Testimony to

Senate Education Committee and Veterans Affairs and Emergency Preparedness Committee

Joint Hearing on School Emergency Plans and Security Measures

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Center for Safe Schools

Camp Hill, Pennsylvania

February 13, 2013
EXECUTIVE SUMMARY

The Center for Safe Schools in Camp Hill, Pennsylvania, one of 16 statewide school safety centers in the nation recognized by the U.S. Department of Education, respectfully submits this written testimony proposing recommendations to the Commonwealth of Pennsylvania for improving the safety of all children enrolled in schools across the commonwealth. These recommendations are intended to provide a safer educational environment in all 3,207 public and charter schools, 88 vocational, technical and career schools, all 29 Intermediate Units and the estimated 2,085 approved private and parochial schools. The recommendations address systemic improvements, increased training and education for school staff, improvements to school design, along with increased emergency drill and exercise requirements.
Chairmen Folmer, Chairwoman Baker and members of the Senate Education and Veteran’s Affairs and Emergency Preparedness Committees:

Good Morning, my name is Don Smith and I serve as the Emergency Planning and Response Management Coordinator at the Center for Safe Schools in Camp Hill, Pennsylvania. I would like to thank you for the opportunity to address this joint committee investigating methods to improve the safety of school children and staff in Pennsylvania. I am honored to speak to you today on behalf of the Center for Safe Schools, and to provide recommendations that are grounded in over 20 years of concrete experience working with Pennsylvania’s schools on the issue of school safety and youth violence prevention.

Pennsylvania is fortunate to have one of only sixteen nationally recognized school safety centers in the United States, focused on the sole mission of school safety. This work takes on many dimensions, and Center staff possess a broad array of expertise to promote safe and supportive schools in the commonwealth; my specific function is to work directly with Local Education Agencies in the areas of emergency preparedness, response and recovery through technical assistance, training and drills and exercises. My remarks today will be focused specifically on emergency preparedness, response and recovery and reflect the experience the Center has from working with hundreds schools, districts and Intermediate Units and training over 5,000 staff through individual, web-based and face-to-face training events. This experience of working extensively with urban, suburban and rural schools, coupled with my previous experience as a sworn law enforcement officer, emergency responder and as a school administrator, provides a unique ability to consider the multiple perspectives of partners who are critical to school emergency planning and safety measures.
The Center for Safe Schools would like to acknowledge the leadership and long and successful partnership it has shared with the Pennsylvania Department of Education on addressing the needs of schools. In these challenging times, the Center continues to seek alternate ways to deliver cost-effective quality training and technical assistance to the field, including the expansion of free, web-based tools and resources to assist schools in emergency planning and response to school-based emergencies. These tools, resources and additional information are available for download at www.SafeSchools.Info.

While funding constraints have significantly impacted available resources for school safety grants, training and technical assistance, the Center continues to work with districts through a variety of funding mechanisms including PDE grants, other grant sources and local district funding. Since the beginning of the 2012-2013 school year, Center staff have trained approximately 2,800 Pennsylvania educators, their first responders and community partner organizations. This includes the targeted training of over 250 Pennsylvania school security and school police officers though intensive four-day institutes covering topics ranging from bullying and harassment to student rights and school law. An additional 400 officers were trained using this format in 2011-2012. While these efforts are noteworthy, much work remains to be done. Schools leaders need practical training and guidance to help them craft appropriate policies and procedures to increase the safety and security of their students and staff.

General Strategies:

The Center respectfully recommends to the Senate Committees represented here today, as well as the Governor’s Office, the full General Assembly and appropriate regulatory agencies, that
school safety and violence prevention be considered in a holistic and systems perspective. Literature cites school safety as being comprised of three distinct and overlapping areas of concern: Academics, Student Behavior, and Climate. These three areas are inextricable. Safety is one of our most basic and primary needs; children cannot learn and teachers cannot teach in an environment that is or feels unsafe. System-wide improvements are necessary to affect positive change in the following key areas: safe schools planning; safe schools training; physical security improvements; and prevention programming.

