

PERFORMANCE AUDIT



Office of the
Washington
State Auditor
Pat McCarthy

Opportunities to Improve School Safety Planning

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State Auditor’s Office contacts

State Auditor Pat McCarthy

360-902-0360, Pat.McCarthy@sao.wa.gov

Scott Frank – Director of Performance and IT Audit

360-902-0376, Scott.Frank@sao.wa.gov

Christopher Cortines, CPA – Assistant Director for Performance Audit

206-355-1546, Christopher.Cortines@sao.wa.gov

Shauna Good – Principal Performance Auditor

360-725-5615, Shauna.Good@sao.wa.gov

Emily Cimber – Lead Performance Auditor

360-725-5430, Emily.Cimber@sao.wa.gov

Rhianna Hruska – Performance Auditor

360-725-5361, Rhianna.Hruska@sao.wa.gov

Kathleen Cooper – Director of Communications

360-902-0470, Kathleen.Cooper@sao.wa.gov

To request public records

Public Records Officer

360-725-5617, PublicRecords@sao.wa.gov

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Executive Summary

Background (page 6)

Effective school safety planning is the foundation of a school's ability to respond to an emergency. Public awareness of school safety issues and emergency preparedness has increased due to recent events around the country and in our state. Two Washington school districts have experienced an active shooter incident in the past four years, and the even greater likelihood for multiple types of natural disasters inherent to Washington makes effective school safety planning of critical importance.

Every school district is required by law to have a comprehensive safety plan. These plans prepare schools and districts to address risks that students or staff might face, including building threats, active shooters and natural disasters. Federal guidance suggests that preventative elements contributing to a positive school climate, such as prevention of suicide and bullying, also be taken into consideration when forming a safety plan. Schools that have a comprehensive school safety plan can inform staff, students and parents what actions to take in an emergency, while working closely with first responders on proper training and drills. According to state law, a comprehensive safety plan should address emergency mitigation, preparedness, response and recovery. The law also specifies required safety planning activities as part of the plan, such as utilizing certain training guidance and setting guidelines for coordinating with first responders.

Many schools' comprehensive safety plans are incomplete. District responses to surveys conducted by the Office of Superintendent of Public Instruction (OSPI) in 2014 and the federal Department of Education in 2015 revealed areas where K-12 school safety planning practices fell short of state requirements and recommended practices. This audit was designed to identify ways school officials could efficiently address some of these known gaps in planning.

What challenges contribute to gaps in school safety preparedness? (page 10)

Although state law requires districts to have a comprehensive safety plan, there are no mechanisms in place to ensure they are complete. Responsibility for ensuring complete safety plans is left entirely up to local school boards, with no additional oversight at the state or local level. While OSPI has general oversight authority over the state's school districts, it does not enforce adherence to safety planning requirements to ensure a comprehensive plan. Two of the state's key resources for

school safety planning also appear to be underfunded. OSPI's School Safety Center, which provides tools and guidance to school districts, has not received a budget increase in 15 years. Rapid Responder, the state's school mapping system, has not had stable funding to pay for ongoing program maintenance. Competing priorities for attention, time and money at school and district levels can place safety preparedness low on the list of district priorities.

What opportunities exist to address known gaps in K-12 school safety planning? (page 18)

Previous surveys of school districts identified four areas of weakness in districts' safety plans. We followed up with school districts and identified ways some had successfully mitigated these gaps. Of the four areas of weakness identified in surveys, coordination is the cornerstone of improving school safety preparedness. Several districts coordinated at a regional level to strengthen planning, create efficiencies and increase accountability. Educational Service Districts (ESDs) can play a wide-ranging role in facilitating school safety coordination. An oversight mechanism at the regional level could produce more consistent safety preparations statewide, increasing coordination, accountability and cost-savings.

State Auditor's Conclusions (page 30)

School safety planning does not always get the attention or resources it requires, in part because it has to compete with other, more immediate demands placed on schools. However, school and community leaders must not lose sight of the value in basic planning and collaboration. In the event of a natural disaster or other emergency, that work could save lives.

The purpose of this audit was to identify concrete, cost-effective processes and programs already happening in Washington, so schools and districts can learn from one another and narrow some of the gaps in their plans. We found the biggest opportunities in the area of collaboration with other key players in safety preparedness and response, including police and firefighters, other government emergency management experts, and neighboring school districts.

School district officials and their elected boards should explore this audit and take note of ideas that might apply to their area, then work toward greater collaboration and coordination.

Recommendations (page 31)

We recommended that OSPI determine the staffing and funding required for the implementation of a regional school safety program, and make a request for the necessary funding to the Legislature. Funding permitted, we recommend OSPI organize and establish a statewide regional school safety program to be delivered through the educational service districts.

We further recommend that the Washington Association of Sheriffs and Police Chiefs (WASPC) determine the staffing and funding required for a comprehensive review of the statewide school mapping system, and make a request for the necessary funding to the Legislature. Funding permitted, we recommend WASPC convene a work group to review how the statewide school mapping system could be better utilized.

Finally, we suggest that school districts consider implementing the practices highlighted in this report, by working together with the community to foster greater collaboration and coordination at a local and regional level.

Next steps

Our performance audits of state programs and services are reviewed by the Joint Legislative Audit and Review Committee (JLARC) and/or by other legislative committees whose members wish to consider findings and recommendations on specific topics. Representatives of the Office of the State Auditor will review this audit with JLARC's Initiative 900 Subcommittee in Olympia. The public will have the opportunity to comment at this hearing. Please check the JLARC website for the exact date, time, and location (www.leg.wa.gov/JLARC). The Office conducts periodic follow-up evaluations to assess the status of recommendations and may conduct follow-up audits at its discretion. See **Appendix A**, which addresses the I-900 areas covered in the audit. **Appendix B** contains information about our methodology.

