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School of Security and Global Studies

Emergency and Disaster Management

The thesis for the master's degree submitted by

Bobbi Jo Nye

under the title

Emergency Plans: A Perception of Preparedness in Non-Public K-8 Schools

has been read by the undersigned. It is hereby recommended for acceptance by the faculty with credit in the amount of three semester hours.

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EMERGENCY PLANS:

A PERCEPTION OF PREPAREDNESS IN NON-PUBLIC K-8 SCHOOLS

A Master Thesis

Submitted to the Faculty

of

American Military University

by

Bobbi Jo Nye

In Partial Fulfillment of the

Requirements for the Degree

of

Master of Arts in Emergency and Disaster Management

December 2014

American Military University

Charles Town, West Virginia

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DEDICATION

I dedicate this thesis to my daughter, who is my inspiration and my husband for all his support during the last three years.

ABSTRACT OF THE THESIS

EMERGENCY PLANS:

A PERCEPTION OF PREPAREDNESS IN NON-PUBLIC K-8 SCHOOLS

By

Bobbi Jo Nye

American Military University, December 21, 2014

Charles Town, West Virginia

Professor Christina Spoons, Thesis Professor

This research examines state and local requirements for 25 non-public K-8 schools in the identified counties of West Virginia, Virginia, and Maryland to have emergency plans that meet the federal recommended guidelines for comprehensive emergency management planning. A mixed methods approach using a web enabled survey instrument developed and used to determine school plan comprehensiveness. The researcher used the same survey instrument to perform a comparative analysis for a sample of public schools in the same counties and states. To gain total plan value to verify if the school plan met the comprehensive definition, the researcher developed a matrix to quantitatively analyze the data. Examination of state statute concluded ambiguous verbiage relating to what schools should develop school emergency plans; only one state specifically included non-public schools in its legislature. Hypothesis one states if there is no requirement to have emergency plans in place, non-public schools have not developed

comprehensive plans. This proved inconclusive due to minimal participation by non-public schools. Hypothesis two stated if non-public schools are required to have emergency plans, these schools do not follow perspective state statute and federal recommended emergency planning guidelines for schools (2013). This proved correct for the non-public schools that responded.

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Introduction

Crisis in Schools

Increased terrorist events, school shootings, and extreme weather events, have caused schools and local communities to examine the safety of their learning environment, supporting the need for increased vigilance in maintaining school safety. Children rely on their teachers and key staff to guide them and keep them safe while in the care of the school. Recent tragedies resulting from the Sandy Hook Shooting in 2012, Moore County Tornado in 2013, have caught the eye of the media and federal government. The President has released a call to action to congress to ensure children are safe in schools.

Early morning on December 14, 2012, a worst-case scenario took place at one school in Newton Connecticut. A gunman made his way into Sandy Hook Elementary School and killed 20 children and five adults before the gunman committed suicide inside the school (Paulson, 2012). This entire event at the school took less than 15 minutes.

On May 21, 2013, Moore, Oklahoma experienced a tornado with winds over 200 mph; siren warnings gave the school a mere 16 minutes to make the decision to shelter-in-place or evacuate (Newton-Small, 2013). Plaza Towers Elementary School lost seven students that day while sheltering-in-place.

In January 2013, the wake of these events, the President released a call for action stating now is the time to protect our children and our communities (White House, 2013). This plan calls for tactics to keep guns out of violent persons reach, increase school safety by providing grants to increase safety officers and mental health counselors at schools, and lastly, to require every school to have comprehensive emergency management plans that includes all-hazards (White House, 2013).

State Statutes

Disasters can strike at a moments notice and no school is immune, whether public or non-public. Children in elementary and middle schools have unique needs; staff and key stakeholders must arise to the call when crisis strikes. Comparing the 2007 Government Accountability Office (GAO) report on school or school district emergency planning requirements for states, to the 2014 state statue requirements under education for school emergency plans; for this study, Maryland and Virginia reported requirements in place in both documents and West Virginia did not. For Maryland and Virginia, state statute specifically outlined prescriptive emergency plan requirements for either a public school or each school board for which the public school falls under. West Virginia did not have any requirements for school emergency plans outlined in the 2007 GAO report, and was not until 2011 did the state enact the authorization for the West Virginia State Board of Education and Division of Homeland Security and Emergency Management create a rule requiring every school to have a current crisis response plan. Two of three states in this study do not specifically mention non-public schools in the statue verbiage.

Collaboration

In states that require school emergency plans, the public schools have the advantage of being automatically connected to the network of local and state public agencies, whereas non-public schools must be proactive about becoming an integral part of the same networks. Nearly 10 percent of the children enrolled in school attend a non-public school (Chung, Danielson, & Shannon, 2009). There is an assumption not supported in literature that private schools are small, it's perceived to have a secure, strong infrastructure, have adequate funding, and be self-sufficient with all bases covered. The U.S. Department of Education's Emergency Management

2007 article discussed the challenges that many non-public schools face for emergency planning. Many of these schools are small, have insufficient resources, and a lack of awareness on the grant opportunities and available resources (DOE, 2007).

It is essential to include non-public schools when defining the scope or intent for county and state school emergency preparedness. Past research has identified the need for realistic comprehensive emergency response plans tested and exercised in public school systems but analysis falls short of including non-public schools (Ashby, 2007). Studies have identified data for enrolled school-aged children in non-public schools, but did not identify those schools in the results of the studies. GAO studies also revealed that many states require emergency plans to be in place, but did not identify if those laws and policies also include non-public schools (Ashby, 2007). This research will target non-public schools, an area that is virtually untouched by past research.

Purpose of the Research

The purpose of this study is to examine state and local requirements in West Virginia, Virginia, and Maryland for non-public schools focusing on elementary through middle grades (K-8), to have emergency plans. School emergency plans to address not only security measures for events like terrorism or active shooter, but include plans for all locally identified hazards, following the federal recommended guidelines for school comprehensive emergency management planning. Analyzing state and local requirements, state hazard vulnerability assessments (HVA), and the federal recommended contents for a school emergency plan; comparing these common elements against survey results for non-public and public schools, the principle investigator will determine if non-public schools in the study's identified county and state have comprehensive school plans in place.

This study focuses on surrounding counties in the tri-state area of West Virginia, Maryland, and Virginia. The sample of schools includes K-8 grades in the following counties: Berkeley and Jefferson (WV), Washington (MD), and Frederick and Clarke (VA). Key leadership in non-public schools is the main participants for this research. Other participants include a sample of public school key leadership.

Evidence stemming from research including non-public schools will raise awareness to educate, local education and government agencies, public school district leadership, and the non-public school sector on the importance of developing, testing, and submitting emergency plans to county emergency management officials and county school district administrators. This would provide the opportunity for increased collaboration and assist with overall mitigation and response efforts for all schools in the county. Target audiences for this study include: Non-

public school administrators, County public school district administrators, County emergency managers, local government officials, and parents of school-aged children.

This study's primary objectives are to provide information about emergency planning in non-public schools, an area that previously has not been included in studies such as "Emergency Management Status of School Districts' Planning and Preparedness", accomplished by the GAO (Ashby, 2007). In the absence of a viable emergency plan, planning, response measures, roles, and responsibilities are not defined, thus chaos will occur, putting our children at risk. Preparing staff, students, and parents with appropriate instructions and cyclical drills will minimize issues in the wake of a disaster. This study will provide situational awareness to ensure that non-public schools are included in overall county plans; through providing the examples of realistic events and lessons learned, to reinforce the importance of developing and maintaining comprehensive emergency plans.

In fulfilling these objectives, the study aims to answer the following questions:

1. What do statutes in West Virginia, Virginia, and Maryland state about non-public school requirements for emergency plans?
2. When do non-public schools submit plans to county school district administrators in the target states?
3. If the non-public school has an emergency plan, what guidelines does it follow?
4. If the non-public school does not have an identified emergency plan, how does it handle all-hazard emergency and crisis issues?

Literature Review

Children comprise approximately 26 percent of the U.S. population (Cornette & So, 2011). Many schools provide before and after care programs for children. As a result, many school-aged children can spend up to 50 hours a week away from home, under the care of teachers, extended care providers, and athletic directors. Historical events and newly surfaced issues over the last two decades, in regards to school shootings and terrorism, have raised serious concerns about comprehensive preparation for situations not previously considered. Research conducted from these unfortunate events provides numerous examples, setting the stage on the significance to having a viable plan in place for all schools.

Pertinent Emergent Events Affecting Schools

Our Lady of Angels Fire

A significant event in history that changed building life safety and fire codes in schools was the calamity that occurred on December 1, 1958 at Our Lady of Angels Catholic School in Chicago, Illinois. This event made headlines internationally shocking the nation, leading to major improvements and standards for school design and safety codes. This kindergarten through eighth-grade non-public school held approximately 1600 enrolled students (Cunningham, 2009).

The fire began after 2:00 p.m. near the end of the school day in a basement trash compartment, spreading dense smoke quickly throughout the lower half of the school. Even though students and teachers reported smoke and smell of fire, it was not until approximately forty-five minutes later; the fire alarm located in Mother Superiors office was manually activated. Teachers activated the internal alarm twice before it went off, along with a telephone

call to notify the fire department (Cunningham, 2009). This fire spread quickly, ultimately resulting in the deaths of 92 students and 3 nuns (Cunningham, 2009).

