

DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL

OIG No. 16-I-0076

September 2016



District of Columbia Public Schools Special Evaluation of Emergency Response Planning and Readiness



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**OIG****Why the OIG Did This
Special Evaluation**

In fiscal year (FY) 2016, the Office of the Inspector General's (OIG) Inspections and Evaluations Unit (I&E) conducted this special evaluation of the District of Columbia Public Schools (DCPS) as part of its planned activities. The OIG's objectives focused on the existence of an emergency response plan at each school; orientation and training events for school staff; drills; and the role of the District's Emergency and Safety Alliance (ESA) in reviewing and approving plans.

What the OIG Recommends

This report makes four recommendations to the DCPS, some of which will necessitate coordination and collaboration between the DCPS and ESA partner agencies, which include the Fire and Emergency Medical Services Department (FEMS).

**D.C. PUBLIC SCHOOLS' EMERGENCY
RESPONSE PLANNING AND READINESS****What the OIG Found**

While the DCPS appears to be working to improve its emergency preparedness capabilities, the OIG found deficiencies with regard to schools' submission of School Emergency Response Plans; orientation and training for school staff; completion and documentation of drills at schools; and the approval of School Emergency Response Plans by FEMS.

Established in 2007, the ESA is an interagency team, intended to assist schools with their emergency planning, that created a *School Emergency Response Plan and Management Guide*, referred to as The Red Book. The OIG found that sixty percent of the schools that were open in school year (SY) 2015-16 (67 of 111 schools) had a complete School Emergency Response Plan, but none of the plans appeared to be current as required by The Red Book; two plans were dated 2013, while the other 65 plans were not dated. We also randomly selected 20 schools that were open in SY 2014-15, and found little evidence that any had scheduled or held staff orientation and training events as required by The Red Book. Additionally, only 1 of the 20 schools we sampled completed the required number of emergency drills in SY 2014-15. Finally, FEMS did not approve any SY 2015-16 School Emergency Response Plans as required.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General



Inspector General

September 19, 2016

Kaya Henderson
Chancellor
D.C. Public Schools
1200 First Street, N.E., 12th Floor
Washington, D.C. 20002

Dear Chancellor Henderson:

This letter is to inform you of the results of the Office of the Inspector General's (OIG) Special Evaluation of the D.C. Public Schools' (DCPS) Emergency Response Planning and Readiness (OIG No. 16-I-0076). While DCPS appears to be working to improve its emergency preparedness capabilities, we found deficiencies with regard to: submission of School Emergency Response Plans; orientation and training for school staff; completion and documentation of drills at schools; and approval of School Emergency Response Plans by the Fire and Emergency Medical Services Department (FEMS). This special evaluation was part of our *Fiscal Year 2016 Audit and Inspection Plan*.¹

The following sections summarize the evaluation's objectives, background, scope and methodology, findings, and recommendations.

Evaluation Objectives

This special evaluation consisted of four objectives:

1. **Existence of a current emergency response plan at each school** – Determine whether each District of Columbia public school submitted a complete School Emergency Response Plan at the beginning of school year (SY) 2015-16.
2. **Scheduling and completion of orientation and training events for staff** – Determine the extent to which, during SY 2014-15, each of the 20 schools we sampled had prepared a year-long schedule of orientation and training events and held the scheduled events.
3. **Scheduling, completion, and documentation of drills** – Determine the extent to which, during SY 2014-15, each of the 20 schools we sampled conducted and documented required fire drills, emergency evacuation drills, severe weather safe area drills, and lockdown drills.

¹ Available at <http://oig.dc.gov>.

4. **Fulfillment of Emergency and Safety Alliance (ESA) responsibilities** – Determine whether the District’s ESA² is fulfilling primary duties assigned to it, such as FEMS review and approval of School Emergency Response Plans.

Evaluation Background

An emergency is defined as “[a] sudden, generally unanticipated event that has the potential to profoundly and negatively impact a significant segment of the school population.”³ Schools must be prepared for a variety of possible emergency situations including fire, the threat of violence, and severe weather.

