needs students from some school buildings and in some cases staff are unsure of how to operate the existing equipment. Officials also reported problems in communicating and coordinating with first responders and parents. In an estimated 39 percent of school districts with emergency management plans, officials experienced a lack of partnerships, limited time or funding to discuss planning with first responders, or lack of interoperability between equipment used by school districts and first responders. About half of the officials in the 27 school districts we interviewed reported difficulty in ensuring that parents received consistent information from the district during an emergency. Some of these officials also described problems in communicating emergency-related information to Limited-English Proficient parents.

To address issues related to the emergency management of school districts, we recommend that (1) DHS clearly identify school districts as entities to which state and local governments may disburse grant funds in its program guidance for the State Homeland Security Program, Urban Areas Security Initiative, and Citizen Corps programs to ensure that states and local governments are aware that they can disburse funding to school districts and still meet funding requirements; (2) Education, in collaboration with DHS and HHS, provide guidance to school districts on successful procedures for sheltering and evacuating special needs students during emergencies; (3) Education collaborate with HHS to

provide specific guidance to states and school districts on how to incorporate, in emergency management plans, procedures for the continuation of education in the event of extended school closures such as those that might occur in the case of a pandemic (such as pandemic influenza); and (4) DHS and Education identify the factors that prevent school districts, first responders, and community partners from training together, develop strategies for addressing those factors, and promote current efforts that can help school districts in this area.

We provided copies of this report to DHS, Education, and HHS for review and comment. DHS generally agreed with the intent of our recommendations but suggested additional language regarding the need to promote the use of current resources in efforts to increase school district training with first responders and community partners, which we incorporated. DHS's comments are in appendix V. In its comments on the draft report, Education generally agreed with our recommendations. Education's comments are in appendix VI. Finally, HHS generally agreed with our recommendations and asked that we include HHS in our recommendation that federal agencies provide additional guidance related to special needs students, which we accepted. HHS's comments are in appendix VII.

Background

Federal Role in Emergency Management

The Homeland Security Act of 2002 created DHS and consolidated most of the federal programs and agencies with responsibilities for emergency management into that agency.⁴ DHS serves as a federal partner to state and local governments in emergency management.⁵ DHS provides technical assistance and homeland security grant funding to states and local governments to enhance their emergency management efforts. States and

⁴Pub. L. No. 107-296.

⁵The Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. No. 100-707, provides the legal framework for this partnership. The Stafford Act is the principal federal statute governing federal disaster assistance and relief and primarily establishes the programs for and processes by which the federal government may provide major disaster and emergency assistance to states and local governments. The Stafford Act also provides emergency assistance to tribal nations, individuals and qualified private non-profit organizations. The Federal Emergency Management Agency (FEMA) is the principal federal agency responsible for implementing the Stafford Act.

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

As we have noted in prior reports, emergency management requires coordinated planning and implementation by a variety of participants. Effective emergency management requires identifying the hazards for which it is necessary to be prepared (risk assessments); establishing clear roles and responsibilities that are effectively communicated and well understood; and developing, maintaining, and mobilizing needed capabilities, such as people, skills, and equipment.⁶ The plans and capabilities should be tested and assessed through realistic exercises that identify strengths and areas that need improvement, with any needed changes made to both plans and capabilities.

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

Funding of School Districts

The responsibility for funding K-12 education rests primarily with state and local governments. Approximately 90 percent of spending on education comes from state, local, and private funds. The federal government contributes approximately 8 to 10 percent. School districts are responsible for spending the funds in accordance with applicable federal, state, and local laws. However, the formulas states use to

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

determine how to fund school districts and the actual amount of funding states and local governments spend on education can vary.

Many States and School Districts Reported Having Requirements for Emergency Management Plans, and Federal and State Governments and School Districts Provide Resources for Emergency Management Planning

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

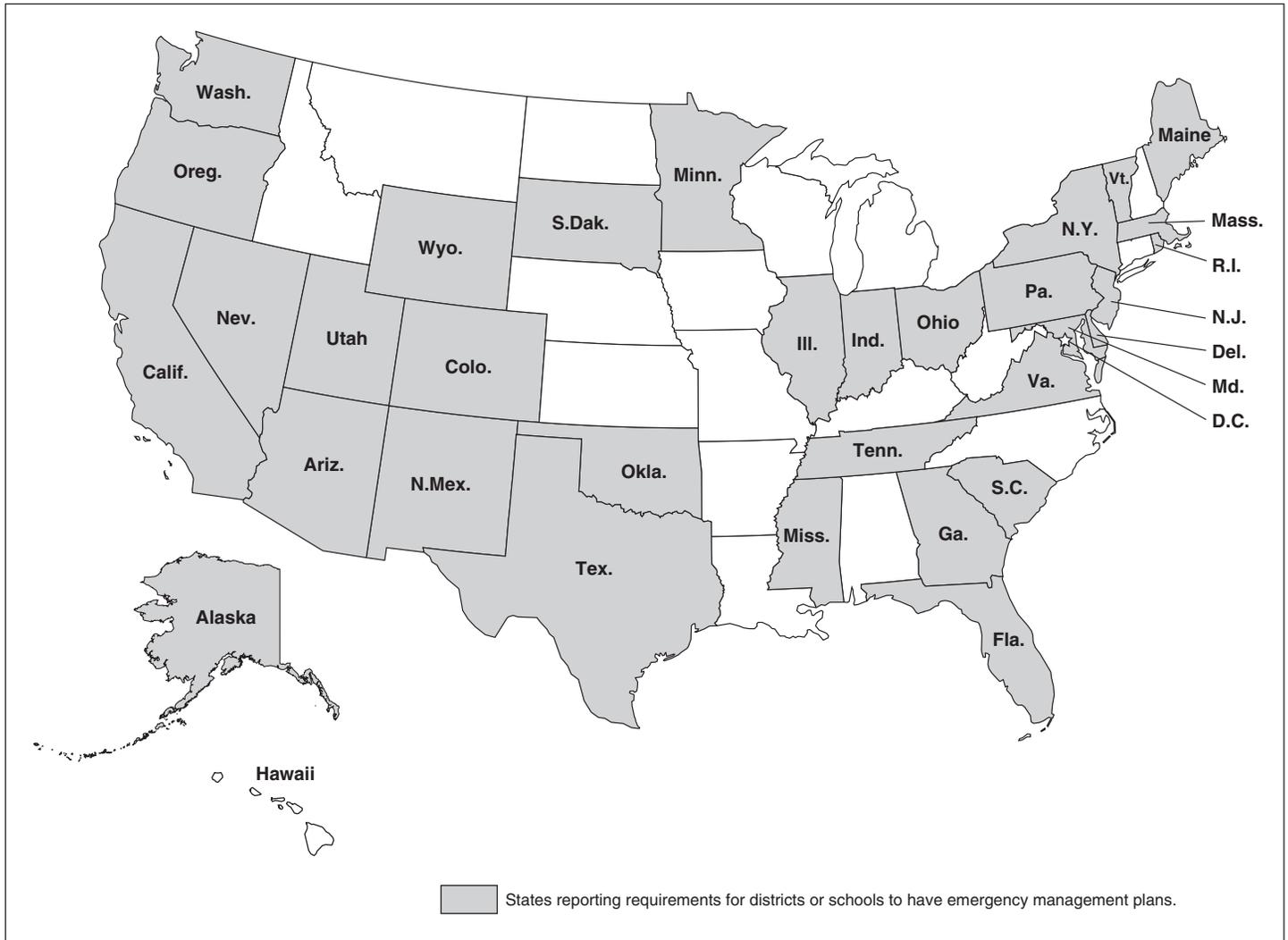
Although No Federal Laws Exist Requiring Emergency Management Planning, the Majority of States and School Districts Have Requirements

Although there are no federal laws requiring all school districts to have emergency management plans, many states reported having laws or other policies that do so. Congress has not enacted any broadly applicable laws requiring all school districts to have emergency management plans, nor have federal agencies issued any regulations imposing such a requirement on all school districts. However, the No Child Left Behind Act of 2001 provides that local education agencies (LEAs or school districts) applying for subgrants under the Safe and Drug Free Schools and Communities Program include in their grant applications an assurance that either they or their schools have “a plan for keeping schools safe and drug-free that includes...a crisis management plan for responding to violent or traumatic incidents on school grounds.”⁷ Thirty-two states reported having laws or

⁷20 U.S.C. § 7114(d)(7)(D). The plans required under the No Child Left Behind Act of 2001 are not required to address multiple hazards; therefore, for purposes of this report, we do not consider this to be a requirement for an emergency management plan.

other policies requiring school districts or schools to have a written emergency management plan (see fig. 1).

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



Source: GAO analysis of survey data; (Map) Map Resources.

Several state laws identify a broad range of specific emergencies that schools or districts are required to address in their plans, while many other states do not identify particular kinds of crises or use more general language to refer to the kinds of emergencies that plans must incorporate. For example, districts in Indiana are required to develop plans that address, at a minimum, fire; natural disasters such as tornadoes, floods, and earthquakes; adverse weather conditions, such as winter storms or

extreme heat; nuclear contamination from power plants or vehicle spills; exposure to chemicals from a variety of sources; and manmade occurrences, such as student disturbances, weapons, weapons of mass destruction, water or air supply contamination, and hostage and kidnapping incidents. In contrast, some states, such as Pennsylvania, South Dakota, and Texas, among others, do not identify any specific hazards in their planning requirements.

State emergency planning requirements also vary in their degree of prescriptiveness regarding plan development and emergency preparedness. For example, a number of states, including Georgia and Ohio, require that schools or districts involve partners, such as first responders, other community leaders, parents, and teachers in the planning process. Likewise, some states, such as Illinois and Nevada, specifically require that plans be reviewed annually and updated as appropriate. Additionally, New Jersey and other states require districts and schools to provide relevant district and school officials with periodic training related to emergency plans. In comparison, the requirements of some states, such as Oregon and Washington, are less detailed. For more detailed information on state emergency planning requirements, see appendix II.

Many of the school districts we surveyed also reported having emergency management planning requirements for schools. Based on our survey of school districts, we estimate that 85 percent of all districts require schools to have their own written emergency management plans. Of these districts, 88 percent require that school plans be submitted to them for review. However, the frequencies of these reviews vary (see table 1).

Table 1: Estimated Frequency of School Districts' Review of Schools' Emergency Management Plans

Frequency of school district review	Percentage estimate of school districts conducting review
At least once a year	71
At least once every 2 years	7
At least once every 3 years	13
Other	5
Do not review	4

Source: GAO analysis of survey data.

Federal Agencies, State Governments, and School Districts Provide Funding for School Districts' Emergency Management Planning

Education provides funding to some school districts specifically for emergency management planning through its Emergency Response and Crisis Management (ERCM) Grant Program.⁸ Since fiscal year 2003, Education dispersed \$130 million in such grants to over 400 of the over 17,000⁹ school districts in the United States. These grant awards ranged from \$68,875 to \$1,365,087. For example, in fiscal year 2004, Seattle Public Schools received an ERCM grant for \$494,144 to train principals in using the Incident Command System (ICS)¹⁰ and to establish Web-based training, among other things. In Tampa, Florida, a school district used a fiscal year 2006 ERCM grant of \$487,424 to install a new radio system and sponsor faculty workshops on emergency response. Other uses reported by school districts we visited include establishing emergency management plans,

⁸The purpose of the ERCM grant program is to provide funds for local education agencies to improve and strengthen their emergency response plans. School districts receiving grant funds under this program may use them to develop improved plans that address all four phases of crisis response: prevention/mitigation, preparedness, response, and recovery. In April 2007, Education announced that it was renaming the ERCM grant as the Readiness and Emergency Management for Schools grant program (REMS) to reflect terminology used in the emergency management field. This notice also invited applications for grant funds, with Education estimating that \$24 million will be available to applicants in amounts ranging from \$100,000 to \$500,000 per school district. In awarding grants, Education will give priority to districts that have not previously received an ERCM grant and that are located in a UASI jurisdiction. Applications must address, among other things, how districts will coordinate their efforts with law enforcement, public safety, public health, mental health, and local government entities, as well as how the applicant will address the needs of individuals with disabilities. Applicants must also agree to develop an infectious disease plan that includes plans for continuing education services. 72 Fed. Reg. 17,139 (Apr. 6, 2007).

⁹As reported by the states to the Department of Education and contained in the Common Core Data (CCD), there were over 17,000 school districts in the United States in school year 2003-04. This number includes school districts in Puerto Rico; four outlying areas (American Samoa, Guam, Northern Marianas, and the U.S. Virgin Islands); the Bureau of Indian Affairs and the Department of Defense, which were eligible for funds but we excluded from the sample for our survey of school districts. While Department of Defense schools are included in the CCD count of school districts, Education officials said that such schools are not eligible to receive funding under the ERCM/REMS grant program.