After an incident such as Sandy Hook, it is typical to see a sudden increase in awareness and risk (from copycat incidents). Unfortunately, prior experience indicates that this increased awareness begins to drop rather quickly in the weeks following a tragic event, whether the event is a shooting, fire or other human-made, technological or natural disaster, even though the risk of a new critical emergency of the same, similar or different type begins to climb very shortly after the original event (see Figure 1 below).

![Risk versus Awareness](Figure 1)
It is imperative that schools, business and industry make emergency preparedness a regular part of their training calendar as there is rarely sufficient advanced warning of future critical events.

The Center shares the concern of school leaders throughout the commonwealth that mandated requirements must be sustainable, both logistically and financially. Specifically, requiring schools to implement new programs or procedures without providing adequate funding to support these large expenditures in the future may open schools to liability and expose children to increased injuries, based upon a decrease in security for financial reasons. Case in point was the influx of school safety funding totaling over $19 million in 1999-2000, following the Columbine incident. While schools put funding to good use for programmatic, physical plant and security and counseling staff, many were unable to sustain these efforts after grant funding was reduced and later eliminated.

In the weeks since the Sandy Hook tragedy, the Center has urged schools to weigh school safety and security decisions carefully, considering both logistic and financial sustainability. We urge this same caution as your Committees examine strategies to assist schools in their efforts to improve school safety, security and emergency preparedness. The Center recommends that funding directed toward improvements in these areas support comprehensive safe schools planning and training, physical security improvements, and prevention programming.

Specific Recommendations:

1. **Improve Safe Schools Planning**: Pre-incident planning is the essential first step in making schools less vulnerable to risks hazards. Safe Schools planning must be viewed
through an all-hazards lens, one that focuses on the many types of natural, human-made (intentional and accidental) and technological, which may threaten schools. Comprehensive, all-hazards planning is a never-ending process, which must be focused on pre-incident communication and collaboration between schools and their first responders. The Center for Safe Schools’ specific recommendations to improve safe schools planning include:

a. Direct funding towards training, tools and resources to allow schools to develop all-hazards plans which comply with best practice recommendations, such as those found in the succinct checklist developed by the Center that allows schools to review their all-hazards plans to determine if all recommended planning areas are addressed. (See “All-Hazards Plan Brief Review,” appendix page 21). The Center also developed a 12-page comprehensive checklist which is used in conjunction with in-depth training and consultation sessions designed to assist schools in updating existing school all-hazard plans.

b. Provide schools with the resources to create comprehensive required all-hazards plans that are reviewed with local responders and practiced on an ongoing basis. Even those districts that have a comprehensive all-hazards plan need to be aware of the “binder mentality” concept. The binder mentality leads school personnel to believe they are capable of performing any action or procedure simply because it is listed in the binder. While binders are useful in organizing plan components in one place, unfortunately most binders are stored or shelves
and seldom reviewed unless an event occurs. The Center for Safe Schools believes that:

- Emergency preparedness requires a plan.
- However plans don’t prepare people.
- Preparing plans prepares the planners.
- Practicing plans prepares people.
- People Preparedness is Emergency Preparedness
- School personnel become prepared only when they practice their plans.

c. Clarify roles and responsibilities for Pennsylvania Emergency Management Agency (PEMA) and county emergency management agencies (EMAs) with regard to school all-hazards plans. Currently, many schools submit their plans to PEMA, mistakenly believing that their plans will be reviewed by PEMA and if their plan is not sufficient, school officials expect that they will be contacted by PEMA and advised of plan deficiencies. The Center recommends that all plan collection and review processes should take place at the county level, as county EMAs are best positioned to collect school all-hazards plans, review the plans and offer feedback to address plan deficiencies. It is recommended that PEMA provide guidance and direction to county EMA personnel regarding appropriate school all-hazards plan components.

d. Consider operation security and confidentiality in all future legislative and regulatory actions. To that extent, the Center recommends the Legislature to provide an exception to the Pennsylvania Sunshine Act (65 Pa.C.S.A. § 701, et. seq.) that allows school emergency planning, school security and risk/vulnerability assessment discussions to take place in executive session. Public
debate could expose our children to potential danger when these issues are
discussed in an open forum. Such an exception pertaining to release of
information is already in place under the Pennsylvania’s Right to Know Law (Act 3 of 2008), commonly referred to as the Open Records Law.