Established in 2007, the ESA is an interagency team intended to assist schools⁴ with their emergency planning, and which “establishes the foundation for support, training, and tools needed by DC school administrators to develop customized school-level Emergency Response Plans” by (*inter alia*) working with sites on specific planning issues, identifying resources to address needs, conducting incident debriefings, and facilitating interagency networking and communication.⁵ ESA partner agencies include DCPS, the Metropolitan Police Department, FEMS, the Homeland Security and Emergency Management Agency, Department of General Services, Executive Office of the Mayor, and the Office of the Chief Technology Officer.

ESA created the *School Emergency Response Plan and Management Guide*, referred to as “The Red Book,” which includes protocols for responding to various emergencies and templates and instructions for schools to use to create and complete their individual School Emergency Response Plans.

The ESA website, <http://esa.dc.gov>, is a repository of emergency management resources, including The Red Book, that is accessible by the public, and also serves as the login portal to the ESA Application, which is a password-protected site where DCPS principals are expected to upload their completed School Emergency Response Plans and record information about staff training sessions and drills conducted during the school year.⁶ School emergency preparedness includes the following elements:

- **A School Emergency Response Plan**, which identifies a designated chain of command, specific roles for School Emergency Response Team members, school-specific procedures, and building floor plans. Having an emergency plan for each

² “The District of Columbia’s Emergency and Safety Alliance (ESA) was formed as an interagency team to plan, implement, manage, and sustain emergency response planning at the individual building level.” [Http://esa.dc.gov/page/about-esa](http://esa.dc.gov/page/about-esa) (last visited Aug. 23, 2016).

³ DISTRICT OF COLUMBIA, SCHOOL EMERGENCY RESPONSE PLAN AND MANAGEMENT GUIDE Sec. 1, p. 3 (Rev. Jan. 2010) (emphasis omitted).

⁴ D.C. public charter schools and Archdiocese of Washington schools are also members of the ESA, but were not included in the scope of this special evaluation.

⁵ [Http://esa.dc.gov/page/emergency-and-safety-alliance](http://esa.dc.gov/page/emergency-and-safety-alliance) (last visited Aug. 23, 2016).

⁶ The Red Book and the ESA Application were developed using grant funding awarded by the U.S. Department of Education.

individual school increases the likelihood of successfully managing a threat or emergency situation because the plan addresses site-specific conditions and identifies any particular needs among its staff and student body.

- **Training** for school staff members to familiarize them with their location's School Emergency Response Plan, protocols for various situations, and their individual roles and responsibilities.
- **Drills**, through which staff and students practice the School Emergency Response Plan and associated procedures.

Evaluation Scope and Methodology

The scope of this special evaluation consisted of: (1) SY 2015-16 School Emergency Response Plans; and (2) staff orientation and training events and school-based drills conducted during SY 2014-15. In May and June 2016, the OIG team reviewed and analyzed information stored in the ESA Application, as well as information and documentation provided by DCPS managers and personnel at individual schools. The OIG team conducted interviews with 3 DCPS Central Office staff members, 18 school administrators, 1 FEMS staff member, and 1 DGS staff member.

This special evaluation was conducted in accordance with standards established by the Council of the Inspectors General on Integrity and Efficiency. As a matter of standard practice, an OIG special evaluation pays particular attention to the quality of internal control.⁷

Findings

This report presents findings regarding deficiencies in each of the four areas we evaluated: completion of School Emergency Response Plans; training and orientation of school personnel; completion of drills; and approval of School Emergency Response Plans. Despite the deficiencies, we also found that DCPS is making significant efforts to improve schools' emergency preparedness. Our recommendations are intended to help DCPS continue to establish internal controls that provide greater assurance that schools are prepared for emergencies.