¹⁰The Incident Command System is a standard incident management system to assist in managing all major incidents. The Incident Command System also prescribes interoperable communications systems and preparedness before an incident happens, including planning, training, and exercises. The Incident Command System was developed in the 1970s following a series of catastrophic fires. Researchers determined that response problems were more likely to result from inadequate management rather than from any other reason. The Incident Command System was designed so that responders from different jurisdictions and disciplines could work together better to respond to natural disasters and emergencies, including acts of terrorism. NIMS includes a unified approach to incident management: standard command and management structures, and emphasis on preparedness, mutual aid, and resource management.

installing equipment such as closed circuit televisions, training school administrative staff (such as principals) on the National Incident Management System (NIMS) and the ICS, and purchasing emergency backpacks for school nurses.

DHS also provides funding to states and local jurisdictions for emergency management planning, and some of this funding can be provided to school districts or schools for emergency management planning. DHS officials told us that such funds are available through the State Homeland Security Program (SHSP), Urban Areas Security Initiative (UASI), and Citizen Corps grants. Five states—Florida, Hawaii, Michigan, Mississippi, and Wyoming—reported that they provided approximately \$14 million in DHS funding directly to school districts in these states during fiscal years 2003–2006 (see table 2). Florida, for example, provided about \$4.3 million in SHSP funds over a 2-year period to selected school districts for training, upgrading the districts’ emergency communications, and controlling access to school facilities, as well as for conducting studies related to emergency management. In fiscal year 2003, Michigan provided \$8.6 million in SHSP funds to 488 of its 801 school districts to conduct planning exercises in response to potential terrorist events.

Table 2: Estimated Number of School Districts That States Reported Providing Homeland Security Funding during Fiscal Years 2003–2006

Fiscal year	Estimated number of school districts ^a
2006	72
2005	85
2004	70
2003	536

Source: GAO analysis of state administering agencies survey data.

^aStates may have funded the same school districts over multiple years.

In addition, eight states and the District of Columbia reported that they provided DHS funding to local jurisdictions that then provided a portion of these funds to school districts or schools for emergency management planning.¹¹ For example, South Dakota officials told us they awarded a portion of the state’s fiscal year 2006 SHSP funds to South Dakota’s local

¹¹A ninth state distributed DHS funding to its state education agency, which then provided the funding to public schools in its state.

counties. These officials said that the counties then provided approximately \$26,000 to 3 of the state's 176 school districts for emergency management planning efforts. Although Oklahoma did not respond to our survey of state administering agencies, in February 2007, officials from its Office of Homeland Security issued a press release and confirmed to us that it provided \$50,000 of DHS funding (SHSP) to five elementary schools to enhance those schools' physical security. They said that each school received a \$10,000 grant to purchase equipment such as cameras, magnetometers, concrete barriers, identification systems, and two-way radios. For additional information on DHS funding that states or their local jurisdictions provided to school districts, see appendix III.

Although DHS officials told us that some of its emergency planning grant programs, such as SHSP, UASI, and Citizen Corps allow for the use of funds at the district or school level, the department's program guidance does not clearly specify that school districts are among the entities to which state and local governments may disburse funds.¹² As a result, some states may not be aware of their availability. For example, state officials in Alaska and Iowa told us they were not aware that DHS emergency planning grants could be used by school districts. School districts in these states do not have the opportunity to benefit from this funding. In Vermont, one official expressed the view that DHS program guidance is unclear on the permissible use of these funds.

Eleven of the 49 states¹³ responding to surveys we sent to state education and state administering agencies reported providing state funding to school districts for emergency management planning (see app. IV for a listing of these states). For example, the Connecticut State Department of Education reported that its State Legislature provided \$180,000 for emergency management training in its state. Of these funds, the state disbursed \$30,000 to each of Connecticut's six education centers to train

¹²DHS guidance for these grant programs provides that state administering agencies are the only agencies eligible to apply for funding and that they are responsible for disbursing grant funds to local units of government and other designated recipients. The guidance identifies a definition of "local unit of government" which includes "any county, city, village, town, district, borough, parish, port authority, transit authority, intercity rail provider, commuter rail system, freight rail provider, water district, regional planning commission, council of government, Indian tribe with jurisdiction over Indian country, authorized Tribal organization, Alaska Native village, independent authority, special district, or other political subdivision of any State."

¹³We included the District of Columbia in our state education and state administering agency surveys.

schools within its region, according to its Department of Education.¹⁴ To use this funding, the Connecticut State Department of Education reported that each education center was required to provide a minimum of three full-day workshops that were open to any school in its respective region. Hawaii also reported providing approximately \$2.1 million to 62 of its 285 schools¹⁵ to assist those schools in contracting for the services of School Safety Managers (mainly retired law enforcement officers) in developing school emergency response plans during fiscal years 2003-2005.

In the absence of federal and state sources, schools have been relying on local school district funds for the emergency management planning that they have undertaken. Three school districts we visited reported that they provided funding for emergency management planning in schools. Officials from a school district in Ohio, Shaker Heights, said that school emergency management activities are funded from the school district's general fund. These school district officials told us they spent about \$100,000, not including staff hours and pay, to undertake emergency management planning. To help prepare for an emergency, officials in Olmsted Falls, Ohio, said that the school district bought one automated external defibrillator¹⁶ for each of its buildings. Finally, officials from Sequim School District in Washington told us that they spent \$70,000 from their general funds to install a camera system at one of the two elementary schools located in their district.

Federal Agencies, State Governments, and School Districts also Provide Guidance, Training, and Equipment

The federal government also provides guidance, training, and equipment to school districts to assist in emergency management planning (see table 3).

¹⁴Under Connecticut law, local boards of education, working in conjunction, are permitted to establish regional educational services centers, which provide programs and services to schools within their designated regions. *Conn. Gen. Stat.* § 10-66a.

¹⁵There were 285 schools (1 school district) in Hawaii as reported by the state to the U.S. Department of Education.

¹⁶An automated external defibrillator (AED) is a portable electronic device that diagnoses and treats cardiac arrest by re-establishing an effective heart rhythm.

Table 3: Examples of Guidance, Training, and Equipment the Federal Government Provides to School Districts

Examples of Guidance

- Education publishes a guide for schools and communities titled *Practical Information on Crisis Planning*, which explains, among other things, how schools can prepare for an emergency.
- Education created the Emergency Response and Crisis Management Technical Assistance Center to help school districts in emergency management planning. The center provides guidance to school districts through such activities as sharing examples of emergency management plans, assisting with training staff, and evaluating emergency management plans.
- DHS created a Web site, *How Schools Can Become More Disaster Resistant*, that provides guidance for teachers and parents regarding how to prepare emergency management plans. The site also discusses identifying and mitigating hazards, developing response and coping plans, and implementing safety drills.
- Education funded the development of the National Clearinghouse for Educational Facilities—Disaster Preparedness for Schools. This Web site provides a list of resources (links, books, and journal articles) regarding building or retrofitting schools to withstand natural disasters and terrorism, developing emergency preparedness plans, and using school buildings to shelter community members during emergencies.
- The Secret Service, an agency within DHS, collaborated with Education in developing and publishing a *Threat Assessment Guide for Schools*. The guide was developed following the Columbine High School attack in April 1999. Secret Service and Education jointly produced and disseminated a CD-ROM that served as a companion to this guide.

Examples of Training

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

Examples of Equipment

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

Source: Education, DHS, and HHS.

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

Education, DHS, and HHS have collaborated and developed recommended practices to assist in preparing for emergencies that can be applied to school districts.¹⁷ Some of these practices are shown in table 4.

Table 4: Selected Practices That Education, DHS, and HHS Recommend School Districts Take to Prepare for Emergencies

Recommended practices

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

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

We have also recognized the importance of certain of these practices in our prior reports on emergency management.¹⁸ For example, a central component of all emergency management plans is defining the roles and

¹⁷Education, for example, also obtained input from state and local school and emergency management officials and associations in developing these recommended practices.

¹⁸See [GAO-07-395T](#) and [GAO-06-618](#).

responsibilities of all those with responsibilities for preparing to respond to an emergency. These roles should be clearly established, communicated, and understood. We have also emphasized the value of identifying the types of hazards for which school districts should be prepared as part of their emergency management efforts. These hazards will vary across the country; thus, it is appropriate that school emergency plans include hazards specific to their area. In addition, we have recognized the importance of realistic training exercises followed by a careful assessment of those exercises. Those with whom the school districts should coordinate and train will vary by the type and size of the emergency. For example, for a potential pandemic flu or other major infectious outbreak, planning and working with local health authorities and others is critical. Furthermore, “after action” reports that assess what went well and what did not go well following real emergency incidents or exercises, can also contribute to improving emergency management.

The type of guidance available from the federal government on topics related to emergency management in schools varies significantly; in some instances federal agencies provide detailed instructions on how to implement recommended practices while in other instances, guidance is less detailed. For example, HHS and its Centers for Disease Control and Prevention (CDC) developed recommended practices with regard to pandemics and provides school districts with specific recommended steps for planning and coordination, infection control policies and procedures, and communications planning. While it also recommends that school districts plan for the continuity of student learning, its guidance does not provide specific recommended steps or examples of successful strategies. Rather, it broadly states that schools should develop scenarios involving short- and long-term school closures. Likewise, Education’s guidance to school districts, through its recommended practices, clearly states that districts should incorporate procedures for special needs students in emergency management plans. However, Education does not provide guidance on or examples of what those procedures could be.

In addition to the federal government, states provide guidance and training to school districts. Based on our survey of state administrative agencies and state education agencies, 47 states reported providing guidance and 37 states reported providing training. Some states also reported providing online resources that include guidance and training. (See app. IV for a listing of these states.) For example:

- **Guidance.** South Dakota’s Department of Education provides guidance on how to distribute food during a crisis or emergency event that may occur at schools.
- **Training.** The Maryland Department of Education offers periodic workshops for school system points-of-contact for emergency planning on topics such as threat assessment and pandemic flu.
- **Online Resources.** The Idaho Department of Education provides links on its Web site to FEMA’s course on emergency planning for schools and Education’s Emergency Response and Crisis Management Technical Assistance Center.

Many of the school districts we surveyed also reported providing their schools with guidance to assist in emergency management planning. For example, based on our survey, we estimate that 73 percent of all school districts have an emergency management plan template that includes key elements schools should include in their plans (see table 5).

Table 5: Key Elements in Emergency Management Plan Templates by Percentage of School Districts with Written Emergency Management Plans

Templates includes	Estimated percentage of school districts
School Campus Plan	95
Potential use of school facilities	93
School level emergency management team members	94
Procedures for communication with law enforcement	94
Procedures for contacting district-level incident response team	92
ICS positions and staff	76
Includes special needs student population	67

Source: GAO analysis of survey data.

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

Almost all school districts have taken steps to prepare for emergencies, including developing written plans, but some plans lack key elements such as procedures for special needs students, plans for continued student education in the event of an extended closure, and procedures for training regularly with first responders. Most districts, those with and without plans, have undertaken a variety of federally-recommended activities, such as conducting vulnerability assessments and school drills and exercises, as well as additional activities to prepare for an emergency such as oversight and coordination with other entities. While most districts have written emergency management plans that address a range of hazards such as intruders, bombs, and natural disasters, the content of plans varies. Although most school districts have plans that include roles and responsibilities for staff, few have procedures for continuing student education in the event of an extended school closure. Many districts have procedures in their plans for special needs students, but these procedures vary in their ability to fully ensure the safety of these students during an emergency. Fewer than half of all school districts involved a representative from the local head of government and fewer than half involved the local public health agency in the development and updating of their emergency management plans. Finally, we estimate that over one-quarter of school districts with emergency management plans have never trained with first responders and over two-thirds of school districts do not regularly (i.e., at least once a year) train with community partners on how to implement their school plans.

Most School Districts Have Undertaken Some Emergency Management Activities

Based on our survey of school districts, we estimate that 93 percent of all school districts conduct inspections of their school buildings and grounds to identify possible vulnerabilities in accordance with recommended practices. Of those school districts, 87 percent made security enhancements to their school facilities and grounds as a result of these inspections. (See table 6.)

