



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF INSPECTOR GENERAL

December 8, 2003

INSPECTION REPORT

To: William Leiding
Assistant Secretary
Office of Management

From: Cathy H. Lewis
Assistant Inspector General
Evaluation, Inspection, and Management Services

Subject: Emergency Evacuation of People with Disabilities in Department of Education Facilities (ED/OIG I13C0017)

Executive Summary

This memorandum provides the results of our inspection of procedures for the emergency evacuation from Department of Education (Department) occupied buildings of Department employees and visitors with disabilities. Our inspection objectives were (1) determine whether Occupant Emergency Plans (OEPs) for Department-occupied buildings provide for the safe evacuation of Department employees and others with disabilities; and (2) determine whether slow descent devices are present and available for use in all Department-occupied buildings for the evacuation of people with disabilities.

A draft of this report was provided to the Office of Management on November 5, 2003. Comments were due back December 5. None were received by the due date; however, comments were received several days later and have been included with this report.

Employee concerns about the evacuation of employees with disabilities in the event of a catastrophic emergency surfaced in a Department-wide survey conducted in October 2002 as part of an ongoing effort to increase Department safety and security.

After the survey results were compiled, OIG posed a series of questions to OM regarding identified employee concerns, including, "How can management address the awareness issues and the needs of employees with disabilities with respect to building safety and security?" The Office of Security Services (OSS) in OM responded that each Occupant Emergency Plan (OEP) is designed to

meet the needs of people with disabilities; that Slow Descent Devices (SDDs or “evacuation chairs”) were installed in all Department facilities nationwide for the evacuation of people with disabilities; and that OM/OSS had begun working with employees with disabilities and others to develop a comprehensive policy to standardize procedures for safely and effectively evacuating employees with disabilities.¹ OSS issued a bulletin that states that SDDs have been installed in each of the Department’s facilities nationwide, along with written instructions and that an abbreviated training program has been conducted.² The Department also provided similar information to the Office of Personnel Management (OPM) in response to an OPM memorandum.³

Because of concerns raised by employees in the Safety and Security survey and because the information provided by OM was not consistent with information from some Department employees with disabilities, OIG conducted additional inspection activities to evaluate the apparent discrepancies.

As a result of our inspection, we determined that, especially since September 11, 2001, the Department, its managers and staff, and the Office of Security Services have expended significant effort and resources to ensure the safety and security of Department employees. However, we determined that in some cases procedures and systems described in pertinent documents to address the needs of people with disabilities during an emergency are inconsistent with conditions in the facility in question. We determined that some OEPs contemplate the availability of methods for communication that may not exist. Additionally, evacuation drills and practices do not attempt to simulate real emergencies. Although OM:2-104 states that OEPs for all Department-occupied buildings are found on connectED, we determined that OEPs for several Department-occupied buildings are not available on the site, and that two OEPs on connectED, while minimally compliant with legal requirements for disability access to information technology, are not readily accessible to users who are blind. We also determined that there is no systematic procedure for identification of people who may require assistance in exiting a Department-occupied building during an emergency evacuation other than new employees who may identify their need for assistance during their new employee orientation. Although SDDs have been identified as central to Department emergency evacuation plans for employees with disabilities, we determined that SDDs are not available in all Department-occupied buildings or, if present, are not known to managers or to employees with disabilities who may need to rely upon them. Further, we were not able to establish that identified SDDs were maintained and tested or that employees have been trained in their use.

¹ <http://oigmis3.ed.gov/Misc/ReportIIJun03.html>

² Update Bulletin #45 continues to be available on connectED:
<http://connected.ed.gov/index.cfm?articleobjectid=2C86F8CB-8EF6-447F-95F992E09A9BE07A>

³ The Department initially was unable to provide us with a copy of this memorandum. We obtained a copy from OPM, but it was not signed, dated or printed on departmental stationary.