e. Strengthen requirements for school safety drills and exercises. The Center
would urge the legislature to expand the scope of emergency drills and exercises
required under both the PA School Code and the Emergency Management Services Act. Following the 1999 Columbine incident, many other states expanded drill and exercise requirements to include active shooter and intruder drills to be conducted every other year. Some states also require schools and law enforcement agencies to conduct joint tabletop exercises each year in which a drill is not conducted. The Center would recommend that schools be required to conduct:

i. A total of nine fire drills per year, three of which must occur in the first 60
days of the school year and the remaining drills will be held during the
months of November through June. At least three of the fire drills must
specifically address a blocked exit situation and all must include a
component to assess accountability systems for students, staff and
visitors.

ii. Intruder/active shooter drills should be required at least two times per
year, one of which must occur in the first ten days of school.

Additionally, school administrators must meet with law enforcement
representatives each year to conduct a tabletop exercise or joint training session focusing on response to active shooter situations.

iii. Two severe weather drills must be conducted each school year, one of which one must occur within the first 15 days of school and the second should occur between March 1st and April 10th of each school year.

iv. Bus evacuation drills should continue to be required two times per year, one of which should be a rear door exit drill.

v. Schools should be encouraged to conduct additional drills such as reverse evacuation, shelter-in-place, room clear and ground shaking scenarios.

f. Strengthen the reporting process by which Pennsylvania schools report completion of emergency drills and exercises. Currently, schools report drill and exercise activity to the Pennsylvania Department of Education through the completion of a self-certified PDE-4101 form. This form is required to be signed by each district’s superintendent and must be submitted by April 10th of each school year to the Pennsylvania Department of Education’s Bureau of Budget and Fiscal Management. This form does not require entry of specific dates or times of drills. Furthermore, only one form is required per district, regardless of the number of schools in that district. By requiring this form to be submitted by April 10th of each school year, the district superintendent certifies future events (April, May and June fire drills), which may or may not take place as planned. The Center would recommend this form be modified as follows:
i. Collect for each school building and require the signature of the building principal and district superintendent;

ii. Extend the submission date to July 15 of each school year;

iii. Provide a place for schools to list drill dates and times for all drills required under the PA School Code, 22 PA Code and Title 35 (Emergency Management Services Act); and

iv. Require schools to maintain copies of documentation for all drills certified on the PDE-4101 for auditing purposes.

g. The Center urges the Legislature to extend drills and exercise requirements to non-public and private schools. While many of these schools follow guidelines for emergency planning and preparedness, they are not required to do so. This exposes countless Pennsylvania students to an increased level of vulnerability.

2. **Safe Schools Training:** For over two decades, the Center has recommended that schools train their personnel to a greater extent than is currently required in Pennsylvania statutes or regulations. School personnel are hired as educational leaders, not as emergency managers. However, approximately 5% or more of an educational leader’s time may be spent on crisis response and emergency management. Therefore, it is incumbent upon us as a society to make sure these individuals are adequately trained in the emergency management skills they are expected to perform. Specifically, the Center recommends the following training standards be established:
a. All persons applying for teaching certification shall successfully complete a
minimum course of instruction on school-based emergencies as part of a
Pennsylvania teacher certification program.

b. School emergency response procedures shall be included in all new teacher
induction programs in the commonwealth.

c. New Pennsylvania-certified administrators shall be trained through the
Pennsylvania Inspired Leadership Program to:
   i. A minimum level regarding the National Incident Management System
      (NIMS) and Incident Command System (ICS). This can be accomplished
      through successful completion of IS-100.Sc.a and IS-700.
   ii. A basic emergency management curriculum on emergency preparedness
       for school administrators.

d. Current administrators certificated in Pennsylvania shall be required to obtain
National Incidents Management training as part of their recertification under Act
45 of 2007:
   i. A minimum level regarding the National Incident Management System
      (NIMS) and Incident Command System (ICS). This can be accomplished
      through successful completion of IS-100.Sc.a and IS-700.
   ii. A basic emergency management curriculum on emergency preparedness
       for school administrators.
iii. It is imperative that the Pennsylvania Department of Education provide Act 45 credit for administrators who successfully complete IS-100.Sc.a and IS-700.

e. The Center strongly encourages the development of minimum and on-going school security officer standards and highly recommends that all school security officers, school police officers and school resource officers assigned receive a basic level of instruction in adolescent behaviors to provide them with effective strategies to interact with school-aged students in the academic setting. Due to the complexity of issues associated with the use of force continuum, only highly trained, sworn law enforcement or court (probation) personnel should be permitted to carry firearms in schools. This position has been echoed by school safety centers, law enforcement and education organizations throughout the country. Training for law enforcement is not limited to firearms proficiency, but also includes criminal and psychological background checks, use of force and weapon retention techniques.