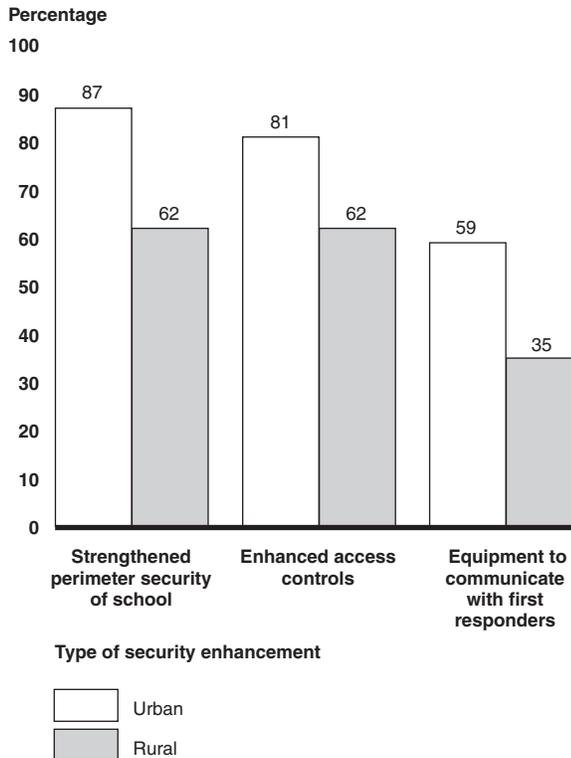
Table 6: Types of Security Enhancements School Districts Made Based on Vulnerability Assessments

Type of security enhancement implemented	Estimated percentage of school districts
Added or enhanced equipment to communicate with school employees	85
Strengthened the perimeter security of school	70
Made inventory changes such as removing hazardous materials	69
Enhanced access controls	68
Added or enhanced equipment to communicate with law enforcement, fire department, and emergency medical service officials	41
Reduced number of portable classrooms	10

Source: GAO analysis of survey data.

A higher percentage of urban school districts have made certain types of security enhancements to schools in their districts as a result of these assessments compared with rural school districts. (See fig. 2.)

Figure 2: Estimated Differences in Types of Security Enhancements Made by Urban and Rural Districts Based on Vulnerability Assessments



Source: GAO analysis of survey data.

Note: Margins of error for rural estimates do not exceed 11 percent.

Based on our survey of school districts, an estimated 73 percent of all school districts regularly conduct some type of school drill or exercise, in alignment with recommended practices to prepare for emergency situations such as evacuations, lockdowns, and shelter-in-place. During our site visits, we learned that drills were tailored to the needs of the local community and varied by locality. For example, in Iowa—a state that is prone to tornados—district officials said the state requires schools to practice tornado drills twice a year. In Washington—a state that is prone to earthquakes—district officials stated they practice earthquake drills twice a year or more.

Our survey of school districts revealed that an estimated 65 percent of all school districts have a storage location and replenish emergency supplies such as food, water, and first-aid supplies, as recommended. During our site visits, school district officials identified a variety of equipment,

supplies, and storage for different types of emergencies. In Renton, Washington, officials reported storing backpacks in the classrooms that contain enough food, water, medical supplies, and flashlights, among other items, for a short-term emergency. For an extended emergency, each school has a supply of emergency gear that includes: a 2- to 3-day supply of water, thermal blankets, sanitation needs, and energy bars. Similarly, school district officials we visited in Des Moines, Iowa, stated they have two kits for different types of emergencies. The first kit, designed for school nurses to use in evacuations, is a duffel bag containing medical supplies such as: bandages, splints, face masks, and eye patches, as well as equipment such as: folding stretcher, blood pressure kit, stethoscope, and cold packs. The second kit, designed for custodians, is a garbage can that contains tools as well as supplies such as a broom, gloves, rope, water, and bleach, among other items. In contrast, in one Washington district the disaster kits contain communication equipment, but they do not include supplies of food or water.

In addition to conducting vulnerability assessments, school drills, and maintaining emergency supplies, school districts took responsibility for a number of activities to prepare for emergencies at the district level. These activities can vary by locality depending on community needs and include oversight, coordination with other entities, and training. (See table 7.) For example, in Hardee County, Florida—a district that is frequently hit by hurricanes—officials stated that the county designated the schools as shelters for the public and the school district provides staff, such as maintenance and food service personnel, to work at the schools as part of a negotiated arrangement. Officials in Pinellas County—a district that is frequently hit by tornados and hurricanes—told us they have trained an on-site district level team that coordinates emergency response activities during an emergency or event.

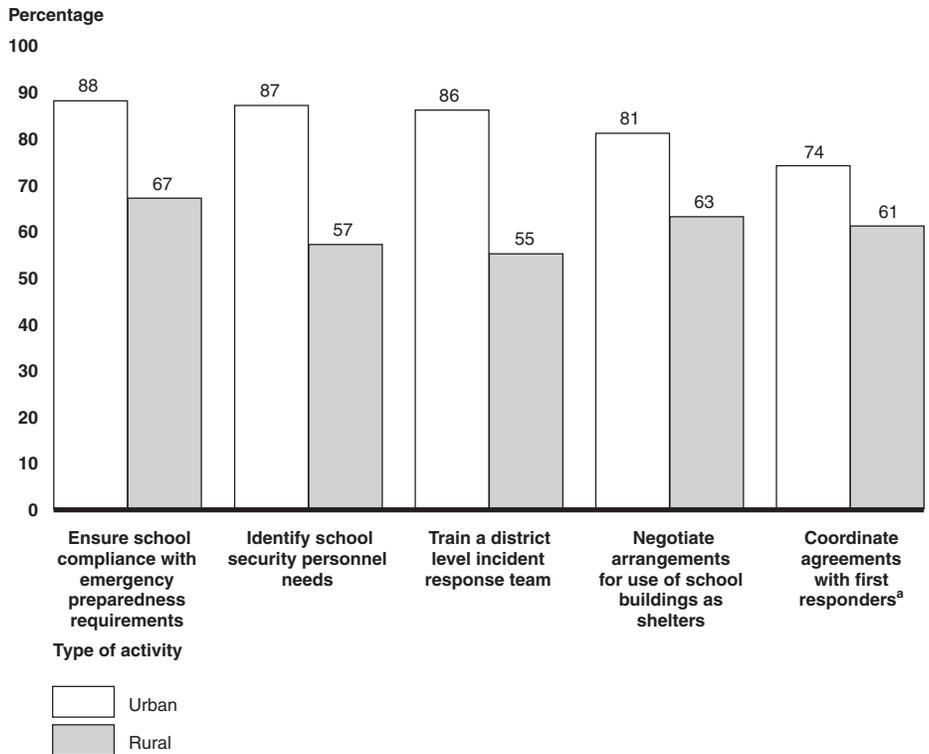
Table 7: Activities School Districts Have Taken Responsibility for to Prepare for Emergencies

Type of activity	Estimated percentage of school districts
Ensure school compliance with emergency preparedness requirements	74
Negotiate arrangements for use of school buildings as temporary shelters	72
Coordinate agreements with law enforcement, fire department, and emergency medical service officials	68
Identify security personnel needs at schools	65
Identify and train a district-level incident response team	62

Source: GAO analysis of survey data.

As shown in figure 3, a higher percentage of urban districts took responsibility for certain types of activities to prepare for an emergency compared with rural districts.

Figure 3: Estimated Differences in Types of Activities Undertaken by Urban and Rural Districts to Prepare for Emergencies



Source: GAO analysis of survey data.

^aDifferences between urban and rural districts are not statistically significant.

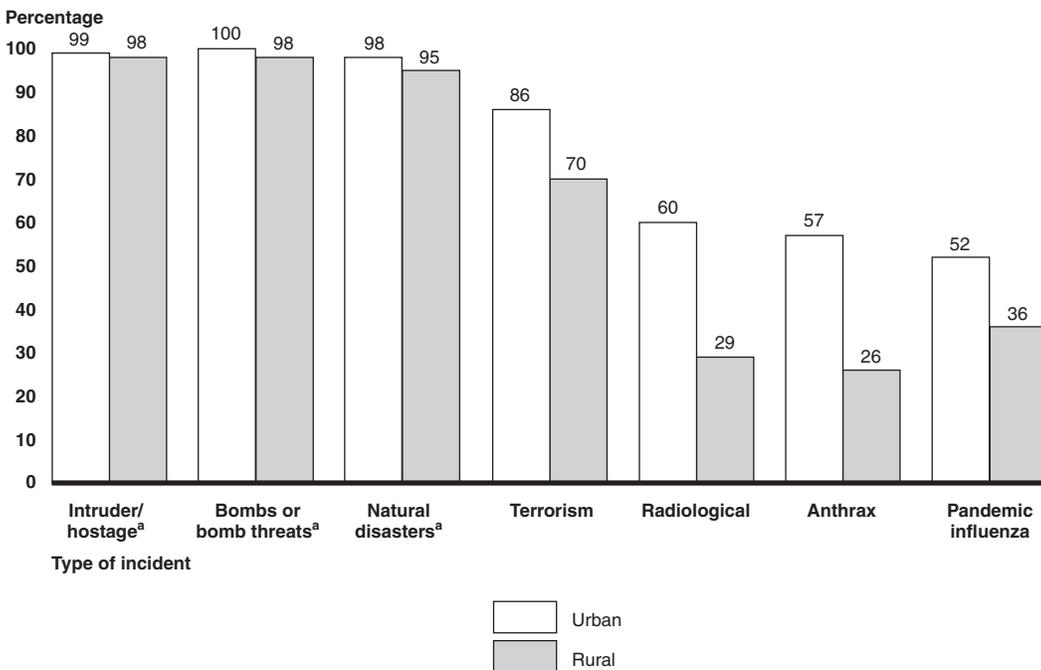
Most Districts Have Emergency Management Plans That Address Multiple Hazards, but the Content of Plans Varies Significantly

Most school districts have developed written emergency management plans that address multiple hazards. Based on our survey of school districts, we estimate that 95 percent of all school districts have written emergency management plans with no statistical difference between urban and rural districts.¹⁹ Of those school districts that have written emergency plans, nearly all (99.6 percent) address multiple hazards in accordance with recommended practices to prepare for emergencies. However, the specific hazards addressed by plans vary. Although most school district

¹⁹Those school districts that did not have a written emergency management plan cited several reasons for the lack of such plans that included (1) no requirement to have a written plan, (2) inadequate resources for experienced personnel to develop emergency plans, and (3) schools, not the district, have individual plans.

plans address emergency situations arising from intruders or hostages, bombs or bomb threats, and natural disasters, a smaller percentage of school districts address pandemic influenza, anthrax, or radiological hazards. A significantly higher percentage of urban districts address terrorism and anthrax, for example, compared to rural school districts.²⁰ (See fig. 4.)

Figure 4: Estimated Percentages of Urban and Rural Districts' Multi-Hazard Emergency Management Plans That Include Specific Incidents



Source: GAO analysis of survey data.

^aDifferences between urban and rural districts are not statistically significant.

In some instances, the hazards included in emergency plans are specific to local conditions which is to be expected. For example, school district officials we visited in Hillsborough, Florida, involved representatives from the airport in the development of their district plan because airport traffic was identified as a unique hazard in their local community. In Ashtabula,

²⁰The difference between two estimates is statistically significant if the probability that the observed or greater difference is due to chance alone is less than 5 percent (95 percent confidence level).

Ohio, district officials said their plan addresses evacuations due to chemical spills because they have a number of chemical plants in the community.

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

Develop Roles and Responsibilities for School Community Members. Based on our survey, most districts have written roles and responsibilities in their plans for staff such as superintendents, building engineers or custodians, principals, teachers, and nurses. Among the plans we reviewed, some have more detailed instructions on roles and responsibilities than others. For example, school district officials we visited in Boston, Massachusetts, have a series of emergency management plans for different school community members that included district officials, school administrators, and teachers. The school district document (the Crisis Command Plan) describes the organizational framework and response resources that the district will use to manage major emergencies, while a document for school administrators describes procedures and resources for school-level incidents. In addition, the district issues a classroom emergency guide that outlines procedures for teachers to use during an emergency. In contrast, the district plan for a district in Iowa lists appropriate actions for specific types of emergencies but does not assign roles and responsibilities for their implementation.

Develop Roles and Responsibilities for First Responders and Community Partners. Based on our survey, we estimate that 43 percent of school districts use the Incident Command System (ICS)—established by DHS as part of the National Incident Management System (NIMS)²¹—to establish the roles and responsibilities of school district officials, local first responders, and community partners during an emergency, in accordance with recommended practices. A significantly higher percentage of urban school districts—67 percent—were responsible for ensuring that their emergency plans were in compliance with DHS's NIMS compared to rural school districts—41 percent.