To address these issues, we recommend that Security Services take immediate and continuing steps to ensure that the following recommendations are implemented:

1. All current Occupant Emergency Plans should be thoroughly reviewed for currency and completeness and the procedures described for evacuating employees and others with disabilities should be tested.
 - Identified employees with disabilities should participate in the review of completed OEPs in the facilities in which they work.
 - All identified employees with disabilities should actively participate in testing the effectiveness of OEPs for their buildings.
 - Fully accessible copies of OEPs for every ED occupied building should be available in an easy to find location on connectED.
 - Areas of refuge should be clearly designated with signage, including Braille, and should be equipped with in place two-way communications devices. In GSA controlled facilities, the Department should contact GSA and resolve any inconsistency issues in signage.
2. The Department's inventory of SDDs should be verified; all existing SDDs should be tested and evaluated for replacement; and functional SDDs should be purchased as needed for all Department-occupied buildings
 - Consideration of existing SDDs for replacement, and consideration of purchasing one or more SDDs where none currently exist, should include individualized consideration of the building in question and of the impairments of employees who would need to use them in an emergency.
 - Before any existing SDDs are removed from service without being replaced, employees with disabilities who may have relied on their availability should be notified of the removal and informed of how they will be evacuated in the event of an emergency.
3. At least once each year, all Department employees should be formally invited to identify themselves as requiring assistance in an emergency because of a disability or medical condition.⁴
4. Also on a yearly basis, the Department should provide those requiring special assistance specific information on how they will be evacuated in an emergency.

⁴ Although an employer may ask employees with known disabilities whether they require assistance, self-identification should be invited periodically from all employees and not be based on assumptions about whether or not an individual has a disability or medical condition requiring such assistance. The EEOC has issued a Fact Sheet on Obtaining and Using Employee Medical Information as Part of Emergency Evacuation Procedures.
<http://www.eeoc.gov/facts/evacuation.html>

5. OM should recall its letter to OPM and inform Departmental staff of the erroneous information with which they have been provided.

Background

The Office of Management (OM) and the Office of Inspector General (OIG) conducted a survey as a part of an ongoing effort to increase safety and security at the Department in October 2002. Eight hundred sixty-five Department employees responded. Responses represented 17% of Department employees, in thirty public and private buildings in eleven states, Puerto Rico, and the District of Columbia.

After the survey results were compiled, OIG posed a series of questions to OM regarding identified employee concerns. One of the questions was, “How can management address the awareness issues and the needs of employees with disabilities with respect to building safety and security?” The Office of Security Services in OM responded, on May 14, 2003, that each Occupant Emergency Plan (OEP) is designed to meet the needs of people with disabilities and includes provisions to address specific individuals and specific disabilities; that Slow Descent Devices (SDDs or “evacuation chairs”) were installed in all Department facilities nationwide for the evacuation of people with disabilities; and that OM/OSS had begun working with employees with disabilities, with Principal Office Representatives, and with other agencies to develop a comprehensive policy to standardize procedures for safely and effectively evacuating employees with disabilities.⁵ OSS also stated that it intended to provide the same information to the Office of Personnel Management (OPM) in response to a March 17, 2003, OPM memorandum, *Security of the Federal Workplace*. In addition, in late March, OSS had issued a Safety and Security Bulletin, *Update Bulletin #45 (3/28/03), Summary of Department’s Security & Emergency Preparedness Activities*, which also stated that SDDs have been installed in each of the Department’s facilities nationwide, along with written instructions and an abbreviated training program.⁶

The Department’s Occupant Emergency Organizations and Plans Directive, OM:2-104,⁷ outlines the policy and responsibilities for establishing and implementing Occupant Emergency Organizations (OEOs) and Occupant Emergency Plans (OEPs) within the Department. It applies to Department employees located in both Headquarters and in the Regions, and states that

⁵ <http://oigmis3.ed.gov/Misc/ReportIIJun03.html>

⁶ Update Bulletin #45 continues to be available on connectED:
<http://connected.ed.gov/index.cfm?articleobjectid=2C86F8CB-8EF6-447F-95F992E09A9BE07A>

⁷ OM:2-104 was issued on July 14, 2003, while OIG’s inspection was underway. It superceded D:ADM:3-102, dated 07/23/1992.

Department policy is to take all steps necessary to minimize the impact on Department employees of any disasters or emergencies. Under OM:2-104, the Assistant Secretary for Management (ASM) has overall responsibility for the Department's emergency planning and implementation. Pursuant to delegations from the ASM, the highest-ranking Department official in a Department-occupied building is responsible for developing, implementing and maintaining an OEP or, in buildings where the Department is not the primary tenant, for consulting with the appropriate official of the primary tenant in the development, implementation, and maintenance of the OEP. The Director of Security Services in OM is responsible for assuring that each Department facility complies with the requirements of an OEP. Security Services also provides guidance, assistance and sample plans to Department officials to facilitate the development of OEPs. Section 504 of the Rehabilitation Act of 1973 states that "no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under" any program or activity that is conducted by, among others, any Executive agency. Section 501 of the Rehabilitation Act prohibits the federal government, as an employer, from discriminating on the basis of disability. Although the Americans with Disabilities Act of 1990 (ADA) does not cover federal employees directly, as a result of statutory amendments in 1992 section 501 incorporates by reference the ADA's standards relative to agencies' treatment of federal employees with disabilities.

