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Emergency Response and Crisis Management (ERCM) Technical Assistance Center

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EMERGENCY MANAGEMENT OPPORTUNITIES AND CHALLENGES FOR NON-PUBLIC SCHOOLS

A Comparison of Non-public and Public Schools in the United States

Non-public schools are defined as institutions that provide instruction for students in one or more of grades K–12, have one or more teachers, are controlled by a non-governmental entity, and are financed from sources other than public taxation.[1] The diversity in orientation and affiliation of the three major types of non-public schools—Catholic, other religious, and nonsectarian—is wide, with "other religious" schools representing 48 percent, Catholic schools 28 percent, and nonsectarian schools 24 percent.[2]

With nearly 10 percent of all U.S. K–12 students enrolled in non-public schools, where classroom instruction, supervision, oversight and safe shelter are provided, emergency management planning is as critical there as it is in public schools.

Ensuring that non-public schools are well equipped to develop, practice, and revise emergency management plans is vital to the safety and security of the approximately 5.5 million non-public school students and teachers across the nation. Collaborating with area local education agencies (LEA) in emergency

A Comparison of Non-public and Public Schools in the United States, by School Characteristics: School Year 2003-04[3]

School Characteristics	Non-public	Public
Number of elementary and secondary schools	28,384	92,816
Student enrollment	5.1 million	48.5 million
Average size	181 students	604 students
FTE teachers	425,238	3 million
Students awarded a high school diploma in 2002-03	295,755	2.7 million
Student/teacher ratio	12/1	16/1
Schools in large cities	33.8 percent	13 percent
Schools in mid-size cities, urban fringes or towns	41.6 percent	57 percent
Schools in rural areas	24.6 percent	31 percent

1 Organizations or institutions supporting home schooling but that do not offer classroom instruction for students are not included in the definition for the purposes of this newsletter.

2 National Center for Education Statistics (NCES), U.S. Department of Education, *Characteristics of Private Schools in the United States: Results from the 2003-2004 Private School Universe (PSU) Survey* released in March 2006.

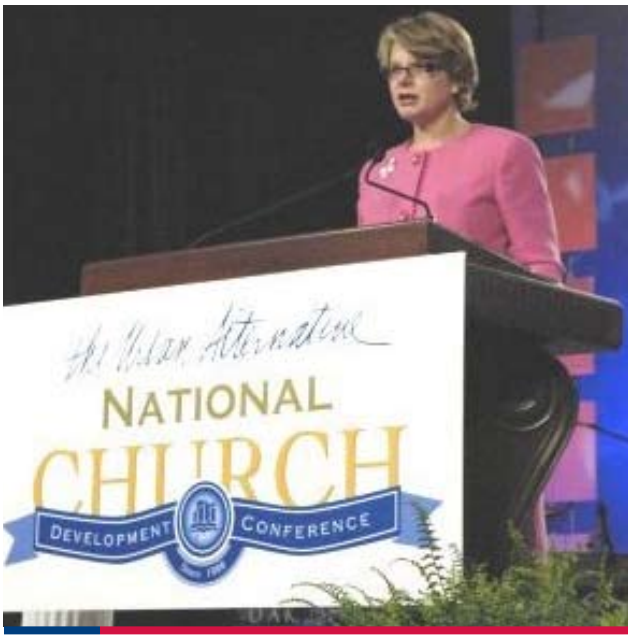
3 Data gleaned from the NCES' *PSU Survey* released in March 2006 and NCES' *Common Core of Data Report, Public Elementary and Secondary Students, Staff, Schools, and School Districts: School Year 2003–04* released in January 2006.

management planning can result in more effective, more unified plans.

Integrating Non-public Schools Into Emergency Management Planning

The need for school safety and emergency management has grown more complex and urgent in the last 15 years. Traditionally, most school emergency management plans focused on prevention issues pertaining to fire, crime, medical emergencies, and natural disasters such as hurricanes, tornadoes, and earthquakes. In the period following the incidents of targeted violence that occurred at Jonesboro High School in Arkansas (1998) and Columbine High School in Colorado (1999), schools began to focus on different types of incidents related to acts of violence. In the aftermath of Sept. 11, schools began to realize the potential threats of terrorist assaults involving explosive devices as well as biological, chemical, nuclear, and radiological weapons. The siege of the West Nickel Mines School (2006), a one-room Amish schoolhouse in Pennsylvania, underscored the importance of understanding the new realities that all schools face.