3. **Physical security improvements**: Funding for schools should be considered to improve the physical security as priority. These improvements would serve as an investment yielding impacts that could be relevant for 15 years or more.

   a. The Center recommends that any funding appropriation be distributed based on the establishment of equitable criteria to address specific security needs, regardless of school size or location. The Center also recommends the
concurrency of local or state law enforcement for any funded physical security improvements, such as panic alarms and “hardened’ double door entry ways.

b. The Center would also recommend that the school building plan approval process be updated to incorporate concepts of CPTED, which is Crime Prevention Through Environmental Design. CPTED best practices include layered physical security concepts, such as double door “capture” entranceways as a requirement for all future school projects. All architects designing school renovations, additions or new projects should be required to have completed the National Crime Prevention Council’s CPTED for Schools course, or an equivalent course of instruction approved by the Department of Education, in conjunction with the Pennsylvania Commission on Crime and Delinquency.

4. **Prevention Programming**: A great deal of research has been conducted nationwide to determine best practices in evidence-based youth violence prevention programs. Programs regarded as evidence-based or promising focus on providing students with tools and resources to make healthy, informed choices, while reducing or eliminating negative behaviors. Choices regarding the selection of specific violence prevention programs should remain at the discretion of local school districts to address their unique needs. All programming decisions must adhere to the common criteria of a strong research or evidence base. For example, while a legislative requirement exists for all public schools to adopt a bullying prevention policy, the mandate does not require programming to support the policy. Additionally, non-public and private schools are not required to adhere to this mandate.
a. The Center recommends that any grant funding directed towards youth violence prevention programming must utilize programs recognized as research- or evidence-based. The Center further recommends that the current requirement for bullying prevention policies remains in place, and also recommends that schools establish programming to support these policies.

b. Programs that stress violence prevention education and rehabilitation should be a priority. The Center would caution the Legislature against criminalization of behaviors that are already covered by the Pennsylvania Crimes Code.

c. The Center further recommends that schools strengthen partnerships with community-based mental health providers. A January 2013 report from the U.S. Department of Education reports approximately one in five school aged students has a mental health disorder. The Legislature must consider the need for services to these students and others with mental health disorders. While Student Assistance Programs (SAP) within schools help identify at-risk students and address some of their issues, community-based mental health programs have suffered funding reductions over the past several years, which places a larger burden for services on SAP teams within schools while limited or non-existing funding sources are available to support these services. Restoration of community-based mental health services across the commonwealth may very well prevent future incidents in or against our schools.
Closing Comments:

In closing, I would like to thank the committees for the opportunity to present my testimony and for your ongoing leadership to uphold the health, safety and welfare of all Pennsylvania students in public, charter, private and parochial schools. It is only through a sustainable, multi-tiered approach to school safety and security that focuses on safe schools planning and training, physical security improvements and prevention programming that our mutual goals can be achieved.

Thank you for your consideration of these recommendations.
APPENDICES
Donald W. Smith, Jr.
Biographical Sketch

Don Smith is currently an Emergency Planning and Response Management Coordinator at the Center for Safe Schools located in Camp Hill, Pennsylvania. The Center for Safe Schools provides technical assistance, training and consultations on school safety and violence prevention. Don works closely with schools, intermediate units and professional organizations promoting school safety and emergency preparedness.

Mr. Smith holds his Bachelor of Arts degree in Criminal Justice Administration from Alvernia College in Reading, Pennsylvania. He received his teaching certification through the Pennsylvania State University. Mr. Smith received a Master’s degree in education from Temple University where he also completed his principal certification.

Mr. Smith started his emergency services career as a volunteer fire fighter and is a past EMS chief. Mr. Smith was a police officer and active law enforcement trainer in Pennsylvania for many years. Don has taken dozens of courses in the emergency management field and has specialty training on emergency planning, risk/threat assessment, mass casualty and incident command.