Develop Procedures for Communicating with Key Stakeholders. Also central to district emergency plans is the inclusion of procedures for communicating with key stakeholders such as staff, parents, and students,

²¹See footnote 10, page 13.

including those who are LEP. Our survey suggests that roughly three-quarters of all school districts have not included written procedures in their plans for communicating with LEP parents and students, in accordance with federally recommended practices. A significantly higher percentage of urban school districts report including procedures for communicating with such parents and students in their plans compared to rural school districts. (See table 8.) This difference may, in part, be explained by the relatively fewer LEP parents and students in rural school districts.

Table 8: Estimated Percentage of School Districts That Have Procedures for Communicating with Limited-English Proficient Parents and Students in Their Emergency Management Plans

Limited-English Proficient	All school districts	Urban school districts	Rural school districts
Parents	27	59	18
Students	28	61	21

Source: GAO analysis of survey data.

Develop Procedures for Special Needs Students. Although HHS officials and some education organizations report that the number of special needs students in the schools is growing, our survey finds that an estimated 28 percent of school districts with emergency management plans do not have specific provisions for them in their emergency management plans. Although most school districts reported having procedures for special needs students, these procedures were not necessarily a part of the written plan. (See table 9.) However, Education’s guidance recommends not only having procedures for special needs students but including these procedures in written emergency plans. Officials from two education associations said the lack of procedures in district plans for evacuating these students, was a significant concern.²² According to these officials, these students may be at increased risk during an emergency. During our site visits, several school officials who did not have provisions in their plans for special needs students said it was a school, not a district-level responsibility. District officials in Marshalltown, Iowa, for example, said special needs student procedures are the responsibility of local schools. However, they said that the district does provide a checklist for schools that includes provisions for special needs

²²National Education Association and National Association of School Psychologists.

students during an emergency such as communicating to first responders the location of special needs students who cannot be evacuated due to mobility impairments. A significantly higher percentage of urban school districts (77 percent) included procedures for special needs students in their written plans compared to rural school districts (62 percent). This may be due, in part, to several reasons such as parents of special needs students selecting communities to live in based on a district's special needs resources or districts with low special needs student populations including procedures for these students in individualized education programs²³ rather than the district plan.

Table 9: Percentage of School Districts That Use the Following Procedures for Students with Special Needs in the Event of an Emergency

Procedures for special needs students in an emergency	Estimated percentage of school districts
Track the location of special needs students during the day	74
Identify list of district or school staff assigned to evacuate or shelter with special needs students during emergency	72
Provide devices for transporting special needs students to evacuation areas	62

Source: GAO analysis of survey data.

Note: Responses are not mutually exclusive.

Education officials told us that because there is no agreement among disability groups on what the best practices are for special needs students in an emergency, districts usually devise their own procedures.²⁴ According to these officials, without the recommendation of experts, some of these procedures such as keeping special needs students in their

²³Each student identified as having a disability under the Individuals with Disabilities Education Act (IDEA) is required to have an Individualized Education Program. This document outlines the delivery of educational services and support for that student. While law dictates minimum requirements for the type of information included in the program, states and school districts have flexibility in including additional information in such programs.

²⁴At a national level, there is also a lack of agreement about a definition of special needs individuals for the purposes of emergency management. HHS officials noted that one definition of special needs individuals, currently being considered for the next revision of the National Response Plan, will help facilitate awareness and planning for special needs populations with regard to emergency management.

classrooms during some emergencies may not ensure the students safety in an emergency. The variety of procedures was evident during our site visits when officials identified several procedures schools use to incorporate the needs of special needs students in their plans during an emergency. For example, school district officials in Pinellas County, Florida, stated that in order to evacuate special needs students during an emergency they use a buddy system, comprised of school staff, which the district updates annually. In contrast, officials in a Massachusetts school district said special needs students must remain in areas of refuge inside the school building until they are evacuated by first responders.

Develop Procedures for Recovering from an Incident. Over half of all school districts with written emergency plans include procedures in their plans to assist with recovering from an incident, in accordance with recommended practices, such as by restoring district administrative functions and resuming transportation services. (See table 10.)

Table 10: Types of Recovery Procedures Addressed in School Districts Written Emergency Management Plans

Type of recovery procedure	Estimated percentage of school districts
Providing on-site trauma teams	64
Restoring district administrative functions	55
Resuming transportation services	53
Conducting damage assessments of school buildings and grounds	53
Locating district employees after a crisis is over	49

Source: GAO analysis of survey data.

Develop Procedures for the Continuation of Student Education. Few school districts’ emergency plans contain procedures for continuing student education in the event of an extended school closure, such as a pandemic outbreak, although it is a federally recommended practice. Based on our survey, we estimate that 56 percent of school districts do not include any of the following procedures (see table 11) in their plans for the continuation of student education during an extended school closure. Without such procedures school districts may not be able to educate students during a school closure that could last from several days to a year or longer. Moreover, there was no statistical difference between the percentage of urban and rural school districts that include these procedures in their written plans. Some school districts we visited stated

they do not have these procedures but are currently working on developing a continuity of student education plan with their community partners, and one district official said he would like guidance from the state on how to provide continued instruction to students during an extended school closure.²⁵

Table 11: Percentages of School Districts with Written Plans That Include Certain Types of Procedures to Continue Student Educational Instruction in the Event of an Extended School Closure

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

Source: GAO analysis of survey data.

Note: Responses are not mutually exclusive.

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

Develop Multi-Purpose Manuals. Some school districts have multi-purpose manuals that contain various types of information such as roles and responsibilities for staff, descriptions of how to respond to different types of emergencies, as well as site specific information for individual schools to complete in order to tailor their plan. For example, in Lee County, North Carolina, the district manual contained a range of materials

²⁵In at least one school district, Seattle, these plans are included in the district’s Continuity of Operations Plan, which is separate from its emergency management plan.

and documents for schools to use and complete such as floor plans, student and faculty rosters, bus routes, and evacuation routes as well as instructions on the location and handling of utilities, such as gas and water valves and electrical breaker panels in school buildings, including a place for photographs for their easy identification. The manual also identified different types of hazards and delineated administrator and teacher responsibilities for different types of emergencies. In contrast, one plan for a district in Washington consisted of a flipchart with contact information on whom to call during an emergency, and one plan for a district in Iowa consisted of actions to take for various hazards but did not outline which staff would be responsible for taking such actions.

About Half of All Districts Involved Local Government, Public Health Agencies, and Other Partners in Developing and Updating Their Plans and Most Reported Not Practicing with First Responders

School districts differed in the extent to which they involve community partner stakeholders in the development and updating of their plans.²⁶ Fewer than half of school districts with emergency management plans involve community partners such as the local head of government (43 percent) or the local public health agency (42 percent) when developing and updating their emergency management plans, as recommended by HHS.²⁷ During our site visits and survey pretests, school district officials cited a number of reasons for this lack of involvement, including a general lack of coordination with local government on emergency management efforts. Officials cited several benefits in coordinating with local government entities including the opportunity to share information, take part in joint training exercises, and receive assistance with their emergency plans.

While most school districts include at least one representative from the school and first responder community in the development and updating of their emergency management plans, fewer involve community partners. (See table 12.) According to written guidance provided by Education, those school districts that do not include community partners in the development and updating of their plans may limit their opportunity to

²⁶In our survey, community partners included representatives from: public health, mental health, local head of government, transportation, hospitals, Red Cross, faith-based community, and the business community.

²⁷Twelve percent of school districts do not know whether public health agencies were included in the development and update of plans. Thirteen percent of districts do not know whether the local head of government was included in the development and update of plans.

exchange information with local officials, take advantage of local resources, and identify gaps in their plan.

We estimate that one-third of all school districts (36 percent) have School Resource Officers (SRO) available at schools during school hours. An SRO²⁸ is a fully sworn/commissioned law enforcement officer whose primary assignment is within the local schools.²⁹ Of those school districts that have SROs, 73 percent include procedures in their plan for involving SROs in the event of an emergency. During our site visits, school district officials cited several methods they use to involve SROs in preparing for emergencies such as including them as a stakeholder in the annual discussion to update the school-level crisis response manual including procedures for dealing with emergencies, among others. A significantly higher percentage of urban school districts had SROs available on school grounds during school hours compared to rural school districts. We estimate about 81 percent of urban school districts had SROs available at school campuses during school hours, compared to just 16 percent of rural school districts.

²⁸This is how we defined an SRO in our survey.

²⁹Through its COPS (Community Oriented Policing in Schools) in Schools (CIS) program, the Department of Justice provides three-year grants that schools may use to hire SROs. The program was designed in part to provide assistance to law enforcement agencies to help combat violence and reduce the fear of crime in schools by deploying police officers as SROs.

Table 12: Percentage of School Districts That Involve Stakeholders in the Development and Update of Written Emergency Management Plans

Stakeholder	Estimated percentage of school districts
Community Partners	
Local head of government	43
Public health agency	42
American Red Cross	30
First Responders	
Law enforcement	89
Fire department	85
Emergency Medical Services	67
School Community	
Superintendent	97
Teachers	91
Building engineers	83
Nurses	76
SROs	42

Source: GAO analysis of survey data.

More than half of all school districts with emergency management plans report regularly updating their emergency management plans in accordance with recommended practices. Specifically, we estimate that 52 percent of all school districts with emergency plans update these plans at least once a year. However, 10 percent of all school districts had never updated their plans. (See table 13.) District officials cited several reasons for regularly updating their emergency management plans, including (1) construction modifications or renovations to school buildings, (2) changes to emergency contact information, (3) procedural changes such as new drills or evacuation routes, and (4) new legislative requirements, among others. However, some school district officials we visited had just recently completed their plans or reported that they had not made any changes to their plans, since they were first developed. According to guidance provided by Education, those school districts that do not regularly update their plans may risk having inaccurate and outdated information in their plans, which could lead to a delayed response during an emergency.

Table 13: Frequency of Updates to Emergency Management Plans

Frequency of updates	Estimated percentage of school districts
At least once a year	52
At least once every 2 years	14
At least once every 3 or more years	19
Have not updated the emergency management plan	10
After an incident	1

Source: GAO analysis of survey data.

The frequency with which districts updated their plans differed for urban and rural areas. A significantly higher percentage of urban school districts update their emergency management plans annually compared to rural districts—69 percent versus 43 percent, respectively. Finally, as many as 13 percent of rural school districts have not updated their emergency plans at all, compared with 3 percent of urban school districts.

Based on our survey of school districts, we estimate that 55 percent of school districts with written emergency management plans coordinate them with city or county emergency response plans. A significantly higher percentage of urban school districts—78 percent—coordinate their plans with the local government emergency response plans as compared to rural school districts (45 percent). For example, in one Ohio school district, officials told us that the school district plan is a component of the city plan in that the city will rely upon the district to make selected school buildings available for use as shelters, if needed in an evacuation. Likewise, officials in a district in Iowa said that the district plan is aligned with the county plan in that, during emergencies, the district’s school buses will be used to evacuate persons from the downtown community. Similarly, in a school district in Massachusetts, officials said that, in coordination with the local board of health’s plan, the district’s plan includes the use of the school facilities as inoculation sites or quarantine facilities in the event of a large-scale pandemic.

As previously discussed, most school districts identify roles and responsibilities for first responders and involve them in developing and updating their plans. However, based on our survey, we estimate that 27 percent of all school districts with emergency management plans have never trained with any first responders on how to implement the plans, in accordance with federally recommended practices. Furthermore, we estimate that about three-quarters of all school districts do not regularly

train (i.e., at least once a year) with each type of first responder—law enforcement, fire, or EMS—on how to implement the school district plan. (See table 14.) The reasons why school districts are not training with first responders are not readily apparent. As we have previously reported, involving first responder groups in training and exercise programs can better familiarize and prepare first responders with their roles in an emergency as well as assess the effectiveness of a school or district’s emergency plan.³⁰ Without such training, school districts and their first responder partners may be at risk of not responding effectively during a school emergency.

Table 14: Estimated Frequency of Training with Each Type of First Responder on How to Implement the School District Emergency Management Plan

Frequency of training	Law enforcement	Firefighters	Emergency Medical Services (EMS) ^a
	Percentage	Percentage	Percentage
At least once a year	33	31	25
At least once every 2 years	15	15	11
At least once every 3 or more years	19	19	17
Never	33	34	46

Source: GAO analysis of survey data.

Notes: All responses are mutually exclusive. Due to rounding, percentages in each column may not sum to 100.

^aDuring our site visits some officials told us that their emergency medical service providers were part of the fire department, not a separate entity.

A significantly higher percentage of urban school districts annually train with law enforcement and firefighters on the school district emergency plan. We estimate that nearly half of urban districts annually train together with law enforcement (42 percent) and firefighters (43 percent) on the school district emergency plan, whereas less than one-quarter of rural school districts train annually with law enforcement (23 percent) and firefighters (23 percent).