Public and non-public schools and community partners, such as law enforcement and mental and public health agencies, the local emergency management agency, area businesses, and nonprofits such as the American Red Cross, should work collaboratively to create all-hazard emergency management plans that seek to help schools mitigate or prevent, prepare for, respond to, or recover from an incident. By combining their efforts, public and non-public schools can help to build the capacity of local, state, and federal agencies, share resources, offer potential services such as serving as an evacuation site, better utilize the time and energy of community partners, and create common procedures or policies that can aid first responders.



Federal Mandates Pertaining to Non-public Schools

Many federal discretionary grant programs require local education agencies to consult with non-public school officials to design grant applications so the programs will meet the needs of non-public school students and staff, which may be different from those of the public schools. For example, the U.S. Department of Education's Office of Safe and Drug-Free Schools' application grant guidance packet indicates that "Applicants are expected to engage in meaningful consultation with non-public schools during the application process to determine which schools will participate in the grant and what needs those schools have." Title IV, Part A of the *No Child Left Behind Act (NCLB)* provides for state formula and national discretionary grants that are awarded to state governors and state education departments to distribute to LEAs according

to established formulas and competitive grants processes. Additionally, the Title IX Uniform Provisions of the statute require the equitable participation of non-public school students. The education programs and benefits provided for non-public school students and teachers, and the expenditures for such, must be equitable in comparison to services and other benefits for public school children and teachers.

Non-public schools are also subject to state and local regulations pertaining to student health and safety. Schools comply with health code mandates in such areas as student inoculations, attendance reporting, and food preparation area inspections. Compliance with safety regulations regarding fire codes and drills, asbestos and lead paint removal, and other hazards is also observed.

Challenges Faced by Non-public Schools in Developing Emergency Management Plans

Internal challenges faced by non-public schools in emergency management planning include:

- *High expectations*. The unique culture of many non-public schools comprises high expectations and social norms in a communal organizational structure. The academic requirements and discipline codes often implemented in non-public schools can create a climate in which students have very limited unengaged or unsupervised time, resulting in limited significant incidents of violence that would raise the awareness levels of potential threats from internal sources.
- *Size.* Non-public schools average 181 students per building and, of the 28,384 non-public schools across the nation, 31 percent enroll fewer than 50 students. Since most students, even in larger high schools, are known by many of their teachers, it is assumed that behavioral patterns that indicate violent tendencies might be detected more readily and that outside intruders would be easily identified and removed.
- *Complacency*. Data, as shown in the National Center for Education Statistics' *Indicators of School Crime and Safety: 2006 (December 2006)*, indicate that less than 2 percent of non-public school students experienced school-related threats of violence, which has led to a degree of complacency about the potential for emergencies and the need to engage in emergency management planning.
- *Insufficient resources*. Non-public schools often have limited personnel and inadequate financial resources to conduct risk assessments, develop emergency plans, serve on crisis response teams, provide training, and practice emergency procedures.
- *Lack of awareness of available resources*. LEAs administer the Readiness and Emergency Management for Schools (REMS) discretionary grant program (formerly known as the Emergency

Response and Crisis Management [ERCM] grant) made available through the U.S. Department of Education's Office of Safe and Drug-Free Schools. Although equitable participation for non-public schools is required for REMS grantees, some non-public school administrators may be unaware of or do not access these federal resources.

External challenges faced by non-public schools in emergency management planning include:

- *Public perception*. The public may perceive non-public schools to be safe environments that do not require emergency management planning initiatives similar to those in public schools or at all.
- *First responders pre-negotiated Memorandums of Understanding*. While non-public schools can be assured that isolated emergency incidents will have the response of local emergency personnel, a more widespread, community episode may result in a delayed response from first responders who are obligated to serve other area schools or agencies with which they have pre-negotiated Memorandums of Understanding in the event of an emergency.
- *LEAs unaware of equitable participation mandate*. Competition for public resources and legal and constitutional issues surrounding aid to non-public schools often leave some misunderstanding of the LEAs' responsibilities under Title IV, Part A of *NCLB* to serve non-public school students. The ongoing challenge for non-public school officials is to collaborate with LEAs to increase awareness of their federal mandate to work with non-public schools in designing and preparing federal and state grant applications.

