



What You Need to Know about Campus Emergency Drills

Compliance, Legal, Liability, and Operational Issues

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Most campus administrators regard evacuation drills as a straightforward obligation on the school calendar. Activate the alarm; students file out bored; students file back in really bored; end of drill. A no-brainer, right?

Wrong!

Evacuation drills are a key element of your campus emergency response plan. Most campuses do not train or practice their plans with students, staff, faculty, and employees. Often, drills are the *only* operational exercise of your emergency response. This puts an enormous emphasis on the criticality of drills. Why? Because people respond the way they were trained, and untrained people panic or freeze.

What is a Drill?

Webster's defines a drill as: 1 a: to fix something in the mind or habit pattern of by repetitive instruction <drill pupils in spelling>

The objective of drills is to take a difficult or unfamiliar process and make it a habit by dint of repetition.

What Drills Aren't

Some want to believe that drills — even false alarms — are training. Drills are *not* training. No military, no emergency services, no state fire code, and no federal regulation or standard regarding emergencies recognizes a drill as training.

The proper sequencing of emergency preparedness is (a) create the plan; (b) train the plan; and then (c) drill the plan.

To train is to teach; to drill is to test.

Legal Definition of a Drill

Almost all state fire codes define a drill using The National Fire Protection Association's Standard 101 (*NFPA 101*[®]). The NFPA 101 defines the *Life Safety Code*[®] for all facilities including campuses. *NFPA 101* states that your drills must include the following:

1. Require that all persons participate
2. Emphasize orderly evacuation rather than speed
3. Be held at expected and unexpected times
4. Simulate varying and unusual conditions that occur in actual emergencies
5. Be held with sufficient frequency to familiarize occupants with the drill procedure, and to have the conduct of the drill a matter of established routine. Almost all state fire codes require one drill a month when school is in session

6. Relocate to an assigned Assembly Area where occupants remain until recalled
7. Complete a written record of each drill.

Implicit in this definition is that you must have a headcount procedure that formally accounts for all personnel.

Now, let's add in federal law to these state requirements.

Every campus in the U.S. is under the jurisdiction of the Occupational Safety and Health Administration (OSHA). OSHA requires that *every employer* — your school — account for *all employees* during an emergency. Your headcount must include all employees, not just students.

So, the convergence of state and federal law requires that you must include in your drills *every person on campus*. Drills must not be focused just on students.

Implications for Structuring Drills

Let's break down what state and federal law requires of your school:

1. **Require that all persons must participate.** Almost all campus emergency drills are student-focused exclusively. But the law requires that *all* persons on campus must participate. Employees include faculty, staff, volunteers, and contractors (coaches; tutors; cafeteria, facilities, and maintenance workers; security guards; etc.). You must also account for visitors, including parents. In addition, you must include your summer, weekend, day care and after-school program participants.
2. **Emphasize orderly evacuation rather than speed.** The goal is not to supervise with a stopwatch. Yes, time *is* important. But a safe and orderly evacuation without panic or injury is the priority.
3. **Be held at expected and unexpected times.** Almost all campus drills are conducted during classes — the “expected” times mentioned in the Code. What about during class changes? Sporting events after classes? When the school is at assembly? During recess? We convince ourselves that everyone's convenience is more important than drills for *Life Safety*. However, if drills are the only operational familiarity with your campus emergency plan, then you should have drills at “unexpected” times mandated by the Code.

Expected times can also mean drills that are announced. If all of your drills are known beforehand, then you really haven't done the job. An actual emergency will not send a memo before it hits your campus. Your drills should not be telegraphed either. This includes the “unannounced” drill that everyone knows about well in advance.

4. **Simulate varying and unusual conditions that occur in actual emergencies.** Drills on nearly all campuses are almost always called fire drills. One lockdown drill per year is also common. Drilling for fire response and lockdown is important. However, the Code mandates drills for varying and unusual conditions. What about a missing student? A chemical spill on campus? A chemical spill off campus but nearby? Shelter in Place when the Fire Chief *orders* your campus sealed, with no students or personnel permitted to leave for an hour? Or a day?

The Code also recommends that some drills force occupants to evacuate via their secondary exits by blocking their primary exits.

5. **Be held with sufficient frequency to familiarize occupants with the drill procedure and to have the conduct of the drill a matter of established routine.** Does one lockdown drill per year add up to having “the conduct of the drill a matter of established routine?” If you have drilled only for fire and lockdown, what about all of the other foreseeable circumstances regarding emergencies on campus?

6. **Relocate to an assigned Assembly Area where occupants remain until recalled, and where a headcount of all personnel can be conducted.** Most campuses do not conduct a headcount for all employees, contractors, volunteers, visitors, etc., even though this is required by law. Most campuses have no mechanism for keeping track of personnel, including employees and students. Also, Shelter in Place may mean that the Assembly Area or Areas are indoors at several venues. Have you drilled this?
7. **Complete a written record of each drill.** This should be simple. But many campuses routinely shun "a written record of each drill," even though it's required by law. Written records are an invaluable asset when you're named in a post-emergency lawsuit after someone on your campus has been injured — or worse.

A Jury is Your Performance Standard

While your fire marshal and OSHA can fine you, the real performance standard is a jury. A jury can put your school out of business.

Juries fully expect that your school will comply with the law — and more — because you are responsible for minors up to age 18; and still responsible for students 18+, in addition to all employees, volunteers, contractors, and visitors. Never underestimate the wrath of jurors regarding your campus's total responsibility for a competent and compliant drill protocol.

You Need A Drill Protocol

Your campus needs a written drill protocol that is an integral part of your emergency response plan. Here are guidelines for drafting protocol:

1. Identify who is exercising command and control during emergencies and drills.
2. Decide how to communicate during a drill for evacuation, assembly areas, headcount, further maneuver, and return to facility.
3. Establish Assembly Areas inside and outside of your facility to prepare for all hazards. Ensure that outside Assembly Areas are far enough away from the facility (600 feet is the gold standard) to prevent flames, shattering glass, etc., from injuring personnel. Ensure Assembly Areas are not in parking lots where there will be emergency service vehicles and departing (and panicked) drivers.
4. Schedule the frequency of drills — at least one per month.
5. Detail how all employees, volunteers, contractors, as well as students are made aware of your plan, are trained, and know that they will be drilled.
6. Identify the times during the day when drills will occur. Residence halls must hold night drills. If you're 24/7, you must drill all shifts of employees.
7. Identify a list of foreseeable emergencies to drill so occupants know how to respond to numerous situations. Include emergencies that may take place next door or upwind from your campus.
8. Conduct some drills during inclement weather. Emergencies do not always strike on sunny, warm days.
9. Prepare to move people from Assembly Areas in case of a new, additional danger or severe weather.
10. Establish a formal structure to conduct a headcount of all employees, contractors, volunteers, students, and visitors.

Summary

Everyone wants to relegate evacuation drills to the boring routine of the campus calendar. However, state and federal laws have robust requirements for which you are accountable. Moreover, drills are often the only operational exercise your plan ever gets.

Your campus needs a comprehensive drill plan to address the complex compliance issues. Ignoring state and federal law can place you in front of an unsympathetic jury — a jury that can put your school out of business.

The core danger: You will become just as complacent about drills as your students are bored by drills. Remember that people respond the way they are trained, and untrained people panic or freeze.

Planning, training, and drills are your best insurance for protecting everyone on your campus and the very survival of your school.

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