

The Principal or his/her designee with supervisory authority shall examine the environmental conditions and operations of each School building under his or her supervision to determine potential hazards to student and staff safety, and shall propose operating changes to prevent dangerous circumstances and develop and adopt a comprehensive school emergency management plan to respond to such hazards (“EMP”). The EMP shall consist of four parts: (i) the emergency operations plan; (ii) a floor plan that is unique to each floor of the School’s building; (iii) a site plan that includes all building property and surrounding property, and (iv) an emergency contact information sheet. The Principal shall consult with community law enforcement and safety officials, parents, and School employees when developing the EMP, and shall list the name, title (if applicable), contact information and signature of all participating parties in the final EMP.

Emergency Operations Plan

The emergency operations plan shall be contained in a single document designed to address and respond to all-hazards that may negatively impact the School, at minimum including the following events: an active shooter event; a hostage situation; a bomb threat; an act of terrorism; bullying; and any other natural or manmade hazards that the Principal or his/her designee knows of or should reasonably anticipate occurring that could compromise the health or safety of students, employees, administrators or property based on the results of a hazard identification and risk analysis for the School. The hazard and risk analysis shall also be included with the emergency operation plan.

The emergency operations plan shall be an all-hazards plan in compliance with the National Incident Management System (“NIMS”) and plan operations shall be organized around five mission areas. These include:

1. Prevention: meaning the capabilities needed to deter, stop or avoid an imminent crime, threat or actual mass casualty event;
2. Protection: defined as the capabilities to secure the School against manmade and natural disasters, acts of violence, or other ongoing hazards;
3. Mitigation: meaning the capabilities needed to eliminate or reduce property damage, injury or loss of life by minimizing the impact of an emergency event and decreasing the likelihood of hazardous events;
4. Response: means the capabilities necessary to stabilize an emergency once it has already happened or is certain to occur in an unpreventable way by establishing a safe and secure environment in order to save lives and property; and
5. Recovery: meaning the capabilities necessary to restore a learning environment after an emergency situation.

Each protocol shall include procedures deemed appropriate by the Principal or his/her designee with supervisory authority for responding to threats and emergency events, respectively, including procedures for the notification of appropriate law enforcement personnel, calling upon specified emergency response personnel for assistance, and informing parents of affected students. When

approved by the Ohio Building Code and noted in the School's certificate of occupancy, the emergency operations plan may also include the use of temporary door locking devices to prevent ingress and egress in emergency situations or during active shooter drills.

The emergency operations plan shall incorporate education procedures, including procedures that involve the use of training drills, to instruct students, staff and administrators on methods to avoid, deter, or stop an imminent crime or safety issue.

Prior to the opening day of each School year or upon initial enrollment, whichever is later, the Principal or his/her designee with supervisory authority shall inform each student enrolled in the School and the student's parent of the parental notification procedures included in the EMP.

EMP Test

The Principal or his/her designee with supervisory authority shall prepare and conduct at least one annual emergency management test, defined as a regularly scheduled drill, exercise, or activity that is designed to assess and evaluate an emergency management plan. The emergency management test shall be either:

1. A tabletop exercise held in an informal setting to discuss of various issues regarding a hypothetical, simulated emergency;
2. A functional exercise conducted in a realistic, real-time environment designed to validate and evaluate the School's emergency capabilities by exercising plans, policies, and procedures through a projected exercise scenario with event updates that drive activity at the management level; or
3. A full-scale exercise involving multiple agencies, organizations, and jurisdictions in order to test and validate the School's many facets of preparedness.

Each exercise type shall be used at least once every 3 years, and shall assess at least one hazard identified in the School's hazard and risk analysis. At least one representative from the local law enforcement agency, fire department, emergency medical services agency or behavioral health entities shall be invited to participate in or observe the emergency management test; however, actual observation or participation by any outside entities shall not be required. Students shall not be included in emergency management tests unless the School has received parental consent, and it is determined by the Principal or his/her designee that the student's participation would be beneficial to the School and would be appropriate given the student's age and understanding of the test's purpose.

The Principal or his/her designee with supervisory authority shall submit an after action report documenting the emergency management test to the Ohio Department of Education no later than thirty (30) days after the test is completed. See **Appendix 447-A**.

The School shall also conduct routine safety drills, including at least one (1) theoretical drill, to provide students and staff with instruction on securing in the building or rapidly evacuating in response to a threat to the School involving an act of terrorism a person possessing a deadly weapon, or another act of violence requiring an immediate response.

The EMP shall be submitted electronically using the standardized forms developed by the Department of Education. The Principal or his/her designee with supervisory authority shall review the EMP annually by September 1 and certify to the Department of Education that the plan is current and accurate. The EMP shall be updated and revised at least every three (3) years from the previous date of compliance. The Principal or his/her designee with supervisory authority must also submit an updated electronic copy of the EMP to the Department of Education whenever a major modification to the School building necessitates changes in the EMP's procedures or whenever the emergency contact information changes. Updated copies are due to the Department within ten (10) days of the adoption of any changes to the EMP. A copy of the EMP shall also be filed with each law enforcement agency having jurisdiction over the School building(s). Upon request, the EMP will be filed with the fire department and emergency medical service organization serving the political subdivision or county, respectively, in which the building is located.