Upon taking an early retirement from policing, he began his education career as a high school teacher. Don also held the positions of Dean of Students, Assistant Principal and District Administrator for Child Accounting and Safety. While serving as an administrator, he was in the elementary school parking lot when the shooting/murder of a parent occurred. Don also handled a multiple fatality traffic accident involving four of his students (three died) as the EMS command officer and then led the crisis recovery process at his high school the following week.

Mr. Smith continues to work with scores of schools, districts and intermediate units delivering training programs, providing technical assistance and facilitating drills and exercises for several dozen school districts each year. Mr. Smith has developed and written over a dozen training programs for school officials in the field of school safety, and co-wrote the Pennsylvania School Security Officer Institute training curriculum first implemented in 2012.

Mr. Smith remains active in emergency services in the capacity of medical team officer for the Dauphin County Hazardous Materials Team. He also serves as a volunteer for the Dauphin County Emergency Management Agency as emergency operations center staff member, trainer and drill/exercise design team leader.

Don combines his unique experiences as an emergency responder and school official into energized presentations and practical technical assistance for school staff of every level.
For nearly two decades, the Center for Safe Schools has been committed to providing schools with resources, training and technical assistance to create and maintain safe, productive learning environments. The Center serves as a statewide clearinghouse for educators, parents, law enforcement and others on school safety and youth violence prevention. Through expert staff, as well as access to a network of state and national researchers and practitioners, the Center provides state-of-the-art professional development and technical assistance to schools throughout the Commonwealth.

The Center for Safe Schools in partnership with the Pennsylvania Department of Education, supports schools, local agencies and parents in developing and practicing emergency management and crisis response plans, creating positive school environments, implementing evidence-based programs and institutionalizing proactive safety measures in partnership with law enforcement and other community entities to address local needs.

The Center for Safe Schools is recognized by the U.S. Department of Education, U.S. Office of Juvenile Justice and Delinquency Prevention and National Crime Prevention Council as one of 16 Statewide School Safety Centers in the nation. Services and resources include:

**Professional Development and Training**
The Center for Safe Schools reaches a broad audience, annually providing face-to-face training to over 5,000 school and community personnel. Professional development opportunities are delivered through statewide conferences, regionally-based workshops and upon request.

**Technical Assistance**
The Center for Safe Schools employs diverse and well-qualified staff that are highly experienced in all aspects of school safety and violence prevention and hold an extensive array of certifications, expertise and practical knowledge and experience in prevention, mitigation, crisis response and postvention. The Center supports schools, local agencies and parents in their efforts to prevent, prepare for, respond to and recover from all types of emergencies and crisis situations as evidenced by the approximate 7,500 requests for technical assistance received annually from these groups.

**Resource Clearinghouse**
As an additional support to schools, the Center has amassed a clearinghouse of over 10,000 resources, including many that specifically address violence prevention and school safety. Curricula, print and multimedia resources are available through the Center’s lending library.

Areas of staff specialization include, but are not limited to:

**Administrative Issues**
- Creating Effective School Safety Policy and Practice
- Creating Effective School-Law Enforcement Partnerships
- Creating Effective Memorandums of Understanding
- School Culture and District-wide Responses
- Youth Violence Risk Assessments and Evidence-based Prevention Strategies
- Dropout Prevention and Truancy Prevention
- Violence Prevention Community and School Partnerships
- Alternative Education for Disruptive Youth

**District-wide Emergency Planning and Preparedness**
- Crisis/Emergency Team Training
- Conducting Drills and Exercises
- Medical Response Team Building
- Incident Command for Schools
- Planning and Preparing for Bomb Incident
- Physical Plant Assessment

**Bullying Prevention**
- Bullying Prevention-Olweus Bullying Prevention Program
- Management of Statewide Trainer Network
- Grant Distribution through PA CARES (Creating an Atmosphere of Respect and Environment for Success), a Highmark Healthy High 5 Bullying Prevention Initiative
- Certified Olweus Trainers on Staff