Background

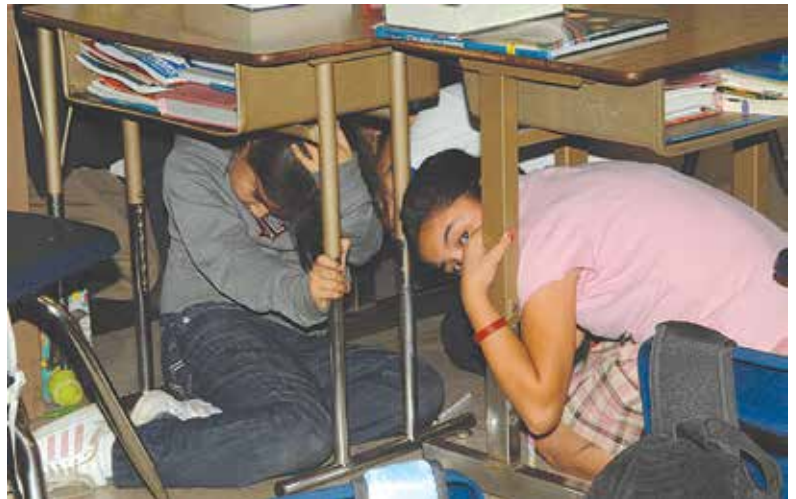
State law requires every school district to have a comprehensive safety plan to protect students and staff from a variety of risks

Effective school safety planning is the foundation of a school's ability to respond to an emergency. Public awareness of school safety issues and emergency preparedness has increased due to recent events around the country and in our state. Two Washington school districts have experienced an active shooter incident in the past four years, and the even greater likelihood for multiple types of natural disasters inherent to Washington makes effective school safety planning of critical importance.

Every school district is required by law to have a comprehensive safety plan. These plans prepare schools and districts to address risks that students or staff might face, including building threats, active shooters and natural disasters.

Federal guidance suggests that preventive elements contributing to a positive school climate, such as prevention of suicide and bullying, also be taken into consideration when formulating a safety plan. Schools that have a comprehensive school safety plan can inform staff, students and parents what actions to take in an emergency, while working closely with first responders on proper training and drills. According to state law, a comprehensive safety plan should address emergency mitigation, preparedness, response and recovery. The law also specifies required safety planning activities as part of the plan, such as using certain training guidance and setting guidelines for coordinating with first responders.

Schools and school districts must consider guidance provided by the Office of Superintendent of Public Instruction (OSPI), including the comprehensive school safety checklist and the model comprehensive safe school plans that include prevention, intervention, all hazard/crisis response, and post-crisis recovery, when developing their own individual comprehensive safe school plans.



Students participating in an earthquake drill.

Two surveys conducted in the past several years revealed gaps in school districts' safety plans

In 2014, OSPI conducted a statewide school district survey in response to legislation, which required a progress report from school districts regarding the establishment of an emergency response system. OSPI took this opportunity to ask further school safety preparedness questions correlating to state and federal law or guidance. The federal Department of Education conducted a similar survey in 2015, with questions based on best practices regarding the development of comprehensive safety plans.

While most school districts do have plans in place, the comprehensiveness of those plans varies. Responses to these surveys revealed areas where district practices fell short of state and federal law, guidance and best practice. Many of these gaps were related to **plan development, oversight, training and coordination**. We analyzed survey responses regarding various aspects of Washington school districts' school safety planning process, and identified a "gap" as a practice in these areas that was reportedly used by only 70 percent of districts or fewer. For the full methodology on how we determined these gaps, see Appendix B (page 35).

Organizations other than school districts play important roles in comprehensive school safety planning

Preparing for emergencies through effective school safety planning is not an isolated endeavor undertaken by one agency. Many key players with varying roles and responsibilities contribute to a successful comprehensive safety plan. Although school districts are responsible for creating their safety plan, safety preparedness and emergency response involves coordinating at the local level with first responders and the city, at the regional level with the county or designated Educational Service District (ESD), and at the state level with the Washington Association of Sheriffs and Police Chiefs or the School Safety Center within OSPI. Some of these organizations and agencies must also coordinate with each other to determine the best guidance or resources to collectively offer to school districts. One forum for such communication is the School Safety Advisory Committee, which brings together a variety of stakeholders from the K-12 system and various organizations with school safety roles. See **Exhibit 1** on the following page for detailed roles and key activities in school safety planning.

Exhibit 1 – School safety planning roles and key activities

Entity	Role in school safety	Key activities
Office of Superintendent of Public Instruction (OSPI)	Oversees the state's 295 school districts	Provides tools and guidance on school safety issues through the School Safety Center
School Safety Center	Provides resources	Materials on Center's website help districts and schools develop high-quality emergency operations and safety plans
School Safety Advisory Committee	Advisory board	Advises the School Safety Center and the Superintendent of Public Instruction on issues relevant to school safety
Washington Association of Sheriffs and Police Chiefs (WASPC)	Statewide association serving law enforcement	Oversees the state mapping system, Rapid Responder. Also provides Rapid Responder training to all school districts and first responders in the state.
Educational Service Districts (ESDs)	State-mandated regional service and resource organizations	Nine ESDs provide regional services and serve as a localized resource for the school districts within their jurisdiction. Some ESDs have established school safety cooperatives, for which districts pay yearly membership dues to receive more packaged school safety services.
Counties and cities	Provides emergency management resources to school districts	Required by state law to establish an emergency management organization, and to develop and submit a comprehensive emergency plan that includes school facilities.
First responders	Respond to incidents occurring in schools within their jurisdiction	First responders often participate in district safety advisory committees to ensure coordination between school districts and emergency response entities.
School districts and schools	Ensure the safety and security of students and staff within their districts and schools	Adopt and implement "safe school" plans consistent with the state's school mapping information system, Rapid Responder. State law encourages schools to adapt and customize district planning templates, and inform the district of training, oversight and funding needs.

