

III. POLICY AND PLANNING

*Recent tragic events in the nation’s schools highlight the need for developing and maintaining up-to-date school-based safety and security plans for responding to crisis situations involving all-hazards, such as natural, technological, man-made, biological and student culture and climate.*¹¹¹

– Uniform State Memorandum of Agreement between
Education and Law Enforcement Officials

The State of School Security in New Jersey

Throughout its research, the NJSBA School Security Task Force found one fact to be crystal clear: *New Jersey has strong and effective school security measures in place.* The procedures result from state law and regulation, aggressive state initiatives, local school board policy, and the interest of caring adults, including teachers, parents, administrators, school board members, and law enforcement personnel.

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| • New Jersey is one of only 10 states that require School Security Drills on a regular basis. |
| • The state’s school districts and charter schools must have Safety and Security Plans , which incorporate minimum requirements for building access, transportation, visitor policy, and other key areas. |
| • Every school district and corresponding law enforcement agency must enter into a Memorandum of Agreement outlining the responsibilities of school officials, police and emergency responders during security threats and other crises. |
| • School districts must have Administrative Response Procedures that correspond to law enforcement procedures on bomb threats, active-shooter response, school lockdowns, school evacuations, and other situations. |

The NJSBA School Security Task Force acknowledges the state-level action taken before and after the Newtown tragedy. It has therefore placed a focus on the basic question facing local school district officials after December 14, 2012: “*What other steps must we take to ensure a safe and secure school environment for our children?*”

Answering that question, however, requires a review of security requirements currently in place in New Jersey’s public schools.

¹¹¹ New Jersey Department of Law & Public Safety and New Jersey Department of Education, *A Uniform State Memorandum of Agreement between Education and Law Enforcement Officials*. (Trenton, N.J., September 2011), Article 8, 31. (<http://www.state.nj.us/education/schools/security/regs/agree.pdf>, accessed Sept. 9, 2014)

The Phases of Crisis Planning

In a memo issued four days after the Newtown tragedy, Commissioner of Education Chris Cerf and State Board of Education President Arcelio Aponte assured local school officials of the state’s continued efforts to enhance school security, citing an October 2012 requirement to align local security plans with updated minimum state requirements.¹¹²

In its April 2013 report, the New SAFE Task Force, a select study group appointed by Governor Christie summarized the status of school security in New Jersey, pre- and post-Newtown:

Fully understanding that students who are fearful will be distracted from academic achievement, this State has undertaken a school security plan rooted in the four phases of crisis planning – prevention/mitigation, preparedness, response, and recovery. That plan began taking shape about eight years ago.¹¹³

The SAFE Task Force report also provides an excellent summary¹¹⁴ of state-level activities established since 2005 to make New Jersey’s public schools secure and to promote safe learning environments. These efforts and resources include creation of the Office of School Preparedness and Planning; the work of the K-12 School Security Task Force, which encompasses state-, local- and county-level law enforcement, emergency management and education agencies; the 2010 School Security Drill Law; the Making Our Schools Safe Initiative; the Anti-Bullying Bill of Rights; and the Safe Schools for a Better Tomorrow initiative, which includes technical assistance, training, database and public information components.

In addition, the report cites statistics, compiled through the New Jersey Department of Education’s annual reports on violence and vandalism¹¹⁵. While stressing the state’s proactive approach to school safety, it recommends “next steps so that we all remain vigilant in ensuring the continued safety of our students and our schools.”¹¹⁶

¹¹² New Jersey Department of Education, Memorandum to Chief School Administrators, Charter School Lead Persons and Nonpublic School Administrators: *Tragedy at Sandy Hook Elementary School (Newtown, CT)*, by Christopher D. Cerf and Arcelio Aponte. (Trenton, N.J., December 18, 2012). (<http://www.state.nj.us/education/schools/security/role/121812memo.pdf>, accessed Sept. 9, 2014)

¹¹³ New Jersey Office of the Attorney General, *The New Jersey SAFE Task Force on Gun Protection, Addiction, Mental Health and Families, and Education Safety*, by Peter G. Verniero, John J. Degnan, Manuel Guantez, James Romer, Evelyn Sullivan, Brian Zychowski, Lee Vartan, Ron Susswein, Paul Salvatoriello, and Joseph Fanaroff. (Trenton, N.J., April 10, 2013), 68. (<http://nj.gov/oag/newsreleases13/NJSAFE-REPORT-04.10.13-WEB.pdf>)

¹¹⁴ *Ibid*, 68-74.

¹¹⁵ *Ibid*, 66: “With regard to violence in New Jersey schools, during the 2010-11 academic year, New Jersey had 1,246 cases of students bringing weapons to school, and New Jersey schools experienced 11,216 violent incidents. At this time, the [state] Office of Homeland Security and Preparedness considers the threat to our K-12 schools to be moderate.”

¹¹⁶ *Ibid*, 65.

Current Requirements

Following is a summary of state requirements as presented to the task force by officials of the New Jersey Department of Education, the Office of Homeland Security & Preparedness, and the New Jersey School Boards Association's policy unit.

Safety and Security Plans

The section of New Jersey Administrative Code that addresses “Programs to Support Student Development” requires every school district and charter school to establish a comprehensive Safety and Security Plan, along with procedures to provide a safe and secure learning environment.¹¹⁷

Local school district administrators must develop security plans and procedures in consultation with law enforcement, health and social services agencies, emergency management planners and other community resources. The plans must be consistent with the municipality's Emergency Management Plan, reviewed annually, and distributed to law enforcement and school employees. They must also address staff in-service training. At a minimum, the plans must provide for—

1. The protection of the health, safety, security and welfare of the school population;
2. The prevention of, intervention in, response to and recovery from emergency and crisis situations;
3. The establishment and maintenance of a climate of civility; and
4. Support services for staff, students and their families.¹¹⁸

According to this same state regulation, the local board of education must distribute a copy of the school safety and security plan to staff members within 60 days of employment. All employees must also be briefed in writing about updates and changes to the plan.