Federal employees with disabilities are entitled under the Rehabilitation Act to the same level of safety as other employees. As with other aspects of employment, reasonable accommodation for the disabilities of Department employees may be necessary to ensure nondiscrimination with respect to their enjoyment of a safe working environment and in planning for emergencies in the work place.

Inspection Results

Objective 1: Determine whether Occupant Emergency Plans (OEPs) for Department-occupied buildings reasonably provide for the safe and nondiscriminatory evacuation of Department employees and others with disabilities.

In general, the OEPs reflect a good-faith effort to develop plans that will maximize the likelihood for the successful emergency evacuation of staff, including people with disabilities. All of the OEPs contain provisions specifically intended to ensure that employees and visitors with disabilities are safely evacuated when other employees are evacuated from the building. However, we did detect some significant issues that must be addressed.

Our inspection revealed that OEP and the signage used in stairwells is inconsistent, thus, occupants may become confused as to which stairwell they are to use in an emergency; DC Fire Department personnel have to rely on

building staff to inform them of all the locations of persons with disabilities needing assistance; there are no two-way communication devices present in the areas of refuge; there is no apparent mechanism to inform people with disabilities of the status of their evacuation once monitors and floor wardens are gone; people with disabilities have no opportunity to practice evacuations since they are not evacuated during drills; several OEPs are not available on ConnectED; and there do not appear to be consistent processes or procedures in place to identify individuals with disabilities who may need assistance during an emergency evacuation.

OM:2-104 requires an Occupant Emergency Organization and an Occupant Emergency Plan for every Department-occupied building. We reviewed OEPs from FB6, Switzer, ROB3 and several Department-occupied buildings outside of the District of Columbia. We also obtained information from people with disabilities, staff expected to assist them, and members of OEOs.

An “area of refuge” or “area of rescue assistance” is a temporary staging area that provides relative safety to its occupants while rescue operations are in progress. The District of Columbia Fire Department (DCFD) and the United States Fire Administration each include areas of refuge as one element of emergency planning for the evacuation of people with disabilities.⁸

The Switzer Building EOP states, “designated ‘Areas of Refuge’ are located at the stairwells on the main corridors of the building, at the head of the 100 and 600 corridors, and beside the main elevator lobbies at the 300 and 400 corridors. These stairwells are clearly marked with signs, designating them as ‘Areas of Refuge.’” On the fourth floor of Switzer, nine stairwells, including the four identified in the EOP, have 8½ x 11 inch photocopied signs on the doors that say: “NOTICE: This is a designated area of refuge in the event of an emergency.” (“Notice” is in red type, making it invisible to those who are red/green colorblind, and no signs are in Braille.) OM stated that GSA put the signs in place, not the Department. Regardless of who put them on the stairwell doors, because the OEP and the signage on the stairwells are not consistent, confusion on the part of visitors and employees with disabilities is likely. Although the risk of such confusion is not limited to people with disabilities, most non-disabled people can descend the “wrong” set of stairs and exit the building. In contrast, people with mobility impairments and some other disabilities may find themselves in the same “wrong” stairway, waiting for rescue. Emergency personnel need to keep track not only of the four stairwells designated in the OEP, each with four or more landings above ground level, but also of another five stairwells with landings on each floor.

⁸ United States Fire Administration, *Emergency Procedures for Employees with Disabilities in Office Occupancies*, FA-154 (6/95); D.C. Fire and EMS Department, *Evacuation Plan Guide*, (Undated, provided to OIG by the D.C. Fire Department on July 19, 2003).