The investigation reported the school had passed its last fire inspection, based on early 1900's standards. Multiple issues that may have mitigated the event or ensured a quicker response were: lack of a sprinkler system, smoke detectors or multiple fire alarms would alert the fire department, few extinguishers located too high to reach, non-fire resilient infrastructure standards, established requirements for fire drills and exits, and overcrowding at the school.

Ensuring safer schools for the children came to the forefront post the 1958 fire. Preparation and mitigation for such an event has come a long way since 1958. Other emergent events call the need for extensive emergency plans that not only include life safety and fire drills.

Columbine School Shooting

On April 20, 1999, two Columbine high school students caught a school off-guard by doing the unthinkable. These students plotted out an event, using multiple explosives to inflict fear, and a cache of weapons that resulted in death and injury, totaling 37. This multiple active shooter event not only overwhelmed the school, but emergency response resources, identifying many shortfalls in school and local emergency response planning (USFA, 1999).

School active shooter situational awareness has increased since the Columbine shooting and the subsequent events of active shooter situations. Schools are not as naive to think it would never happen at its location; even joking or rumors of these types of events are serious threats. Many states have invoked requirements to have emergency plans in place for public school districts that include drills for lockdown and evacuations. Due to the new wing at the school, initial response efforts by law enforcement at Columbine, searched the wrong end of the library

(Cullen, 2004). School districts should ensure local emergency response have up-to-date school floor plans and alarm codes (Cullen, 2004).

Sandy Hook Shooting

On the morning of December 14, 2012, a 20 year-old male, son of a staff member of the school, entered the elementary school and opened fire inside, resulting in 25 deaths. This school took previous events about active shooter seriously, having a well-developed comprehensive emergency and crisis plan exercised on a reoccurring basis. This school also had an elaborate security system that monitored school grounds and had controlled access into the school. This schools actions and practices of the basics of safety provided mitigation that lessoned the potential for additional senseless deaths of innocent children (Paulson, 2012). Unfortunately, the best plans in place still cannot prevent the inevitable, as this gunman was known by school staff and fired his way through the controlled access.

Moore County Tornado

Changing weather patterns, causing more extreme weather events, increased populations in high-risk areas contribute to the results of disastrous events. The tornado that flattened Plaza Towers Elementary School in Moore County, Oklahoma, is just one example of these extreme weather events. This school was located in the heart of tornado valley. It had a comprehensive emergency plan for tornado preparedness in place and practiced more tornado drills than required by law (Newton-Small, 2013).

Despite preparations, the mitigation measures were lacking. This school did not have safe rooms for extreme events that are so common in this area. Emergency plans need to take into consideration local hazard vulnerability assessments. With grant funding available through the federal government to build safe rooms, mitigation was possible. Vulnerabilities that are

noted as high probability of occurrence and high risk of disastrous results should have trigger points and decision models built into mitigation planning. Unfortunately, increased population in schools, costs to keep up with requirements for the student teacher ratio, and costs to build more schools, require a large portion of county and state funding. County and State governments have to make wrenching decisions not only on vulnerabilities and risks, but also the needs and requirements for the education of children. This is the reality of many struggles of public education and emergency planning.

Virginia Earthquake

Early afternoon on August 23, 2011, a 5.8 magnitude earthquake affected millions along the Mid-Atlantic States and up and down the East Coast, with an epicenter in Mineral, Virginia (Karp, 2013). This event was something that many never experienced, causing moments of chaos to those that were not accustomed. For six schools in Louisa County, Virginia, near the epicenter, damages sustained required two of those schools to be completely condemned. Students were back in school after three weeks, some schools using modular buildings, alternate school schedules, and local businesses that provided space to host classes while schools still standing, became fixed. This situation although not common reiterates the need for schools to include in its plans long-term recovery measures and continuity of operations for the education of its students for any calamity that has catastrophic results to infrastructure.

Due to the geographical location, the principal investigators personal experience with this event was noteworthy and one of the main reasons for conducting this study. The principal investigator's daughter attends a K-8 non-public school in West Virginia.

Students evacuated safely following fire drill measures, immediately post event. Post earthquake the principal investigator found that this school did not have a plan for evacuation of

students to an alternate location, communication procedures with local emergency services to assess the situation, mass communication to parents to inform that all students were safe, and a re-unification plan. The earthquake occurred at 1:51 pm on the first day of school; students remained in the parking lot of the school until 3:00 pm when dismissal occurred and normal pick-up procedures started.

Berkeley County Active Shooter Threat

Social media has become the avenue for many emergency response and communications agencies, but also can be the repository for threats and rumors. Such a threat occurred on Sunday, October 12, 2014 to a local Berkeley County, West Virginia high school. The word spread quickly through social medial and the county public school district Superintendent did not take this threat lightly. Martinsburg City Police, Berkeley County Sheriff's department, West Virginia State Police, and the Federal Bureau of Investigation became involved immediately investigating a former students hacked Twitter account where numerous "tweets" occurred stating threat to open fire at a local school, thus resulting in the arrest of another former student of the school (Mistich & McCormick, 2014). The suspect was located within 12 hours, arrested, and charged with making threats of terrorist acts, before the start of the school day on Monday. As an increased precaution, the Superintendent of schools ensured there was increased police presence at every school in the county, public and private.

Local emergent situations human caused, technological, biological, and natural, reinforce the need to ensure the safety and well being of school-aged children. Other situations nationally provide benchmarked opportunities or for local schools to build comprehensive emergency plans. Political entities need to confirm that schools and school districts school plans contain the necessary topics, local hazards, threats, preparedness response, mitigation, and recovery

elements. Eliciting change requires legislative requirements and measures in place to enforce changes in behavior to make certain school emergency plans meet the needs of key stakeholders within the community.

Regulations That Involve School Emergency Plans

Federal Level

Review of federal mandates found no specific statutes requiring states to have school emergency or crisis plans. Two acts discuss school-aged children in relation to crisis or emergency situations.

The Family Educational Rights and Privacy Act covers information sharing during the emergency planning process or actual emergencies and disasters, defining what type of personal information from student's education records can be shared to outside parties when planning or responding to emergencies (DOE, 2014). This law encompasses all public schools and institutions that receive funds from the Department of Education. Non-public schools in most cases do not receive funding therefore are not subject to this act.

In 2013, the House of Representatives introduced a bill titled Secure America for Education in Out Schools Act (SAFE). This act originates to amend the Homeland Security Act of 2002 to direct the Federal Emergency Management Agency (FEMA) to require each state include in its application for funds under the Homeland Security Grant Program (HSGP) to provide certification that all schools under its purview have a adequate emergency response plan in place (Payne, 2013). Under this act school plans will have the following included: evacuation and relocation plan, family reunification plan, special needs students plan, and a plan for addressing multiple hazards, complying with the 2010 National Commission on Children and Disasters (Payne, 2013). This bill has not become law.

State Level

A GAO report accomplished in 2007 found that 32 states reported requirements for school or school district emergency plans (Ashby, 2007). Upon specific review of state statute under the Chapter or Article for Education, the reality of the 2007 GAO report today, would only find 26 states that mention school emergency plans under Education in the state statute (Heintz, 2013). Another report provided from the Council of State Governments, Legislative action on school safety plans, stated that 33 states have statues that specifically require every school or school district to have a comprehensive school safety or emergency plan in place; 14% increase in the past seven years (Heintz, 2013). States that do require school emergency plans largely vary in content and would benefit immensely from templates or more prescriptive state statutes having basic requirements, but still allow for unique constraints affecting the particular school community.

The three states in this study, Maryland, Virginia, and West Virginia currently have statutes in place requiring K-12 schools or school districts to have emergency or crisis plans. The grey area under these state statutes is a clear definition of the inclusion of non-public schools and reportable requirements. To what extent are non-public schools held, if any, to the standards of public school counterparts.

Maryland State law under State Board of Education Regulations requires each public school and school system, in consultation of other health and safety officials to establish an emergency plan dealing with all-hazards (Maryland Legislature, 2014). The statute requires that all plans remain on file and an annual schedule of drills is developed and implemented. In July 2013, the State of Maryland established the Center for School Safety with the intent of connecting schools through collaboration among community key stakeholders, and providing

best practice and technical assistance to schools and school districts when requested. There is no specific mention to non-public school emergency planning requirements.

Virginia State law under the Education article requires each school board to ensure each school designates an emergency manager and has school crisis, emergency management, and medical emergency response plans in place (Virginia Legislature, 2013). Similar to Maryland, the State of Virginia also has a Center for School Safety. All school plans are audited annually via a web-enabled Virginia State program. Virginia statute takes a prescriptive approach on school emergency planning requirements. These requirements are considered during the analysis of non-public and public schools in Clarke and Frederick Counties of Virginia. Virginia law does not specifically identify non-public school requirements for emergency plans.

West Virginia is lucid in its law in regards to school emergency plans. The State authorizes the State Board of Education along with the Division of Homeland Security and Emergency Management to create a rule requiring every school to have a current crisis response plan (West Virginia Legislature, 2014). These entities created a school template plan that for schools to use when developing plans.

Similar with Virginia, West Virginia is prescriptive on the requirements for schools plans. Plans must be completed, filed with the school county board, and included in the State's designated secure electronic system for school critical information (DHS, 2014 & West Virginia Legislature, 2014). In late 2014, West Virginia enacted a new role-based web enabled filing system provided the capability of school to not only update school emergency plans, but upload infrastructure plans, security and access points, along with community of interest forums and workspaces to collaborate during an incident (DHS, 2014). Under the West Virginia state statute, specific procedures are mentioned for non public schools, holding these schools to the

same standards as pubic school counterparts in regards to developing, filing, and updating school emergency plans on an annual basis, using the state model template.