Additionally, the Uniform State Memorandum of Agreement between Education and Law Enforcement Officials, approved by the New Jersey Department of Law & Public Safety and the Department of Education, requires school safety and security plans.

The school safety and security plans should include procedures for quickly communicating to faculty members that a crisis situation exists, and procedures for minimizing the risk of physical harm to students and faculty by reducing their exposure to all hazards. ...it is appropriate to develop and rehearse plans and procedures for “locking down” classrooms and buildings to restrict the movement of children and staff and to minimize their exposure to hazardous situations.¹¹⁹

Other aspects of the Uniform State Memorandum of Agreement are described on pages 46 through 48 of this report.

¹¹⁷ N.J.A.C. 6A:16-5.1, 49 (<http://www.nj.gov/education/code/current/title6a/chap16.pdf>). “Each school district shall develop and implement comprehensive plans, procedures and mechanisms that provide for safety and security in the public elementary and secondary schools of the school district.”

¹¹⁸ *Ibid*, 50.

¹¹⁹ *A Uniform State Memorandum of Agreement between Education and Law Enforcement Officials*, Article 8, 31.

Ongoing Planning

The NJDOE Office of School Preparedness and Emergency Planning issued a resource/guidance document, *School Safety and Security Plans: Minimum Requirements*¹²⁰ in 2011. During his presentation to the NJSBA task force on August 22, 2013, Anthony Bland, state coordinator for School Preparedness and Emergency Planning, noted that, prior to its release, the document was reviewed by the state’s Domestic Security Preparedness Task Force and representatives of the public school community.¹²¹

The document emphasizes the need for ongoing planning in concert with public safety and emergency management agencies. It lists six basic steps to assist school districts in formulating their safety and security plans:

1. Assemble a **district-wide planning team**, including staff, parents and representatives of law enforcement, fire, hospital and emergency management agencies.
2. Conduct a **hazard analysis** of school buildings and grounds, with the possible assistance of local emergency management personnel. The analysis should not only assess the physical environment and technological infrastructure, but also the school climate.
3. **Eliminate** (or mitigate) hazards.
4. Develop procedures to **respond to hazards**.
5. **Train** students and staff on their responsibilities in a given situation.
6. Conduct **drills** and **tabletop exercises** (i.e., activities in which key personnel discuss simulated scenarios in an informal setting).¹²²

According to Mr. Bland, there are 91 required elements of a school safety and security plan, including creation of building-level response teams; protocols for potential threats and responses, such as bomb threats, active-shooter situations, lock-downs and reverse evacuations; target-hardening initiatives; and mental health protocols.

The 2011 minimum requirements also include the establishment of “policies and procedures for a variety of target-hardening initiatives [in areas], such as—

- Building access,
- Visitor policy,
- Delivery procedures,
- Student transportation security,

¹²⁰ New Jersey Department of Education, Office of Preparedness and Emergency Planning, *School Safety and Security Plans: Minimum Requirements*. (Trenton, N.J., August 2011). (<http://www.state.nj.us/education/schools/security/req/req.pdf>, accessed Sept. 11, 2014)

¹²¹ Anthony Bland, “Keeping New Jersey’s Schools Safe: School Preparedness Briefing” (presentation to the NJSBA School Security Task Force, Trenton, N.J., August 23, 2013).

¹²² *School Safety and Security Plans: Minimum Requirements*, 5.

- Master key and access code distribution,
- Vehicular access and parking procedures, and
- Access to storage and HVAC system areas.”¹²³

School District/Board Responsibility

Mr. Bland advised the NJSBA task force that school districts should approach the creation of their safety and security plans as they do curriculum: the state’s minimum requirements represent a template upon which districts may also address their individual security needs.

He noted that—

- Most of the content of the local school district safety and security plan is exempt from public records requirements.
- All school districts must have policies addressing security at school-sponsored events and on school vehicles.
- Local school board approval of the school safety and security plan is not required.

Mr. Bland recommended the following actions:

- School districts should have clear procedures concerning entry to buildings. These procedures should address matters, such as the distribution of keys and other access devices to the staff and a separate process for entry by substitute teachers.
- Each school should designate a “safe haven” or relocation site to be used when appropriate during an emergency.

While the state required that all school districts review their security plans in October 2012, **46.7%** of school district officials responding to an NJSBA survey¹²⁴ indicated that their districts went beyond the directive and conducted additional review of security plans following the Newtown tragedy in December 2012.

Changes/enhancements to security reflected in the revised plans included—

- Expanded **electronic surveillance** of buildings and grounds;
- Updated **lockdown procedures**;
- Revised **access procedures** for visitors and staff;
- Changes in **door hardware and locks**;
- Revised **drill procedures**;
- Increased **police presence** on school grounds and at school events;
- Engagement of **School Resource Officers** and/or security personnel, and
- Renovations of school **vestibules and entryways**.

¹²³ *Ibid*, 9.

¹²⁴ The electronic survey was administered July 25 through September 26, 2013 to local school board presidents and school business administrators. Two hundred seventy-three local school officials participated in the survey.

Approval of Plans

NJSBA's Policy Service advises that state law and regulation require collaboration among school administrators, law enforcement and first responders in the development of the safety and security plan.¹²⁵ However, there is no requirement that the local board of education approve the plan.

In comparison, another critical security document, the district's Memorandum of Agreement between Education and Law Enforcement Officials, requires the signature of the local school board president, along with those of the chief of police, the county prosecutor, the district superintendent and the executive county superintendent.¹²⁶ In many respects, the memorandum provides the standards, procedures, principles and *policies* upon which the security plan's strategies are constructed.