School districts report training with community partners—such as local public health and local government entities—on activities to prepare for an emergency with similar frequency. Specifically, we estimate that

³⁰See [GAO-06-618](#).

29 percent of all school districts train with community partners. As with first responders, the reasons for the lack of training with community partners are not readily apparent. In our work on Hurricane Katrina, we reported that involving local community partners in exercise programs and training could help prepare community partners and enhance their understanding of their roles in an emergency as well as help assess the effectiveness of a school district's emergency plan.³¹ Without such training, school districts and their community partners may not fully understand their roles and responsibilities and could be at risk of not responding effectively during a school emergency.

Training differed for urban and rural areas. A significantly higher percentage of urban school districts train with community partners on how to implement the school district plan compared to rural school districts—45 percent versus 26 percent.

Some school districts collaborate with community partners on other aspects of emergency preparedness. For example, one component of the Citizen Corps program—Community Emergency Response Teams—instructs citizens on how to respond to emergencies (e.g., first aid) and participants, in turn, provide instruction to others. An official with the Highlands County, Florida school district said that 50 school district employees have participated in a Community Emergency Response Teams program. Likewise, in Olmstead Falls, Ohio, school district officials have coordinated with the American Red Cross in conducting a pandemic immunization drill in school facilities.

³¹See [GAO-06-618](#).

School Districts Report Challenges in Planning for Emergencies as Well as Difficulties in Communicating with First Responders and Parents, but No Challenges in Communicating with Students

In planning for emergencies, many school districts face challenges resulting from competing priorities, a lack of equipment, and limited expertise; some school districts experience difficulties in communicating and coordinating with first responders and parents, but most do not have such challenges with students. Within their own districts, officials struggle to balance activities related to educating their students with those related to recommended practices for emergency management. Officials also confront a shortage of equipment and expertise necessary for planning and responding to emergencies. In some cases, officials noted that it was particularly challenging to plan for special needs students in the absence of such equipment and expertise. Less prevalent among school districts were problems in communicating and coordinating with first responders and parents.

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

School district officials who responded to our survey reported difficulty in following the recommended practice of allocating time to emergency management planning, given the higher priority and competing demand on their time for educating students and carrying out other administrative responsibilities. Based on our survey of school districts, we estimate that in 70 percent of all districts, officials consider competing priorities to be a challenge to planning for emergencies. In at least two districts we visited, officials said that they have a limited number of staff development days³² and they want to use the time to train staff on instruction rather than emergency planning. For example, in one Florida district, officials noted that only two days a year were available for staff development, making it difficult to cover emergency planning as well as federal and state requirements for schools. Officials in a North Carolina district said although they had the instructors they needed, they forfeited some emergency planning activities after the allotted number of staff development days were cut short.

In an estimated 62 percent of districts, officials cited a lack of equipment and expertise as impediments to emergency planning. In the course of our site visits, officials focused primarily on shortages of three types of equipment: equipment to control or monitor school grounds, such as locks

³²Districts allocate staff development days to assist teachers and other staff with improving skills, provide training, and meet certification requirements, among other activities.

on doors and surveillance equipment; equipment to evacuate or maintain a shelter-in-place for students and staff; and communications equipment, such as two-way radios and satellite phones. Officials in one Massachusetts school district reported that they do not have adequate locks on some of the doors to school buildings to implement a lockdown procedure, for example. Other districts lacked fencing for school grounds or surveillance cameras for school buildings. Officials also described a lack of sufficient equipment to maintain a shelter-in-place or evacuate students. Five of the 27 school districts we interviewed reported that they do not have generators to maintain power in school buildings. One superintendent in Washington noted that the district's only school building is located in a remote mountainous area that could be inaccessible in the event of an earthquake or heavy snowfall that blocked the few access roads in and out of the community. Yet, according to this superintendent, the district does not have a generator to supply electricity in the event of such an emergency. Although the officials in one Massachusetts school district did not report problems maintaining a shelter-in-place facility, they said the district did not have enough school buses to accommodate all of the students in the case of evacuation. Finally, school officials in the districts we visited discussed a lack of equipment to facilitate communication during emergencies. In one North Carolina district, officials said a lack of two-way radios for staff in the elementary schools hinders their ability to communicate with one another and with first responders during an emergency.³³ Similarly, in one Washington school district, the superintendent told us the district does not have satellite two-way radios that are needed in case conventional cellular telephones do not operate under the severe weather conditions common to the remote and mountainous location. In a district in Iowa, officials reported a need to replace their aging two-way radios because the radios' signals cannot penetrate the walls of the school buildings. Officials in four additional districts stated that their districts need to update or maintain communication equipment. As demonstrated in these school districts, the lack of equipment prevents districts from implementing the procedures in their plans and hinders communication among district staff and with first responders during emergencies.

³³Two-way radios, commonly known as walkie-talkies, are radios that can alternate between receiving and transmitting messages. Cellular telephones and satellite telephones are also two-way radios but, unlike walkie-talkies, simultaneously receive and transmit messages.

In addition to not having sufficient equipment, school district officials we spoke with described a shortage of expertise in both planning for and managing emergencies. These officials said their districts lacked specialized personnel and training with which to develop needed expertise. One Washington state superintendent said he needed to provide those staff most likely to be present in an emergency with training on emergency management but would need additional funding to do so. District officials in 5 of the 27 districts noted that they do not have sufficient funding to hire full-time emergency management staff to provide such training or take responsibility for updating their district plans.³⁴ Still, other officials described an unmet need for specific staff positions such as either an SRO or a school nurse to assist in planning for and responding to emergencies. According to officials in a North Carolina district, due to a shortage of funding, the district did not have SROs for the district's elementary schools. In this district, the SROs have a role in providing comments on the emergency plans of the schools to which they are assigned before those plans are submitted to the district for annual reviews. Similarly, officials in the Lee County district of North Carolina reported a shortage of school nurses, which they said could precipitate a medical crisis in an evacuation on days when a nurse is not available to distribute student medications or attend to those who may become ill. These officials noted that the lack of expertise makes it difficult to adequately plan for responding to emergencies.

As previously discussed, school districts reported challenges in incorporating special needs students in emergency management planning. According to officials in about half (13 of 27) of the districts in which we conducted interviews, a lack of equipment or expertise poses challenges for districts—particularly in the area of evacuating special needs students. In one Massachusetts school district, while schools assign persons to special needs students for evacuations, officials reported that these persons or “buddies” are typically other students, rather than experienced personnel.³⁵ The students may not always be in the same classes as the students to whom they are assigned or may be absent from school on the

³⁴Three districts, Hardee County, Florida; Ashtabula, Ohio; and Durham, North Carolina, reported needing a full-time staff person to train staff. Two districts, Olmsted Falls, Ohio, and Hanover, Massachusetts, reported needing a full-time staff person to update the district plan.

³⁵At the time of our visit, the school district used this practice for its special needs students. However, in a subsequent e-mail message a district official noted the district no longer uses students as buddies.

day of the emergency. An official in a Washington school district said that the district tracks the location of special needs students, but many of the district's schools do not have evacuation equipment (e.g., evacuation chairs used to transport disabled persons down a flight of stairs) to remove students from buildings and staff need more training on how to operate the existing equipment. Lee County, North Carolina, district officials reported that a shortage of nurses across the district has led to difficulties in meeting the medical needs of special needs students during evacuations, because nurses are the only staff permitted to physically remove medical supplies and distribute medicine. Because coordination with first responders often occurs at the district level, delegating responsibility for planning for special needs students to individual schools can result in a lack of information for first responders. In one school district in Ohio, a fire department official we interviewed was unaware that the schools in his area had assigned special aides to help evacuate special needs students.

School district officials who reported challenges in planning for special needs students also identified challenges in adequately planning for temporarily disabled students (e.g., a student with a broken leg), maintaining a supply of surplus medical supplies for students with special needs, and ensuring the district maintains privacy standards related to the conditions of special needs students during emergencies. Finally, officials in three school districts stated that the districts' school buildings are not all in compliance with the Americans with Disabilities Act standards,³⁶ thus limiting the district's ability to adequately plan for students with special needs.

³⁶The Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973 generally require that school facilities be accessible to individuals with disabilities, although there is some variation in requirements depending on whether a building is new or existing. The ADA Accessibility Guidelines for Buildings and Facilities specify the technical requirements for accessibility and address such issues as the design of doorways, stairwells, elevators, and ramps.

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

Based on our survey of school districts, an estimated 39 percent of districts with emergency plans experience challenges in communicating and coordinating with local first responders.³⁷ Specifically, these school districts experience a lack of partnerships with all or specific first responders, limited time or funding to collaborate with first responders on plans for emergencies, or a lack of interoperability between the equipment used by the school district and equipment used by first responders.

The superintendent of a Washington school district said that law enforcement has not been responsive to the district's requests to participate in emergency drills, and, in addition to never having had a district wide drill with first responders, competition among city, county, and private first responders has made it difficult for the school district to know with which first responder entity it should coordinate. In another Washington district, the superintendent reported not having a local law enforcement entity in the community, but rather, a deputy from the county sheriff's department that drives through the local community twice a day. This superintendent said that based on an absence of a relationship with law enforcement, he assumed that his district was essentially "on its own" in responding to emergencies. According to guidance provided by Education, the lack of partnerships, as demonstrated in these school districts, can lead to an absence of training that prevents schools and first responders from understanding their roles and responsibilities during emergencies.

Even when forming partnerships is not a problem, school districts may be unable to find sufficient time or funding to meet with first responders on issues related to emergency management planning. An official in the Chatham, North Carolina, district said that it is difficult to find a convenient time for both first responders and school district officials to meet and discuss the district's plan. According to an official in the Seattle school district, first responders for the district are more likely to meet with the school district when there are funds available to pay both first responders and district staff for such efforts. Officials in an Ohio district said that while first responders drill in school facilities over the weekends, the district does not have additional funding or staff to conduct these drills during school hours.

³⁷Thirteen percent of school districts reported not knowing whether the district has challenges related to first responders.

Finally, officials we interviewed described a lack of interoperable equipment as a hindrance to communicating with first responders during emergencies. In 8 of the 27 districts in which we conducted interviews, officials said that the two-way radios or other equipment used in their school districts lacked interoperability with the radios used by first responders. Officials in an Iowa district said that the lack of interoperability among first responders³⁸ impacts the district's ability to communicate during emergencies because the district shares a radio frequency with some first responders but not others.

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

In keeping with recommended practices that call for school districts to have a way to contact parents of students enrolled in the district, all of the school districts we interviewed had ways of communicating emergency procedures to parents prior to (e.g., newsletters), during (e.g., media, telephone), and after an incident (e.g., letters). Eleven of these districts have a system that can send instant electronic and telephone messages to parents of students in the district. Despite these methods, 16 of the 27 districts we interviewed experience difficulties in implementing the recommended practice that school districts communicate clear, consistent, and appropriate information to parents regarding an emergency. For example, officials in a Florida school district said that with students' increased access to cellular telephones, parents often arrive on school grounds during an incident to pick up their children before the district has an opportunity to provide parents with information. Thus, according to these officials, the district experiences challenges in simultaneously maintaining control of both the emergency situation and access to school grounds by parents and others. Other districts discussed challenges in providing messages, during emergencies, with instructions to parents for reuniting with their children. Officials in the Boston school district said that having inaccurate telephone numbers for parents prevented the district from delivering messages to all parents during or

³⁸ GAO has reported on the range of issues associated with the lack of interoperability among first responders and the implications of these issues for emergency management. For a fuller discussion of these issues, see the following GAO reports: *First Responders: Much Work Remains to Improve Communications Interoperability*, [GAO-07-301](#) (Washington, D.C.: Apr. 2, 2007); *Catastrophic Disasters: Enhanced Leadership, Capabilities, and Accountability Controls Will Improve the Effectiveness of the Nation's Preparedness, Response, and Recovery System*, [GAO-06-618](#) (Washington, D.C.: Sept. 6, 2006); and *Homeland Security: Federal Leadership and Intergovernmental Cooperation Required to Achieve First Responder Interoperable Communications*, [GAO-04-740](#) (Washington, D.C.: July 20, 2004).

after emergencies. Representatives of three education associations³⁹ also noted that school districts have much to do to ensure that their emergency management efforts diffuse confusion during emergencies and provide parents with consistent information.