⁷ "Internal control" is defined by the U.S. Government Accountability Office as comprising "the plans, methods, policies, and procedures used to fulfill the mission, strategic plan, goals, and objectives of the entity" and is not one event, but a series of actions that occur throughout an entity's operations. Furthermore, internal control is a process that provides reasonable assurance that the objectives of an entity will be achieved, serves as the first line of defense in safeguarding assets, and is an integral part of the operational processes management uses to guide its operations. U.S. GOVERNMENT ACCOUNTABILITY OFFICE, STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT 5-6, GAO-14-704G (Sept. 2014).

Finding 1: Sixty percent of DCPS schools (67 of 111 schools) had a complete School Emergency Response Plan in the ESA Application, but none of the plans appeared to be current; two plans were dated 2013, while the other 65 were not dated.

Criteria: The Red Book states: “All schools will submit their School Emergency Response Plan on an annual basis, through the [ESA Application].”⁸ For SY 2015-2016, schools were required to enter their plans by October 30, 2015.

Condition: In May 2016, we reviewed information in the ESA Application for all 111 schools that were open in SY 2015-16. We found completed plans⁹ posted in the ESA Application for 60% (67 of 111) of the schools. However, we found no information that would allow us to conclude that the plans were current: 2 of the plans were dated 2013, while the other 65 plans were not dated. Furthermore, the ESA Application lacks a data field indicating when a plan was completed or last accessed.

Cause: Based on interviews with a limited number of DCPS principals, the team identified several potential causes for the lack of completed, up-to-date plans. Two principals said they had updated their school’s plan at the beginning of the school year, but that the ESA Application failed to recognize the plan as “complete.” Another principal said that he sent several requests to ESA for a username and password so that he could enter his school’s plan, but received no response. Lack of awareness, especially among new principals, of the annual requirement to complete a School Emergency Response Plan is also a potential cause.

DCPS also lacks written procedures for monitoring schools’ compliance with Red Book requirements for completing School Emergency Response Plans in the ESA Application. Responsibility for monitoring whether plans are complete reportedly rests with School Operations Specialists¹⁰ in the School Operations Team and an Office of School Security employee. These duties, however, are not part of their position descriptions or defined in written policies or procedures.

Additionally, the ESA Application affords very limited monitoring capabilities. “Percent complete” information for each School Emergency Response Plan is readily available, but the application does not enable anyone in an oversight role to quickly identify schools that have not complied with the annual deadline for plan completion.

⁸ DISTRICT OF COLUMBIA, SCHOOL EMERGENCY RESPONSE PLAN AND MANAGEMENT GUIDE Sec. 2, p.3 (Rev. Jan. 2010).

⁹ A plan is considered complete when all required plan content has been uploaded to the ESA Application. As stated in an ESA Application user guide produced by OCTO, “[t]he entire Emergency Plan will NOT be complete until each page of the plan is completed.... The plan is rated from **0% (not started) to 99% (fully complete)** with each page accumulating a certain percentage once filled out. The remaining **1% is reserved for plan approval**....” D.C. OFFICE OF THE CHIEF TECHNOLOGY OFFICER, e-GOV APPLICATION SUPPORT ESA APPLICATION EMERGENCY PLAN USER GUIDE, VER. 1.0, § 2.1 (Oct. 1, 2009) (emphasis in original).

¹⁰ School Operations Specialists are assigned to assist clusters of schools with their facilities and other issues.

Effect: Incomplete and out-of-date School Emergency Response Plans limit the effectiveness of these plans in an emergency. In the event of an actual emergency, first responders may need to access and rely on information contained in a School Emergency Response Plan, so it is imperative that schools comply with the annual requirement to complete a plan in the ESA Application.

Accountability: School principals are responsible for ensuring School Emergency Response Plans are complete in the ESA Application.

Finding 2: For the 20 schools we sampled,¹¹ the OIG found little evidence that any had scheduled or held staff orientation and training events in SY 2014-2015 as required by The Red Book.