Administrative Response Procedures

In 2007, the state Attorney General issued a directive requiring law enforcement agencies to establish and maintain policies and procedures on school safety, including bomb threats, active-shooter response, school lockdowns, school evacuations, and public information. Model policies were distributed through the County Prosecutors to all law enforcement agencies.¹²⁷

To complement the model policies for law enforcement, the New Jersey Department of Education issued model procedures for school administration.¹²⁸ The commissioner of education directed local school districts to use the model procedures when revising existing practices as needed. She also advised local school officials to consult with law enforcement to ensure alignment with the Attorney General's model policies, state-issued directives and regulatory requirements, and local needs.¹²⁹

¹²⁵ NJSBA Policy Services, "School Safety and Security Plans" (presentation to the NJSBA School Security Task Force, Trenton, N.J., May 23, 2013).

¹²⁶ *A Uniform State Memorandum of Agreement between Education and Law Enforcement Officials*, 48.

¹²⁷ New Jersey Department of Law and Public Safety, *Attorney General Law Enforcement Directive No. 2007-1*. (Trenton, N.J., July 13, 2007). (http://www.nj.gov/lps/dcj/agguide/directives/dir-le_dir-2007-1.pdf, accessed Sept. 9, 2014)

¹²⁸ New Jersey Department of Education, *School Administrator Procedures: Responding to Critical Incidents*, New Jersey Department of Education, October 2007 (This document is not publicly available.)

¹²⁹ New Jersey Department of Education, *Memorandum Re: School Administrator Procedures: Responding to Critical Incidents*, to Chief School Administrators, Charter School Lead Persons and Nonpublic School Administrators, by Lucille E. Davy. (Trenton, N.J., October 22, 2007). "These procedures will enhance communication, cooperation and coordination, resulting in improved responses to threats and hazards. Attached to the procedures are model 'Rapid Response' guides for active shooter and lockdown situations that, once individualized for each school, should be distributed to all staff to support consistent responses to emergencies." (http://www.state.nj.us/education/schools/security/regs/102207crit_inc.pdf, accessed Sept. 9, 2014)

The Administrative Response Procedures address the appropriate strategy to be used in a particular situation. They describe the responsibilities of school administrators, faculty, the designated public information liaison and other staff in various emergencies and provide guidance on recovery after the situation is brought under control.

The procedures stress cooperation with local law enforcement and other first-responders:

Collaboration and coordination with local responders is the foundation for producing effective protocols and efficient communication.Knowing what to do when faced with a critical incident can be the difference between calm and chaos and between life and death.¹³⁰

Incident Command System

In a May 23, 2013 presentation to the NJSBA task force, the Association’s Policy Service staff explained, “Both the Administrative Response Procedures and the Uniform Memorandum Agreement note the importance for clear communications, chain of command and decision-making protocols [to] be established between emergency responders and schools.”¹³¹

...school administrators should establish a clear chain of command in order to initiate proper notifications to their school crisis response team and emergency responders by activating the school/district’s Incident Command System (ICS) or an ICS-like structure that identifies immediate action, functional protocols and guidelines for responding to all types of hazards.¹³²

...all school safety and security plans shall include defined communication and decision-making protocols (e.g., Incident Command System) and the minimum requirements for the format and contents of the plans, as determined by the Commissioner of Education and the Domestic Security Preparedness Task force.¹³³

The importance of an ICS is highlighted in emergency management guidelines issued by several government agencies. “It is important for all staff members, administration, teaching and non teaching staff to be trained so that they fully understand their specific duties and responsibilities in any crisis situation. School staff members need to be familiar with the Incident Command System (ICS) to avoid any confusion.”¹³⁴

The Federal Emergency Management Agency describes the ICS as “a standardized on-scene incident management concept designed specifically to allow responders to adopt an integrated organizational structure equal to the complexity and demands of any single incident or multiple incidents without being hindered by jurisdictional boundaries.”¹³⁵

¹³⁰ *School Administrator Procedures: Responding to Critical Incidents*, 5-6.

¹³¹ NJSBA Policy Service, “School Safety and Security Plans,” May 23, 2013.

¹³² *School Administrator Procedures: Responding to Critical Incidents*, 4.

¹³³ *A Uniform State Memorandum of Agreement*, 32.

¹³⁴ *School Administrator Procedures: Responding to Critical Incidents*, 4.

¹³⁵ U.S. Department of Labor, Occupational, Safety & Health Administration, *What is an Incident Command System?* (Washington, D.C.), (https://www.osha.gov/SLTC/etools/ics/what_is_ics.html, accessed Sept. 12, 2014)

Drills and Exercises

State-Required Drills

New Jersey is one of 10 states that require security drills in schools, according to Anthony Bland, the state coordinator for school preparedness and emergency planning. “Requirements vary from one security drill every three years (Texas) to one per month (New Jersey),” he noted in his presentation to the NJSBA task force.

Enacted in 2010, a New Jersey statute¹³⁶ requires that monthly security drills take place when school is in session. The requirement, which went into effect in the 2010-2011 school year, defines “school security drill” as “an exercise, other than a fire drill, to practice procedures that respond to an emergency situation including, but not limited to, a non-fire evacuation, lockdown, or active shooter situation...”

The statute amended an existing law that requires school fire drills. It reduced the number of required fire drills from two to one per month, while mandating the monthly security drill.

Guidelines¹³⁷ issued by the New Jersey Department of Education and the state Office of Homeland Security & Preparedness cite additional drill requirements for schools:

- The conducting of a security drill within the first 15 days of the beginning of the school year.
- A minimum of two of each of the following security drills¹³⁸ annually:
 - Active shooter;
 - Evacuation (non-fire);
 - Bomb threat, and
 - Lockdown.