U.S. Fire Administration guidelines state that areas of refuge should have devices in place for two-way communications, with instructions for use. The Switzer OEP states: "Two-way communications between the Command Center and each Area of Refuge are available to keep the people located in these areas informed of the status of the emergency and their evacuation." We found no two-way communications devices in any of the areas designated as areas of refuge in the OEP or by signs in the building. OM stated that the U.S. Fire Administration policy does not state that the two-way communication has to be electronic, thus allowing voice communication in the stairwell to be the Department's communication methodology of choice. OIG disagrees on this point. The policy states that there should be "devices" with "instructions for use," which would indicate that something more than vocal communication is intended. Also, individuals with certain illnesses (such as multiple sclerosis or muscular dystrophy) may have limited vocal capacity and be unable to indicate where they are on a stairwell.

The OEP states that radio, telephone or runners are used to maintain communications. Designated Stairwell Monitors are expected to report the presence of people with disabilities remaining in the stairwell to the Floor Monitor and to the Command Center. At the same time, their responsibilities include leading occupants to safety, and exiting the building when the flow of traffic ceases. Similarly, the Switzer OEP provides that Floor Wardens are to report the location of disabled employees and visitors to the emergency command center established on the first floor of the building, after which they are not to return to their floors but are to leave the building. The OEP describes no mechanism by which people with disabilities awaiting rescue will be kept informed "of the status of the emergency and their evacuation" once the Stairwell Monitors and the Floor Wardens have left.

DC Fire Department officials stated that its personnel are dependent on building staff to inform them of the location of people with disabilities needing to be rescued, and that successful evacuation of people with disabilities depends largely on the ability of a particular building to give accurate information to the responding emergency personnel.

In the Jackson Federal Building in Seattle, in which Department employees occupy the 33rd and 28th floors, people with disabilities who are unable to descend and exit without assistance, are directed to await rescue in one of two stairwells. The floor warden on the 33rd floor was instructed to use the telephone for two-way communications, including to report that people with disabilities are awaiting rescue, but there is no telephone in the stairwell. Further, during and after the Seattle earthquake in 2001, telephones were largely unusable because no dial tone was available.

A key person under DM:2-104 and in Department OEPs is the Occupant Emergency Coordinator for a facility. Under most Department OEPs, including

the Switzer Building's, the Occupant Emergency Coordinator is responsible for selecting, training (including scheduling drills) and organizing an adequate staff to conduct emergency operations; and supervising the activities of the Emergency Command Center Team. During an emergency, the Occupant Emergency Coordinator reports to the Designated Official and keeps that person apprised of events. The current and the previous Switzer Building OEPs, issued in March 2003 and October 2001, respectively, both list the position of Occupant Emergency Coordinator as Vacant.

According to Security Services, people with disabilities are not evacuated during practice evacuations or drills. Instead, they stay in the area of refuge and then return to their work area. The Occupant Emergency Coordinator is responsible for reporting any deficiencies encountered during drills, including problems experienced by individuals with disabilities and their assistants. When drills are incomplete in this respect, relevant information is unavailable to members of the building Occupant Emergency Organization about the effectiveness of its planning for the evacuation of people with disabilities and, unlike other employees, people with disabilities and those who assist them do not have an opportunity to practice or familiarize themselves with the activities that would be needed in the event of a real emergency.

OM2-104 requires the publication of all OEPs on connectED. At this time, plans for several buildings occupied by Department employees are not available at that location. For example, in both Boston and Seattle, OEPs are listed and linked for only one of the two principal buildings occupied by large numbers of Department staff. In addition, the OEP for the River Center in Chicago is missing floor plans and evacuation routes for the floors occupied by the Department of Education and other federal agencies in the privately owned building.⁹ Although these omissions affect people without disabilities too, their impact is likely to be greater for people with disabilities since many have little or no ability to rescue themselves; they are wholly dependent for their safety and survival in an emergency on the procedures in the relevant OEP.

Procedures for identifying people who, because of disability or physical impairments, may require assistance in exiting a Department-occupied building during an emergency evacuation are ambiguous and hit-or-miss. OEPs generally do not include procedures for the identification of such people. According to Security Services, identification depends on supervisors, who are likely only to raise the issue with those for whom the need is self-evident or who have requested accommodation for the impact of their disabilities on other aspects of their work. Department supervisors generally are not trained to determine whether employees have physical impairments that may be expected to interfere with their ability to evacuate the building in an emergency. The omission is likely to be especially true when employees themselves do not regard their medical

⁹ The location in the emergency plan where this critical information should be says simply, "(Pages 22 – 26 to be inserted: Plans for each of the federally occupied floors – 6, 8, 9, 10 & 11)"

condition as a disability because it does not interfere with their ability to do their jobs or to require reasonable accommodation in their work. Conditions such as asthma and heart disease, while not disabling relative to job performance, can prevent unassisted evacuation in an emergency.