This audit examines opportunities to address known gaps in K-12 school safety planning

Effective safety planning for Washington's schools is unquestionably important. However, recent surveys of schools revealed gaps in planning practices that contributed to incomplete safety plans. The Office of the Washington State Auditor conducted this audit to help school districts strengthen their own safety planning processes by learning from one another. Auditors interviewed school districts across the state to answer the following questions:

1. What challenges contribute to gaps in school safety preparedness?
2. What opportunities exist to address known gaps in K-12 school safety planning?

As a study seeking practices to improve school safety planning activities, the audit did not test the completeness or efficacy of any school or district safety plan, to see if one or another included the right elements or succeeded in keeping students safer. The elements included in any given school's safety preparedness must allow for variables – tsunami preparation, for example, is irrelevant in landlocked Yakima – while incorporating tactics to deal with far more common events like fire. However, certain tasks and activities – from plan development through to drilling and training – are common to all districts as they prepare to meet threats to student safety.

Audit Results

What challenges contribute to gaps in school safety preparedness?

Answer in brief

Although state law requires districts to have a comprehensive safety plan, there are no mechanisms in place to ensure plans are complete. Responsibility for ensuring complete safety plans is left entirely up to local school boards, with no additional oversight at the state or local level. While the Office of Superintendent of Public Instruction (OSPI) has general oversight authority over the state's school districts, it does not enforce adherence to safety planning requirements to ensure a comprehensive plan. Two of the state's key resources for school safety planning also appear to be underfunded. OSPI's School Safety Center, which provides tools and guidance to school districts, has not received a budget increase in 15 years. Rapid Responder, the state's school mapping system, has not had stable funding to pay for ongoing program maintenance. Competing priorities for attention, time and money at school and district levels can place safety preparedness low on the list of district priorities.

Although state law requires districts to have a comprehensive safety plan, there are no mechanisms in place to ensure plans are complete

State law requires districts to have comprehensive safety plans, but surveys reveal planning gaps

Washington state law requires each school district to develop a comprehensive safety plan to ensure the safety of staff and students. However, surveys conducted by OSPI and the federal Department of Education revealed that comprehensiveness of those plans varies by district. While some level of variation can be expected based on the needs of each district, certain key elements (discussed on page 6) are required. Other elements, according to OSPI guidance, are expected to be considered for inclusion. Variation in district responses to survey questions indicates that school districts might not be held accountable for the comprehensiveness of their plans.

Responsibility for ensuring complete safety plans is left entirely up to local school boards, with no additional oversight mechanisms at the state or local level

Although RCW 28A.320.125 mandates that every district and school have a comprehensive safety plan, it does not incorporate a requirement for documentation and accountability to ensure they do. The law directs districts to do the following, but only “to the extent funds are available:”

- Annually review and update their plans in collaboration with first responders
- Conduct an inventory of all hazardous materials
- Update information in the state’s school mapping system to reflect current staffing and revised plans
- Provide information to all staff on the use of emergency supplies and on notification and alert procedures
- Record and report on the above recommended activities to the Washington Association of Sheriffs and Police Chiefs (WASPC)

And while certain components of a safety plan are specified in statute, such as documenting that drills have taken place, no state or local agency is required or empowered to check that all required elements are present in each district’s safety plan or that districts are performing these required tasks. Stakeholders expressed frustration that neither statute nor policy mandates school safety plan accountability or assigns enforcement responsibility. Absent a clear direction for accountability at the state level, responsibility for ensuring a complete, comprehensive and updated safety plan currently lies with district leadership – including the district’s school board, which is responsible for setting districtwide policies and thus enforcing them. However, stakeholders such as OSPI and other School Safety Advisory Committee representatives reported that nobody is formally checking district plans, with the consequence that many school district plans may go unexamined by anyone except their authors.

While OSPI has general oversight authority over the state’s school districts, it does not enforce adherence to safety planning requirements to ensure a comprehensive plan

OSPI’s legislatively mandated duties include having “supervision over all matters pertaining to the public schools of the state,” including safety preparedness. However, there is no statutory language specifically directing OSPI to review district safety plans or requiring school districts to submit their plans to OSPI. Given its broad supervision authority and without specific direction in state law, OSPI must choose how to supervise districts’ safety preparedness and what oversight activities to conduct. OSPI staff confirmed they do not check district

safety plans. The Legislature has charged OSPI's School Safety Center with providing "assistance to schools to establish a comprehensive safe school plan," but does not require the Center to review plans once completed.

Two of the state's key resources for school safety planning appear to be underfunded

OSPI's School Safety Center, which provides tools and guidance to school districts, has not received a budget increase in 15 years

In 2001, the Legislature allocated \$100,000 to establish the School Safety Center within OSPI. The Center was created to serve as a central, statewide safety resource for school districts to assist in providing planning guidance and coordinating safety activities. Specifically, the legislation directed the School Safety Center to:

- Select models of cooperative efforts that have proven successful
- Review and approve manuals and curricula used for school safety models and training
- Disseminate successful models of school safety plans and cooperative efforts
- Provide assistance to schools to establish a comprehensive safe school plan
- Act as a resource center when an incident occurs in a school district within Washington or another state
- Coordinate activities related to school safety
- Develop and maintain a school safety information website
- Participate in the School Safety Center Advisory Committee

In 2003, the Legislature set the Center's annual budget at \$96,000, where it has remained for the last 15 years. This amount is insufficient to fully fund the Center's one full-time employee. OSPI reported that it has had to obtain funding from another source in order for the Center's employee to carry out the required duties.

Even if the budget allocation was sufficient to fund a full-time position, it is unlikely that a single full-time employee can deliver the expected role of the Center. The list of duties the Legislature directs the Center to perform, which are considered essential to adequately support the safety planning efforts of Washington's 295 school districts, appears to be more than one person could reasonably undertake.

Given the many activities and roles assigned to the Center, it appears to be significantly underfunded. The present budget therefore appears insufficient to fund any additional safety efforts at the Center, such as checking each district's safety plan.