Two of these eight mandated drills do not have to include students. The two non-student drills cannot be in the same category.

(Schools may also conduct other types of security drills, such as shelter-in-place, reverse evacuation, evacuation to relocation site, testing of notification system and procedures, table top exercises, and full-scale exercises.)

- Notification of emergency responders at least 48 hours prior to the drill.
- Submission of an annual “Security Drill Statement of Assurance” to the New Jersey Department of Education, and documentation of each drill, including the type of exercise, procedures, duration, participants, and weather conditions.

¹³⁶ P.L. 2009, c. 178 (http://www.njleg.state.nj.us/2008/Bills/PL09/178_.HTM); N.J.S.A. 18A:41-1; N.J.S.A. 18A:41-2.

¹³⁷ New Jersey Department of Education and Office of Homeland Security & Preparedness, *School Security Drill Guide*. (Trenton, N.J.) (<http://www.nj.gov/education/schools/security/drill/Guide.pdf>, accessed Sept. 9, 2014.)

¹³⁸ In *School Security Drill Guide* (<http://www.nj.gov/education/schools/security/drill/Guide.pdf>) and *School Security Drill Law N.J.S. 18A:41-1 FAQs* (<http://www.nj.gov/education/schools/security/drill/faq.pdf>, accessed Sept. 9, 2014), the New Jersey Department of Education describes the various types of security drills.

Unannounced Drills

In early 2013, the New Jersey Department of Education and the Office of Homeland Security and Preparedness began “unannounced” drill assessments.

“The purpose of the unannounced visits is to provide technical assistance and support to your school security preparedness efforts and to share best practices that have been seen in other school districts. The evaluation of the drill is informational and an opportunity for collegial collaboration” explained Commissioner Cerf and Edward Dickson, director of the Office of Homeland Security and Preparedness, in a February 2013 memo to school district officials.¹³⁹ Cerf and Dickson also noted that the unannounced observations had been recommended in 2007 by the state’s School Security Task Force.

A “Spot Drill Observation Checklist,” posted on the Department of Education’s security webpage¹⁴⁰, lists various factors to be considered during the drill assessments.¹⁴¹ At the August 22, 2013 meeting of the NJSBA task force, Mr. Bland, recommended the following drill practices:

- Drills should be scheduled at varying times of the school day and in various weather conditions.
- Schools located within 500 feet of each other should conduct drills together and have similar responses.

The New Jersey SAFE Task Force recommended increasing state observation of lockdown drills, both announced and unannounced.

...state agencies have been proactive in conducting school security audits and observing lockdown drills, particularly since the tragedy at Newtown. Additional agency resources should be committed to allow for more visits and assessments of school compliance. Each school’s security plan can only be effective if schools are able to properly carry them out.¹⁴²

Full-Scale Exercises

Assessing the effectiveness of emergency plans and procedures is stressed through the guidance documents issued by the NJDOE and other state and federal agencies.

¹³⁹ New Jersey Department of Education, *Unannounced Visits*, Memorandum to Chief School Administrators, Charter School Lead Persons and Nonpublic School Administrators by Christopher D. Cerf and Edward Dickson. (Trenton, N.J., February 26, 2013) (<http://www.state.nj.us/education/schools/security/task/audits/UnannouncedDrillsMemo.pdf>, accessed Oct. 16, 2014)

¹⁴⁰ New Jersey Department of Education, *Safer Schools for a Better Tomorrow: School Security Audits*. (Trenton, N.J.) (<http://www.nj.gov/education/schools/security/task/audits/>, accessed July 9, 2014)

¹⁴¹ New Jersey Department of Education, *Spot Drill Observation Checklist*. (Trenton, N.J., February 2013). (<http://www.state.nj.us/education/schools/security/task/audits/UnannouncedDrillObservationForm.pdf>, accessed Sept. 10, 2014)

¹⁴² *The New Jersey SAFE Task Force*, 81.

Whenever possible, schools should participate in full-scale, or full-field, exercises that involve police, fire, local industries and other outside agencies. “Integrating training for school personnel with training for community responders reduces the costs, broadens the training experience and facilitates communication between people who may have to work together in an emergency,” states the NJDOE *School Safety & Security Manual: Best Practices Guidelines*.¹⁴³

Tabletop Exercises

Full-scale exercises can be time- and labor-intensive, and the state guidelines offer tabletop exercises as an effective, relatively inexpensive and less time-consuming alternative.

Many schools have found tabletop exercises very useful in practicing and testing the procedures specified in their crisis plan. Tabletop exercises involve school staff and emergency responders sitting around a table discussing the steps they would take to respond to a crisis. Often, training and drills identify issues that need to be addressed in the crisis plan and problems with plans for communication and response.¹⁴⁴

Conducted properly, the tabletop exercise:

- Takes little time.
- Enables participants to act and understand the consequences of their response.
- Highlights relationships, tests plans, and improves decision-making.
- Creates a sense of urgency that facilitates learning since participants must think on their feet and adapt.
- Allows leaders to observe the strengths and weaknesses of the plan and the Crisis Management Team.¹⁴⁵

Federal guidelines define tabletop exercises as follows:

...small-group discussions that walk through a scenario and the courses of action a school will need to take before, during, and after an emergency to lessen the impact on the school community. This activity helps assess the plan and resources, and facilitates an understanding of emergency management and planning concepts.¹⁴⁶

According to the Federal Emergency Management Agency (FEMA), tabletop exercises “provide an opportunity for key agencies and stakeholders to become acquainted with one another, their

¹⁴³ New Jersey Department of Education, *School Safety & Security Manual: Best Practices Guidelines*. (Trenton, N.J., December 2006), 127. (Much of the information in the manual is considered confidential. Therefore the document is available only to designated school district officials through a password-protected portal of the New Jersey Department of Education’s online School Safety Center at <http://www.nj.gov/education/schools/security/safetycenter/>).