Without significant improvements in the areas identified above, the individuals with disabilities appear to be at significant risk should there be an actual emergency.

Objective 2: Determine whether slow descent devices (SDDs) are available for use in all Department facilities for the evacuation of people with disabilities.

Our inspection revealed that, although SDDs have been identified as key components of the Department's planning for emergency evacuation employees with disabilities, they are not available in all Department-occupied buildings, or, if present, are not known to managers or employees with disabilities who may need to rely on them. Further, we were unable to establish that identified SDDs were maintained and tested, or that employees have been trained in their use.

Within the last six months, the Office of Management and more particularly Security Services has stated on more than one occasion and has publicized to all Department employees that Slow Descent Devices are available in all Department buildings nationwide for the emergency evacuation of employees with disabilities. In July 2003, Security Services told OIG that Headquarters buildings in the DC area have four chairs per building and in the regions two per building.

The Mary E Switzer Building has 5 floors above ground level, and 9 stairwells accessible on each floor except the top one. OIG, with assistance from the Building Manager, was able to locate three SDDs, in three different stair landings. The current OEP for the Switzer Building does not identify SDDs as a component of building plans for the evacuation of employees with disabilities.

The Department of Education Building (FB6) has 6 floors above ground level. OIG identified six SDDs in different stairwells. The current OEP for FB6 does not identify SDDs as a component of building plans for the evacuation of employees with disabilities.

Current and former employees who worked in ROB3, including a senior manager with a mobility impairment who could not exit the building unassisted in an emergency, knew of no SSD in Department-occupied sections of the building or in emergency exit routes designated for use by Department employees. The current OEP for ROB3 does not identify SDDs as a component of building plans for the evacuation of employees with disabilities.

Department managers of large regional staffs in Chicago and Seattle, each of whom supervises employees with disabilities including mobility impairments, did not know of and could not identify any SDDs in their buildings. The floor warden for Department-occupied space in Seattle also did not know of an SDD. The Chicago office leases space on the 10th floor of a private building. The Seattle office in question is located on the 33rd floor of a large GSA-operated Federal Building.

A Department manager in Denver works on the 3rd floor of a privately owned building. The manager has a mobility impairment and ordinarily uses a scooter, although she is able to walk, using crutches, with difficulty. No SDD is available for her use. Her efforts and efforts of others to obtain one have not been successful.

Between March and May 2003, Security Services reported to Department employees, to OIG, and to the Office of Personnel Management that Secure Descent Devices are a key component of Department efforts to ensure the safety of people with disabilities in the event of emergency evacuation. In late April or early May, however, Security Services recommended against the purchase of an SDD for use by the previously described Denver employee.

In an interview held in July 2003, a Security Services staff member stated that the SDDs purchased in 1993 are not reliable, and that Department staff were never trained to use them.

The slow descent chairs located in the Switzer and FB6 Buildings are designed so that a person assisting the person in control of the chair must physically weigh more than the person who is being assisted, thereby eliminating many colleagues including often an aide employed specifically to assist an employee with a disability. In addition, the devices are not self-arresting—that is, if a person assisting in an evacuation with the device were to lose his or her grip on the controls, the device would continue to descend, out of control.

The Smithsonian Institution uses the same kind of SDD that is installed in the Switzer Building. The devices are installed on every other floor, and are used by some employees with disabilities during unannounced, live, drills designed to simulate a real emergency evacuation as closely as possible. All employees and all visitors are fully evacuated. The Safety Coordinator at the Smithsonian reported no injuries or disruptions of evacuation drills attributable to use of the devices, and that employees are trained to delay their descent until the major flow of traffic has passed in the stairwell before using the chairs.

We found no record that the existing SDDs in Switzer or FB6 have been tested or maintained in recent years, if ever. Although this type of SDD is supposed to be maintenance free, the Smithsonian found through experience that they require

periodic inspection and routine maintenance to ensure that they can be used when needed.

We also found no indication that existing SDDs in Switzer or FB6 have been used in drills or training to simulate as closely as possible the conditions of a real emergency, and Security Services told us that no training of employees in the use of the devices has been conducted since they were purchased a decade ago. Without such training, it is difficult to anticipate and plan for problems that may arise, or to ensure that people with disabilities and those who may be required to assist in an evacuation know what is expected with regard to using SDDs.