Based on our survey of school districts, an estimated 39 percent of all school districts provide translators to communicate with LEP parents during emergencies, but fewer—an estimated 23 percent of all districts—provide translations of emergency management materials. Officials in 8 of the 27 districts we interviewed discussed challenges in retaining bilingual staff to conduct translations of the districts’ messages or in reaching parents who do not speak the languages or dialects the district translates. In Seattle, where the district provides translations of 10 of the 47 languages spoken in the schools, the official we interviewed said that staff often experience “burn out” due to their dual roles as interpreters and liaisons between the local community and school district. The problem in retaining bilingual staff was not related to the level of work required by interpreters in the Hardee County, Florida, school district, but with the district’s inability to recruit qualified bilingual staff who also want to reside in the rural, hurricane-prone community. In two different districts, officials were unsure of whether the district’s emergency messages reached parents who did not speak the translated languages provided by the school district. Officials in the Pinellas County school district said that they were unsure about the district’s success in getting emergency management information to parents who speak 1 of the 107 languages for which the district does not provide translations. Difficulties in accommodating dialects was also cited by an official of the Ashtabula, Ohio, school district because staff there have encountered problems ensuring the messages translated by telephone were understood due to the differences in dialects of Spanish spoken by some parents and the school officials providing the translated message. Our findings, while limited to the districts in which we conducted interviews, are consistent with the observations of some national education groups that have indicated that districts, in part due to limited funding, struggle to effectively communicate emergency-related information to this population of parents.

While school districts experience a range of challenges in planning for emergencies and in communicating and coordinating with first responders

³⁹National Education Association, American Association of School Administrators, and National Association of Secondary School Principals.

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

Conclusions

While emergency management is overwhelmingly a state and local responsibility, the federal government plays a critical role in disseminating information on best practices, providing guidance, and giving states flexibility to target federal funding to areas of greatest need. While all three federal agencies involved in emergency management planning for schools have provided some resources, additional access to federal resources would enhance the ability of school districts to plan and prepare for emergencies. Given the challenges many school districts face due to a lack of necessary equipment and expertise, they do not have the tools to support the plans they have in place and, therefore, school districts are left with gaps in their ability to fully prepare for emergencies. Making it clear to states and local governments that school districts are among the entities to which they may disburse certain grant funds they have received from DHS would be one way to diversify the available emergency management resources to which school districts have access.

School districts have taken a number of important steps to plan for a range of emergencies, most notably developing emergency management plans; however, in many districts these plans or their implementation do not align with federally recommended practices. For example, because most districts' plans do not have procedures to ensure the continuity of education in the event of extended school closures, such as those caused by a pandemic or natural disasters, school districts, both urban and rural, are largely not prepared to continue their primary mission of educating students. Unless the federal government examines strategies for planning for on-going student instruction in the event of extended school closures and determines which of those strategies are successful, schools may not have the information they need to put in place a plan that will adequately prepare them for emergencies that require such a response. In addition, while most districts have procedures for special needs students in place, because there is no agreement on procedures school districts should use with such students, districts may employ less than optimal or even risky procedures for evacuating or sheltering these students in an emergency. Further, while the reasons are not readily apparent and can vary as to why school districts do not train with first responders and community partners, by not training together, school districts, first responders, and community

partners may limit their ability to effectively respond to and mitigate the impact of emergencies when they occur. If the federal government had information on why school districts do not train with first responders and community partners, it would be better positioned to provide assistance to school districts that would enable them to train with first responders and community partners on a regular basis.

Finally, our findings show that in some areas there are vast differences in how urban and rural districts prepare for emergencies and it appears that urban districts are taking more actions as suggested by recommended practices to prepare for incidents. It may not be possible for urban and rural school districts to plan equally given differences in geography, resources, expertise, and other demographics that may warrant different approaches. However, it is important that all districts include key procedures, cover the full range of incidents that could affect them, and practice their plans to prepare for emergencies because some incidents, such as natural disasters, may impact urban and rural districts alike.

Recommendations for Executive Action

To help address the challenges school districts face in planning for emergencies, we recommend that the Secretary of DHS clarify that school districts are among those entities to which state and local governments may disburse grant funds received through the State Homeland Security Program, Urban Areas Security Initiative, and Citizens Corps grant programs. This should be done through its guidance for these programs so that states and local governments will know they can disburse these program funds to school districts.

To address the lack of procedures for continuing student education in the event of an extended school closure, we recommend that the Secretary of Education collaborate with the Secretary of HHS in his role as head of the lead agency on pandemics, to examine and identify successful strategies for developing such procedures and provide guidance to school districts on how to include the resulting procedures for the continuation of student education in their emergency management plans. These agencies may consider providing specific suggestions for states and districts to work with state education agencies, health departments, and local community organizations in the process of developing these procedures.

To help school districts shelter or evacuate students with special needs and temporarily disabled students in an emergency, we recommend that the Secretary of Education, in collaboration with the Secretaries of DHS and HHS, examine and identify successful procedures for sheltering and

removing such students from school buildings and share these procedures with school districts.

To promote training between school districts and first responders and between school districts and community partners on how to implement district emergency management plans, we recommend that the Secretaries of DHS and Education identify the factors that prevent school districts, first responders, and community partners from training together and develop strategies for addressing those factors. These strategies should include the continued use of any current resources that could facilitate joint training. DHS and Education should share the strategies with school districts, first responders, and community partners and encourage them to consider implementing the strategies as appropriate.

Agency Comments and Our Evaluation

We provided a draft of this report to DHS, Education, and HHS for review and comment. DHS provided written comments on May 16, 2007, which are presented in appendix V. In commenting on the draft report, DHS generally agreed with the intent of our first recommendation that it clarify that school districts are eligible entities to which states and local governments may disburse emergency management funding. While the department stated that it would continue to alert states and local governments of school districts' eligibility through such activities as site visits and workshops, it did not comment on whether it would modify its program guidelines. Taking the opportunity to remind states and local governments of school districts' eligibility in such one-on-one settings should help to increase awareness of school districts' eligibility. However, we continue to believe that DHS should explicitly include school districts in its program guidance, so that all state and local governments receiving homeland security funds would have access to guidance that provides a clear understanding of how to use the funding. DHS disagreed with the language in our fourth recommendation that the department collaborate with Education to identify and address the factors that prevent training among school districts, first responders, and community partners. DHS suggested that we modify the recommendation to acknowledge the need for DHS and Education to promote current resources in addressing these factors. We agree with DHS's suggestion and have revised the recommendation to recognize the need for DHS and Education to promote current resources. DHS also suggested that we include a discussion of the Citizen Corp Council in the report as a resource for collaboration among local governments, the private sector, and non-profit entities including school districts. We agree and have revised the report to include information on the Citizen Corp Council.

Education provided written comments on May 7, 2007, which are included in appendix VI. Education agreed with all four of our recommendations, but expressed concern about our statement that there are no federal requirements for school districts to have emergency management plans, pointing to a requirement in the No Child Left Behind Act (NCLBA) relating to safe and drug-free schools. As we explain in the report, we did not consider plans required under NCLBA to be emergency management plans for purposes of our report because these plans are not required to address multiple hazards. While Education acknowledged that we had included this information in a footnote, it stated that the footnote appeared only once. We have revised the report to more prominently display this information.

HHS provided written comments on our draft report on May 8, 2007, which are presented in appendix VII. HHS generally agreed with our recommendations. However, HHS requested that Education take the lead with respect to our second recommendation that both agencies provide guidance to school districts on the continuation of education during extended school closures because Education is responsible for leading federal efforts related to the education process. We discussed the issue with Education officials and they agreed to take the lead on this recommendation. Thus, we modified the recommendation accordingly. HHS also requested that we include it in our third recommendation to provide guidance on evacuating and sheltering special needs students because of the agency's expertise on special needs students. We agree and have modified the recommendation to include HHS.

DHS, Education, and HHS also provided technical comments, which we incorporated where appropriate.

We are sending copies of this report to the Secretaries of Education, DHS, HHS, and relevant congressional committees. We will also make copies available to others upon request. In addition, the report will be made available at no charge on GAO's Web site at <http://www.gao.gov>.

Please contact us at (202) 512-7215 or (202) 512-8757 if you or your staff have any questions about this report. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Major contributors are listed in appendix VI.

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Appendix I: Scope and Methodology

To obtain information on federal, state, and local roles and requirements for school districts, how school districts prepare and plan, and any challenges in doing so, we interviewed staff in the Departments of Education, Homeland Security, and Health and Human Services; conducted an e-mail survey of state education agencies and an e-mail survey of state administering agencies; and conducted a mail survey of school districts from a stratified random sample of public school districts. We also conducted site visits during which we interviewed district officials, security administrators, and other officials in 27 school districts in six states. We conducted our work from April 2006 through March 2007 in accordance with generally accepted government auditing standards.

Survey of States

To better understand the role of states in how school districts prepare for emergencies, we designed and administered two surveys—one to state education agencies and a separate, but similar, one to state administering agencies—to all 50 states and the District of Columbia. The survey to state education agencies was conducted between August 2006 and October 2006. The survey included questions about laws that require school districts to have emergency management plans, state funding provided to school districts, and any other resources provided to school districts. The survey of state administering agencies was conducted between November 2006 and January 2007. The survey also included questions about laws requiring school districts to have emergency management plans, state funding provided to school districts, and other resources. In this survey we specifically asked about whether the state allocated portions of the State Homeland Security Program (SHSP), Urban Areas Security Initiative (UASI), and Citizen Corps grants to school districts. In 19 states, there were no UASI funds provided and we did not ask about funding related to this program for those states.

The practical difficulties of conducting any survey may introduce nonsampling errors, such as variations in how respondents interpret questions and their willingness to offer accurate responses. We took steps to minimize nonsampling errors, including pretesting draft instruments and following up on specific responses. Specifically, during survey development, we pretested draft instruments with various officials. For the survey to state administering agencies, we pretested with officials representing state administering agencies in California and Maryland in November 2006. In the pretests, we were generally interested in the clarity of the questions and the flow and layout of the survey. For example, we wanted to ensure definitions used in the surveys were clear and known to the respondents, categories provided in closed-ended questions were

complete and exclusive, and the ordering of survey sections and the questions within each section was appropriate.

We analyzed the requirements for schools and districts to have emergency management plans that were reported to us by states. In some cases, we determined that the laws or other requirements reported in these surveys did not constitute emergency management planning requirements for purposes of this report. Accordingly, these survey responses are not included in our analysis of state requirements. We did not conduct any independent legal research to identify state legal requirements in this area.

Survey of School Districts

To obtain national-level information on school district management planning, we administered a mail survey to a stratified random sample of public school districts. The survey was conducted between September 2006 and January 2007. To obtain the maximum number of responses to our survey, we sent a follow-up mailing with the full survey instrument to nonrespondents approximately 3 weeks after the initial mailing, and a reminder postcard to nonrespondents approximately 4 weeks after the initial mailing of the survey instrument. The survey included questions about whether school districts had emergency management plans, activities related to emergency management plans, characteristics of plans, district requirements of schools, and coordination with various persons in the school environment, local community, and first responders.

Population

The target population of 14,432 districts consisted of public school districts in the 50 states and the District of Columbia with at least one school in each of their jurisdictions in the 2003-2004 school year.¹ We used Education's Common Core of Data (CCD) Local Education Agency (School District) file for the 2003-2004 school year (version 1b) as the basis of defining our population. To define our sampling frame, we removed districts from the CCD that were not a component of a supervisory union; state and federally-operated institutions; other

¹We arrived at our target population of 14,432 by eliminating certain types of school districts such as: local school 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 less than one student or one school, agencies run by the Department of Defense or Bureau of Indian Affairs, and districts in U.S. territories.

education agencies; had less than 1 student; were closed; run by the Department of Defense or Bureau of Indian Affairs; or located in American Samoa, Guam, Northern Marianas, Puerto Rico, or the Virgin Islands. On the basis of our review of these data, we determined this source to be adequate for the purposes of our work.

Sample Design and Errors

The sample design for the mail survey was a stratified random sample of districts with two certainty strata containing all of the urban and urban fringe districts with over 100,000 students. We defined the strata classifications using the locale code in the CCD. We chose districts with the largest number of students with certainty because the total number of students in these districts makes up nearly 13 percent of the total students in our universe. We also included four additional strata—urban, urban fringe, towns, and rural. Table 15 provides a description of the universe and sample of districts.

Table 15: Description of the Population and Sample of Districts

Stratum	Population/universe	Sample size
Large urban	12	12
Large urban fringe	14	14
Urban	860	125
Urban fringe	3,795	135
Town	1,785	132
Rural	7,966	136
Total	14,432	554

Source: GAO.