Rapid Responder, the state's school mapping system, has not had stable funding to pay for ongoing program maintenance

Rapid Responder, managed by the Washington Association of Sheriffs and Police Chiefs (WASPC), has been considered essential to school safety preparedness. In 2003, the Legislature directed WASPC to create a statewide mapping information system for government buildings. The resulting Rapid Responder system, developed by a third-party vendor and managed by WASPC, is a centralized resource storing maps of many Washington public spaces. The mapping system provides information to first responders, including tactical pre-plans, satellite and geospatial imagery, interior and exterior photos, floor plans, staging areas, hazardous materials, utility shut-offs and evacuation routes. Every law enforcement and fire department in the state can access this information via Rapid Responder to better respond to emergencies at schools and other mapped facilities. The Legislature further charged WASPC with mapping every government building, including schools, and required that each school district adopt a "safe school" plan consistent with the school mapping information system no later than September 1, 2008. WASPC reported that every school was mapped in Rapid Responder by 2008.

Districts continue to build new schools and remodel old ones, with at least 37 school building or remodeling projects taking place in 2016 alone. However, funding for WASPC to sustain mapping efforts has been discontinued, and remaining funding for program maintenance is unstable. The Legislature cut funding for the agency's school mapping activities in 2016, putting the program's existence in jeopardy. While the Legislature has continued to provide some funding, WASPC reported the funding to be inconsistent and uncertain from year to year. The current funding is sufficient to pay for the vendor to maintain the software and for WASPC to fund one FTE employee who can provide limited training to schools so they can map their own facilities.

Although access to Rapid Responder is free, districts' use of the system is inconsistent — in part because regular use of the system is not mandatory and available training is limited. Some school districts did report using Rapid Responder regularly, taking advantage of its other capabilities, such as documenting drills, staffing changes and plan revisions. Several districts also use the Easy Alert feature, which acts as a mass notification and communication system between facility staff and emergency personnel.

“

Rapid Responder has not proven itself to be trustworthy in terms of funding. There is a need for Rapid Responder to be around in the future, otherwise it will not be worth the time and effort to provide extensive training,

School district official

”

“

First responders don't use Rapid Responder, so our district doesn't put much effort into it apart from logging drills as required

School district official

”

Competing priorities for attention, time and money at school and district levels can place safety preparedness low on the list

The priorities set by school district leadership may not place safety preparedness ahead of other needs and goals

District leadership – generally the superintendent and the school board – set the priorities and expectations for their schools. Although it is unlikely anyone thinks safety is not an important area of concern, districts have competing pressures they respond to with greater urgency. School and district leaders are more apt to attend to the things they are held personally accountable for or which they hear about regularly, such as test scores, teacher contracts or tax levies. Preparing for a hypothetical emergency may be overlooked if it is considered less urgent or of less concern to state, district or community leadership.

School districts and stakeholders reported that the experience and enthusiasm of school and district leadership for school safety preparedness directly affects how these officials prioritize it. This in turn affects how comprehensive each district's plan might be, or the ways in which they hold their own schools accountable. Stakeholders also said that obtaining and maintaining leadership buy-in is necessary for safety efforts but can be a challenge. Past experience with an incident or with regional safety coordination can make it more likely a superintendent will prioritize safety issues. For example, Spokane County Emergency Management observed that a district's interactions with its local emergency managers depends completely on who is in charge at the district. Some districts in the county were apparently not even aware that the county offers assistance with planning, exercises and training at no cost to the district.

Some districts and stakeholders reported that a district's prioritization of safety preparedness is made even more challenging when there are changes in leadership. For example, turnover in leadership can make it difficult to maintain a particular district's buy-in for certain safety efforts or sustain relationships within the community. One regional group of school safety staff reported they have not met this year because one of the group's founders left for a new position, and that person's replacement does not have the same drive. Other districts reported that the attitudes of individual principals can also affect safety planning for better or worse.

Limited staff capacity can hinder basic safety planning practices at the district level

According to some district superintendents, staff at the district level are balancing safety efforts with their other daily job responsibilities. As a result, some districts struggle to undertake basic safety planning practices. Superintendents said allocating time to attend trainings or conduct drills is difficult, with one saying the district lacked sufficient time to devote attention to safety issues. A few superintendents explained that staff contracts do not allocate extra days or compensation for them to perform safety duties, resulting in some safety planning practices becoming difficult to perform or falling by the wayside. A few explained that staff turnover can make it difficult to continually provide training for new staff or to perform the necessary tasks. Other superintendents said their safety preparedness depends upon the knowledge level of their staff, who are trained primarily as educators and not safety specialists. A few superintendents reported not being able to afford a full time safety coordinator for their districts, noting that – especially for smaller districts – they have to take on multiple roles.



Small districts have superintendents that wear multiple hats, safety can be out of sight out of mind.

ESD Assistant
Superintendent



The state provides funding to school districts for school safety, but because this funding is not restricted, districts may choose to use it for other purposes

At the state level, Washington can point to funding formulas that consider costs of school safety preparedness. The formula by which OSPI determines district funding allocates funds for .079, .092 and .141 full time equivalent staff for “providing student and staff safety” at each elementary, middle, and high school, respectively. Funding allocations are adjusted or may deviate from the above school prototypes based on the annual average number of students at each grade level for each district. Funding allocated for materials, supplies and operating costs, which cover district needs such as textbooks or professional development days for staff, also considers safety and security needs. The most recent allocation formula allocated \$121.94 for security and central office administration per annual average full-time equivalent student in grades K-12 for each district.

While this funding allocation is intended to be spent on school safety, it is not restricted: school districts may spend this money however they choose. The state does not require districts to spend the funding allocation on school safety; it is simply a consideration in the formula when determining overall funding amounts for each district. According to RCW 28A.150.260, “the distribution formula under this subsection shall be for allocation purposes only [...] nothing in this section requires school districts to use basic education instructional funds to implement a particular instructional approach or service.” OSPI confirmed that while it may appear the state generously funds school safety, there is no mandate for how this money is spent.