Steps Non-Public Schools Should Take to Develop Emergency Management Plans

The June 2007 report of the Safe and Drug-Free Schools and Communities Advisory Committee, *Enhancing Achievement and Proficiency Through Safe and Drug-Free Schools,* highlights the legislative mandates for the equitable participation of non-public school students in federal safety programs. The report concludes that non-public schools have an obligation to work to equitably contribute to and administer school security programs.

To participate in the planning of emergency management for schools, non-public administrators can:

1. Contact the area district's school security or school safety director and express a willingness and desire to participate in all emergency planning activities.

2. Enlist the assistance of all community partners (e.g., fire, police, emergency medical services, mental health, public health, other community-based organizations, area businesses) when developing, implementing, and evaluating the plan. Non-public school officials should invite relevant community partners to tour the school and provide them with floor plans and other documentation they would need to assist in providing emergency services.

3. Incorporate into the emergency plan the principles of the National Incident Management System (NIMS), a national, unified, standardized system for managing domestic incidents that is appropriate for all public and non-public schools to use during all phases of emergency management to facilitate local decision-making and improvement. Within the NIMS framework, the Command and Management component creates an Incident Command System (ICS) that is a standard strategy for handling all school-related incidents, regardless of the agencies or partners involved. Whereas the LEA is the coordination center for all of its schools, there is not a comparable structure for non-public schools. Therefore, integration into the public systemwide response plans is essential.

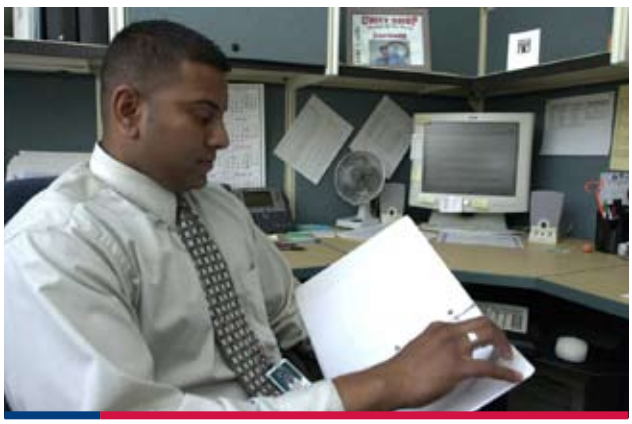
4. Develop the plan based on the unique characteristics of the school, such as the location of the school, proximity to highways or commercial areas, natural hazards common to the geographic area, and the framework of any religious or nonsectarian structures to which the school might belong.

5. Communicate the importance of emergency management for schools to all staff, students, families, and other stakeholders.

6. Work with the LEA and public health and safety agencies to share resources for training staff and students about emergency management procedures and for practicing and testing the procedures on a regular basis.

7. Work with faculty to develop a Continuity of Operations Plan (COOP) to ensure that in the event of an emergency that forces schools to be closed for an extended period of time education will continue. The manner in which the yearly tuition contracts and employment agreements in non-public schools will be honored are significant factors that must be taken into account in the event of the interruption of education.

8. Budget, with the appropriate governing authorities, sufficient funds to customize emergency management plans particular to the school community: campus safety considerations, interruption of business insurance, and a comprehensive communication plan. Leverage available free, federal, state and district-funded resources and training.



Stories From The Field

Collaborate With Area LEAs

Maureen Dowling of the Office of Non-Public Education at the U.S. Department of Education advises that the most successful emergency management strategy for non-public schools is to be proactive in approaching the LEA about participation in eligible programs. Collaboration is the key for successful emergency management planning for non-public schools and administrators. Together with LEA staff and relevant partners, they should develop workable timetables for integrating their schools into the district's emergency management plan. The collaborations should focus on developing Memoranda of Understanding (MOUs) that outline each partner's contributions, responsibilities, and roles for supporting emergency planning for non-public schools. Below are several examples of how non-public schools have collaborated with LEAs to develop school emergency management plans and share resources.

