

Cooper, Kathy

2928

From: Schalles, Scott R.
Sent: Tuesday, March 06, 2012 11:12 AM
To: Michelle L. Elliott; Wilmarth, Fiona E.; David Sumner; Johnson, Leslie A. Lewis
Cc: IRRC
Subject: FW: Comments on Regulation #6-325

From: Randy K. Rockey [mailto:rkrockey@co.centre.pa.us]
Sent: Tuesday, March 06, 2012 10:47 AM
To: Schalles, Scott R.
Subject: FW: Comments on Regulation #6-325



From: Randy K. Rockey
Sent: Tuesday, March 06, 2012 10:42 AM
To: 'sschalles@pa.gov'; 'sschalles@irrc.pa.gov'; 'kamolchano@pa.gov'
Cc: Timothy T. Boyde; 'Weeks, Pamela'; Jody L. Lair (jllair@co.centre.pa.us)
Subject: Comments on Regulation #6-325

The following comments are submitted regarding the Regulation #6-325 (Proposed Chapter 10 regulation):

Section 10.8 item (e) states "a school district shall provide to each local police department and each local fire department having jurisdiction....a copy of the district's comprehensive disaster and response emergency preparedness plan".

This is a severe operational security concern. On one hand we are trying to protect students and the school populace, yet on the other hand we are going to require schools to hand out preparedness and response plans without controlling the access to those plans? Local police departments and fire departments (in many areas) do not necessarily have extra space or secure locations/space to store sensitive plans. While police departments may require background checks, security checks, child abuse checks, etc., on their employees, not all other career or volunteer agencies require the same. Those other agencies could, in fact, potentially have members who should not have access to the plans or sensitive pre-planned information (i.e., members that have PFA's, or are Megan's Law offenders, or have other criminal records). Depending on how a plan is written, the "basic" part of a plan may not really provide any information valuable to responders in an actual incident. The annexes and appendices, however, contain detailed information that responders would need during an actual incident. Making unnecessary distribution of sensitive plans only increases the chances for access by unauthorized personnel (or losing the plan itself). Providing one copy of the plan to the County EOC (secure location/access) should be sufficient for any preparedness need. Keep in mind that it is the involvement of the command responders (fire, police, EMS, EMA) with the school administrators in the planning process and plan development which is the important part – just providing a hardcopy of a plan to sit on a shelf does NOT do anything for preparedness or response. If/when an incident does occur, school officials are taught (and train) to be part of the Unified Command at the incident scene along with fire, police, EMS, EMA, and to bring the most current information in their "Go-Kit" to the Command Post.

Section 10.8(g) requires the schools to provide numerous items to the local police and fire departments annually, no later than September 30. Several of these items represent unnecessary costs and an additional burden on the schools, and potential security risks if distributed pre-maturely:

- (1) "Blueprints or floor plans of school buildings." Rebuttal: The most current plans need to be brought to the Incident Command Post (ICP) when an event occurs.

- (2) "Aerial photo, map or layout of the school campus, adjacent properties and surrounding streets or roads." Rebuttal: The most current plans need to be brought to the ICP when an event occurs.
- (3) "Locations of predetermined or prospective command posts." Rebuttal: The school may plan for an internal ICP, for an internal incident (which should not be released to just anybody); but the Unified Command, no the school, will determine where the ICP will be located depending on the situation.
- (4) "Current teacher/employee roster." Rebuttal: These lists change daily. Schools are taught to bring the current day list/roster to the ICP during an incident.
- (5) "Current student roster." Rebuttal: These lists change daily based on attendance, transfers, etc. These list should be tightly controlled. Schools are taught to bring the current day list/roster to the ICP during an incident.
- (6) "Current school yearbook." Rebuttal: Any yearbook available by Sep 30 is already one year old and outdated. This is an unnecessary requirement and cost burden on the school.

Again, the sharing of information is crucial during the pre-planning process (meetings, trainings, and exercises) between key command level responders and school officials. We have all adopted (or should have adopted) the National Incident Management System (NIMS) and the Incident Command System (ICS) in Pennsylvania as the standard manner to respond. As such, each stakeholder would bring the most current information to the incident and work together in effective decision-making and ensuring the ultimate protection of the students and school population.

Recommend this proposed regulation be DISAPPROVED in its entirety.

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