As some school districts struggle to adequately plan with the existing funding and available staff time, they might need to spend allocated school safety funding on other things. One district official noted that schools are usually ranked based on their academic success and not safety preparedness, with minimal funding being put toward safety needs. Another district reported that money intended for school safety is not well controlled, and the money that should be spent on emergency supplies is spent on other expenses, like textbooks.

What opportunities exist to address known gaps in K-12 school safety planning?

Answer in brief

Previous surveys of school districts identified four areas of weakness in districts' safety plans. We followed up with school districts and identified ways some had successfully mitigated these gaps. Of the four areas of weakness identified in surveys, coordination is the cornerstone of improving school safety preparedness. Several districts coordinated at a regional level to strengthen planning, create efficiencies and increase accountability. Educational Service Districts (ESDs) can play a wide-ranging role in facilitating school safety coordination. An oversight mechanism at the regional level could produce more consistent safety preparations statewide, increasing coordination, accountability and cost-savings.

For the full list of school districts that provided information and how those districts were selected, see Appendix B (page 35).

Previous surveys of school districts identified four areas of weakness in districts' safety plans

State law requires school districts to have comprehensive school safety plans. OSPI surveyed school districts in 2014 to gauge their establishment of an emergency response system and their compliance with state and federal law or guidance. The federal Department of Education (Education) conducted a similar survey in 2015, focusing on the development of comprehensive safety plans. These surveys determined gaps related to plan development, oversight, training and coordination. The background section of this report provides more detail about these previous surveys of school districts (page 7).

We followed up with school districts and identified ways some had mitigated these gaps

We spoke with school districts about their safety practices related to plan development, oversight, training and coordination (listed in **Exhibit 2** on the following page). The districts reported the steps they take to keep their students, teachers and staff safe. We did not determine them to be best practices, and none are recommended except as examples that have worked for other districts in the state. However, these practices have the potential to be applied in other districts to strengthen their school safety planning efforts. The practices will not prevent every risk the district might face, but can mitigate some of those risks. All the examples in

this section were reported to auditors by one or more school districts, and districts should consider applying them as they apply to their own situations. These and many more practices are given credit in **Appendix C** (page 38).

Exhibit 2 – School safety planning practices

School safety planning gap area	Why the gap area is important	How districts have addressed the gap areas
Plan development Taking steps to create and update school safety plans	Allows school administrators to efficiently create a school safety plan, while also ensuring the vital emergency planning elements are included in the plan.	<ul style="list-style-type: none"> • District-wide template customized for each school • Threat assessment template • Regional sharing of plans to create consistency
Oversight Taking steps to ensure plans are complete and accurate	Provides more accountability in the absence of state-level oversight.	<ul style="list-style-type: none"> • Scheduled and coordinated process for safety plan review • Scheduling and tracking mechanisms for drills • Reports on school safety to district leadership
Training Taking steps to ensure all necessary personnel have received correct and sufficient training	Allows districts to successfully implement safety plans in the event of an actual emergency.	<ul style="list-style-type: none"> • Regional “train the trainer” model • Creatively scheduling training
Coordination Taking steps to ensure the right people participate in planning, oversight and training activities	Helps avoid redundancy or districts “re-inventing the wheel,” holds districts accountable, and allows involved parties to share and conserve resources.	<ul style="list-style-type: none"> • Coordinating with other school districts through regional meetings • Coordinating with stakeholders and first responders • Coordinating with outside entities for grant opportunities

Within all four gaps areas, practices involving a coordinated effort were most prominent and important to improving district safety preparedness. These practices which require coordination will be the focus of the remaining audit results.

Of the four areas of weakness identified in surveys, coordination is the cornerstone of improving school safety preparedness

The most common way districts were able to mitigate gaps was by coordinating with others. School district survey results revealed that coordination was a significant school safety planning gap, especially in the area of communication with first responders. From the OSPI survey, 45 percent of surveyed districts reported they did not have regularly scheduled meetings with law enforcement, and 36 percent indicated they did not have a mass notification plan for first responders. Most of the practices in the other identified gap areas of plan development, oversight and training also require a coordinated effort with stakeholders. Thirty-six percent of OSPI survey respondents reported they did not regularly coordinate district and law enforcement review of their safety plans, while 30 percent of Education survey respondents reported their plans did not include a process for review and update at all. Education's survey responses also showed that school safety plan development processes do not always include parents/guardians or community partners. Only about 60 percent of OSPI survey respondents said that most or all of their administrators were receiving trainings on emergency management systems or school safety related software, like Rapid Responder, or were trained in collaboration with law enforcement. Because these practices rely on communication between schools and communities, coordination underpins all other efforts to close safety preparedness gaps.

Several districts coordinated at a local and regional level to strengthen planning, create efficiencies and increase accountability

Ensuring a mechanism exists for the necessary coordination and communication between school districts, first responders and the community is an essential part of school safety preparedness. The school districts we spoke with reported that coordination and communication within the community and across districts through collaborative meetings, drills and training helps avoid redundancy, holds districts accountable and allows involved parties to share and conserve resources. The following strategies offer ways to put coordination mechanisms in place.



Agency buy-in comes from close community relationships. [Our district] attends an inter-agency emergency planning meeting that occurs every two months, which provides accountability to all of the agencies through delegating tasks and checking in.

School district



Regional meetings promote coordination between districts

Countywide or regional safety groups, created by ESD or district school safety staff, offer multiple school districts a venue where they can meet regularly to share resources and combine efforts to create a more robust, regionalized plan. These meetings allow for peer feedback, add an extra layer of accountability, increase plan consistency within the region, lessen individual school workload and eliminate the need for stakeholders to attend multiple meetings.

One countywide model serving all school districts in the county is the Pierce County Consortium.