School Emergency Preparedness Plans

In 2007, the GAO conducted a quantifiable analysis surveying a random sample of rural and urban public school districts, state agencies that administer federal grants that can be used for school emergency planning, and federal officials (Ashby & Jenkins, 2007). The purpose of the report was to examine the role that federal government plays in establishing requirements for resources for school districts' emergency planning initiatives, what public school districts have done for emergency planning, and the challenges that they face (Ashby, 2007). At the time of the report, there was no federal mandate for local school districts to have emergency plans in place but half of the states had laws or policies in place requiring public school districts to produce a plan. Many of the emergency plans examined did not address federally recommended practices; address special needs students, or extended school closure. Fewer than half of the school districts surveyed did not involve local community partners when producing their emergency plans and have not tested their plans with community partners to ensure their vitality (Ashby & Jenkins, 2007). Another issue identified with emergency plans is adequate funding to implement mitigation strategies or provide training and equipment for preparedness and response. A lack of clear governance on how funding provided from federal grants can be utilized by states for school district emergency plans was another area of concern (Ashby & Jenkins, 2007).

Research for the Agency for Healthcare Research and Quality focused on school-based emergency preparedness. There was an identified need to provide a template that has the flexibility to adapt to specific needs of schools, as there was no comprehensive guideline in place

for schools to adapt to. The goal of this study conducted in 2009, was to create a "best practice" emergency plan template based on survey results from school districts across the nation with a concentrated study on a school district in Brookline, Massachusetts.

While certain aspects of school-based emergency response (e.g., fire drills and evacuation) are universal, other equally important aspects of emergency response, including sheltering-in-place and lockdown protocols, exist in few schools and school districts across the Nation (Chung, Danielson, & Shannon, 2009). Through surveys, interviews, and site visits, findings revealed that specific emergency plan procedures need further development in areas of extended day programs, evacuation, sheltering-in-place, and for special needs students and staff. Other areas identified for further development, training and exercising school plans and involving local emergency officials in the development stage and exercising.

There is a recognized need for adequate comprehensive emergency plans for children because of their unique needs, making them distinct from other at-risk populations (Cornette & So, 2011). A comprehensive examination was performed by the National Commission on Children in Disasters in 2009 focusing on children's needs as they relate to the four phases of emergency management in an all-hazards approach, along with the evaluation of current laws, regulations, policies, and programs relevant to these needs. According to research, there are more than 49 million students attending 99,000 public schools and an additional 5.8 million students enrolled in 33,700 non-public schools (Cornette & So, 2011). The K-12 public schools examined have emergency plans in place, however many of these plans did not comply with the federally recommended practices. This study emphasized the necessity to ensure the consideration for children's needs met for evacuation, medical assistance, and post event mental

health monitoring. Addressing these topics at local levels is a necessary component in school emergency planning.

A quantitative study was preformed by Graham, Shirm, Liggin, Aitken, & Dick (2006) focusing on the preparedness of urban versus rural public schools in the United States for the prevention-of and response-to a mass-casualty event. The ability of school systems and emergency medical systems to respond to school-based emergencies was questioned, so investigators mailed a survey to a sample of 3,670 school superintendents of public school districts, chosen from a list of school districts in the National Center for Education Statistics of the U.S. Department of Education, January 2004 (Graham et al., 2006).

Of the respondents surveyed, 2,137 rural and urban public school districts responded with an overall 58.2% response rate (Graham et al., 2006). Survey questions used the prevention, preparedness, response, evacuation procedures, and lockdown procedures as its basis. The majority of schools surveyed responded positively to having a documented emergency response and evacuation plan in place but, half did not have a prevention plan for a mass-casualty or terrorist event or have ever met with local medical or emergency response officials for planning (Graham et al., 2006). Special needs of children during disasters were also another area of concern along with the need to exercise their plans to ensure viability. This research supports the need to include local emergency response in school emergency planning. These responders should have an understanding of the unique needs of children, and schools need to know what capabilities exist in the community for children.

The stipulation for school emergency plans is included in most state statutes for having a plan in place. Kennedy's (2007) article titled "Preparing the Plan," defends the need for school plans that follow the comprehensive emergency management process, and notes the challenges

to find personnel who have the experience to develop an adequate plan. Local schools and school districts with funding and time to train school personnel, and to exercise and update the plan on a continual basis (Kennedy, 2007). Understanding what the local community has to offer for the emergency management capability can reap rewards for schools that need help bridge the gaps in development, training, and exercise.

An article by Civics in Action (2006) supports the whole community involvement in a large-scale exercise involving federal, state, local, emergency response agencies at one high school. The inclusion of the school in this exercise provided the school the opportunity to test its school emergency plan and response. It also provided the students and staff, a realistic look at an emergent event in a learning environment. Accountability and facing the fears of what could really happen were in the minds of the schools leadership. This article supports the need for integration of schools in local community drills.

An article provided by the U.S. Department of Education discussed the opportunities and challenges that non-public schools face in regards to emergency management. Non-public schools are commonly termed as Catholic, other religious, or nonsectarian and are identified as institutions that provide instruction for students in one or more grades K-12, have one or more teachers, are controlled by a non-governmental entity, and are financed from other sources other than public taxation (DOE, 2007).

Approximately ten percent of school-aged children are enrolled in a non-public school. Internal challenges faced by non-public schools in developing emergency plans are: high expectations of social norms in a communal structure, size of the institution, complacency, insufficient resources, and lack of awareness of available resources (DOE, 2007). Their external challenges can be just as hard to break through, as public perception of the institution to be a safe

environment that does not require emergency plans, and a lack of situational awareness from local emergency management community officials and county districts' understanding of equitable participation for grant funding to non-public schools (DOE, 2007). Non-Public schools comply with fire drills, health department, and safety requirements, but when it comes to school emergency planning practices, it becomes opaque. The goal of this article was to raise awareness for non-public schools to become aware of the challenges and how to overcome them through integration and networking with public school and county education counterparts. The recommendations from this article on the development of school emergency plans align with federally recommended practices and considered in the quantifiable analysis of the principal investigator's research.

Current School Emergency Plan Recommendations

The federal government through the Departments of Homeland Security, Education, Health and Human Services, Justice, Federal Bureau of Investigation and Federal Emergency Management Agency collaborated to develop the 2013 *"Guide for Developing High-Quality School Emergency Operations Plans"* (DOE, 2013). The Federal Emergency Management Agency (2011) also developed the "*Sample School Emergency Operations Plan*." Both documents provide a comprehensive template that States can use for county and local school emergency plans.

The 2013 guide provides recommended guidance for school emergency plans. It discuses principles of school emergency planning, process of developing, implementing and processes improvement practices of emergency operations plans, content for a basic, functional and threat annex for emergency plans (DOE, 2013). This guide was prepared to answer the Presidents call to develop a template for all schools to use. This guide will be the basis of the principal

investigators recommended practice guidelines for the non-public schools surveyed and the premise for analysis.

The Sample School Operations Plan publication provides schools a template to work from to develop a local school emergency operations plan. It includes basic plan contents, functional annex examples, and threat and hazard specific annexes categorized as natural, technological, and human-caused (FEMA, 2011). Schools can adopt this template into its own.

"The Guide to School Vulnerability Assessments and Key Principals for Safe Schools" (2008) government publication provided by the Department of Education provides an in-depth on school vulnerability assessments. This is a necessary step when developing school emergency plans. It validates the need to preform a hazard vulnerability assessment for the school to ensure the plans include the identified hazards pertaining to school location and its high-risk probability outcomes.

Summary of Findings

The literature review supports the requirement to have comprehensive emergency plans that are tested and evaluated as adequate in schools systems across the United States. The expectation is the protection of children as they spend most of their waking hours in the care of school systems and in school before and after care programs. Quantitative and qualitative analysis have identified issues within these plans that all have common threads. Surveyed key Leadership or examined public school districts emergency plans revealed the following in multiple research findings.

1. Inadequate emergency management plans following federally recommended practices or state requirements (including local all-hazards)

2. Including emergency management officials, medical personnel, key stakeholders in emergency development process
3. Training and exercise plans with local community partners
4. Evacuation and relocation plan
5. Family reunification plan
6. Addressing special needs students and staff
7. Emergency plans for extended care or after school programs
8. Emergency communication plans with parents and staff
9. Review of plans on a continual basis
10. Lack of awareness about federal grants and funding for school emergency planning

These top issues should elicit a culture for improvement and dedication to preparing for an emergency and crisis and used to develop the framework for analysis of the chosen schools in the five counties in three states identified for this research study.

Theoretical Framework

This empirical research provides the framework for increased situational awareness about non-public school readiness and its intention to assist to key leadership in the school community, build relationships, and collaborate to enhance school comprehensive emergency plans to decreasing risks and increasing schools resiliency.

Hypothesis # 1: If there is no requirement to have emergency plans in place, non-public schools have not developed comprehensive plans.

Hypothesis #2: If non-public schools are required to have emergency plans, they do not follow perspective state statute and recommended emergency planning guidelines in the 2013 Department of Education Guide for Developing High-Quality School Emergency Operations Plans.