The Al-Huda Islamic Academy, an Islamic school in the Charlotte-Mecklenburg area, became more cognizant of possible retaliatory attacks because of its identity in the post-Sept. 11 climate, in which newspaper stories of violence against Muslims were reported. Hassan Elennani, principal, participated in a U.S. Department of Education's (ED) *Emergency Management for Schools* training workshop to learn more about effective emergency management planning for his nine-acre open campus. Working with two other organizations that share the facility, the school is engaging in dialogue with the Charlotte-Mecklenburg School District to find ways to integrate the academy's emergency management plans with the district's so that response efforts will be coordinated. The school will begin to participate in the Title IV programs and use some of the resources to develop its emergency management plans.

Pool Resources

For many small non-public schools, collaborating with several other schools to share resources can help to serve students and staff more effectively. In the Catholic school community, many diocesan central school offices coordinate emergency management planning on behalf of all of the community's schools to create a uniform emergency management approach and to obtain more value for the shared resources.

In New York City, Frances Maturo, executive director of the Archdiocesan Drug Abuse Prevention Program (ADAPP), and Paul Lynch, associate superintendent for Government Programs, have consolidated the Title IV formula grants for all of the city's Catholic schools. With the agreement of the LEA, which must serve as the fiduciary agent for

the non-public schools, ADAPP, a non-profit community-based organization, serves as a contactor to administer the programs for the New York City Catholic schools on behalf of the LEA. Under this arrangement, the Catholic schools near Ground Zero and those that lost family members in the Sept. 11 attacks were provided with crisis management and recovery services, and, through the U.S. Department of Education's Project SERV (School Emergency Response to Violence) grant, non-public schools produced crisis manuals and training programs to deal with school climate issues and fortify systems so that, in the event of an incident, recovery could begin efficiently. Under the Title IV formula grants, each of the Catholic elementary schools is participating in the development of a crisis management guide and in a training program that requires interaction with public agencies and first responders.

The Catholic school office in Worcester, Mass., on behalf of its 31 schools, is working collaboratively with the LEA and the city's Civil Defense Unit to develop a coordinated response plan and chain of command protocol for emergency management. A tool kit of materials and training is provided to all public and non-public schools by the City of Worcester. Steve Perla, superintendent of Catholic schools there, said that the state formula safe and drug-free schools funds will be used by the Catholic school office "to purchase and implement an emergency notification system for the Catholic schools that simultaneously sends phone call, text message and e-mail emergency alerts to all its schools and parents that will mirror what the LEA does for the public schools."

Explore Alternate Funding Sources

In metropolitan Washington, D.C., greater coordination among schools, local governments, and other public agencies to address potential terrorist threats has been a high priority. Within all sectors of the non-public school community there is concern for emergency preparedness to safeguard students and staff. In Maryland, the governor directed the state to spend a portion of its federal homeland security allotment on external security for Jewish schools considered "soft targets" for terrorists. Rabbi Abba Cohen, legislative director of Agudath Israel, successfully lobbied Congress with Jewish nonprofit groups to appropriate a set-aside of $25 million of homeland security funds to be used by nonprofit groups, including schools, to improve security. While all nonprofits could apply, more than 20 Jewish organizations in the National Capital Region received grants to install or enhance security systems. Rabbi Sarah Meytin, assistant director of the Jewish Community Council of Greater Washington, noted that its schools and religious institutions have undertaken complete security assessments and are using the grants to obtain hardware, cameras, lighting upgrades, and security

windows that are on a Department of Homeland Security approved equipment list.

Work With Local Governments

Michael Caruso, assistant superintendent of Catholic schools in Washington, D.C., has been actively engaged with the Council of Government and the D.C. Public Schools (DCPS) in developing coordinated interagency plans to prepare for major incidents, which invariably provide for local contingencies as well. These collaborative efforts within the District of Columbia have served as models to leverage greater coordination and cooperation in the neighboring Maryland counties. The Archdiocesan schools' office is negotiating with DCPS to pool Title IV funds to contract for the development of a professional multi-year emergency management and response plan that utilizes the structure of the nationally recognized Incident Command System model. Caruso indicated that his office was coordinating the development of a systemwide emergency management plan that would incorporate a standard template that each of the schools would be required to complete.

Conclusion

The need to protect children from harm, regardless of the type of school they attend, is the fundamental principle that should shape policy and procedures for including non-public schools in an integrated network of emergency management planning. Students and school personnel in non-public schools are entitled to the same protections to insure their safety as if they were in any other "public" facility.