In 2007, the county's schools

asked Pierce County Emergency

Management to help form a consortium of schools and first responders so safety staff could find local resources to meet safety requirements. Pierce County Emergency Management provided initial funding to make equipment purchases for schools and to pay for training for relevant district staff. Every district sends a representative to the monthly consortium meetings; districts that have school resource officers (law enforcement officers who work within schools) usually designate this person as the representative. Among the initiatives that were made possible or more efficient through the consortium's work are consistent lockdown procedures used in all Pierce County schools and the establishment of a countywide threat assessment program. The latter saved resources by basing the program on a recognized model (see sidebar), and using the consortium as a forum to bring together the appropriate community partners. The lockdown procedures and threat assessment program resulted in consistent models all schools could work from. The consortium does not charge schools for safety services, and its efforts rely on dedicated time from school district representatives.

A second county-based example is the Cowlitz County Safe Group, coordinated by the Cowlitz County Department of Emergency Management. The group meets monthly and includes partners from law enforcement, fire departments and community agencies, as well as Lower Columbia College and all Cowlitz County public and private schools. Cowlitz County Safe Group helps coordinate the schools' safety efforts. For example, it is planning a countywide drill in the Kalama School District to promote training and practice. The group also provides school safety grants for districts.

At the regional level, the Washington Education Safety and Emergency Managers Association (WESEMA) engages with 15 school districts in its catchment area of four counties. Local retired police chiefs and state troopers designed the group to mirror Snohomish County Sheriff and Police Chiefs Association meetings. They

Salem-Keizer Threat Assessment model

In 2000, Oregon's Salem-Keizer School District developed a nationally recognized model for student threat assessment in collaboration with law enforcement, Children's Mental Health, the Oregon State Court System, and other youth-serving agencies. The system in place today includes two levels of assessment, and is operated in conjunction with all of the public agencies that serve youth.



It's important to collaborate with nearby school districts to learn from the experience of others.

School District



established WESEMA as a forum for participating school district staff to share ideas with, or request help from, the group during regularly scheduled meetings or through emails. A WESEMA representative emphasized that safety staff can often learn more from peers in an informal, conversational setting, compared with trainings and conferences that offer fewer opportunities for collaborative feedback. Further, regional meetings such as WESEMA's usually incur lower travel costs.

WESEMA itself has partnered with the Washington State Fusion Center, which facilitates the sharing of threat-related information between government and private-sector partners. The Center's website says: "Located in states and major urban areas throughout the country, fusion centers are uniquely situated to empower [community partners] to understand local implications of national intelligence, thus enabling local officials to better protect their communities." WESEMA uses a section of the Center's website as an information-sharing portal between districts in the group. At WESEMA's request, the Center added a school safety link, where WESEMA has added resources for other schools in the group to use. Any school official can register with the Homeland Security Information Network through the Fusion Center's webmaster, which in turn allows them to gain access to the safety link and contribute other resources. Nonetheless, the resource is little used outside the WESEMA organization, which OSPI confirmed. This underutilized resource could help districts collaborate by sharing knowledge and resources.

First responders coordinate with districts to prepare for emergencies

First responders include law enforcement, firefighters and paramedics. Conducting regular meetings with first responders helps school districts formalize their collaboration on trainings, drills and safety plan review. This helps build relationships and establish trust when communicating school safety efforts, and hold both parties accountable to maintaining the relationship. Many districts meet monthly with first responders, others even more frequently.

In addition to holding meetings, training and drilling with first responders helps prepare both district staff and emergency crews for an actual safety event, because procedures have been agreed on and practiced in advance of a real incident. Rehearsal and familiarity with school locations, buildings and staff procedures make it more likely operations will go smoothly under pressure. First responders might, for example, conduct walkthroughs to become acquainted with interior spaces such as corridors and schoolrooms, or hold their own first-responder drills on school grounds when students are not present.

As noted on page 13, Rapid Responder presents an under-utilized opportunity for a successful coordinated activity between school districts and first responders. Both sets of stakeholders need to communicate with each other about using Rapid Responder before an emergency occurs. Attending Rapid Responder training with first-responder organizations can help ensure both district staff and emergency

Yakima School District holds monthly inter-agency meetings with courts and law enforcement to discuss information or situations that the other entities should know about.

personnel understand the software's uses, such as its ability to share safety plans, and features, such as Easy Alert, which lets users notify first responders of an incident through a phone application. One school district reported that its safety staff can point to Rapid Responder for hard evidence of their safety efforts if a parent or non-district personnel asks what the district is doing regarding safety or risk management.

Community stakeholders provide expertise to districts to enhance school safety resources

When districts and their community partners coordinate with each other and train together, safety plans are better aligned and the entire region is more prepared for an emergency. By formally facilitating more stakeholder involvement and collaborating with parents, students, hospitals, Educational Service Districts (ESDs) and other community members, districts can strengthen partnerships that will enhance school safety resources and services.

One essential aspect of community coordination is involving parents and students in safety preparedness by including them in safety meetings, district trainings and drills. Keeping parents and students informed and engaged strengthens a school's safety efforts, because prepared parents and students will know how to respond to a natural disaster or threat should one occur. Districts could host small meetings with parents to hear their priorities or concerns around processes like conducting drills, communication or reunification, where a location is determined for parents to pick up their children from district staff in the event of an emergency. Kennewick School District holds a more elaborate community day, which provides a chance for parents, staff and first responders to learn more about district safety efforts. Some districts notify parents about important safety related information through mass notification systems. Multiple districts have an anonymous tip line for parents and students, so they can report anything they might have seen or heard that district personnel should know about. Parents or community members can also provide career expertise to the district, perhaps by acting as security volunteers during school events if they have military or law enforcement experience.

School districts also partner with their community's health department, local hospitals or mental health service providers. Coordinating with health departments or hospitals allows both districts and first responders to establish protocols for actions to take in the case of an emergency where health services would be necessary. To achieve this, a few districts invite hospital staff to their safety meetings. The Pierce County Consortium solicited support in establishing its countywide threat assessment model by reaching out to a local hospital and substance abuse center.

Most districts partnering with their county or city do so through their local department of emergency management. This partnership is an efficient way of coordinating between multiple organizations including fire and police departments, medical support and state-level responders such as the State Patrol. Districts cited

Tacoma School District holds post-drill discussions with its students to receive student input.