Shortfalls in the Literature

Multiple school disastrous events continuously reiterate the need for realistic comprehensive emergency response plans tested and exercised in public schools systems. However, discussion is nonexistent about events occurring at non-public schools and ensuring non-public schools meet the same requirements. Glen Muschert associate professor at Miami University of Ohio, stated in the sample of case studies performed on schools, the reason for limited research on non-public schools is largely due to size of these schools; non-public schools pull form a different geographical area, certain groups either religious, nonsectarian, or socioeconomic groups (Dunjgen, 2012). Parents choose for their children to go to these schools; within these smaller school environments, teachers and staff have the ability to monitor the students closer (Dunjgen, 2012).

On possible answer is there is a false sense of security that smaller non-public schools are safe and there is no need to have the same requirements as their public school counterparts.

Analysis falls short to include non-public schools in samples of cases found. Internet research identified one article addressing the need to include non-public schools in school district emergency planning. Studies identified statistical information for enrolled school-aged children in non-public schools but failed to identify those schools in their studies. Studies also reveled that over half the states require emergency plans to be in place, but did not identify if those laws and policies included non-public schools. There is an assumption that all non-public schools are small and secure. The U.S. Department of Education's Emergency Management article (2007) stated otherwise, discussing the challenges and opportunities that non-public schools face for emergency planning. Non-public schools are just as susceptible to disaster situations as its public school counterparts. More research needs to be accomplished to include non-public schools, to raise awareness educating both public school district leadership and non-public school key staff on the importance of creating, testing, and submitting emergency plans to county emergency management officials and county school districts.

Methodology

Research Design and Strategy

Research takes on many forms: accomplished to help seek out a particular answer, to establish a fact, or can lead to additional theories or questions. It uses a systematic process of planning, designing, preparing, collecting, analyzing, sharing results, concluding and providing recommendations for further studies if necessary (Yin, 2014, p.27). Conducting research provides a holistic view on targeted topics for the professional field, helping to advance knowledge and perspectives for consideration. Deciding what type of research method depends largely on the questions that are developed. Some initial questions to ask are: what is the research seeking to investigate, is there enough information available to conduct the research or vice versa, is the research already saturated, does the research have an established timeframe for completion, and is there funding necessary to conduct the investigation. Successful results, whether supported or disproved, includes ensuring that the components of research are addressed sufficiently in the research design process. Creswell (2009) describes three distinct types of research approaches, Qualitative, Quantitative, and Mixed-Methods.

Qualitative research is exploratory in nature and relies on views of participants on a subjective manner. It relies on the human perspective derived from social behaviors, cultures, and other aspects of inquiry (Creswell, 2009). Open-ended questions, observations, documentation, and interviews, are the common used ways to collect qualitative data.

The survey instrument developed provides the opportunity to provide subjective data through opened-ended questions. This perspective will help with the analysis of the data collected from schools. The principal investigator developed many of these questions using the deficiency themes presented in the Summary of Findings under Literature Review. Questions

are related to school emergency plan components to include: Communications, training and exercises, plan development and maintenance, grant opportunity, State statute requirements and hazard vulnerability assessment priorities. The qualitative responses will provide the situational awareness focused on non-public school emergency planning and the overall comprehensiveness of a school emergency operations plan.

Quantitative research is a means for testing objective theories by reviewing relationships between dependent or independent variables, measured by instruments such as surveys or interviews, resulting in data that can be analyzed in a quantifiable manner (Creswell, 2009). This study obtains hard data through a survey instrument used in this study that asks specific questions to analyze and measure against a matrix of school emergency operations plan contents. The variables are independent of each other. Independent variables are the content requirements in Section three of the Guide for Developing High-Quality School Emergency Operations Plans 2013: Basic Plan Annex, Functional Annex, and Threat and Hazard Annex, identified State statutes, and State HVA highest risks. Identified contents within the areas stated above are the factors to determine if the school contains a comprehensive emergency operations plan.

Mixed Methods research uses both qualitative and quantitative aspects of research and is the chosen method in this study to further understand the research problem. Concurrent mixed methods procedures is used to collect and integrate data between the federal recommended school emergency plan contents, state statutes, state HVA highest priorities, and historical trended deficiencies in plans, used to prove or disprove the investigators hypotheses.

Selection of Method

In order to inquire about non-public schools and the requirements to have comprehensive emergency plans, this concurrent mixed methods research includes the following components:

cross-sectional survey, and a content and comparative analysis. Data and contents captured from respondents of public schools, and respondents of non-public schools emergency plans, cross referencing and of the Departments of Education, Homeland Security (DHS), and Health and Human Services (HHS) recommended practices, House of Representative Bill 3158 SAFE in Our Schools Act, and state statutes (See Table 4). The Matrix to Determine Comprehensive/Exemplary School Emergency Plan (Table 4) was developed to assist the principal investigator define what constitutes substandard, comprehensive, and exemplary school emergency operations plan.

This research study began with a comprehensive literature review to provide the background in regards to emergency and crisis planning and state statutes for the identified county schools. The main component of this research is the creation of a cross-sectional survey for the key leadership at the designated non-public and public schools.

Task analysis included identifying specific State, sector, or local public school district requirements for emergency plans. Survey data from previous studies are compared to the principal investigator's researched federal recommended planning requirements for emergency plans to conduct the preliminary analysis and develop the survey instrument.

Data Collection

Research should have a method of categorizing, and sorting the data collected. Developed protocols are to ensure process and procedures for data collections, questions, and overall matrix for findings and discussion are all in place (Yin, 2014, p.85). Developing protocols ensures the study has a plan that helps research stay on the correct path and will increase reliability of the study. Using multiple sources for collecting evidence will help to triangulate research to provide different views. This will help avoid the problem of bias. Data

collection methods used previous research findings, governmental publications, peer-reviewed research, and state statutes in relations to contents of school emergency planning requirements. The survey instrument development stemmed form the content analysis of the documentation.

The sample of non-public schools will include 100% (33) K-8 schools in counties and states identified in Table 1 below.

Table 1

Total Non-Public Schools by County and State

State	County	Total Non-Public K-8 Schools by County
WEST VIRGINIA	BERKELEY JEFFERSON	5 4
MARYLAND	WASHINGTON	15
VIRGINIA	FREDERICK CLARKE	7 2

The sample of public schools will include 50% (47) K-8 schools in counties and states identified in Table 2 below. This sample of public schools is a used as a comparable analysis to the non-public school survey sample. These K-8 schools randomly selected by the principal investigator using Microsoft Excel random sampling, by county and state.

Table 2

Total Public Schools by County and State

State	County	Total Public K-8 Schools by County
WEST VIRGINIA	• BERKELEY • JEFFERSON	• 14 • 8
MARYLAND	• WASHINGTON	• 11
VIRGINIA	• FREDERICK • CLARKE	• 11 • 3

Figure 1. *Tri-State Area Defined Pictorially*

Survey creation. The survey instrument used to collect data from non-public K-8 schools and public schools is a web-enabled survey, developed online using surveygizmo.com, under a subscription account paid for by the principal investigator. The web enabled software capable of custom questions, collecting and providing results in a quick cost efficient way. This survey only allows one survey per respondent, collected using a one-time password to prevent multiple surveys' being completed. The web is a primary means for survey response and paper survey provided for special requests only.

Web-enabled surveys provide participants the convenience to complete in a timely manner. The purpose of the survey is to gather information about the level of understanding of emergency plans, positive response to a developed plan, and adherence to state statutes and federally recommended practices. Survey questions are closed and opened-ended, when applicable offer the opportunity for additional comments. Questions utilized a common

language; any terms that found to be uncommon were defined. The survey contains 30 questions and estimated ten to fifteen minutes to complete. (See Appendix D to review the survey presented to respondents).

The survey contained an e-consent cover letter explaining the purpose of the research and the benefits of the research to the respondents, information on confidentiality of the research results, instructions, consent request, and opt out option. The American Public University School System, Institutional Review Board (IRB) approved the survey with a maximum time to complete of 20 days. Due to time constraints survey respondent's timeframe to complete the survey was 12 days. This timeframe comparable according to the University of Texas at Austin's Instructional Assessment Resources (2007) average time of seven to ten days. Following best practices to obtain the maximized response rate, the principal investigator provided an emailed reminder to all respondents about the deadline for the survey and adding the link of the survey again for completion convenience. The expected response rate is 30 percent of all schools in the sample population in line with the average response rate for online surveys (UTA, 2007).

Beta testing accomplished for the survey examining clarity, common language, flow of questions, and overall layout of survey. Peer-review of the survey instrument conducted involving three local emergency officials who are subject-matter-experts in emergency planning and emergency planners for primary and secondary schools. Feedback based on peer reviews elicited and applied to reduce bias and uncommon language.

Data Analysis

A qualitative and quantitative data analysis was performed. The principal investigator broke down survey return rates by state, county, and public or non-public school; cross-

referenced results to the Matrix to Determine a Comprehensive/Exemplary School Emergency Plan (Table 4). Survey responses relate to the variables discussed in the two hypotheses.

Survey instrument results grouped by state to provide a total hard data count and overall percentage for the number of continuous variables and proportions for categorical variables. Factors considered were based on research of emergent school events, federal recommended contents for school emergency operations plans, the House of Representatives Bill 3158, SAFE in Our Schools Act, historical GAO reports trended findings, issues in states that had plans in place, and state statutes. The principal investigator performed a comparative analysis to develop a matrix of common factors to define what constitutes a comprehensive school emergency operations plan (Table 4).

