

Introduction

Effective learning and teaching takes place in a safe, secure and welcoming school environment. Safe schools contribute to improved attendance, increased student achievement and community support. As such, one of the primary responsibilities of schools is to ensure the safety of students and staff.

Among [other safety-related requirements](#), CSI Schools are required to establish a [School Response Framework](#) that is consistent with the requirements outlined in 22-32-109.1(4), C.R.S. of the Colorado Safe Schools Act and in CSI Board policy.ⁱ By satisfying the requirements, a school will also be in compliance with the [National Incident Management System](#), referred to as “NIMS”, developed by the Federal Emergency Management Agency (FEMA) and formally adopted by the CSI Board.

Why NIMS?

NIMS provides a national framework for incident management and response. As noted in [NIMS: Frequently Asked Questions](#), NIMS offers “a consistent framework for government, the private sector and nongovernmental organizations to work together to prepare for, prevent, respond to, recover from, and mitigate effects of incidents regardless of the cause, size, location or complexity.” Because not all requirements of NIMS are applicable to schools, 22-32-109.1(4), C.R.S. of the Colorado Safe Schools Act outlines what specific requirements districts and schools must meet in order to be considered compliant with NIMS.

Achieving NIMS Compliance

To establish a School Response Framework and be considered in compliance with NIMS, CSI schools must complete the following tasks:

1. Adopt NRF/NIMS and Establish a Date for Compliance

- Adopt the [National Response Framework](#) (NRF) and [National Incident Management System](#) (NIMS) developed by FEMA formally through orders or resolutions;
 - Together, NRF and NIMS provide a national framework for incident management and response. For more information about NRF and NIMS, see [NIMS: Frequently Asked Questions](#).
- Coordinate with community partners to assess overall alignment and compliance with 22-32-109.1(4), C.R.S., and develop a timeline and strategy for compliance with the requirements;

- Coordinate with community partners to update and revise all standard operating procedures, ensuring that all aspects of NIMS are incorporated, including but not limited to: policies and principles, planning, procedures, training, response, exercises, equipment, evaluation, and corrective actions;
- Establish a date by which the school is (or will be) in compliance with the requirements outlined in 22-32-109.1(4), C.R.S. and make the dates available to the public upon request;
- Institutionalize the [Incident Command System](#) (ICS) as taught by the Emergency Management Institute of FEMA;
 - ICS provides a standardized approach to the command, control and coordination of emergency response and serves as the coordinating link between multiple agencies and jurisdictions responding to the same event. For more information about ICS, see [NIMS: Frequently Asked Questions](#) and [Incident Command System Tools for Schools](#).

2. Create a Safety Plan

- Develop a [School Safety, Readiness, and Incident Management Plan](#) (also known as an “Emergency Operations Plan” or “Safety Plan”), including to the extent possible, emergency communications, that coordinates with any statewide or local emergency operations plans, which, at a minimum, identifies the following:
 - Safety teams and backups who are responsible for interacting with community partners and assuming key incident command positions, and
 - Potential locations for various types of operational locations and support functions.
- The plan must meet the requirements established in the [CSI Board Safe Schools Policy](#) and [CSI Board Safety Policy Supplement](#). CSI Schools can use the [School EOP checklist](#) to ensure compliance with state statute and CSI Board policy.

3. Train Key Emergency Personnel and Staff

- Identify key emergency school personnel, including, but not limited to safety teams and backups, to complete courses provided by FEMA’s Emergency Management Institute, which shall include but may not be limited to:
 - [IS 100.C - Introduction to the Incident Command System](#)
 - [IS 362.A - Multi-Hazard Emergency Planning for Schools](#);

- Ensure school employee safety and incident management training;
 - This might include training in First Aid, CPR, drills, and reunification.

4. Practice and Assess Emergency Preparedness and Communications

- To the extent possible, create an all-hazard exercise program based on NIMS and conduct tabletop exercises and other exercises in collaboration with community partners from multiple disciplines and, if possible, multiple jurisdictions to practice and assess preparedness and communications interoperability;
 - For support, see the [Colorado School Emergency Operations Plan Exercise Toolkit](#) and the [FEMA Preparedness Toolkit](#). Follow [this link](#) for access to an online course on tabletop exercises.
- To the extent possible, hold coordinated exercises among school employees and community partners, including at a minimum:
 - Orientation meetings to inform all parties about emergency operation plan and procedures,
 - All-hazard drills, in addition to fire drills, to improve individual and student emergency procedures and to test communications interoperability, and
 - Tabletop exercises to discuss and identify roles and responsibilities in different scenarios;
- Conduct a written evaluation following the exercises and certain incidents as identified by the school and identifying and addressing lessons learned and corrective actions in updating response plans and procedures;
 - For support, see the [Colorado School Emergency Operations Plan Exercise Toolkit](#) and the [FEMA Preparedness Toolkit](#). Follow [this link](#) for access to an online course on tabletop exercises.
- If applicable, ensure school resource officers are familiar with the School Response Framework, the all-hazard exercise program, and the interoperable communications of the school to which he or she is assigned.

