

From: Schalles, Scott R.
Sent: Wednesday, March 07, 2012 8:25 AM
To: Michelle L. Elliott; Wilmarth, Fiona E.
Cc: IRRRC
Subject: FW: Regulation #6-325 (Proposed Chapter 10 regulation)



From: MaryAnn Volders [<mailto:MAVolders@cpi.edu>]
Sent: Wednesday, March 07, 2012 8:07 AM
To: kamolchano@pa.gov; Schalles, Scott R.
Subject: Regulation #6-325 (Proposed Chapter 10 regulation)

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 security concern. The Central PA Institute of Science and Technology constantly tries to protect students and the school populace, yet we are being asked to hand out preparedness and response plans without controlling who has access to those plans. Local police departments and fire departments do not necessarily have extra space or secure locations to store these extremely sensitive documents. While police departments may require background checks, security checks, and child abuse checks 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. Providing one copy of the plan to the County EOC 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, not 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 lists 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 between key command level responders and school officials. The Central PA Institute of Science and Technology has adopted the National Incident Management System (NIMS) 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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