Table 3

Legend for Matrix

CROSS REFERENCED SCHOOL EMERGENCY PLAN CONTENTS (Left Side)	
	LEGEND
GAO REPORT 2007 (GAO-07-821T and GAO 07-609)	G
H.R. BILL 3158 SAFE IN OUR SCHOOLS ACT (2013-2014)	H
STATE SPECIFIC REQUIREMENTS S FOR SCHOOL EMERGENCY PLANS	
• WEST VIRGINIA	W
• VIRGINIA	V
• MARYLAND	M
STATE HAZARD VULNERABILITY ASSESSMENT (High and Medium High risks)	HVA
• WEST VIRGINIA	W
• VIRGINIA	V
• MARYLAND	M
SURVEY INSTRUMENT QUESTION/TOPICS	SUR
• Questions relating to topics in plan	Q#
NOTES	
• Denotes the topic referenced in cross-referenced documents	X
• In State HVA Plan “h” = high “mh” = medium high	h/mh
• State required school plan template outlining additional requirements.	*

The matrix divides into three sections; aligning with the Guide for Developing High-Quality School Emergency Operations Plans (2013) as the main template. The Basic Plan provides an overview of the schools approach to operations before, during, and after an emergency, describing the overarching activities regardless of the type of emergency (DOE, 2013). The Functional Annex outlines operational functions or courses of action a school may have to take in order to respond to the emergent situation (DOE, 2013). The third section contains the Threat and Hazard Annex, which are plans developed for all-hazards identified for schools and geographical location.

Table 4

Matrix to Determine a Comprehensive/Exemplary School Emergency Plan

CROSS REFERENCE	G	H	STATUTE			STATE HVA			SURVEY
BASIC PLAN			*W	V	*M	W	V	M	
• Approval of Plan									Q5
• Purpose of Document									Q13,23
• Continuity of Operations									
• Roles and Responsibilities of Staff	X				X				Q6
• Control and Coordination									Q26
• Crisis Response Planning Team			X		X				Q7
• Information Sharing			X						
• Communication	X		X		X				Q17-19
• Release Plan to Parents			X						Q9
• Training and Exercises	X		X		X				Q28-30
• Capability and Resources	X								Q27
• Plan Development (Parent, First Responders, Community Partners) and Maintenance	X		X		X				Q10-12
• State and Local requirements, statutes	X								Q23-24
CROSS REFERENCE	G	H	STATUTE			STATE HVA			SURVEY
FUNCTIONAL ANNEX			*W	V	*M	W	V	M	
• Evacuation		X	X	X	X				Q14
• Relocation		X		X	X				Q14
• Lockdown			X		X				Q14
• Shelter-in-Place			X	X	X				Q14
• Accountability									
• Communications			X	X	X				X Q17-19
• Special Needs Students	X	X							Q14-15
• Extended Care or After School Programs	X								Q14,16
• Reunification		X	X		X				Q14
• Continuity of Operations	X				X				Q14
• Recovery	X				X				Q14
• Medical Contingencies									
• Security Measures			X		X				Q14,27

CROSS REFERENCE	G	H	STATUTE			STATE HVA			SURVEY
THREAT AND HAZARD ANNEX			*W	V	*M	W	V	M	
Natural	X	X							Q20-21
• Earthquakes			X						Q21,22
• Tornados			X	X	X				Q21,22
• Lightening									Q21,22
• Severe Wind						X h	X mh	X mh	Q21,22
• Hurricanes									Q21,22
• Floods			X	X		X h	X h	X h	Q21,22
• Wildfires									Q21,22
• Extreme Temperatures									Q21,22
• Landslides									Q21,22
• Winter Precipitation			X		X	X h	X mh	X mh	Q21,22
Technological	X	X							Q20-21
• Explosions			X	X	X				Q21,22
• HazMat- Internal or External			X	X	X				Q21,22
• Radiological			X		X				Q21,22
• Dam									
• Water Issues				X	X				Q21,22
• Power Outage			X	X	X				Q22
Biological	X	X							Q20-21
• Infectious Disease (Pandemic)					X				Q21,22
• Contaminated Food					X				
• Toxic Material					X				
Human Cause Threats	X	X							Q20-21
• Fire			X	X	X				Q21,22
• Active Shooter			X	X	X				Q21,22
• Criminal Threat				X	X				Q21,22
• Gang					X				
• Bomb Threat				X	X				Q21,22
• Domestic Violence				X	X				
• Cyber Attacks									
• Suicide					X				Q21,22
• Death			X	X	X				Q21,22
• Injuries			X	X	X				Q21,22
• Bus Accident			X	X					Q21,22
• Kidnapping			X	X	X				Q21,22
• Hostage				X	X				Q21,22
• Gun/Weapon			X	X	X				Q21,22
• Trespasser			X	X					Q21,22

The survey instrument correlates with the matrix common factors to elicit results. Analyzed results are grouped into: No school plan, substandard school plan, comprehensive school plan, and exemplary school plan.

Definitions of Grouped Results using Table 4 as reference:

- No School Emergency Plan- School identified that it does not have a current plan.
- Substandard School Emergency Plan- School does not meet minimum state requirements based on the residing state statute.
- Comprehensive School Emergency Plan- School meets minimum state requirements based on residing state statue, and at least three of the identified GAO (G) or House of Representative Bill (H) factors in the Basic and Functional Annex content areas, and three additional factors not already required under the residing state in the Threat and Hazard Annex content area.
- Exemplary School Emergency Plan- School meets state requirements, addresses all residing state Hazard Vulnerability Assessment content areas, all of the identified GAO (G) or H.R. Bill (H) factors in the Basic and Functional Annex content areas, and six additional factors not already required under the residing state in the Threat and Hazard Annex content area.

The Survey Instrument was developed and submitted to the Institutional Review Board before final research determined that additional factors located in the matrix, play in the identified state requirements. Due to time constraints, the factors listed but not considered or analyzed during this research become shaded grey in Table 4. Future research recommendations mention these additional factors.

Equation Values

The matrix lists 11 items as factors for the Basic (B) elements of a school emergency plan. If a school lists as having an item as part of its plan, it will obtain one point for each item met. The matrix lists 11 items as factors for the Functional (F) elements of a school emergency plan. If a school lists as having an item as part of its plan, it will obtain one point for each item met. The matrix lists 28 items as factors for the Threat and Hazard (TH) elements of a school emergency plan. If a school lists as having a element as part of its plan, it will obtain one point for each item met. The maximum points a school can obtain overall (O) based on the sum of annex areas if all items met is 50 points.

If the school meets all state requirements, it will receive plus 5 points. If the school does not meet all its residing state requirements it will lose 5 points and automatically and the plan is deemed substandard. This point system is the equalizing (e) factor as state statute requirements contain different element factors within each annex of a plan.

To determine if a school has a comprehensive school plan it must meet minimum state requirements for its residing state and include at least three items in the (B) and (F) element areas on the matrix within the “G” and “H” columns, and three items not already listed in state requirements under the (TH) element areas. With meeting the above, the plan value (Pv) for a comprehensive plan is a minimal 28 points.

To determine if a school has an exemplary school plan it must meet not only the minimum state requirements, but also the state HVA requirements for its residing state. It must include six items in the (B) and (F) element areas on the matrix within the “G” and “H” columns, and six items not already listed under state requirements in the (TH) element areas. Any plan value (Pv) score above 37 points including meeting the above meets exemplary standards.

Equation: $B + F + TH = O \pm e = Pv$

Researcher's Perspective

Potential Bias Issues

Once the survey instrument was in place, a test, or pilot of the approach to survey collection method, survey questions and overall research analysis tool occurred to apply the data gathering techniques, ensure all questions were adequate, and timelines were realistic. This testing provided the time to adjust the process before the real work happens in the field. A peer review from five subject matter experts in the emergency management profession (emergency management first responder, federal emergency management planner, and K-12 public school emergency management planner) tested these methods. There is the potential that biased language could occur. Non-Public schools can be grouped further into faith-based, Catholic, and nonsectarian (DOE, 2007). It is important to present unbiased language when developing the survey as well as writing the final research report providing conclusions and recommendations.

Anticipated Ethical Issues

Possible issues in the purpose of the research and questions may arise. Non-Public schools may be sensitive to an external study inquiring about emergency plans, feeling singled out or concerned about revealing a weakness in emergency plans or if there are no plans in place. To define the purpose of the research, reach out to the schools, develop a relationship, and develop a trust for the survey, a comprehensive cover letter will be included discussing why this research is being conducted and benefits it will have for the non-public school sector.

There is a need to reiterate the confidentiality of non-public schools involved and the market benefit of raising awareness and providing assistance to help build an effective emergency plan, to include grant information and the importance of building relationships with community emergency management officials and the county public school districts. Creating an

informed consent form including my name, sponsoring institution, identify risks and benefits of participating, provide confidentiality and withdrawal statement, and provide point of contact info will ensure participants' rights are protected during data collection, analysis and final report.

Results

Non-public and public schools sampled, received 67 surveys via email, in the tri-state area of the defined research study. The survey was prepared to send to 33 non-public schools in the area. Of the 33 non-public schools, four schools contacted were not willing to provide additional contact information or did not return calls, and four schools declined to participate; leaving the total of contacted non-public schools for this research at 25 for the tri-state area.