Criteria: The Red Book states, “Annually, each team should prepare a schedule of orientation and training events.”¹² A template in The Red Book is intended to help schools develop a schedule of events for the year, and for some events, the template already identifies the month, “training event and who is to be trained,”¹³ and the person responsible for conducting the event.

However, the OIG team found that The Red Book lacks adequate detail regarding the types of orientation and training events that schools are expected to schedule, and how they should conduct them. It also states that in accordance with Federal Emergency Management Agency recommendation, the training should be: “Informal; [] Not a simulation; [] Include[] a discussion of roles and responsibilities; and [] Introduce[] related policies, procedures, plans, and responsibilities.”¹⁴ One of the events on the schedule template, for example, is an “Orientation of Students, Parents, and Community;” it is unclear how school staff members are expected to conduct such an orientation (e.g., in a school-wide assembly or meeting, in writing, etc.).

Condition: We found activity schedules in the ESA Application for each of the 20 schools we sampled, but were unable to determine whether: (1) these schedules applied to SY 2014-15; and (2) any of the scheduled activities were conducted. We contacted each of the sampled schools to request documentation of any SY 2014-15 orientation and training events that they completed but were not reflected in the ESA Application. Three schools provided documentation of several training events they held during SY 2014-15; the other 17 schools did not provide documentation.

Cause: Contributing factors include principals’ lack of awareness and training, and limited capability of the ESA Application. Some principals were not aware of the requirement to schedule, conduct, and document orientation and training events,

¹¹ The OIG randomly selected 20 of the 109 schools that were open in SY 2014-15.

¹² DISTRICT OF COLUMBIA, SCHOOL EMERGENCY RESPONSE PLAN AND MANAGEMENT GUIDE Sec. 3, p. 73 (Rev. Jan. 2010).

¹³ *Id.*

¹⁴ *Id.* Sec. 1, p. 25.

saying they were not trained on their emergency preparedness responsibilities. Also, the ESA Application does not have date fields or time stamps that would enable DCPS managers to effectively monitor schools' scheduling and completion of orientation and training activities.¹⁵ One interviewee said the ESA Application was designed with the understanding that information in it would be erased at the conclusion of each school year, so that principals would need to complete a plan every year. It seems that the ESA Application was intentionally designed to have limited monitoring and reporting features.

Finding 3: According to information in the ESA application, only 1 of the 20 schools we sampled completed the required number of emergency drills¹⁶ in SY 2014-15. Seven of the 20 schools we sampled recorded no completed drills for SY 2014-15.

Criteria: The Red Book requires that each school conduct two emergency evacuation drills, one severe weather safe area drill, and two lockdown drills each school year.¹⁷ It also states that two fire drills should be held in the first month of school and one per month following that, if applicable.¹⁸ This equates to a total of 11 fire drills in a 10-month school year.¹⁹ Schools are to log completed drills in the ESA Application.

Condition: We sampled 20 of the 109 DCPS schools that were open in SY 2014-15 to see whether they conducted the required numbers of fire, emergency evacuation, severe weather safe area, and lockdown drills. We examined drill records in the ESA Application and contacted principals at 19 of the 20 schools²⁰ to request documentation for any drills that may have been conducted but were not recorded in the ESA Application. DCPS Central Office personnel also contacted principals at the 19 schools to ensure school staff members attempted to locate any such documents.

Of the 20 schools we sampled, only one school appeared to have conducted the required number of each of the 4 drill types. Seven schools had no drills documented in the ESA Application. Table 1 on the next page summarizes the results of our sampling.

¹⁵ OCTO provides information technology support services for the ESA Application through a Memorandum of Understanding with DCPS.

¹⁶ Drills include practicing responses for the following types of incidents: fire; emergency evacuation due to a situation such as a chemical spill; "severe weather safe area," when all occupants move to the interior of the building, prior to the arrival of a severe thunderstorm or tornado, to avoid flying projectiles such as furniture and broken glass; and lockdown due to a threat either inside or outside the school, such as an armed suspect.