**Positive School Climate**
- Resiliency
- Student Behavior Management
- Responding to Changing Demographics and Inter-Group Tension
- Gang/Hate Group Identification and Reduction
- Student Problem Identification and Resolution Training (SPIRIT)
- Hate Crimes and Racial Tension/Addressing Demographic Changes

**Internet Safety Training for Students, Staff and Parents**
- Protecting Kids Online
- Management of Statewide Network of Trained Law Enforcement Officers
- Cyberbullying

The Center for Safe Schools is part of the Center for Schools and Communities, a public, nonprofit education agency. The Center for Schools and Communities is a division of the Central Susquehanna Intermediate Unit and provides training, technical assistance, resources, grant administration and program evaluation to programs serving children, families and communities in Pennsylvania.
### All-Hazards Plan

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<th>Does the school district have the following components included as part of their all-hazards plan?</th>
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#### a. Plan is an all-hazards plan addressing:
- [ ] Natural Events
- [ ] Technological Events
- [ ] Human-Made Events:
  - ( ) Intentional and ( ) Accidental
  - ( ) Transportation Emergencies

#### b. Plan contains an administrative section with:
- [ ] Adoption Statement
- [ ] NIMS/ICS adoption and incorporation

#### c. Plan contains a basic EOP (emergency operations plan) addressing:
- [ ] Basic Concepts
- [ ] Organization and Responsibility
- [ ] NIMS/ICS functions
- [ ] Line of Succession
- [ ] Plan Maintenance
- [ ] Communications

#### d. Plan addresses all four phases of emergency management
- [ ] Prevention/Mitigation
- [ ] Preparedness
- [ ] Response
- [ ] Recovery

#### e. Plan addresses Levels of Response

#### f. Plan addresses Protective Actions
- [ ] Cancellation, delay start, early dismissal, extended day
- [ ] Evacuation and Reverse Evacuation
- [ ] Lockdown: internal/external threats and active shooter
- [ ] Administrative lockdowns
- [ ] Severe weather and ground shaking
- [ ] Shelter in Place
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g. Plan addresses need for:
- Operational Debriefing
- Critical Incident Stress Debriefings
- After-Action Reviews/Improvement Plans

h. Plan addresses:
- Procedures for parent child reunification
- Crisis communications
- Crisis recovery counseling

i. Plan addresses:
- Damage Assessment Processed

j. Plan addresses response guidelines for:
- Criminal events
- Bomb and bomb threat (including assessment algorithm)
- Fires/Explosions
- School Vehicle Accidents
- Medical Emergencies
- Civil Tension/Unrest
- Utility Failure
- Weather Events
- Geological Events
- Deaths: on/off campus staff/student; accidental/intentional
- Aircraft accidents
- Special Events incidents
- Custody/Kidnapping
- Traffic Accidents on Campus
- Child Abuse: suspected or actual
- Terrorism/CBRNE events

k. Plan addresses:
- Relocation off campus (where, routes, processes)
- Sheltering of another school on your campus (if applicable)
Plan addresses continuity of operations:
- Educational Services
- Business Services
- Transportation
- Information Technology
- Pandemic

Plan includes building specific procedures for specific protective actions and response at the building level.

This list does not include all possible practices and procedures but is a general starting point prior to an in-depth review.

### Ancillary Plans (separate from All-hazards Plan)

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<td>a. Asbestos abatement</td>
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<td>b. Athletic Event Emergency Procedures</td>
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<td>c. Auditorium/Performing Arts Center</td>
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<td>d. Chemical Safety/Hygiene Plan</td>
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<td>e. Crisis Communications Manuals</td>
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<td>f. Field Trip Guide for teachers and Chaperones</td>
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<td>g. Food Safety Plan (accidental sickening)</td>
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<td>h. Food Defense Plan (intentional poisoning/tainting)</td>
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<td>i. Integrated Pest Management Plan</td>
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<td>j. Radiological Emergency Response Plan (RERP) if applicable:</td>
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<td>- Levels of Emergency</td>
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<td>- Host/Reception Facility Information</td>
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<td>- Parent Child Reunification Procedures</td>
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<td>k. Recovery Crisis Manual</td>
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<td>l. Special Event Emergency Planning Guide</td>
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<td>m. Threat Assessment Guide/Workbook</td>
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<td>n. Workplace Safety and Control Manual</td>
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