The Principal or his/her designee with supervisory authority shall keep copies of this EMP in a secure place. Copies of the EMP and information pertaining to the School's safety protocols are not public records and shall be exempt from public disclosure or release in accordance with the Ohio Public Records Act.

The School will grant access to School buildings so that law enforcement personnel, the fire department for the political subdivision, emergency medical service organizations for the political subdivision, and emergency management agencies for the county in which the building is situated may hold emergency response training sessions. The training sessions must occur outside of student instructional hours, and the Principal or a designee of the School must be present during the sessions.

Threat Assessment

Beginning with the 2022-2023, if the School serves any of the grades 6-12, the School shall establish a multidisciplinary Threat Assessment Team ("TAT"), comprised of a School administrator, and when possible, mental health professionals, school resource officers, and other necessary personnel. Upon appointment, and every three (3) years thereafter, each member of the TAT shall complete a threat assessment training approved by the Department of Public Safety, which shall include instruction on the following:

- Identifying behaviors, signs and threats that may lead to a violent act;
- Determining the seriousness of a threat; and
- Developing intervention plans that protect potential victims and address underlying problems or conflicts that initiated the behavior and assessment results.

Proof of training shall be uploaded with the EMP.

The TAT shall conduct a threat assessment to minimize the risk of targeted violence at the School. The TAT shall utilize an evidence-based threat assessment process or best practices threat assessment guidelines created by the national threat assessment center (including the joint U.S. Secret Service and U.S. Department of Education publication, Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates for identifying,

assessing, and managing students who may pose a threat). The results of the threat assessment shall be used to develop a Threat Assessment Plan (“TAP”), which shall be incorporated into the EMP and shall do at least the following:

- Identify the types of threatening behavior that may represent a physical threat to the School community;
- Identify individuals to whom threatening behavior should be reported and steps to be taken by those individuals;
- Establish threat assessment guidelines, including identification, evaluation of the seriousness of a threat or danger, intervention to reduce potential violence, and follow-up to assess intervention results; and
- Establish guidelines for coordinating with local law enforcement agencies and reports collected through the School’s anonymous reporting tip-line, including identification of a point of contact.

Board employees, volunteers, and other school community members, including students and parents, shall immediately report to the Principal any expression of intent to harm another person or other statements or behaviors that suggest a student may intend to commit an act of violence. Nothing in this policy overrides or replaces an individual's responsibility to contact 911 in an emergency. In the event that the Principal or his or her designee learns of a threat of violence or concerning communications or behaviors that indicate the likelihood of a threatening situation, the TAT will be directed to meet to gather information, evaluate facts, and make a determination as to whether a threat of violence exists. If the TAT determines that there is a specific risk of violence, the TAT may collaborate with interested parties to develop and implement a written plan to manage or reduce the threat posed by the student in that situation. Regardless of threat assessment activities or protocols, disciplinary action and referral to law enforcement shall occur as required by State law and Board policy.

The TAT shall maintain student confidentiality as required by the Family Educational Rights and Privacy Act (“FERPA”), including in conformity with the health or safety emergency exception to FERPA permitting disclosure of student information to appropriate parties to address a health and safety emergency.

Notwithstanding any other immunity or defense available, the School, Board, and employees, including the members of the TAT shall not be liable for damages in a civil action for injury, death, or loss to person or property allegedly arising from a TAT member’s execution of duties related to school safety unless the team member’s act or omission constitutes willful or wanton misconduct.

Anonymous Reporting Tip-Line

The School shall register with the SaferOhio school tip line operated by the Ohio Department of Public Safety or enter into an agreement with an anonymous reporting program that is capable of the following:

- Operates 24 hours a day, seven days per week; and

- Forwards all reported information to and coordinates with the appropriate school Principal, threat assessment teams (once established) and law enforcement.

The School shall promote the availability of the anonymous reporting tip-line.

The School will maintain a log of reported tips, including demographic information about the student subject to the report, and any disciplinary or mental health actions and/or referrals made for the subject student.

Cell Phones

The School's EMP shall address student use of cell phones during an active threat or emergency.

R.C. 3737.73(D); R.C. 3314.03(A)(11)(d); R.C. 3313.669; R.C. 3313.6610; R.C. 5502.6262; R.C. 5502.263; O.A.C. 3301-5-01.

See also **Policy 423 Facility Security, Policy 424 Emergency Preparedness and Evacuation; Appendix 424-A Emergency Management and Health Plan Emergency Drills, Policy 428 Bomb Threat Policy, Policy 429 Crisis Media Situations, and Appendix 447-A Data Collection Worksheet: Information for EMT (Emergency Management Test) Entry Into SAFE Account.**