5. Inventory Emergency Equipment

- Take an inventory at least every academic term of emergency equipment and test communications equipment and its interoperability with affected state and local agencies;

- Inventory list might include, for example, security technology, AEDs, medical equipment, and [school emergency supplies and “go-kits”](#).

6. Coordinate with the Community

- To the extent possible, enter into a Memorandum of Understanding (MOU) with community partners (including, for example, fire departments, law enforcement agencies, emergency medical service personnel, mental health organizations and local public health agencies).
 - An MOU should define expectations and responsibilities on the part of the school and first responders regarding a response to a school. An MOU ensures that School Safety, Readiness, and Incident Management Plans are coordinated with local responders and all potential conflicts are eliminated.
 - For support, download [Developing and Enhancing Memoranda of Understanding \(MOUs\) With Your Community Partners](#).
- Adopt written procedures for taking action and communicating with local law enforcement agencies, community emergency services, parents, students and the media in the event of certain incidents as identified by the school;
 - This is site-specific and should be developed by the school safety planning team in partnership with community stakeholders. See p. 30 of [The Guide for Developing High-Quality School Emergency Operations Plans](#) for key items to consider when developing the procedures.

Next Steps

CSI school governing boards should adopt a policy in alignment with these requirements (see Policy Components and Sample Policy Language on next page). School leadership should then establish roles and responsibilities as necessary to complete the tasks. CSSRC's [School Response Framework - Safety Readiness and Incident Management Plan Outline](#) can be used as a tool for identifying gaps in compliance and tracking progress toward completion. Schools might also choose to use CSSRC's [Comprehensive School Safety Planning Elements Checklist](#) to assess and improve school safety more broadly.

Policy Components Checklist

A Crisis Management Policy should be adopted by the school governing board. A Crisis Management Policy should, at a minimum:

- Adopt the [National Response Framework](#) (NRF) and [National Incident Management System](#) (NIMS) developed by FEMA, which shall include implementation of the [Incident Command System](#);
- Include the date by which the school is (or will be) in compliance with the requirements outlined in 22-32-109.1(4), C.R.S.;
- Address coordination with community partners to assess overall alignment and compliance with 22-32-109.1(4), C.R.S.; and
- Direct the Executive Director/Head of School/Principal (or designee) to develop, implement, and maintain a School Safety, Readiness, and Incident Management Plan.

Sample Policy Language

Crisis Management Policy

The Governing Board (the “Board”) for [School] recognizes that effective learning and teaching takes place in a safe, secure, and welcoming environment, and that safe schools contribute to improved attendance, increased student achievement, and community support. The Board further acknowledges the necessity of preparing a School Response Framework to adequately prepare school personnel, parents, and the community to respond appropriately to a crisis that involves the school community.

As an important component of school safety planning, the [School] Board adopts the National Response Framework and National Incident Management System (NIMS) as applicable to schools. In adopting the National Response Framework and NIMS, [School] will institutionalize the Incident Command System to ensure all responders use common language and processes when responding to a school emergency. [School] achieved compliance [ALTERNATE: will achieve compliance] with the requirements set forth in C.R.S. 22-32-109.1(4) on DATE [ALTERNATE: must be no later than December 31, 2021] and will continue to take the necessary steps to remain in compliance.

The Board directs the [Executive Director/Head of School/Principal] (or designee) to develop, implement, and maintain a School Safety, Readiness, and Incident Management Plan (Safety Plan) including, to the extent possible, emergency communications, that coordinates with any statewide or local emergency operation plans already in place. To the extent possible, the Safety Plan shall be done in conjunction with [School’s] local community partners including fire departments, law enforcement agencies, emergency medical service personnel, mental health organizations and local public health agencies. The Safety Plan shall incorporate the

requirements of state law and CSI Board Policy and shall be reviewed and updated at least annually.

References

22-32-109.1(4), C.R.S.

22-30.5-503.5, C.R.S.

[CSI Board Safe Schools Policy](#)

[CSI Safety Policy Supplement](#)

Additional Resources and References

CSI Resources

[Colorado Safe Schools Act Checklist](#)

[School Safety Resource Page](#)

External Resources

[Colorado School Safety Guide](#)

[Comprehensive School Safety Planning: Suggested Elements for Districts and Schools](#)

[Comprehensive School Safety Planning Elements Checklist \(CSSRC\)](#)

[Guide for Developing High-Quality School Emergency Operations Plans \(USDOE et. al.\)](#)

[School Response Framework - School Safety Readiness and Incident Management Plan Outline \(CSSRC\)](#)

Contact Information

Contact the Legal and Policy Department at legalandpolicy_csi@csi.state.co.us with questions.

ⁱ 22-32-109.1(4), C.R.S., 22-30.5-503.5, C.R.S., [CSI Board Safe Schools Policy](#), [CSI Board Safety Policy Supplement](#), CSI Board Crisis Management: Safety, Readiness and Incident Management Planning Policy