¹⁴⁴ *Ibid*, 98.

¹⁴⁵ *Ibid*, 128.

¹⁴⁶ U.S. Department of Education, Office of Elementary and Secondary Education, Office of Safe and Healthy Students, *Guide for Developing High-Quality School Emergency Operations Plans*. (Washington, DC, 2013), 21. (http://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf, accessed Sept. 11, 2014)

interrelated roles, and their respective responsibilities.”¹⁴⁷ The task force believes that law enforcement, fire departments, and emergency response agencies should be involved in the conducting of tabletop exercises.

When appropriate, participation by and/or communication with neighboring school districts and their corresponding law enforcement and emergency response agencies should be an element of tabletop and full-scale exercises.

Comparison of Emergency Exercises

FEMA identifies four types of emergency-preparedness exercises for organizations and institutions. Schools may consider these exercises in developing emergency response procedures.

Exercise Program Activities ¹⁴⁸	
Drill	A coordinated, supervised activity that is normally used to test a single specific operation or function. It enables emergency planners to focus on a potential problem area.
Tabletop Exercise	A facilitated analysis of an emergency situation in an informal, stress-free environment. The tabletop exercise provides an environment for problem-solving, and preparation for functional exercises.
Functional Exercise	A fully simulated interactive exercise that tests an organization’s capability to respond to simulated event. The exercise tests multiple functions of the organization’s emergency response plan.
Full-Scale Exercise	Simulates a real event as closely as possible. Designed to evaluate the operational capability of emergency management systems, the full-scale exercise takes place in a highly stressful environment that simulates actual response conditions.

After-School Security

Protecting students, staff and other school occupants during the instructional day is critical. However, schools do not cease operation at 3 p.m. The typical New Jersey high school may host athletic events, student concerts and performances, meetings of booster clubs and parent organizations, board meetings and other activities in the late afternoon or evening. The task force believes that school districts should establish practices and procedures addressing building access, emergency evacuation, security personnel and emergency medical services for events and functions that take place outside the instructional day.

¹⁴⁷ U.S. Department of Homeland Security, Federal Emergency Management Agency, Emergency Management Institute, Independent Study Program, *IS-139 Exercise Design, Unit 2: Comprehensive Exercise Program*. (Emmitsburg, MD, 2013), 2.11. (www.training.fema.gov/EMIWeb/downloads/is139Unit2.doc, accessed Oct. 6, 2014)

¹⁴⁸ *Ibid*, 2.8; 2.10; 2.12; 2.15. On pages 2.18 and 2.19, the FEMA training document includes a chart, “Comparison of Key Activity Characteristics,” which describes each exercise’s format, leadership, participants, facilities, time of implementation, and preparation. The document, at www.training.fema.gov/EMIWeb/downloads/is139Unit2.doc, addresses emergency preparedness for a wide variety of organizations, including schools.

In its *Best Practices Guidelines*, the NJDOE cites the need for “additional safety precautions for before-school and after-school and athletic events” and recommends requesting “additional law enforcement presence at athletic events, as well as suspicious package sweeps prior to hosting the events.”¹⁴⁹ It also cites the need for developing “procedures and protective measures for after school activities, community events, summer school, and special events,” as part of an evaluation of building safety.¹⁵⁰

The Uniform Memorandum of Agreement

One of the most significant documents related to school security is “A Uniform State Memorandum of Agreement between Education and Law Enforcement Officials,”¹⁵¹ which is developed under the auspices of the state Attorney General and the Commissioner of Education. The document serves as the template for the state-required¹⁵² local arrangements. These local agreements define the obligations of the schools, police and other emergency responders during security threats, natural and man-made disasters, and unlawful activities.¹⁵³ The memorandum must be approved by the local board of education, the county prosecutor and the executive county superintendent.¹⁵⁴

At the NJSBA task force meeting on August 22, 2013, Gary Vermeire, coordinator of the Safe & Supportive Schools Unit of the New Jersey Department of Education, emphasized the importance of communication between law enforcement and education officials in developing the required memorandum. He noted that the memorandum should serve as a vehicle for promoting cooperation and coordination among the two sectors. The Attorney General and Commissioner of Education are “emphatic” that education and law enforcement officials engage in an ongoing dialogue to identify safety issues and other factors that should be addressed in the memorandum, he said.

Mr. Vermeire also stressed that local boards of education should review and discuss the district’s proposed MOA prior to the annual vote to approve the document.

¹⁴⁹ *School Safety and Security Manual: Best Practices Guidelines*, 273.

¹⁵⁰ *Ibid*, 63.

¹⁵¹ *A Uniform State Memorandum of Agreement between Education and Law Enforcement Officials* (<http://www.state.nj.us/education/schools/security/regs/agree.pdf>, accessed Sept. 9, 2014).

¹⁵² *N.J.A.C. 6A:16-6.2(b)* 13 through 15, 92-93. (<http://www.nj.gov/education/code/current/title6a/chap16.pdf>)

¹⁵³ In July 2012, the Education-Law Enforcement Working Group, consisting of representatives of the Attorney General’s Office, Department of Education and stakeholder groups, including the NJSBA, published a list of 30 Frequently Asked Question about the Memorandum of Agreement. The document is available at www.nj.gov/education/schools/security/regs/agreefaq.pdf (accessed Sept. 9, 2014).

¹⁵⁴ *A Uniform State Memorandum of Agreement between Education and Law Enforcement Officials*, 48.

