

Cooper, Kathy

2928

From: IRRRC
Subject: FW: CHAPTER 10 REGULATIONS#6-325 (IRRC #2928) entitled "Safe Schools."

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As per our discussion

Two areas of Proposed Chapter 10 Regulations which should be further evaluated.

Requirement

Provide Student Roster and Staff Roster/Current Yearbook to Law Enforcement on or before September 30 of each school year.

Objection

A student and staff roster provided prior to September 30 will have minimal value, as information regarding student and staff is constantly changing. Information provided on or before September 30 will be inaccurate within 30 days because of transient nature of school students and staff. In addition current year Yearbooks are not available until mid year, and again provide minimal value to law enforcement for identification. Most public school systems maintain photo ID's which are tracked and maintained in a computerized enrollment systems.

Recommendation

Current student and staff rosters will be provided upon request or activation of an Emergency Command Center
Photo Id's of students will be provided upon request

Requirement

Provide Student Roster and Staff Roster/Current Yearbook to Fire Departments on or before September 30 of each school year.

Objection

Many fire departments in Pennsylvania consist of solely volunteer members. Operational Security concerns regarding the confidential nature of student information would be of critical importance and could be easily compromised..

Recommendation

In the event of an emergency, student and staff rosters will be made available to Fire Department personnel through the Incident Command System as prescribed and in accordance with NIMS.

Respectfully Submitted

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