The Federal Emergency Management Agency and the United States Fire Administration include SDDs in technical assistance materials regarding the evacuation of people with disabilities from office buildings. The United States Architectural and Transportation Barriers Compliance Board (the Access Board) purchased SDDs and includes them as part of its own OEP.¹⁰ The Department of Housing and Urban Development, after careful evaluation of available options, recently initiated the purchase of 123 SDDs for employees in its headquarters offices. OSERS currently is evaluating several models of SDDs for use by employees. The DC Fire Department advises that SDDs can be used when the devices are available and employees have been trained to use them.

SDDs are not present in all buildings, and in those where they do exist, there does not appear to have been adequate training or practice on how to use them in the case of an emergency.

Conclusions

Department planning for the emergency evacuation of people with disabilities is largely untested through drills or practices that reasonably simulate the conditions of a real emergency. As a result, Occupant Emergency Plans describe procedures that cannot be implemented at the various sites. Slow descent devices have erroneously been promoted inside and outside the Department as being available in all Department buildings for the emergency evacuation of people with disabilities. The devices have not been adequately inventoried or tested to ensure that the ones currently in place are in good working order. There is no established procedure in the Department for the identification of people who will require evacuation assistance. Locations designated for people with disabilities and those assigned to remain with them to await rescue lack means of communication with those coordinating rescue

¹⁰ Access Board: Emergency Evacuation Plan, <http://www.access-board.gov/evacplan.htm>. See also, The Access Board's Emergency Evacuation Plan: Background Information, <http://www.access-board.gov/evacplan-back.htm>

efforts. Those requiring assistance during an evacuation do not have specific information on how they will be evacuated during an emergency.

Scope and Methodology:

This inspection evaluated the effectiveness of procedures for the emergency evacuation of employees and others with disabilities from Department-occupied buildings.

We conducted interviews with essential personnel within and without the Department; gathered pertinent documents; reviewed applicable policies, regulations, procedures, and pertinent literature; visited Department-occupied buildings in the District of Columbia and regional offices, and another federal agency's facility. We also spoke to staff responsible for emergency planning for people with disabilities in other federal agencies and to Fire Department personnel. We focused our inspection on the Mary E. Switzer Building and additionally reviewed information regarding five other Department-occupied buildings: FB6, ROB3, the Jackson Federal Building in Seattle, and two privately owned buildings in which the Department leases space, the River Center Building in Chicago, and the Parkway Center in Denver.

This inspection took place during June-September, 2003.



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF MANAGEMENT

December 8, 2003

Response to Draft Inspection Report

TO : Cathy H. Lewis
Assistant Inspector General
Evaluation, Inspection and Management Services

FROM : William J. Leidinger

SUBJECT : **Response and Action Plan** – Emergency Evacuation of People with Disabilities in Department of Education Facilities (ED/OIG I13C0017)

Executive Summary

The Office of Management (OM) appreciates the concern and the time spent assessing the procedures for the evacuation of employees and visitors with disabilities. The draft inspection report submitted by the Office of the Inspector General (OIG), dated November 5, 2003, offers some insights on areas OM will consider in enhancing the Department's programs.

In response to the areas of concern in the OIG report the following general comments are offered. The section that addresses areas of refuge and the use of Slow Decent Device's appears to be based on information obtained from the United States Fire Administration (USFA) and the District of Columbia *Evacuation Plan Guide*. While these documents may prove helpful as reference documents, they were not used to establish the guidelines for the Department's program. In addition, the use of SDD's is not a requirement. Current guidelines call for the designation of a safe location for disabled personnel, until such a time as Fire or other Emergency service officials can safely evacuate them.

The ED program follows and is in compliance with the guidelines provided by the following regulatory agencies – National Fire Protection Association (NFPA), Uniformed Federal Accessibility Standard (UFAS), Americans with Disabilities Act (ADA), Code of Federal Regulations (CFR) and other national guidelines recognized by the General Services Administration. These guidelines ensure that accommodations afforded to non-disabled employees are reasonably afforded to disabled employees.

In this report the Inspector General (IG) has indicated that they have found indications of inconsistency with information from disabled employees, OEP's that were not current or complete, inconsistent signage in buildings and other findings. However, the report does not list the specific buildings or locations. Security Services looks forward to working with the IG and gaining sufficient information to address the specific findings cited.