Ephrata School District partnered with the Grant County Department of Health, the City of Ephrata, staff, parents and first responders to establish safe walking routes for students

many benefits of coordinating with their city or county: advance notice of incidents occurring in the region or outside the district, joint training opportunities, and help developing emergency plans. One school district reported that district staff joined the city emergency manager at a weeklong Federal Emergency Management Agency (FEMA) Multi-hazard Emergency Planning for Schools training, which allowed the school and city to develop emergency plans that work together.

Districts can stretch limited funds by coordinating with stakeholders for grant opportunities

Some districts coordinate with federal and state entities to fund safety preparedness efforts. Key uses for such funds include training, property improvements and plan development activities. For example, Cowlitz County Safe Schools Grant helped fund one school district's Emergency Response Operations Plan.

Safety projects are good candidates for risk pool and federal grants. The state's two largest insurance risk pools, Clear Risk Solutions and the Washington Schools Risk Management Pool (WSRMP), have awarded grants to school districts to help them pay for small safety improvement projects or safety supplies such as backpacks or buckets with evacuation supplies. One district used a risk management grant of \$25,000, which the district matched, to pay for a building audit by police and to purchase cameras.

Federal grant funds can assist districts with training expenses. Local organizations can help with local training, but school districts seeking to maximize cost-effective training often turn to FEMA. For example, federal guidance recommends that district administrators be trained in FEMA's National Incident Management System and Incident Command System. FEMA provides grants to cover travel costs for district staff and local first responders to attend FEMA emergency preparedness trainings in Washington, D.C. Several school districts reported receiving FEMA grant money for flights, lodging and classes. Districts can apply for this grant through the Washington State Military Department's Emergency Management division.

Also at the federal level, Education offers safety planning grants. Based on a Washington State Institute for Public Policy's 50-state review of school security funding, at least eight Washington school districts received Education funding from 2004 to 2018.

Educational Service Districts (ESDs) can play a wide-ranging role in facilitating school safety coordination

The state's nine ESDs support school districts in their regions (shown in Exhibit 3) through a variety of services, including mental and behavioral health assessments, threat assessments and training opportunities. ESDs provide planning resources and regionally consistent coordination. Although the individual safety support services each ESD offers depend on the availability of resources and staff expertise, at a minimum they can include trainings or threat assessments. ESD staff are often available to attend regional safety meetings; a few school districts have a memorandum of understanding with their ESD for added accountability and meet monthly if not more frequently. ESDs that have an established safety program or co-op may also assess safety plans, send reminders about drills, and help districts complete their drill requirements. Having a more regional view of school safety helps account for local needs and risks, and can provide accountability that a single state agency may struggle to offer. One ESD in particular serves as a model for regional safety coordination.

Exhibit 3 – Washington's ESDs



Source: OSPI.

The School Safety Operations and Coordination Center offers a recognized model for safety preparedness coordination

ESD 105, which includes Yakima, established the School Safety Operations and Coordination Center (SSOCC) as a regional safety center, which school districts, stakeholders and the Legislature have recognized as a model worthy of imitation. In 2016, the Legislature noted that one particular ESD had developed a model for regional school safety, and permitted other ESDs to do the same.

“The legislature finds [...] there is a need to develop training for school personnel to intervene and provide assistance during these emergency incidents. The legislature recognizes an educational service district has developed a model for a regional school safety and security center, which can provide this type of training.”

The SSOCC regularly convenes a safety advisory committee that includes school district superintendents, principals, insurance company representatives, local university representatives and ESD staff. Twenty of the ESD region's 25 districts are members of the SSOCC. Fees help pay for SSOCC services, set at two levels – \$2,000 and \$5,000 per school annually – with a reduced rate for schools with fewer than 300 students. For an extra fee, schools — including those outside the SSOCC and ESD 105 — can purchase access to ESD 105's exclusive safety software systems.

The SSOCC provides many services to help school districts close gaps in their safety preparations. These include creating an inventory of maintained safety assets, annually reviewing the school's safety portfolio and making sure schools log their drills. The SSOCC also offers many types of trainings, including de-escalation, threat assessment and crisis response. SSOCC staff use a tracking system that shows which services the ESD has provided to each district and schools' compliance with specific state school safety laws. An SSOCC staff member monitors schools' safety efforts on weekdays, and conducts monthly one-hour calls with schools to check on their progress. These services, plus SSOCC guidance and record-keeping tools, help school districts increase their level of accountability.

While ESD 105 is the only ESD with a fully operational regional safety center, about half of all ESDs reported offering some type of safety co-op service, although they are not as robust as the services provided through the SSOCC. The rest of the ESDs indicated they had not yet established a regional co-op but believe this is the best model moving forward.

Funding, however, remains an issue. For all of the ESD safety center co-ops including the SSOCC, only the school districts willing and able to pay have joined, and ESDs reported district buy-in can be a challenge. Those ESDs yet to establish regional safety co-ops said they would like to follow suit but only if they could receive adequate funding to do so.

A regional level oversight mechanism could produce more consistent safety preparations statewide while increasing coordination, accountability and cost-savings

When ESDs enumerated the benefits of a regional safety model, they noted that such a model brings together resources from other school districts, establishes consistency, saves schools money on training, and acts as a support and accountability network. Many of the practices that help address gaps in school safety preparedness are only possible when school districts coordinate locally or with other districts.



The [Educational Service District regional safety model] would provide for better and more consistent coordination between and among OSPI, the 9 ESDs, our 295 [districts], Charter Schools and all K-12 schools. This would help ensure common language, preparation, response and planning efforts throughout the state.

School Safety Advisory Committee



"Collaborating lessens the work load for each school."

"Our interagency meetings provide accountability."

School districts



In considering the many practices districts described, the audit identified six that could be emulated by other districts. Listed below, they are discussed in more detail on the following pages.

