

From: HURLEY, MIKE [hurleym@carliseschools.org]
Sent: Thursday, April 19, 2012 11:37 AM
To: 'melliott@IRRC.STATE.PA.US'
Cc: 'Kozup, Michael'
Subject: FW: CHAPTER 10 REGULATIONS#6-325 (IRRC #2928) entitled "Safe Schools."

Ms. Elliot

Please see below:

Comments and Objections to Proposed Chapter 10 Legislation

Issues which were previously identified have not been properly addressed by the State Board of Education, and will result in confusion and needless delays in school districts , and law enforcements ability to respond appropriately in emergency incidents.

Item # 1

10-8 Emergency and nonemergency response

Requirement

- Provide current Teacher/Employee Roster (4)**
- and**
- Provide current Student Roster (5)**
- And**
- Provide most current Yearbook (6)**
- No Later than September 30 of each school year.**



Objection

A student and staff roster provided no later than 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 because of transient nature of school students Providing this information, on or before a set date will primarily result in providing inaccurate information which at the time of an emergency, if utilized by first responders will result in confusion and massive discrepancies.

Recommendation

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

Item 10-8 Letter G Incident Command Posts

OBJECTION– Incident Command Posts may not exist at a fixed physical location as identified in (3),where secured physical storage of such data is possible. While a specific address may be referenced in the alternate site locations. A physical Incident Command Post , may not exist until activated in an Emergency. It would appear that there is a lack of understanding of what and Incident Command Post is.

This again may create confusion as multiple sites may be predetermined, however in actually only one site may be utilized. The wording as described herein would require school district to inaccurate information to multiple sites.

Example Incident Command Post - Established at Expo Center (150 K Street)

Issue - Expo Center is a functional site , with a large parking area- however privately owned It provides central access to technology and communication functions.

As it is privately owned, there are no provisions for secured storage of information by the property owner. Nor would that requirement be considered relative to HIPPA and FERPA

regulations.

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.

Overall Objection to Chapter 10 Regulation Implementation

It is apparent after considerable reviews and discussions with School Officials(Safety Administrators) and Law Enforcement Agencies that limited input was obtained by the State Board of Education, prior to the consideration of this regulation. While the intentions of the regulation is admirable. The actual implementation by School Security Officials and Law Enforcement Agencies, creates confusion, and may ultimately result in delays and inappropriate responses from agencies responding to emergency events. The outcome resulting in a negative impact on the life safety of school students and staff, across the Commonwealth of Pennsylvania.

Respectfully Submitted

Michael L Hurley
Director of Safety and Security
CARLISLE AREA SCHOOL DISTRICT

School Services Officer
Cumberland County Department of Public Safety