We used the metro-centric locale codes assigned to each district in the 03-04 CCD to define urban and rural. We defined urban districts to be those districts within a central city of a Core Based Statistical Area or Consolidated Statistical Area (locale codes 1 and 2). Generally, those are considered to be a central city of a Core Based Statistical Area (CBSA) or Consolidated Statistical Area (CSA), with the city having a population greater than or equal to 250,000 (for locale code 1) or a central city of a CBSA or CSA, with the city having a population less than 250,000 (for locale 2). Rural districts are any incorporated place, Census-designated place, or non-place territory and defined as rural by the Census Bureau (locale codes 7 and 8). These are generally defined as any incorporated place, Census-designated place, or non-place territory not within a CBSA

or CSA of a large or mid-size city and defined as rural by the Census Bureau; and any incorporated place, Census-designated place, or non-place territory within a CBSA or CSA of a large or mid-size city and defined as rural by the Census Bureau.

Because we surveyed a sample of districts, our results are estimates of a population of districts and thus are subject to sampling errors that are associated with samples of this size and type. Our confidence in the precision of the results from this sample is expressed in 95 percent confidence intervals, which are expected to include the actual results in 95 percent of the samples of this type. We calculated confidence intervals for this sample based on methods that are appropriate for a stratified random sample. We determined that nine of the sampled districts were out of scope because they were not considered to be school districts. All estimates produced from the sample and presented in this report are for the estimated target population of 14,131 districts with at least one school in the 2003-2004 school year. All percentage estimates included in this report have margins of error of plus or minus 10 percentage points or less, unless otherwise noted.

We took steps to minimize nonsampling errors that are not accounted for through statistical tests, like sampling errors. In developing the mail survey, we conducted several pretests of draft instruments. We pretested the survey instrument with district officials in six districts—Baltimore County, Maryland; Carbon County, Wyoming; Citrus County, Florida; Muleshoe Independent, Texas; Santa Fe Public Schools, New Mexico; and Vigo County, Indiana—between July 25, 2006, and August 18, 2006. On the basis of the pretests, the draft survey instrument underwent some revisions.

Response Rate

We received survey responses from 444, or 80 percent, of the 554 school districts in the sample.

Site Visits

To understand emergency management planning at the local level, we conducted site visits and conducted interviews in six states between September 27, 2006, and November 15, 2006. The states we visited included Florida, Iowa, Massachusetts, North Carolina, Ohio, and Washington. In each state, to the extent possible, we visited or interviewed (by telephone) at least one district that corresponded to the strata in our survey of school districts. We selected states and school districts that included recommended practices, some that did and did not receive

federal funding for emergency management, both urban and rural districts, and those representing geographic diversity. When viewed as a group, the states and school districts also provided variation across characteristics such as geographic location, district size, student populations, and the percentage of students with Limited-English proficiency or disabilities. We conducted a pretest of questions used in the site visits with the Alleghany County Public Schools district, in Maryland, on September 13, 2006. We used this interview to determine whether our interview questions were clear as well as to gauge the amount of time the interviews would take.

In total, we interviewed officials in 27 school districts. Through our interviews with district officials, we collected information on the role of the school district in emergency management planning, state or local requirements, whether the district received federal, state, or local funding and guidance, and experiences in communicating and coordinating with first responders, parents, and students. Table 16 indicates the school districts we visited during site visits or interviewed, the corresponding locale code, and other selected characteristics.

Table 16: School Districts Interviewed or Visited during Site Visits

District	Common Core of Data Locale Code	Number of schools	Number of students	Number of students categorized as Limited-English Proficient (LEP)
Florida				
Pinellas County School District	2 (urban)	174	113,651	3,204
Hillsborough County School District	3 (urban fringe)	258	189,469	19,686
Hardee County School District	6 (town)	9	5,146	450
Highlands County School District	7 (rural)	18	12,049	517
Washington				
Seattle School District	1 (urban)	111	46,746	5,752
Renton School District	2 (urban)	26	13,236	1,485
Sequim School District	6 (town)	5	2,950	48
Skykomish School District	8 (rural)	2	70	2
Index School District	8 (rural)	1	30	0

Appendix I: Scope and Methodology

District	Common Core of Data Locale Code	Number of schools	Number of students	Number of students categorized as Limited-English Proficient (LEP)
Iowa				
Des Moines Independent Community School District	2 (urban)	72	32,194	3,502
West Des Moines Community School District	4 (urban fringe)	15	8,491	246
Marshalltown Community School District	5 (town)	9	4,922	1,203
Bondurant-Farrar Community School District	8 (rural)	2	1,042	0
Massachusetts				
Boston Public Schools	1 (urban)	136	57,742	9,789
Holliston Public Schools ^a	3 (urban fringe)	4	3,035	1
Hanover Public School District	3 (urban fringe)	5	2,809	2
Greenfield Public Schools	6 (town)	7	1,948	91
Mashpee Public School System	8 (rural)	3	2,108	6
North Carolina				
Durham City Schools	2 (urban)	45	30,955	2,925
Wake County Schools	3 (urban fringe)	132	114,568	6,777
Lee County Schools	6 (town)	12	9,242	1,104
Granville County Schools	7 (rural)	14	8,674	452
Chatham County Schools ^a	8 (rural)	15	7,404	1,004
Ohio				
Cleveland Municipal Schools	(1) urban	122	64,670	3,119
Shaker Heights Schools	3 (urban fringe)	9	5,737	79
Ashtabula Area City Schools ^a	6 (town)	12	4,492	145
Olmsted Falls City Schools	8 (rural)	4	3,388	12

Source: Common Core Data.

^aWe interviewed these officials by telephone.

Appendix II: Emergency Management Planning Requirements

Table 17: States Reporting Selected Requirements for School Districts or Schools for Emergency Management Planning

State ^a	Planning requirements						
	State requirement for school districts or schools to have emergency management plans	Specific hazards to be included in plans	Review or update of plans by the school district or some other entity	Requirements pertaining to drills or other training for teachers and/or students	Parent involvement in the planning process	First responders ^b involvement in the planning process	Community partners ^c involvement in the planning process
Alabama							
Alaska	X	X	X	X	X ^d	X	X
Arizona	X ^e					X	
Arkansas							
California	X		X	X	X	X ^f	
Colorado	X			X			
Connecticut							
Delaware	X ^e		X	X			
District of Columbia							
Florida	X	X		X			
Georgia	X	X	X		X	X	X
Hawaii							
Idaho							
Illinois	X	X	X ^g	X			
Indiana	X	X	X			X	
Iowa							
Kansas							
Kentucky							
Maine	X	X	X			X	X
Maryland	X	X		X		X	X
Massachusetts	X	X	X	X		X	
Michigan							
Minnesota	X			X	X	X	X
Mississippi	X		X				
Missouri							
Montana							
Nebraska							
Nevada	X	X	X	X	X	X	X
New Hampshire							
New Jersey	X ^e		X	X		X	X

**Appendix II: Emergency Management
Planning Requirements**

State ^a	Planning requirements						
	State requirement for school districts or schools to have emergency management plans	Specific hazards to be included in plans	Review or update of plans by the school district or some other entity	Requirements pertaining to drills or other training for teachers and/or students	Parent involvement in the planning process	First responders ^b involvement in the planning process	Community partners ^c involvement in the planning process
New Mexico	X		X		X		X
New York	X	X	X	X		X	
North Carolina							
North Dakota							
Ohio	X	X	X		X	X	
Oklahoma	X	X					
Oregon	X			X			
Pennsylvania	X ^e		X	X			X*
Rhode Island	X	X	X	X	X	X	
South Carolina	X	X		X			
South Dakota	X			X			
Tennessee	X	X					
Texas	X			X			
Utah	X	X	X	X	X	X	X
Vermont	X	X	X				
Virginia	X	X		X		X	
Washington	X ^e						
Wisconsin							
West Virginia							
Wyoming	X			X			
Total	32	18	18	21	9	16	10

Source: GAO analysis of state education agencies' and state administering agencies' survey responses.

^aNeither Louisiana's SEA nor its SAA responded to our survey.

^bFor purposes of this report, we define first responders to include fire, law enforcement, EMS, and state and local emergency management agencies. States may define this term differently.

^cFor purposes of this report, we define community partners to include public health entities, mental health entities, local heads of government, transportation entities, hospitals, the Red Cross, the faith-based community, and the business community. States may define this term differently.

^dSchools are required to form crisis response teams that include, among others, a parent whose child attends the school. The emergency management plan must include the names of these team members and their specific job functions relating to a crisis. However, it is not clear what role, if any, parents play in developing the emergency management plan.

^eThe state requirement specifies that the school or district level plan must satisfy certain minimum requirements developed by other entities, such as the state department of education.

**Appendix II: Emergency Management
Planning Requirements**

¹Parents may become involved in the emergency preparedness plan development if the school site council, otherwise tasked with plan development, delegates planning responsibility to a school safety planning committee.

⁹Although first responders are not required to be involved in the development of emergency management plans, districts are required to invite them to participate in the annual review process.

Appendix III: Homeland Security Funding Provided to School Districts

Table 18: States That Reported Providing Homeland Security Funding Directly to School Districts

State	Type of DHS grant awarded to states and provided to school districts			Amount of grant funding provided to school districts during fiscal years 2003—2006 (Dollars in thousands)			
	State Homeland Security Program	Urban Areas Security Initiative	Citizen Corps	Fiscal year 2003	Fiscal year 2004	Fiscal year 2005	Fiscal year 2006
	Hawaii	X				\$110	\$71
Florida	X				120	2,282	\$2,000
			X	\$34	36	36	46
Michigan	X			8,600			
Mississippi			X			66	60
Wyoming	X			386			
Total				\$9,020	\$266	\$2,455	\$2,106
Grand total							\$13,847

Source: GAO analysis of state administering agencies' survey data.

Table 19: States and the District of Columbia That Reported Provided Homeland Security Funding to School Districts through Local Jurisdictions during Fiscal Years 2003—2006

State	Type of grant		
	State Homeland Security Program	Urban Areas Security Initiative	Citizen Corps
Alabama	X		X
District of Columbia		X	
Hawaii ^a			X
Minnesota		X	
Nevada	X	X	X
New Jersey	X	X	
North Dakota	X		
Pennsylvania		X	
South Dakota	X		
Wyoming			X

Source: GAO analysis of state administering agencies' survey data.

^aHawaii distributed DHS funding to its state education agency, which then provided funding to public schools in its state.

Appendix IV: Guidance, Training, and Funding States Provided to School Districts

Table 20: States and the District of Columbia That Reported Providing Resources to School Districts to Assist in Emergency Management Planning

State	Guidance provided	Training provided	State funding provided
Alabama	X	X	X
Alaska	X		X
Arizona	X	X	
Arkansas	X	X	
California	X	X	X
Colorado	X		
Connecticut	X	X	X
Delaware	X	X	
District of Columbia	X	X	
Florida	X		
Georgia	X	X	
Hawaii	X		X
Illinois	X	X	
Idaho ^a			
Indiana	X	X	
Iowa	X	X	
Kansas	X		
Kentucky	X	X	
Louisiana ^b			
Maine	X	X	X
Maryland	X	X	
Massachusetts		X	
Michigan	X	X	
Minnesota	X	X	
Mississippi	X	X	
Missouri	X	X	X
Montana	X	X	
Nebraska	X		
Nevada	X		
New Hampshire	X	X	X
New Jersey	X	X	
New Mexico	X	X	
New York	X	X	
North Carolina	X	X	

Appendix IV: Guidance, Training, and Funding States Provided to School Districts

State	Guidance provided	Training provided	State funding provided
North Dakota	X	X	
Ohio	X	X	X
Oklahoma	X	X	
Oregon	X	X	
Pennsylvania	X	X	
Rhode Island	X		
South Carolina	X	X	
South Dakota	X		
Tennessee	X	X	X
Texas	X	X	
Utah ^c			
Vermont	X	X	X
Virginia	X		
Washington	X	X	
West Virginia	X	X	
Wisconsin	X	X	
Wyoming	X		
Total	47	37	11

Source: GAO analysis of state administering and education agencies' survey data.

^aIdaho did not provide guidance, training, or state funding to school districts for emergency management planning.

^bLouisiana's state administering and education agencies did not respond to our surveys.

^cUtah did not provide guidance, training, or state funding to school districts for emergency management planning.

Appendix V: Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, DC 20528



**Homeland
Security**

May 15, 2007

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

Mr. William O. Jenkins, Jr.
Director
Homeland Security and Justice Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

2007 MAY 17 PM 1:08
US GAO

Dear Ms. Ashby and Mr. Jenkins:

Thank you for the opportunity to review and comment on the Government Accountability Office's (GAO's) draft report GAO-07-609 entitled *EMERGENCY MANAGEMENT: Most School Districts Have Emergency Management Plans, but Would Benefit from Additional Federal Guidance*.