New Jersey first issued the Uniform Memorandum of Agreement (MOA) in 1988 and, since then, the state has revised the model document several times, including a 2011 update to address harassment, intimidation and bullying. The original document and the revisions were developed under the guidance of an Education-Law Enforcement Working Group, which includes a representative of the New Jersey School Boards Association. All local memorandums must be consistent with the state model.

The product of 25 years of ongoing discussion, deliberation and experience, the MOA...addresses a wide range of issues of mutual concern to education and law enforcement officials. The MOA provides precise guidance on how these two professions will work together as a team, each respecting the other's roles, responsibilities and professional judgments. For example, the MOA explains that police officers entering a school will, except in an emergency, comply with the procedures established by the school for the reporting of visitors.¹⁵⁵

...the MOA explains in detail how law enforcement interactions with schoolchildren can be done in a way that minimizes unnecessary conflict, distraction or intimidation.¹⁵⁶

The current "Uniform State Memorandum of Agreement Between Education and Law Enforcement Officials" is a 54-page document that includes 16 articles and an addendum that address subjects ranging from "Obligation to Report Offenses and Preserve Evidence" and "School Access to Law Enforcement Information" to "School Safety and Security."¹⁵⁷

The uniform agreement's chapter on School Safety and Security "recognizes that recent tragic events in the nation's schools highlight the need for developing and maintaining up-to-date school-based safety and security plans for responding to crisis situations of all kinds, natural and man-made. The section requires discussion and collaboration on school drills and means for critical incident planning (e.g., lockdown, active shooter, evacuations)."¹⁵⁸

Security plans identified through the memorandum can be tailored to address individual needs for perimeter checks of school grounds, surveillance of buildings and grounds, communication with local first responders, and emergency alert systems.

Significantly, the model states that "the chief school administrator agrees to supply law enforcement officials with current copies of blueprints and maps of all schools and school grounds."¹⁵⁹

¹⁵⁵ *The New Jersey SAFE Task Force*, 75.

¹⁵⁶ *Ibid*, 76.

¹⁵⁷ *A Uniform State Memorandum of Agreement between Education and Law Enforcement Officials*.

¹⁵⁸ New Jersey School Boards Association, *Memorandum Re: Memorandum of Agreement Between Education and Law Enforcement Officials*, to NJSBA School Security Task Force, by Steven McGettigan, Manager, Policy, New Jersey School Boards Association. (Trenton, N.J. August 22, 2013), 2.

¹⁵⁹ *Ibid*.

The state model requires discussion among school officials, first responders and law enforcement on critical-incident planning, such as lockdowns and active shooter situations. It also “encourages a spirit of communication and cooperation between education and law enforcement, and participation in ongoing consultation to discuss new developments in state statute, administrative code, and court decisions. The parties also agree to discuss joint training needs to support school safety and security, including in-service programs for school staff. Other community representatives (fire officials, emergency management professionals) are encouraged to participate in school safety and security planning.”¹⁶⁰

Security Audits/Assessments

“A comprehensive needs assessment conducted prior to the development of district-wide school safety plans is essential for identifying the possible risks for all students as well as their capabilities to respond and recover from critical incidents”¹⁶¹

Whether their background was in school security, architecture, law enforcement or school climate, the experts who consulted with the NJSBA task force stressed the value of pre-incident planning through security audits and community engagement.

At the August 12, 2013 meeting of the NJSBA task force, Brian J. Klimakowski, chief of police in Manchester Township, Ocean County, and the New Jersey State Association of Chiefs of Police representative to the Governor’s K-12 School Security Task Force, emphasized the importance of assessments to –

- Analyze capabilities and potential hazards
- Determine the degree of vulnerability to the facility, and
- Locate weaknesses in defense and to determine the degree of protection required.¹⁶²

The task force also heard a presentation by James Hyslop, president of SSC Consulting, Inc., a firm that advises school districts, other public entities and private firms on security procedures and facility enhancements. Mr. Hyslop, who has also been involved in training more than 1,000 school resource officers¹⁶³, outlined the factors to be considered in a security assessment, including access

¹⁶⁰ *Ibid.*

¹⁶¹ *School Safety & Security Manual: Best Practices Guidelines*, 21.

¹⁶² Brian J. Klimakowski, “School Security: 2013 and Beyond” (presentation to the NJSBA School Security Task Force, Trenton, N.J., August 12, 2013).

¹⁶³ James Hyslop, “Who Is an SRO?” (presentation to the NJSBA School Security Task Force, Trenton, N.J., August 12, 2013).

to buildings, interior design, the surrounding neighborhood, the need for surveillance, and identification of procedures and technology needed to secure the school.

In December 2006, the New Jersey Department of Education published a revised edition of the *School Safety and Security Manual: Best Practices Guidelines*.¹⁶⁴ The 426-page document serves as a comprehensive guide that identifies effective practices in areas, such as prevention, preparedness, response, recovery, long-range planning and evaluation, rapid response in emergencies, risk management and assessment, and crisis management. The 2006 revision “incorporates information on...site-specific vulnerability assessments, the incident command system, crisis response, target hardening/mitigation measures, communication protocols, gang awareness and pandemic influenza planning.”¹⁶⁵

The NJDOE guide, developed in collaboration with the state’s Domestic Security Preparedness Task Force and the Office of Homeland Security and Preparedness, advises school districts to consider numerous factors as part of their needs assessments. These factors include proximity to water, trees, power lines, highways, airports, hazardous materials, facilities and railroads; providing school blueprints to emergency responders; the distance from the school, and the capabilities of law enforcement, fire departments and other emergency responders.¹⁶⁶

The document provides specific guidance on assessing the following factors:

- Resources to implement the crisis and emergency management plan
- Vulnerability to hazardous materials
- Communications, including dealing with rumors, use of technology and internal signals
- Crowd control
- Traffic control
- Relations with the news media
- Role of the student
- Mutual aid with public safety and emergency medical services agencies
- Procedures for individuals with special needs
- Training
- Future planning

¹⁶⁴ Much of the information in the manual is considered confidential. Therefore the document is available only to designated school district officials through a password-protected portal of the New Jersey Department of Education’s online School Safety Center at <http://www.nj.gov/education/schools/security/safetycenter/>.