Obtaining public school contact information was less of an issue as the county in each state maintained a public website for information about each school in the county, including name of key leadership, phone number, and email address. Due to the ease of locating public school information of the sample of schools available, only two emails were invalid, one respondent was unavailable to participate, and two declined to participate. The total list from the sample of contacted public schools for this research, 42 for the tri-state area.

The Principal investigator sent survey reminders with survey link and password five days before the close of the survey to both non-public and public schools. This elicited a few additional responses from the public school respondents, but non-public response remained the same.

Response Rates

The principal investigator response rate goal was 30 percent for all schools, non-public and public in the sampled population, at least 20 responses. The actual response rate achieved, 14 percent, nine responses from both types of schools. Two non-pubic school respondents represented Berkeley County, West Virginia, and one respondent represented Frederick County, Virginia. One respondent from Jefferson County, West Virginia started the survey but failed to complete it, therefore not considered in the overall results. For public school response rates,

respondents represented all counties for this research except Frederick County, Virginia. Berkeley and Jefferson County, West Virginia provided two respondents for each county, while the other counties has one response in each county. Two additional responses from Jefferson County started the survey but did not complete, thus not considered in the overall results.

Data from the respondents is used an analyzed against the matrix in table 4, given an item met score outlined in table 5, to derive final analysis results divided out by non-public and public schools in tables 6 and 7.

Table 5

Equation for Overall School Plan Value Score

	B	F	TH	O	±E	Pv
NPS West Virginia	5	8	12	25	-5	20
NPS West Virginia	8	9	19	36	-5	31
NPS Virginia	6	8	11	25	-5	20
PS West Virginia	8	8	22	38	-5	33
PS West Virginia	8	10	21	39	-5	34
PS West Virginia	9	10	29	48	5	53
PS West Virginia	9	10	29	48	5	53
PS Virginia	11	9	13	33	-5	28
PS Maryland	8	10	27	46	-5	41

Legend: NPS-Non-Public School PS- Public School

Table 6

Analysis Results- Non-Public School by County and State (Contacted)

RESULTS	**STATE (non-public K-8 schools)**							
	West Virginia (Berkeley & Jefferson Co)		Virginia (Frederick & Clarke Co)		Maryland (Washington Co)		Total by Tri-Sate Area	
No Response	71%	5	89%	8	100%	9	88%	22
No Plan								
Substandard plan	29%	2	11%	1			12%	3
Comprehensive Plan								
Exemplary Plan								
Total by State	100%	7	100%	9	100%	9	100%	25

Table 7

Analysis Results- Public Schools by County and State (Contacted)

RESULTS	**STATE (public K-8 schools)**							
	West Virginia (Berkeley & Jefferson Co)		Virginia (Frederick & Clarke Co)		Maryland (Washington Co)		Total by Tri-Sate Area	
No Response	80%	17	92%	11	89%	8	86%	36
No Plan								
Substandard plan	10%	2	8%	1	11%	1	10%	4
Comprehensive Plan	10%	2					4%	2
Exemplary Plan								
Total by State	100%	21	100%	12	100%	9	100%	42

The West Virginia and Virginia non-public school respondents didn't meet all residing state requirements for a school emergency plan, therefore did not score to the level of comprehensive plan. Two of the four West Virginia public school respondents scored to the level of comprehensive, only missing exemplary by one item noted in the functional annex factor area. The other two West Virginia schools, Virginia and Maryland school respondents scored to

the level of substandard due not meeting all residing state requirements for a school emergency plan. The Maryland school missed the level of comprehensive by one state required item in the functional annex factor area. Many schools met the Plan value (Pv) score, but lacked the state prescribed requirements for the plan, which is the focus of this research.

Discussion

School crisis and disastrous events continue to occur, reinforcing the need for all schools to ensure comprehensive school emergency operations plans are in place, reviewed, exercised, and updated on a reoccurring basis. Schools non-public and public look to its leadership in the county or the sector to provide guidance. Historically, public schools rely on its county district and local government resources to assist with plan development, training, and equipment resources to effectively carry out school preparedness and response. Non-public schools may or may not have the same capabilities. State statute provides direction for all schools to follow, mentioning public schools in most of the legislature, county and local government are charged to enforce statute to ensure schools are prepared for the unthinkable.

State Statue Review

West Virginia. Of the three states in this study, West Virginia contained descriptive verbiage about non-public school inclusion for school crisis planning. This state prescribed for a master school plan template, developed and updated in 2012, with the required use by every school in the state. This template is response orientated covering some functional and much of the threat and hazard annex portion of a school plan, but does not detail the basic annex of the plan. The basic content detail for a school plan is located in chapter 18-9F-9 of the statue, referencing command and control, communications, safety and security measures, release to parents on information related to plan (redacted), plan filing and update timeframes (West Virginia Legislature, 2014). The state recently adopted a new web enabled program through grant funding that requires all schools to upload into the database school plans and other pertinent infrastructure plans and security information as a tracking mechanism and for preparedness, response, and recovery efforts. Verbiage does not stipulate whether non-public

schools are responsible for providing the additional information, following same suit as the pubic school districts.

Under this statute, two non-public schools responded to the survey portraying two different views on knowledge of federal, state, and local school emergency management. The Basic annex factors of the plan for both schools answered positively a plan in place, reviewing the plan recently, and updating the plan annually, crisis team established; with one school ensuring all staff understood roles and responsibilities, and both schools involving one or two outside emergency management resources to develop the plan. Both schools answered negatively to training and exercising, stating fire drills are the main drills performed, with minimal internally accomplished crisis exercise sessions. Both schools aligned with Functional annex factors including GAO and state requirements. These two schools responded differently to Threat and Hazard annex factors. Private school one included all but six elements of state requirements: floods, explosions, HazMat, radiological, power outage, and bus accident, currently not addressed in this schools plan. Private school two addressed all but three elements: power outage, explosions, and radiological.

The major differences in these school responses stem from the answers to questions in relation to the knowledge of federal and state requirements for school emergency plans. Private school two, noted familiarity with state statue for a school plan requirement, used the template provided by the perspective county administrator, had knowledge of the Federal guide for school plans (2013), and had awareness of the residing state HVA. This school provided its basic plan to parents in the form of a handbook. Private school two answered survey questions stating it was not familiar with the Federal Guide for Schools (2013), state requirements for school emergency plans, or the potential effects of hazards in the state HVA. This school used a school

emergency plan template provided from an insurance company. This school referenced that the majority of parents did not obtain the basic school emergency plan. Even with one schools familiarity on state school emergency plan requirements, both schools missed essential elements and both rated substandard.

A comparative analysis performed with West Virginia public school respondents found survey answers also positive to the development of a school emergency plan, reviewed within the last three months. Two of the four public schools met all Basic annex factor elements for the state, and all schools that responded met all factor elements under the Functional annex. The same two schools only missed one state requirement element factor under the Threat and Hazard annex. These four public schools stated familiarly with the Federal Guide for Schools (2013), state requirements for school emergency plans, and state HVA top risks. Three of the four public schools did not use the state provided school emergency plan template. The school that scored to the comprehensive level used the state provided template. All schools stated the use of many outside emergency management agencies to develop its plan, mentioning Law Enforcement, Fire-rescue, Emergency Medical Services, Local Health Department, Parent organizations, and County public school district staff. One of the four schools experienced a real world event in the past three years, causing the school to activate one of its functional operations. Overall, these public schools met the majority of the state defined criteria for this analysis, but two failed to state it conducted training and exercises, an area that is vital to any emergency plan, rating those schools plan substandard.

Virginia. This state provides a prescriptive requirement under the verbiage of the statue for the inclusion of many elements in the basic, functional and threat annex for a school emergency plan. Legislature states that local school boards shall ensure that schools in its

district and control shall provide audits of its plans on an annual basis to the Virginia Center for School and Campus Safety (Virginia Legislature, 2014). This verbiage specifically states public schools and does not have any provisions for non-public schools.

One non-public school responded to the survey for this research. This school positively identified it currently has a school emergency plan, reviewed in the last three months. This school answered negatively to a familiarity with Federal Guide for Schools (2013), state requirements for school emergency plans, or state HVA. It only included 30 percent of the required state Threat and Hazard annex element factors in the school plan. However, the school included many elements from the Basic and Functional Annex, missing only one item that deemed a requirement by the state.

One public school respondent answered the survey with a positive response to a current school emergency plan reviewed in the last three months. The respondent answered favorably to a familiarity with the Federal Guide for Schools (2013), Virginia statue for school emergency plans, and the state HVA. This school only addressed one natural hazard in its plan, provided a heavy focus on human caused threats, meeting Virginia state requirements for human caused threats. This school added an additional plan for dealing with the media, not a requirement in school plans, mentioned in the federal guide, but is mentioned in other types of emergency operations plan, providing an additional functional readiness for this school. This school commented it has worked with external emergency response agencies during exercises and training.

Maryland. This state specifically references only public schools in its requirements to have emergency plans. The legislation states each county board shall evaluate the emergency management plan in each public school including its training activities, emergency safety

exercises, school security policy and procedures, school resource officer programs, and coordination of emergency management activities, plans and resources with local, state and federal agencies (Maryland Legislature, 2014).