¹⁷ DISTRICT OF COLUMBIA, SCHOOL EMERGENCY RESPONSE PLAN AND MANAGEMENT GUIDE Sec. 3, p. 75 (Rev. Jan. 2010).

¹⁸ *Id.*

¹⁹ An FEMS staff member confirmed our understanding that each school must complete 11 fire drills per school year.

²⁰ One school open in SY 2014-15, Mamie D. Lee, was closed during our fieldwork.

Type of Drill (Number Required During SY)	Percent (Number) of Sampled Schools Meeting Drill Requirement
Fire (11)	10% (2)
Emergency Evacuation (2)	5% (1)
Severe Weather Safe Area (1)	25% (5)
Lockdown (2)	10% (2)

Table 1: Sampled Schools' Compliance With Number of Drills Required in SY 2014-15

Cause: We found insufficient internal controls to ensure compliance with drill requirements. First, DCPS does not have a procedure for monitoring schools' performance of emergency drills. Second, DCPS did not have a staff member dedicated to monitoring emergency preparedness in SY 2014-15; the responsibility was shared among several people. Third, principals we interviewed said they were not adequately informed of drill requirements, and find it challenging to balance other responsibilities that may interfere with conducting the required number of drills, such as providing sufficient instructional time.

Effect: The Red Book states: "It is essential to practice the [School Emergency Response Plan] periodically to make sure that it works, and that all personnel understand their roles."²¹ In addition, school staff may not understand how they must communicate and coordinate their activities to be effective during an emergency.

Accountability: Each school's principal or his/her designee is responsible for ensuring that the school conducts the appropriate number of drills each year.²²

Finding 4: FEMS did not approve any SY 2015-16 School Emergency Response Plan as required by The Red Book.

Criteria: The Red Book states, "The International Fire Code (IFC), Chapter 4 – Emergency Planning and Preparedness, is adopted by DCMR 12H – Fire Code, and is the single source currently used by the DC Fire Marshal to approve the Emergency Response Plans."²³ The 2012 International Fire Code (2012 IFC) § 401.2 states: "**Approval.** Where required by this code, fire safety plans, emergency procedures

²¹ DISTRICT OF COLUMBIA, SCHOOL EMERGENCY RESPONSE PLAN AND MANAGEMENT GUIDE Sec. 1, p. 25 (Rev. Jan. 2010).

²² See DISTRICT OF COLUMBIA, SCHOOL EMERGENCY RESPONSE PLAN AND MANAGEMENT GUIDE Sec. 3, p. 23 (Rev. Jan. 2010).

²³ DISTRICT OF COLUMBIA, SCHOOL EMERGENCY RESPONSE PLAN AND MANAGEMENT GUIDE Sec. 1, p. 17 (Rev. Jan. 2010). As set forth in 12H DCMR § 101.1, the D.C. Fire Code "shall consist of the 2012 edition of the International Fire Code"

and employee training programs shall be *approved* by the *fire code official*.²⁴ The 2012 IFC defines “Educational Group E” occupancy to include “the use of a building or structure, or a portion thereof, by six or more persons at any one time for educational purposes through the 12th grade.”²⁵ Further, the 2012 IFC requires approved fire safety and evacuation plans for buildings used for educational purposes.²⁶ In addition, the IFC specifies requirements for the contents of fire evacuation plans, fire safety plans, and lockdown plans, which are to be approved by the fire code official.²⁷

Condition: For SY 2015-16, FEMS did not approve School Emergency Response Plans. The ESA Application has the capability to allow designated individuals to review and approve plans, but this capability was not used.

Cause: We found a lack of clarity regarding a review process for School Emergency Response Plans. The team learned that as of May 2016, DCPS and FEMS were discussing, but had not yet agreed upon, a process for reviewing and approving the plans.

Effect: Without proper review and approval by qualified personnel, School Emergency Response Plans may contain operational gaps or other deficiencies that go undetected, possibly leading to inefficient emergency responses that fail to protect students and school employees.