¹⁶⁵ New Jersey Department of Education, *Memorandum Re: Revised School Safety and Security Manual: Best Practice Guidelines and Available Training*, to Chief School Administrators, Charter School Leader Persons and Nonpublic School Administrators, by Lucille E. Davy. (Trenton, N.J., January 9, 2007).

¹⁶⁶ *School Safety and Security Manual: Best Practices Guidelines*, 21-22.

- Cyber-security
- Natural disasters

The U.S. Department of Education in its 2013 *Guide for Developing High-Quality School Emergency Operations Plans*, published in cooperation with several other federal agencies, lists four types of assessments essential for school security: Site Assessment; Culture and Climate Assessment; School Threat Assessment (internal); and Capacity Assessment (the resources available within the school district and the community).¹⁶⁷ The guide describes Site Assessment as follows:

A site assessment examines the safety, accessibility, and emergency preparedness of the school’s buildings and grounds. This assessment includes, but is not limited to, a review of building access and egress control measures, visibility around the exterior of the building, structural integrity of the building, compliance with applicable architectural standards for individuals with disabilities and others with functional and access needs, and emergency vehicle access.

In April, Governor Christie’s NJ SAFE Task Force recommended that school districts “conduct vulnerability audits to identify flaws in existing security and communication systems to ensure that every school district is in compliance with the policies and protocols of this State.”¹⁶⁸ The Governor’s task force noted that the New Jersey Department of Education and the Office of Homeland Security and Planning do not have the capacity to audit each of the state’s school districts.

Engaging the Full Community

Several experts who spoke before the NJSBA task force stressed the importance of engaging the school community and outside interests in developing security plans, identifying security enhancements and building a healthy school climate.

- Anthony Bland, coordinator of the NJDOE Office of School Preparedness and Emergency Planning, stressed the importance of communication with stakeholders during the planning stage.¹⁶⁹
- William D. (Ted) Hopkins, III, AIA, of the firm Fraytak Veisz Hopkins Duthie PC, recommends the creation of a “Security Preparation Team” consisting of board members, the building principal, teachers, maintenance staff, students, local construction code officials, public safety personnel, and professional consultants, such as architects, engineers and information technology experts, and members of the community.¹⁷⁰

¹⁶⁷ *Guide for Developing High-Quality School Emergency Operations Plans*, 9-10.

¹⁶⁸ *The New Jersey SAFE Task Force*, 82.

¹⁶⁹ Anthony Bland, “Keeping New Jersey’s Schools Safe: School Preparedness Briefing,” August 23, 2013.

¹⁷⁰ William D. (Ted) Hopkins, III, AIA, “Security Challenges on the Educational Campus” (presentation to the NJSBA School Security Task Force, Trenton, N.J., April 30, 2013).

- On July 18, the task force heard a presentation by one of the nation’s leading experts in school climate and social and emotional learning, Maurice J. Elias, Ph.D.¹⁷¹ He emphasized the importance of an assessment of school climate and culture and the meaningful inclusion of students, staff, and parents in the assessment process, as well as in the stages of planning a respectful culture of learning.¹⁷²

In *School Climate: Building Safe, Supportive and Engaging Classrooms & Schools*, Dr. Elias and Jonathan Cohen, Ph.D., recommend a six-step preparation and planning stage that includes the formation of “a School Climate Improvement Leadership Team” consisting of “representatives from different members of the school community...” The effort should also involve building “support among the community and foster[ing] ‘buy in’ for the school climate improvement process.”¹⁷³

- Anne Gregory, Ph.D., of the Rutgers University Graduate School of Professional and Applied Psychology, advised that “School security needs to be considered in terms of how schools build community and supportive relationships.”¹⁷⁴

The NJSBA task force also took note of the Project Guardian Program in the Burlington Township Public Schools. A key element of this comprehensive school safety program brings all stakeholders to the table to secure critical input and constituent support for the plan. At NJSBA’s January 2013 Safe and Secure Schools Forum, Dr. Chris Manno, then Burlington Township schools superintendent¹⁷⁵, described the initiative.

“While we have invested significantly in Burlington Township to develop a strong infrastructure for security, we realize that ‘safety and security’ is not only about the systems and the hardware we purchase,” Manno said. “We have also fostered a broad-based community partnership.”

Eight years ago, Burlington Township developed...its Emergency Preparedness Task Force. The group includes school administrators; police, fire and emergency medical personnel; school resource officers; representatives from the board of education and the town’s governing body; risk management professionals; security experts; officials from the county’s Office of Emergency Management; the district’s student assistance coordinator; its anti-bullying

¹⁷¹ Dr. Elias is director of clinical training, Rutgers University Department of Psychology, director of the Rutgers Social and Emotional Learning Laboratory, and director of the Collaborative, Rutgers’ Center for Community-Based Research, Service and Public Scholarship.

¹⁷² Maurice J. Elias, Ph.D., “Proven and Practical Approaches to Understanding and Improving Your School Climate and Culture for School Safety and Achievement” (presentation to NJSBA School Security Task Force, Trenton, N.J., July 18, 2013).

¹⁷³ Jonathan Cohen, Ph.D. and Maurice J. Elias, Ph.D., *School Climate: Building Safe, Supportive and Engaging Classrooms & Schools* (Port Chester, New York: Dude Publishing, National Professional Resources, Inc., 2011), 2.