Whereas public schools are automatically connected to the network among public agencies, non-public schools must be more proactive about becoming integrated into these networks. This could begin with non-public school officials requesting a meeting with state and local authorities to discuss the school's assessed needs and ways in which safety could be enhanced by closer collaboration. This may require non-public schools to become more cognizant of their needs, to budget for greater safety resources, and to be more transparent about their shortcomings. A greater collaboration between non-public and public school officials, particularly with the LEAs' personnel who coordinate emergency management for the public schools, should result in a more flexible administration of programs so as to account for the unique needs of the non-public schools in their jurisdictions and provide for the safety of all students in all schools.

RESOURCES

National Association of Independent Schools (NAIS)

NAIS provides resources and support to independent schools at the national, regional, state, and local levels. Services include teacher recruitment, curriculum, fundraising, professional development, enrollment, and advocacy. Independent schools can work with their nearby AIS as they coordinate, collaborate, and communicate emergency management activities for their schools and with the local school districts.

http://www.nais.org

The National Association of Private Special Education Centers (NAPSEC)

NAPSEC is a non-profit association representing the needs of private special education centers, and their leaders, students, and community. NAPSEC has programs at the state and local levels, serves private and nonprofit education institutions, and generally serves students ages 6 through 21, with some services in early childhood. Services include: physical, occupational, and speech therapy; nursing services; and social work. NAPSEC can provide information and resources for integrating the needs of students with disabilities and all emergency management agencies.

http://www.napsec.org

National Catholic Educational Association (NCEA)

NCEA is the national education organization providing leadership, services, and resources to Catholic preschools, elementary and secondary schools, and their students. Services and resources include conventions, professional development, publications, strategic planning, and curriculum and instructional support. One program, Selected Programs for Improving Catholic Education (SPICE Model Programs), spotlighted the issue of Security Awareness for Everyone.

www.ncea.org

U.S. Department of Education's Office of Non-Public Education (ONPE)

ONPE represents and supports the needs of the non-public school community at the U.S. Department of Education. ONPE serves two roles: it provides resources and guidance to ED offices for ensuring that non-public schools are included in programs and initiatives; and it provides guidance and support to the non-public school community through consultation, information dissemination, and outreach. ONPE also provides up-to-date information regarding participation in federal education programs and initiatives, as supported by *No Child Left Behind*.

http://www.ed.gov/about/offices/list/oii/nonpublic/index.html

Emergency Response and Crisis Management (ERCM) Technical Assistance (TA) Center

The ERCM TA Center offers school-based emergency response and crisis management resources, including: webcasts; training documents from experts in the field; information on the ERCM discretionary grant program; and newsletters addressing key issues. http://ercm.ed.gov.

School Safety Webcast

On Nov. 15, 2006, OSDFS hosted a webcast focused on reviewing and updating school emergency management plans. The webcast provides parents, educators, school administrators, and local safety personnel with an opportunity to review key considerations related to school emergency management planning, including what schools can do to help mitigate, prevent, prepare for, respond to, and recover from a crisis. The webcast may be viewed at www.ConnectLive.com/events/edschoolsafety.

Practical Information on Crisis Planning: A Guide for Communities and Schools

This guide, produced by the U.S. Department of Education's Office of Safe and Drug-Free Schools, provides schools and their communities with a general introduction to crisis management as it applies to schools and offers basic guidelines for developing school emergency management plans. The guide outlines the four phases of crisis planning (prevention-mitigation, preparedness, response, and recovery); provides checklists for the critical issues encountered in each of the four phases; and provides information on specific elements of crisis management, including leadership, communication, and the Incident Command System. http://www.ed.gov/admins/lead/safety/emergencyplan/crisisplanning.pdf

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For information about the Readiness and Emergency Management for Schools grant (formerly the Emergency Response and Crisis Management grant) program, contact Tara Hill (tara.hill@ed.gov), Michelle Sinkgraven (michelle.sinkgraven@ed.gov), or Sara Strizzi (sara.strizzi@ed.gov). Suggestions for newsletter topics should be sent to the ERCM TA Center Suggestion Box at http://ercm.ed.gov/

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