Accountability: FEMS’s Office of the Fire Marshal is responsible for reviewing School Emergency Response Plans.

Recommendations

Based on the above findings, we recommend that the Chancellor, DCPS:

- (1) Coordinate with ESA partner agencies to conduct a thorough assessment of the ESA Application’s functionality, and implement an action plan to ensure that the ESA Application gives DCPS personnel the information technology capabilities they need to meet Red Book annual requirements regarding completion of School Emergency Response Plans, and scheduling, completion, and documentation of orientation and training events and drills.

Agree _____ X _____ Disagree _____

²⁴ *Id.* at 55 (emphasis in the original).

²⁵ 2012 International Fire Code at 32.

²⁶ *See id.* §§ 404.2 and 405.1.

²⁷ *See id.* §§ 404.3.1 - 404.3.3.

Excerpt from DCPS' September 2016 Response, As Received:²⁸ DCPS agrees with the recommendation. The DCPS Emergency Planning and Guidance (EPG) team will coordinate with FEMS and HSEMA by March 30, 2017, to conduct a full assessment of the ESA application's functionality, and implement a complete action plan that will provide monitoring capabilities including time and date stamps for ERPs and the completion of orientation and training events and drills, that will include appropriate participation documentation. DCPS has dedicated resources to the monitoring of this work through the creation of the EPG, set to launch October 3, 2016.[]

DCPS identified an Emergency Operation Plan (EOP) software platform, administered through the U.S. Department of Education's (DOE), Office of Safe and Healthy Students Readiness and Emergency Management for Schools Technical Assistance Center, which provides DCPS with the necessary functionality and monitoring capabilities for school ERPs. The EOP software provides the recommended six (6) steps for planning, including sample plans, emergency plan calendars and training documents to further assist schools in the development of site ERPs. Schools will continue to report and document the required information in the ESA application. We anticipate using the DOE platform in combination with ESA beginning spring 2017. We have a target date of November 30, 2016 for schools to submit their drill plan and activities. The EPG team will monitor a sample of school drills as well as monitor the ESA website to ensure schools are reporting their drill activities appropriately.

- (2) Implement a communication strategy that informs principals throughout the school year of their responsibilities to complete and update School Emergency Response Plans and conduct and document orientation and training events and drills.

Agree X Disagree

Excerpt from DCPS' September 2016 Response, As Received: DCPS agrees with the recommendation. By November 30, 2016 the EPG team will implement a communication strategy that will inform principals and other school leaders of their responsibilities for ERPs and training. We will utilize the following DCPS resources to achieve this goal:

- We will disseminate emergency planning guidance and documentation requirements to principals and other responsible school based leaders by July 15th annually, so the information can be shared in cluster meetings with principals during the summer.
- We will send monthly reminder emails about posting and documenting drill activity to principals and other responsible school leaders on the 15th day of each month through the Daily Update sent by the Chief of Schools;

²⁸ The full text of DCPS' response to the draft report is Appendix A. (Documents submitted by DCPS and referenced in the footnotes of the response are not included.)

- We will announce updates in the Director/Manager of Strategy & Logistics (DSL/MSL)[] monthly, electronic newsletter. These updates will be included by the 15th day of each month; and
- School Operations Specialists will include EPG updates in person and in writing in their monthly check-ins with principals and/or DSLs/MSL.

- (3) Develop and disseminate a uniform orientation and training program to principals so that they understand how and when they are expected to deliver relevant emergency preparedness information to faculty, parents, and other community stakeholders.

Agree _____ X _____ Disagree _____

Excerpt from DCPS' September 2016 Response, As Received: DCPS agrees with the recommendation. By November 30, 2016, the EPG team will formalize the SERT training[] that began November 2015 and provide templates to schools for documenting the school-level orientations and trainings conducted. Annually in August, during the two (2) weeks leading up to school opening, we will provide school leaders with our expectations around the planning and execution of drills, including the documentation of such in the ESA portal. The EPG team will also provide a sample agenda and training materials to be presented to school staff to ensure that all staff is aware of the school procedures in various emergency situations. We will also require that schools provide sign-in sheets for all who attended. We will have schools post emergency preparedness information on the school website for the broader community. We will also provide templates for schools to disseminate at back-to-school events and to make copies available in the main office.