¹⁷⁴ Anne Gregory, Ph.D. “Fostering a Sense of Community in High Schools” (presentation to the NJSBA School Security Task Force, Trenton, N.J., July 18, 2013).

¹⁷⁵ Dr. Manno currently serves as the superintendent of the Burlington County Special Services School District and the Burlington County Institute of Technology.

specialist; its construction management personnel; and representatives from the local YMCA, which runs before- and after-school programs for students.

The group meets three times a year to identify safety concerns ... and to propose actions. The group members have a clear idea of everyone's roles, key priorities and initiatives.

"We regularly conduct joint exercises using various scenarios that represent possible threats that are identified at the table. Together we have improved and refined our emergency management plans and critical response plans and our partnership had contributed to a major safety and security initiative..., which includes technological infrastructure upgrades," explained Manno.¹⁷⁶

The U.S. Department of Education strongly advises the creation of community-wide planning teams in the development of security procedures:

Lessons learned from experience indicate that operational planning is best performed by a team. Case studies reinforce this concept by pointing out that the common thread found in successful operations is that participating organizations have understood and accepted their roles.

The core planning team should include representatives from a wide range of school personnel, including, but not limited to, administrators, educators, school psychologists, nurses, facilities managers, transportation managers, food personnel, and family services representatives. It should also include student and parent representatives, and individuals and organizations that serve and represent the interests of students, staff, and parents with disabilities, and others with access and functional needs, as well as racial minorities and religious organizations, so that specific concerns are included in the early stages of planning. In addition, the core planning team should include community partners such as first responders, local emergency management staff, and others who have roles and responsibilities in school emergency management before, during, and after an incident. This includes local law enforcement officers, emergency medical services (EMS) personnel, school resource officers, fire officials, public and mental health practitioners, and local emergency managers....

The planning team should be small enough to permit close collaboration with first responders and other community partners, yet large enough to be representative of the school, its families, and its community. It should also be large enough as to not place an undue burden on any single person.¹⁷⁷

Finally, in the *School Safety and Security Manual: Best Practices Guidelines*, the New Jersey Department of Education recommends the formation of a districtwide emergency and crisis management planning team that should include the following:

- School district leadership (e.g., chief school administrator, board of education)
- Security, safety and risk-management staff
- School board attorney

¹⁷⁶ Janet Bamford, "Making New Jersey's Schools Safe and Secure," *New Jersey School Leader*, Vol.43, No.4 (January 2013): 29-30. (<http://www.njsba.org/news/school-leader/01022013/making-nj-schools-safe-and-secure.php>).

¹⁷⁷ *Guide for Developing High-Quality School Emergency Operations Plans*, 5-6.

- School business administrator
- County terrorism coordinator
- Student support services staff (e.g., school psychologist, school social worker, school counselor, substance awareness coordinator)
- Medical service providers (e.g., school nurse, school physician, hospital staff)
- Facilities management staff
- Parent groups, other community organizations and businesses
- District public information staff
- Law enforcement officials
- Health and social services providers
- Municipal government
- Local and regional emergency management personnel
- Health and public works officials
- American Red Cross and other volunteer agencies¹⁷⁸

¹⁷⁸ *School Safety & Security Manual: Best Practices Guidelines*, 100-101.

POLICY AND PLANNING: RECOMMENDATIONS

Based on its research, including consultation with experts in the areas of school climate, security and law enforcement, the NJSBA School Security Task Force makes the following recommendations in the area of Policy and Planning:

Local School District/Community

- 16.** The local board of education should ensure that the school district has completed assessments of physical security, threats, capacity and school climate. The assessments, or audits, should be conducted in concert with local law enforcement and emergency responders, should follow guidelines published in the *New Jersey School Safety & Security Manual: Best Practices Guidelines* (2006) and should draw on the work of experts in the areas of school climate, security, and building design.
- 17.** Local board of education members should familiarize themselves with the terms of the Memorandum of Agreement between the local school district and the local law enforcement agency.
- 18.** Local school districts should form committees representing all stakeholders (staff, parents, administrators, emergency responders, law enforcement, community members, etc.) as part of their efforts to develop school security plans, to assess the plans on an ongoing basis, and to identify necessary enhancement of school security protocols, equipment, and staffing.
- 19.** Local school districts should ensure ongoing, periodic review of the school security plan, the Memorandum of Agreement, administrative response procedures, and protocols governing security drills.
- 20.** School district security policies and regulations should address administrators' responsibilities, building and site access (including after-hours use of facilities), and distribution of keys and access cards.
- 21.** School districts should stage state-required security drills at varying times and days of the week and under different weather conditions. Drills should involve numerous crisis scenarios, so that school officials and law enforcement can evaluate their effectiveness, make necessary adjustments in procedures, identify safety weaknesses and make recommendations for additional training.
- 22.** School districts should make tabletop exercises a regular part of the security protocol, especially when full-scale exercises and testing of crisis response is not feasible. Tabletop exercises should involve law enforcement, fire departments, and emergency response agencies.

23. Local boards of education should review their policies related to school security, including those that address violence and vandalism, student conduct, emergencies/disaster preparedness, and weapons/firearms, to ensure that they are compliant with current statute and regulation and reflect district-specific factors and concerns. (Appendix F of this report contains relevant NJSBA model policies and samples.)
24. School boards should ensure that practices and procedures are in place to address building access, emergency evacuation, security personnel and emergency medical services for events and functions that take place after the instructional day.

State

25. The New Jersey Department of Education should ensure that the manual, *School Safety and Security Manual: Best Practice Guidelines*, last published in 2006 is updated as needed to incorporate the most recent developments in school security strategies and procedures, emergency equipment and technology.