No private schools in the county and state of Maryland for this research that answered this survey. However, one public school responded to the survey, stating it currently has a plan, reviewed in the last three months. This school is not familiar with its residing state statute on school emergency plans, but has followed the state provided template. Even though this school followed the school plan template, it did not include a plan for recovery, or mentioned training and exercises on a regular basis, not to include fire drills. This study's focus is non-public K-8 schools, the pubic school response provides insight, but not used for a comparative analysis. This school has experienced a real world crisis in the last three years, categorized as a human caused event.

State Statue and Federal Guide Summary

The purpose of this research was to examine state and local requirements for non-public elementary and middle schools in five counties of the surrounding states of West Virginia, Virginia, and Maryland to have school emergency plans meeting not only state statue, but federal recommended guidelines for comprehensive school emergency management plans. It is a 30 to 45 minute drive to any location within these three states and five counties. Reviewing statutes from each state's education and school emergency or crisis planning, all three have verbiage vastly different and can be interpreted in multiple ways. This leads to the main focus for this study.

It is concluded from the results received that West Virginia non-public schools have developed school emergency plans, and one Virginia respondent, even though the state statute

does not include non-public schools, has indeed developed a school emergency plan. Focusing on non-public schools, if there is no requirement to have school emergency plans in place, then these schools have not developed them. This hypothesis statement cannot be determined based on results received from survey respondents. Although a small percentage of non-public schools represented counties in West Virginia and Virginia responding positively to having a developed school plan; Maryland perspective non-public schools provided no responses, thus the determination for this state was inconclusive.

If non-public schools are required to have a school emergency plan, non-public schools don't follow residing state statute or the recommended emergency planning guidelines in the 2013 Department of Education Guide for Developing High-Quality School Emergency Operations Plans. Research analysis found two of three non-public schools responded negatively to situational awareness about residing state school plan statute, and Federal Guide for Schools (2013) comparatively, only one of the six public school respondents stated unfamiliarity with state statutes and requirements for school plans and all 100 percent responded to familiarity with the Federal Guide for Schools (2013). Yet overall, seven of nine schools rated substandard by missing critical elements required by the residing state.

Based on the comparative analysis this begs the question to whether there is enough interaction between public schools, and its county district administrators, not considered in this research, and the need for non-public schools and county emergency management officials or other key resources which this research supports.

Conclusions and Recommendations

Identified Problems with Current State Statutes

Lack of prescriptive verbiage, undefined meaning of "school," and the states wide variance in requirements for what constitutes a school emergency plan. To what extent is the statute in the states in this research study enforced? West Virginia requires non-public schools to have an emergency plan and provides the template for required use, as seen from the above responses only one of those non-public schools used the template, and only one of the four public schools.

Proposed Changes

The findings in this analysis suggest a need for bottom-up change and culture change in thinking in terms of inclusion of non-public schools. County governments need to reach out to these non-public schools providing information on resources available to develop a comprehensive school emergency plan following state statute. County Emergency Management officials can provide additional resources and increase collaboration between local emergency response capabilities and give guidance to these schools, if there is no dedicated county or state school safety agency.

States can take action by modifying verbiage to define "school" further include the non-public schools in state requirements for school emergency operations plans.

There are House Bills currently seeking law to ensure school emergency plans are required for all states that apply for federal grant funds under the Hazard Grant Programs. Non-public schools can receive federal grant funding, and must be included in federal and state requirements for school emergency plans. Federal laws must define the term "schools" and exactly whom that includes. Federal standards must standardize a school emergency operation

plans template for all states to follow, leaving local hazard vulnerability assessments up to the state to further define.

All children should have the same opportunity for a safe environment, meaning key staff and leadership must be prepared, trained, and ready for any school crisis.

Research Limitations

Although this research provides support to elicit change in perception of readiness in non-public schools, there are limitations to the study. Past research focuses on state requirements concentrating on public schools and its districts. However, the fact remains a crisis or disaster can occur anywhere at anytime. Non-public schools face additional challenges with lack of resources or capability to obtain resources to assist unlike public school counterparts who fall under perspective school districts, having a direct link to government funding and agencies. Unless the Federal or State government provides statue and enforces the law for all schools public or non-public to have a comprehensive school emergency plan, its ultimately up to the non-public school on whether it develops and maintains a plan or not.

Recommendations for Future Research

There are many opportunities for future research on this topic. The principal investigator recommends using the matrix developed in table 4 to perform other quantitative and qualitative studies focusing on other counties with a high count of non-public and public schools geographically close to one another. Additional research is required determining the residing state statute for school emergency planning requirements.

Additional face-to-face interviews of the residing County Emergency Management and County Public School Administrator provides the missing piece, to further discover the interaction between non-public schools and county key leadership that state legislature charges

as oversight for school emergency planning. Open-ended questions referencing communication, coordination, and collaboration provide the researcher with supplementary data to expand upon. Refer to Appendix D for suggested interview questions.

Recommend including follow-up studies at one, three, and five years, to review plans and collaboration efforts between non-public schools, County Emergency Management officials, and Public school district administrators to provide historical reference and lessons learned for building relationships between both sectors.

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APPENDICES

APPENDIX A: List of Tables

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APPENDIX C: Electronic Survey

School Emergency Plans Online Survey

Survey tool (Survey Gizmo)

Page 1: Enter the Survey

This area is where the respondent will enter a one time password that is sent with the email. The respondent will have the option at any time to save the survey and continue later.

The respondent will also have the option to not answer any questions. The survey will allow the respondent to move to the next question. Exception: Page 3 and page 4, This basic information is required to complete my analysis.

Page 2: Survey Consent Form

In an effort to recognize the importance that non-public schools play in community emergency management planning, I am conducting a research study focusing on non-public schools emergency plans. Your input can help me examine the benefits of community collaboration between non-public schools, county emergency management officials, and county public school counterparts; to raise awareness about non-public schools emergency planning processes and their inclusion into the overall county emergency planning process.

The purpose of this research project is to examine state and local requirements in the surrounding counties of Berkeley and Jefferson, West Virginia, Frederick and Clarke, Virginia, and Washington, Maryland for primary and intermediate non-public schools to have emergency plans that address not only security measures for events like terrorism or active shooter, but include plans for all locally identified hazards, following the federal and state recommended guidelines for school comprehensive emergency management planning.

This is a research project being conducted by Bobbi Jo Nye, a graduate student at American Public University System. You are invited to participate in this research project because you fall in the category of Principal, Dean, Commandant, School Administrator, and Emergency Management Official, all which have a vested interest in protecting our children.

The survey contains 30 questions pertain to school emergency plans. Your participation in this research study is voluntary and you can opt out of any or all of the questions at any time. All questions for the exception of the basic information required in the beginning, are optional, allowing you to move through the survey and answer questions later or allow no response if it is necessary. This survey takes approximately 10 minutes to complete.

All data is stored in a password protected electronic format and subject to standard data use

policies, which protect the anonymity of individuals and institutions. To help protect your confidentiality, the survey will not contain information that will personally identify you. The data is only accessible to Bobbi Jo Nye and the Professor of the research thesis.

The information from the survey will be used solely by Bobbi Jo Nye, under the American Public University System for a graduate research paper and possibly for a related article for publication in a journal in the field of emergency and disaster management.

This research has been reviewed according to Institutional Review Board (IRB) procedures for research involving human subjects.

If you have any questions or concerns about this study, please contact the researcher. (Bobbi Jo Nye, bobbijo.nye@icloud.com , (304) 820-5909).

ELECTRONIC CONSENT:
Please select your choice below.
Clicking on the "agree" button below indicates that:

- You have read the above information
- You voluntarily agree to participate
- You are at least 18 years of age
-

If you do not wish to participate in the research study, please decline participation by clicking on the "disagree" button.*

( ) Agree

( ) Disagree

Page 3: School Information

1) Where is your school located?*

( ) Washington County (Maryland)

( ) Clarke County (Virginia)

( ) Frederick County (Virginia)

( ) Berkeley County (West Virginia)

( ) Jefferson County (West Virginia)

2) What is your schools enrollment and staff count?*

( ) 20-50

( ) 51-100

( ) 100-300

( ) 301-500

( ) 501+

Page 4: School Emergency Plan

3) Does this school have an emergency plan?*

( ) Yes

( ) No

Pages 7-9 is based on Question 3's answer. It will not appear unless Question 3 is answered No

---

Page 7: If the School Has Not Developed an Emergency Plan

Does this school plan on developing an emergency plan in the next six months?
If "No" please explain in the comments section.

( ) Yes

( ) No

Comments

_____

Page 8: Information on Best Practice Plans

Would the school like information on best practice emergency plan templates and key point of contacts in the county for school emergency planning?

( ) Yes

( ) No

If the respondent answers No to the question above, the resspondent is taken to the “Thank You!”page (completion of the survey)

Page 9: More Information

Please complete the information below and I will email you the links to your County point of contacts and federal guidelines to school emergency plans templates.

First Name: _____

Last Name: _____

Email Address: _____

Please select the county in which your school resides.

( ) Washington County

( ) Clarke County

( ) Frederick County

( ) Berkeley County

( ) Jefferson County

The survey would then go to the “Thank You!” Page (completion of the survey)

If the School Has an Emergency Plan

Page 5: About the Plan

4) When was the plan developed?*

_____

5) When did key internal staff last review and approve the plan (month/year)?

_____

6) Are all school staff aware of the plan and trained on their roles and responsibilities during an emergent event?