We also recommend that the Chancellor, DCPS, in coordination with the Chief, FEMS:

- (4) Develop and disseminate a written procedure that defines the process through which the Office of the Fire Marshal will review and approve, annually, completed School Emergency Response Plans in the ESA Application.

Agree _____ X²⁹ _____ Disagree _____

Excerpt from DCPS' September 2016 Response, As Received: DCPS agrees with the recommendation. The EPG team will coordinate a review of the established process in the Red Book and work with the appropriate FEMS staff to identify a time line for FEMS to annually approve school EOPs. Upon agreement of a review process, DCPS will develop and implement a written procedure by March 30, 2017. We will widely disseminate this procedure to school leaders as well as provide

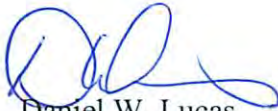
²⁹ FEMS also agreed with this recommendation, and stated that its Office of the Fire Marshal will work with DCPS to clarify the process through which plans will be reviewed and approved. FEMS also stated it will "provide any additional assistance required to ensure compliance with the findings and recommendations of the OIG's report."

guidance and periodic updates to all stakeholders. On August 30, 2016, DCPS contacted Chief Falwell to initiate this collaborative effort.

The OIG will communicate with your office periodically during SY 2016-17 and request updates on DCPS' progress toward implementing the initiatives cited in your response. In the interim, if you have any additional questions related to this evaluation, please contact me or Edward Farley, Assistant Inspector General for Inspections and Evaluations, at (202) 727-2540.

We appreciate the cooperation and courtesies extended to our staff during this engagement.

Sincerely,



Daniel W. Lucas
Inspector General

DWL/ef

cc: See Distribution List

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APPENDIX A – DCPS RESPONSE TO DRAFT REPORT



DISTRICT OF COLUMBIA
PUBLIC SCHOOLS

Office of the Chief Operating Officer

September 8, 2016

Daniel W. Lucas
Inspector General
717 14th St., NW
Washington, DC 20005

Dear Mr. Lucas:

We are in receipt of the Office of the Inspector General's draft report entitled *Special Evaluation of D.C. Public Schools' Emergency Response Planning and Readiness (OIG No. 16-I-00##)*, dated August 29, 2016. Thank you for providing this feedback as well as allowing us the opportunity to respond and provide input.

In summary, DCPS concurs with the recommendations set forth in the draft report and is taking steps to implement these recommendations. We have noted the specific findings and recommendations of the draft report and have provided our specific responses below.

Recommendations:

(1) Coordinate with ESA partner agencies to conduct a thorough assessment of the ESA Application's functionality, and implement an action plan to ensure that the ESA Application gives DCPS personnel the information technology capabilities they need to meet Red Book annual requirements regarding completion of School Emergency Response Plans, and scheduling, completion, and documentation of orientation and training events and drills.

DCPS Response:

DCPS agrees with the recommendation. The DCPS Emergency Planning and Guidance (EPG) team will coordinate with FEMS and HSEMA by March 30, 2017, to conduct a full assessment of the ESA application's functionality, and implement a complete action plan that will provide monitoring capabilities including time and date stamps for ERPs and the completion of orientation and training events and drills, that will include appropriate participation documentation. DCPS has dedicated resources to the monitoring of this work through the creation of the EPG, set to launch October 3, 2016.¹

¹ The newly created EPG team will plan, design, and evaluate training programs and exercises to facilitate safe and secure environments for the DCPS students, employees, and others. The team is part of DCPS' School Security Unit. We have received approval to hire two (2) dedicated positions for this work with a mission of improving DCPS' EPG. Position descriptions will be posted the week of September 12, 2016. Copies of the position descriptions have been included with this correspondence.