In response to the specific steps suggested in the report, the following comments are offered:

[1] Survey all Occupant Emergency Plans

- a. Each Occupant Emergency Plan (OEP) will be reviewed and those plans that ED has control over will be brought into compliance with government requirements. ED does not in all cases own many of the OEP's where ED offices are located. A number of these OEP's (13) are controlled by other agencies where ED is not the lead tenant. In these cases, the lead tenant is responsible for the development and maintenance of the OEP. The lead tenant has a responsibility to furnish a copy of their OEP to other tenants in the building.
- b. There are currently programs in place or are being developed in an effort to provide safety and security to all ED employees. Security Services is currently developing an awareness program for distribution to all ED employees. Security Services will develop and produce a condensed written guide, which specifies what to do when an emergency occurs. This guide when finished will be produced in written, Braille and audible formats to accommodate all ED employees. To assist in developing this guide, Security Services has assembled teams of employees, including those with disabilities to provide input to the staff.
- c. Security Services will review the OEP's currently available on the web site, if any OEP's are not found on the web, Security Services will make every effort to obtain the missing OEP's. As done in the past, Security Services will make a written appeal for updates of Occupant Emergency Plans from Headquarters and Regional Facilities. In those instances where a Headquarters or Regional Facility does not have a plan, or the responsible individual (e.g. lead tenant) has difficulty developing a plan, Security Services provides a "boiler-plate" plan to assist in the completion of the task.
- d. Signage in all ED controlled building will be review for compliance with guidelines. In ED buildings signage not meeting the guidelines will be reported to GSA with the request for correct signage to be posted. In non-

ED controlled buildings every attempt will be made to work with the building managers to ensure compliance.

As previously stated, the Department's program is in compliance with guidelines. None of the guidelines require the installation of two-way communication in existing construction. Security Services will continue to work with assessments completed on any new construction to ensure compliance with security and safety guidelines, including the applicability of two-way communication devices in areas of refuge.

[2] Locate all Slow Decent Devices in Headquarters and Regional Facilities

- a. Security Services will ask each Headquarters and Regional site to verify the location and condition of SDD's in their facility. In order to fully and adequately address the issue of slow decent devices (SDD's), there is a need to look at the history of these devices within the Department of Education. Approximately 15 years ago (1988-1989) the issue of SDD's surfaced, at that time 32 of these devices were purchased and distributed within the Department of Education. Slow Decent Devices were purchased in 1990 for ED facilities in the Headquarters and Regional sites. At the time of procurement, it was determined and communicated that the Slow Decent Devices were for the use by local fire and rescue personnel. This was due to the type of equipment purchased and the liabilities recognized by the agency.

As previously stated, the use of SDD's is not mandated. However, Security Services, as explained below, is working with employees to evaluate and provide adequate evacuation procedures for all employees. Security Services provides periodic information, as well as updates based upon significant changes. As the evacuation program changes, Security Services will provide information to ED employees.

- b. The use of SDD's in the Department is a complex issue in which numerous versions of the devices must be evaluated, differing building construction types must be accommodated, and numerous variations of disabling conditions require different types of SDD's. Security Services, as the lead for the Office of Management, in concert with the Office of Special Education and Rehabilitative Services (OSERS) has initiated a program by which written guidelines have been drafted, SDD's have been purchased and a training process is being developed. It is hoped that the program will culminate with a written Administrative Directive, which will outline how and when SDD's shall be used, who will be qualified to use them, and under what authorities and protection this process can be implemented. In

addition, Security Services will locate and inspect all SDD's to ensure they are functional or removed from service if appropriate.

[3] Identify employees requiring assistance in an emergency

- a. Security Services will conduct an annual review of persons with disabilities, and invite others requiring assistance to identify themselves.

[4] Provide evacuation information annually

- a. Security Services provides evacuation and other safety information continuously on its website and through the Department's e-mail system. When new information is available or changes are made, announcements are also made. In addition to this always-available information, Security Services will provide an annual reminder to employees to remind them where the information can be obtained.

[5] Provide accurate information

Security Services will continue to provide periodic updates and information regarding changes in the program to Department staff and other external offices, including OPM. In addition to the methods of information dissemination discussed above, Security Services conducts "town hall" meetings at Headquarters locations and Regions.