The draft report addresses each of the three areas of inquiry, i. e., respective roles of Federal and State governments and school districts in establishing requirements and providing resources to school districts for emergency management planning; school districts' efforts to plan and prepare for emergencies; and challenges the school districts have experienced in planning for emergencies; and communicating and coordinating with first responders, parents, and students.

The data collected from school districts and States are helpful in identifying gaps in emergency management capabilities.

Regarding readiness activities, the report includes various activities under "planning" (planning, training, equipping, exercising, etc.). To help determine next steps, it would be useful to know the relative degree to which districts report that they engage in each activity. The report does not estimate relative gaps among various shortfalls, such as guidance/technical assistance, funding, training, and equipment. Such estimates would help prioritize and focus next steps to address shortfalls. GAO may wish to consider this as an area for future study.

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The report states that fewer than half of school districts with emergency management plans involve community partners in developing and updating such plans. The report does not include the local Citizen Corps Council as a readily-available resource for collaboration among local government, private sector, and non-profit entities that should also include local school districts. We recommend that this be added to the report.

With respect to the draft report's recommendations, we concur with the first recommendation directed the Department and request that the second recommendation be reworded. The two recommendations for the Department are as follows:

Recommendation 1: Clarify that school districts are among those entities to which state and local governments may disburse grant funds received through the State Homeland Security Program, Urban Areas Security Initiative, and Citizens Corps (sic) grant programs.

Response: The Department of Homeland Security (DHS) will continue to re-affirm that school districts and universities are eligible entities of DHS State Homeland Security Grant funds based on the definition of "local units of government" in the Conference Report accompanying the DHS Appropriations Act of FY 2007 and the States' applicable statutes. The Conference Report accompanying the DHS Appropriations Act of 2007 provides a definition of what the term "local units of government" means. Specifically, a local unit of government is defined as "any county, city, village, town, district, borough, parish, port authority, transit authority, intercity rail provider, commuter rail system, freight rail provider, water district, regional planning commission, council of government, Indian tribe with jurisdiction over Indian country, authorized Tribal organization, Alaska Native village, independent authority, special district, or other political subdivision of any State."

DHS will continue to clarify that school districts and universities are eligible recipients of DHS State Homeland Security Grant funds as it administers its preparedness grant programs. This clarification currently occurs and will be re-emphasized during site visits, monitoring visits, seminars, workshops, town hall meetings, etc. as well as during day-to-day interaction and collaboration with State and local customers.

Recommendation 2: With the Department of Education, identify the factors that prevent school districts, first responders, and community partners from training together and develop strategies for addressing those factors.

Response: Nonconcur as written. Recommend that this recommendation be revised to state: ...the Secretaries of DHS and Education identify the factors that prevent school districts, first responders, and community partners from training together, and promote current resources (e.g., local Citizen Corps Councils) and the development of new strategies for addressing those factors.

Thank you again for the opportunity to comment on this draft report and we look forward to working with you on future homeland security issues.

Sincerely,



Steven J. Pecinovsky
Director
Departmental GAO/OIG Liaison Office

Appendix VI: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF SAFE AND DRUG-FREE SCHOOLS

May 7, 2007

Ms. Cornelia M. Ashby
Director, Education, Workforce,
and Income Security Issues
Mr. William O. Jenkins
Director, Homeland Security
and Justice Issues
Government Accountability Office
441 G Street, N.W.
Washington, DC 20548

Dear Ms. Ashby and Mr. Jenkins:

Thank you for sharing your proposed report, "Emergency Management: Most School Districts Have Emergency Plans, but Would Benefit from Additional Federal Guidance" (GAO-07-609), and offering us an opportunity to comment on the draft document.

While we share your conclusion that schools and school districts face many challenges in planning effectively for emergencies and that more work needs to be done, we believe that the results of your recent survey include some very positive news. The vast majority of districts (about 95 percent) report having written emergency plans, and nearly all of those plans address multiple hazards. About 85 percent of school districts have developed specific requirements for school emergency planning, and many districts are taking the important steps of practicing their emergency management plans and reviewing and revising those plans at least annually.

The draft report contained four recommendations for executive action.

To help address the challenges school districts face in planning for emergencies, we recommend that the Secretary of DHS clarify that school districts are among those entities to which state and local governments may disburse grant funds received through the State Homeland Security Program, Urban Areas Security Initiative, and Citizen Corps grant programs. This should be done through its guidance for these programs so that states and local governments will know they can disburse these program funds to school districts.

We support the recommendation. In working with schools and school districts around emergency management issues in the past several years, we have observed that schools may not routinely be part of local emergency management activities. The kind of guidance recommended by the draft could help encourage the inclusion of school districts

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in such efforts and increase their access to available funding to support important emergency management activities.

To address the lack of procedures for continuing student education in the event of an extended school closure, we recommend that the Secretary of HHS, as the lead agency on pandemics, and the Secretary of Education examine and identify successful strategies for developing such procedures and provide guidance to school districts on how to include the resulting procedures for the continuation of student education in their emergency management plans. These agencies may consider providing specific suggestions for states and districts to work with state education agencies, health departments, and local community organizations in the process of developing these procedures.

We agree with this recommendation. We believe that schools will play several critical roles in the event of an outbreak of pandemic influenza, including developing and implementing procedures for continuing student learning in the event of an extended school closure. We have already identified this issue as a priority. Since fiscal year 2006, we have required grantees under our Emergency Response and Crisis Management (ERCM) grant program (which we have since renamed Readiness and Emergency Management for Schools, or “REMS”) to develop a written plan designed to prepare the school district for a possible infectious disease outbreak, such as pandemic influenza. Plans must include disease surveillance, school closure decision-making processes, business continuity issues, and continuation of educational services.

To help school districts shelter or evacuate students with special needs and temporarily disabled students in an emergency, we recommend that the Secretary of Education, in collaboration with the Secretary of DHS, examine and identify successful procedures for sheltering and removing such students from school buildings and share these procedures with school districts.

We agree with this recommendation. Students and staff with special needs, as well as temporarily disabled students or staff, pose special challenges for emergency management planning, and those needs must be explicitly addressed in developing plans, and in practicing and updating those plans. Under the REMS program, we require that applicants demonstrate that they have taken into consideration the communication, transportation, and medical needs of individuals with disabilities within their school district. Some grant sites have made incorporating information about students and staff with special needs an important focus of their planning and implementation efforts. We have shared information about some of the strategies they have developed in our training activities.

But our work with school districts has also taught us that the students and staff with special needs have a wide range of disabilities that require varied and specialized responses and planning actions. We look forward to working with the Secretary of DHS on developing and sharing procedures to shelter or evacuate students or staff with special needs from school buildings, and remain open to a broad range of approaches given the evolving nature of this field.

To promote training between school districts and first responders and between school districts and community partners on how to implement district emergency management plans, we recommend that the Secretaries of DHS and Education identify the factors that prevent school districts, first responders, and community partners from training together and develop strategies for addressing those factors. DHS and Education should share the strategies with school districts, first responders, and community partners and encourage them to consider implementing the strategies as appropriate.

We agree with this recommendation. The challenges that schools, first responders, and other community partners face in collaborating to develop, practice, and fine tune emergency management plans are significant. Using the experience of our REMS grantees, and working with DHS, we believe that we can identify some common barriers to this necessary collaboration, and identify strategies that have helped some communities increase the extent to which school emergency management activities, involving all of the necessary partners, are a shared responsibility.

In addition to our responses to the report's recommendations, we would like to express concern about the impression, conveyed at the beginning of the "Highlights" section of the draft report and repeated throughout the draft, that there are no Federal laws requiring school districts to have emergency management plans. While we agree that the requirements in 20 U.S.C. Section 7114(d)(7)(D) do not require that such plans address multiple hazards, the provisions do require that schools districts participating in the Safe and Drug-Free Schools and Communities Act State Grants program (which includes most school districts in the country) submit an assurance that they have "a plan for keeping schools safe and drug-free that includes ... a crisis management plan for responding to violent or traumatic incidents on school grounds." In a footnote on page nine, the draft report explains that you have made a distinction between the current Federal requirement to have a plan and a Federal requirement to have a plan *that addresses multiple hazards*. Your explanation appears only in this one footnote, and only after the original, arguably misleading statement has appeared several times in the draft report. We encourage you to revise your statement in each of the places it appears in the report. We offer the following language:

"Although the No Child Left Behind Act of 2001 requires school districts participating in the Safe and Drug-Free Schools and Communities Act State Grants program to submit an assurance that they have a crisis management plan for responding to violent or traumatic incidents on school grounds, there are no federal laws requiring school districts to have emergency management plans that address multiple hazards."

Under separate cover, we have transmitted some additional technical comments that we hope will be helpful to you as you finalize the draft report.

Again, thank you for sharing the report with us and allowing us the opportunity to submit comments concerning your draft. I hope that you will let me know if we can provide any

clarifying information about the comments and concerns contained in this letter, or assist in any other way as you finalize your report on this very important issue.

Sincerely,



Deborah A. Price
Assistant Deputy Secretary

Appendix VII: Comments from the Department of Health & Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the Assistant Secretary
for Legislation

Washington, D.C. 20201

MAY 8 2007

Ms. Cornelia M. Ashby
Director, Education, Workforce,
And Income Security Issues
U.S. Government Accountability Office
Washington, DC 20548

Dear Ms. Ashby:

Enclosed are the Department's comments on the U.S. Government Accountability Office's (GAO) draft report entitled, "Emergency Management: Most School Districts Have Emergency Management Plans, but Would Benefit from Additional Federal Guidance" (GAO-07-609).

The Department appreciates the opportunity to review and comment on this draft before its publication.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Hernandez".

Vincent J. Ventimiglia
Assistant Secretary for Legislation

for

GENERAL COMMENTS OF THE DEPARTMENT OF HEALTH AND HUMAN SERVICES (HHS) ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S (GAO) DRAFT REPORT ENTITLED: EMERGENCY MANGEMENT: MOST SCHOOL DISTRICTS HAVE EMERGENCY MANAGEMENT PLANS, BUT WOULD BENEFIT FROM ADDITIONAL FEDERAL GUIDANCE (GAO 07-609)

HHS COMMENT:

"To address the lack of procedures for continuing student education in the event of an extended school closure, we recommend that the Secretary of HHS, as head of the lead agency on pandemics, and the Secretary of Education examine and identify successful strategies for developing such procedures and provide guidance to school districts on how to include the resulting procedures for the continuation of student education in their emergency management plans."

HHS and Education work closely on issues related to pandemic influenza and school closures. While HHS provides leadership on health-related issues such as reducing disease transmission, Education leads activities related to the educational process, including continuation of education. Therefore, this recommendation should be rewritten to place Education as the lead, with support from HHS.

It might be appropriate to include HHS in the recommendation on identifying successful procedures for helping students with special needs. CDC/NCBDDD would be able to provide expertise in this area.

TECHNICAL COMMENTS OF THE DEPARTMENT OF HEALTH AND HUMAN SERVICES (HHS) ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S (GAO) DRAFT REPORT ENTITLED: EMERGENCY MANAGEMENT: MOST SCHOOL DISTRICTS HAVE EMERGENCY MANAGEMENT PLANS, BUT WOULD BENEFIT FROM ADDITIONAL FEDERAL GUIDANCE (GAO 07-609)

Throughout the report there is reference to "special needs" individuals (students or the general population). It should be noted in the report that the disability community throughout the nation has been involved in reaching consensus on the definition of "special needs" for the pending National Response Plan (NRP) which is currently under revision.

One consensus definition of special needs will help facilitate awareness and planning for special needs populations and hopefully result in Federal, State, and local agencies reaching out to those populations and including them as partners in emergency planning and response. Once the revised NRP is approved, it would be beneficial for the school districts to adopt the NRP "special needs" definition to ensure better awareness and preparedness in all communities and ensure consistency throughout the nation.

Appendix VIII: GAO Contacts and Staff Acknowledgments

GAO Contacts

Cornelia M. Ashby (202) 512-7215, ashbyc@gao.gov

William O. Jenkins, Jr. (202) 512-8757, jenkinswo@gao.gov

Acknowledgments

Kathryn Larin (Assistant Director), Debra Sebastian (Assistant Director), and Tahra Nichols (Analyst-in-Charge) managed all aspects of this assignment. Benjamin Jordan, Meaghan Marshall, and Kris Trueblood made significant contributions to this report. Krista Anderson, Jennifer Gregory, Lise Levie, and Paul Revesz also made contributions to this report. Sue Bernstein and Katherine Davis contributed to writing this report. Jim Ashley, Jean McSween, Amanda Miller, and Joan Vogel provided key technical support. Sheila McCoy provided legal support.

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