APPENDIX A – DCPS RESPONSE TO DRAFT REPORT

DCPS identified an Emergency Operation Plan (EOP) software platform, administered through the U.S. Department of Education's (DOE), Office of Safe and Healthy Students Readiness and Emergency Management for Schools Technical Assistance Center, which provides DCPS with the necessary functionality and monitoring capabilities for school ERPs. The EOP software provides the recommended six (6) steps for planning, including sample plans, emergency plan calendars and training documents to further assist schools in the development of site ERPs. Schools will continue to report and document the required information in the ESA application. We anticipate using the DOE platform in combination with ESA beginning spring 2017. We have a target date of November 30, 2016 for schools to submit their drill plan and activities. The EPG team will monitor a sample of school drills as well as monitor the ESA website to ensure schools are reporting their drill activities appropriately.

(2) Implement a communications strategy that informs principals throughout the school year of their responsibilities to complete and update School Emergency Response Plans and conduct and document orientation and training events and drills.

DCPS Response:

DCPS agrees with the recommendation. By November 30, 2016 the EPG team will implement a communication strategy that will inform principals and other school leaders of their responsibilities for ERPs and training. We will utilize the following DCPS resources to achieve this goal:

- We will disseminate emergency planning guidance and documentation requirements to principals and other responsible school based leaders by July 15th annually, so the information can be shared in cluster meetings with principals during the summer.
- We will send monthly reminder emails about posting and documenting drill activity to principals and other responsible school leaders on the 15th day of each month through the Daily Update sent by the Chief of Schools;
- We will announce updates in the Director/Manager of Strategy & Logistics (DSL/MSL)² monthly, electronic newsletter. These updates will be included by the 15th day of each month; and
- School Operations Specialists will include EPG updates in person and in writing in their monthly check-ins with principals and/or DSLs/MSL.

(3) Develop and disseminate a uniform orientation and training program to principals so they understand how and when they are expected to deliver relevant emergency preparedness information to faculty, parents, and other community stakeholders.

DCPS Response:

DCPS agrees with the recommendation. By November 30, 2016, the EPG team will formalize the SERT training³ that began November 2015 and provide templates to schools for documenting the school-level orientations and trainings conducted. Annually in August, during the two (2) weeks leading up to school opening, we will provide school leaders with our expectations around the planning and execution of drills, including the documentation of such in the ESA portal. The EPG team will also provide a sample

² Directors or Managers of Strategy & Logistics serve as school-based operational leaders. Sixty-one DCPS schools have funded this operational position, and as a part of their roles and responsibilities, they coordinate School Emergency Response Team (SERT) training, emergency planning and evacuation drills.

³ SERT Training Agenda is attached.

APPENDIX A – DCPS RESPONSE TO DRAFT REPORT

agenda and training materials to be presented to school staff to ensure that all staff is aware of the school procedures in various emergency situations. We will also require that schools provide sign-in sheets for all who attended. We will have schools post emergency preparedness information on the school website for the broader community. We will also provide templates for schools to disseminate at back-to-school events and to make copies available in the main office.

(4) Develop and disseminate a written procedure that defines the process through which the Office of the Fire Marshall will review and approve, annually, completed School Emergency Response Plans in the ESA Application.

DCPS Response:

DCPS agrees with the recommendation. The EPG team will coordinate a review of the established process in the Red Book and work with the appropriate FEMS staff to identify a timeline for FEMS to annually approve school EOPs. Upon agreement of a review process, DCPS will develop and implement a written procedure by March 30, 2017. We will widely disseminate this procedure to school leaders as well as provide guidance and periodic updates to all stakeholders. On August 30, 2016, DCPS contacted Chief Falwell to initiate this collaborative effort.

Thank you again for your evaluation and assisting DCPS in improving the efficiency and effectiveness of our ERP system.

Sincerely,



Carla D. Watson
Interim Chief Operating Officer
District of Columbia Public Schools