( ) Yes

( ) No

7) Does the school have a crisis team?

( ) Yes

( ) No

If Yes then the question will appear below, If NO then Question 9 Becomes the next question asked

8) Does the crisis team:

	Yes	**No**
Understand Roles and Responsibilities	( )	( )
Exercise an event at least semi-annually	( )	( )

9) Are parents/guardians of enrolled students aware of schools emergency plan?

( ) Yes

( ) No

10) Who assisted in the development of your schools emergency plan?

[ ] School Administrators (I.e. Principal, Dean)

[ ] School Administrative Staff

[ ] Teachers

[ ] Cafeteria Staff

[ ] Parents

[ ] School Volunteers

[ ] Custodial/Maintenance Staff

[ ] Other (Please List):: _____

11) Were there any outside agencies that assisted in the development of your school emergency plan?

[ ] None

[ ] County Emergency Management

[ ] Law Enforcement

[ ] Fire-Rescue

[ ] Emergency Medical Services

[ ] Parent Organizations

[ ] Public School District Administrator Staff

[ ] Local Media (newspaper, radio, television)

[ ] Local Health Department

[ ] Other (Please List):: _____

12) Did the school use a school emergency plans template?

If Yes, where did the school obtain the Emergency Plan template?

( ) Yes: _____

( ) No

13) Are you aware of the Federal Emergency Management Agency (FEMA)/ Department of Education's Guide for Developing High-Quality School Operations Plans (2013)?

( ) Yes

( ) No

14) Please select all of the following topics that your schools emergency plan includes:

[ ] Building security and safety

[ ] Communication (internal and external)

[ ] Continuity of Operations

[ ] Preparation for large scale emergencies

[ ] Response plans for specific local hazards (man-made or natural)

[ ] Evacuation

[ ] Relocation

[ ] Family reunification

[ ] Sheltering-in-place

[ ] Lockdown

[ ] Special needs students

[ ] Extended care/before and after school programs

[ ] Other (Please List:): _____

15) How are special needs students and staff addressed in the emergency plan?

If none have been developed, please state "none" in the box below.

_____

_____

_____

_____

16) What plans are in place for extended care or before/after school programs?

If none have been developed, please state "none" in the box below.

_____

_____

_____

_____

17) Does the school have a mass notification system?

If Yes, please state the type of system in the text box provided.

( ) Yes: _____

( ) No

18) Has the school developed an emergency communication plan for internal and external stakeholders (i.e. Parents, staff, emergency responders, media)?

( ) Yes

( ) No

19) Have you provided the emergency communication plan with the enrolled students parents/guardians?

( ) Yes

( ) No

Hazard vulnerability and risk assessment are defined as: In terms of disaster management hazard vulnerability means assessing the threats from potential hazards to the population and to infrastructure in which the community resides. A risk assessment analyzes the threat (probability of occurrence), and asset value and vulnerabilities (consequences of the occurrence) to ascertain the level of risk for each asset against each applicable threat/hazard.

20) Is the school familiar with the community hazards that may affect them?

( ) Yes

( ) No

21) Has the school performed an Hazard Vulnerability/Risk Assessment?

If Yes, please state the schools highest risks identified

( ) Yes: _____

( ) No

22) Check all other hazards the school has addressed in its emergency plan?

[ ] All Listed

[ ] Injury/Illness

[ ] Pandemic

[ ] Flood

[ ] Lightning Strike

[ ] Tornado

[ ] Fire

[ ] Winter Preciptation

[ ] Earthquake

[ ] Hurricane

[ ] HazMat (Internal or External)

[ ] Radiological

[ ] Explosion

[ ] Bus Accident

[ ] Water issue

[ ] Power Outage

[ ] Pandemic

[ ] Trespasser

[ ] Kidnapping

[ ] Bomb Threat

[ ] Criminal Threat

[ ] Active Shooter

[ ] Death

[ ] Suicide

[ ] Hostage

[ ] Gun/Weapon

[ ] Other (Please List:): _____

Page 6: External School Emergency Management Planning Awareness

23) Are you familiar with your States laws about school emergency planning?

( ) Yes

( ) No

24) Is there a local county policy about school emergency planning?

( ) Yes

( ) No

( ) Dont know

25) Has the school been in contact with a county public school district administrator about emergency planning?

If Yes, please state when.

( ) Yes: _____

( ) No

26) Explain school involvement in regards to county school emergency planning with county emergency management or public school district?

If None, please state "none" in the box below.

_____

_____

_____

_____

27) Are you familiar with external safety and security resources available for schools in your county (i.e. nurses, mental health agencies, special emergency response equipment)?

( ) Yes

( ) No

28) Has the school trained or exercised plans with local county partners or internally with staff in the past year?

If Internally, Please state the last time this occurred and how many times. If Externally, Please state the last time this occurred and how many times. Otherwise choose "No"

[ ] No

[ ] Internally: _____

[ ] Externally: _____

29) How many critical incident/emergency drills does the school conduct each year?

( ) less than 3

( ) 4-6

( ) 6+

How many of those drills are fire drills:

( ) None

( ) 1

( ) 2

( ) 3

( ) 4

( ) 5

( ) 6+

30) Has the school experienced any real world emergent events in the past three years?

If Yes, please explain the event in the comments section.

( ) Yes

( ) No

Comments:

If the respondent chose "Disagree" under survey consent

Page 10: Thank You!

Thank you for your consideration to take this survey.

Your responses are very important to this research. My goal is to raise awareness about emergency planning the inclusion of non-public schools in community emergency preparedness.

If you change your mind, the survey will remain open until Wednesday, November 12th 2014.

If you have any questions feel free to contact me at bobbijo.nye@icloud.com

---

If the respondent completed the entire Survey

Page 11: Thank You!

Thank you for taking this survey.

Your responses are very important to this research. My goal is to raise awareness about emergency planning the inclusion of non-public schools in community emergency preparedness.

If you have any questions feel free to contact me at bobbijo.nye@icloud.com

---

Appendix D: Face-to-Face Consent and Interview Questions

Interview Consent Form

I, the undersigned hereby volunteer to be interviewed by Bobbi Jo Nye, graduate student from the American Public University System, on the topic of Emergency Plans for elementary and middle schools.

The purpose of this research project is to examine state and local requirements in the surrounding counties of Berkeley and Jefferson, West Virginia, Frederick and Clarke, Virginia, and Washington, Maryland for primary and intermediate schools, with a concentration on non-public schools, to have emergency plans that address not only security measures for events like terrorism or active shooter, but include plans for all locally identified hazards, following the federal recommended guidelines for school comprehensive emergency management planning.

I understand that:

a) The interview will be conducted either over the telephone or in person at a mutually agreed time and date.
b) The interview will be 20-30 minutes in duration.
c) There will be approximately 15 questions about county schools current Emergency Plans.
d) My participation is voluntary and I can opt out of the interview at any time without penalty. I will not receive any compensation for my participation.
e) My replies will remain confidential and I will not be personally identified in any reports.
f) Uses of records and data will be subject to standard data use policies, which protect the anonymity of individuals and institutions. The data is only accessible to Bobbi Jo Nye and the Professor of the research thesis.
g) The information from the interview will be used solely by Bobbi Jo Nye, under the American Public University System for a graduate research paper and possibly for a related article for publication in a journal in the field of emergency and disaster management.

If you have any questions or concerns about this study, please contact the researcher. (Bobbi Jo Nye, bobbijo.nye@icloud.com , (304) 820-5909)

Signed . . . . Date. . . . . .

Interview Questions for:
County Emergency Management or Public School District Administrator

- Full Name _____
- County _____
- School Name (If Applicable)_____
- School Address (If Applicable)_____
- Business Phone Number_____
- Title_____

1. Are you familiar with the Guide for Developing High-Quality School Emergency Operations Plan (2013)?
2. Do you have copies of all county schools public and non public schools emergency management plans?
3. What contact has been made with non-public schools about emergency planning?
4. Are schools aware of the local hazard vulnerabilities in the community?
5. Does the school system have an emergency plan template?
    a. What are the defined contents of the plan?
6. When are plans reviewed and updated?
7. Have you included non-public schools in updates to emergency management planning?
8. What is the school systems emergency communication plans with parents and staff?
9. What is your awareness about federal grants and funding for school emergency planning?
10. Were non-public schools included in any grant funding in the past 5 years for emergency planning/mitigation?
11. Is there a list of point of contacts for schools to coordinate with local response officials and for emergency resource opportunities?
12. Have any schools trained and exercised plans with local community partners and internally with staff? When?
13. Are there requirements in place to exercise school response to emergency situations, other than required fire drills?
14. Are non-public schools included in public school system or community exercises? If so what type and when?
15. Has there been any local training opportunities provided by school system for Incident Command or emergency planning (school related offered to schools (public and non-public)?

APPENDIX E: IRB Approval Letter

American Public University System
American Military University
American Public University

Institutional Review Board (IRB)

31 October 2014

Dear Bobbi Jo Nye,

The APUS IRB has reviewed and approved your revised application # 1-2014-52 (submitted 10/30/2014). The approval covers one calendar year. Should you need an extension beyond the one year timeframe, an extension request will have to be submitted. However, this does not mean your research must be complete within the one year time frame. Should your research using human subjects extend beyond the time covered by this approval, you will need to submit an extension request to the IRB.

Sincerely,

Patricia J. Campbell
Chair, IRB

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