- Templates for plan development
- Templates for threat assessments
- Scheduling safety plan reviews
- Scheduling safety preparedness “report cards”
- Sharing training expenses
- Saving costs through “train the trainer” exercises

Among the benefits these practices provide are standardization, elimination of unnecessary redundancies, opportunities for cost sharing and conservation of resources, including staff time.

Using standardized templates helps ensure plans are comprehensive and consistent across schools, districts or regions

Using a **district or regional safety planning template** allows school administrators to create a school safety plan efficiently, while ensuring that vital emergency planning elements and particular participants are not forgotten. A few school districts reported using a standardized safety plan template and customizing the required information to the size and needs of their district.

Working from a standardized template saves time because administrators do not have to research desirable elements in safety preparedness. Well-crafted templates are more likely to result in more concise plans compared to previously uncoordinated school safety plans. Safety plans developed from a districtwide or countywide template ensure staff, teachers and first responders are all aware of their responsibilities, increasing the likelihood everyone will respond to an emergency in a predictable way. Consistent plans minimize confusion between staff and first responders during an incident. Consistency has an additional benefit for administrators or teachers who work in more than one school building within the district: They know how to respond to an incident no matter where they may be working that day. Districts can promote stronger and more regionally standardized templates by sharing their safety plans with other districts, which also provides administrators an opportunity to request peer feedback related to specific issues occurring within their districts.

Using a **district or countywide student threat assessment template** produces similar benefits. A threat assessment is a set of protocols and safety planning procedures that a district may apply when a student becomes a potential threat to themselves or others. District staff, especially in smaller districts, may not have expertise in the area of threat assessment. Using a template that sets out the



“Regional safety centers would provide consistency.”

“[The safety center regional] model is beneficial for small districts who don’t have the staff capacity to make plans.”

ESDs



necessary assessment partners and tasks in the process ensures any designated staff member follows the approved procedure. Often, once a student is identified as a potential threat, a secondary assessment is made, which requires involvement from parents, first responders, mental health professionals and members of the community. Because coordination extends beyond district staff, countywide use of the template ensures everyone involved knows their roles.

It is possible to further streamline the creation of a standardized threat assessment protocol by using an already developed standard as a model. Many Washington districts reported basing their assessment template on Oregon's Salem-Keizer Threat Assessment model.

Scheduling safety plan reviews, drills and reports can help hold district staff accountable

Scheduling a **coordinated process for safety plan review** gives everyone involved, including staff, teachers and the community, an opportunity to evaluate how well a safety plan has worked for their district and whether any changes should be made. Many districts review and update their own school safety plan annually, though some do so more frequently. Seattle School District, for example, reviews specific parts of its safety plan by season. Districts without dedicated school safety personnel might use committees and include community partners in the review process. Districts can also reach out to their local ESD and ask for help in reviewing their plans for compliance and completeness. ESD staff often have specific expertise in school safety, and bring regional expertise and an awareness of what other schools are working on. These scheduled reviews help create an extra layer of accountability to the planning process.

Having staff **schedule and regularly report on drills** helps ensure drills happen as required by law. Having set days and times for drills allows districts to invite first responders or other stakeholders to participate in their drills. Once drills are scheduled, staff can record them on district calendars and send out reminders to all necessary participants. For example, the Evergreen (Clark) School District secretary sends district staff calendar invites about the scheduled drills. A few ESDs send notifications to districts about conducting or logging their drills. Aside from school calendars, districts can use features in Rapid Responder to track, report and log their drills. Rapid Responder also offers reporting features, which WASPC says it can use to show which schools are logging into Rapid Responder and recording their drills. However, WASPC says no one currently requests this information, but the agency could easily send regular reports to a governing agency. This would provide another layer of accountability.

Preparing **regular “report cards”** can help keep schools and districts accountable to their school safety goals and ensure that safety remains a priority for staff. One district reported that such report cards hold principals accountable to the safety practices that the district has committed to implementing, and can help principals prioritize trainings based on scores. Report cards sent to district superintendents



It's consistency. You need to keep it the most simple and consistent. Some law enforcement can span counties.

School Safety Advisory Committee on statewide advice for active shooter plans



Yakima School district sends an annual safety survey to all teachers and shares results with school principals.

show where each school is well prepared for an emergency, as well as areas where the district could provide more support to improve safety efforts. Reports also promote public transparency, showing that school district leadership is committed to safety preparedness.

Districts can schedule dedicated time for regional training and implement the “train the trainer” model to conserve resources

One way districts can conserve resources while gaining the knowledge specialized training offers is to “train the trainer,” sending one employee who returns to share what they have learned. For example, district staff can attend FEMA trainings, then receive FEMA certification to train others. This model of learning can be applied to other trainings, such as active shooter, lockdown or threat assessment.

The capabilities for **regional coordination** that ESDs inherently possess place them in a good position to facilitate trainings across the state. A new topic

under consideration is training in Rapid Responder. WASPC, which has limited resources for providing individual training to districts, hopes to start training more at the ESD level to reduce the number of trainings WASPC needs to provide, as long as ESDs will agree to host it. As one ESD echoed, it is more beneficial to coordinate one trainer for the region than have that trainer conduct trainings at each individual district.

Dedicating time to safety training in busy school schedules can be difficult, but it is one of the surest ways to ensure schools and their partners are prepared for emergencies. Schools might devote afternoon early release times for safety training once or more in a month, or add a block of time to monthly principals’ meeting, adding new lessons each meeting related to different school safety topics to keep attendees interested and learning. While it might be an expensive option, one district reported paying for substitute teachers as needed so that full-time staff can attend important or infrequently offered safety trainings.

Training the trainer: The Salem-Keizer Threat Assessment model

John Van Dreal, creator of this assessment tool, told auditors that his individual training program for school districts can be too costly for some, but that the broad, three-day training he offers in Oregon is rarely enough to work through every attending district’s unique situation. Because the Salem-Keizer model is open for anyone to use, he suggests districts could help neighboring districts and themselves by working with their ESD to send a representative familiar with regional issues to the training course. When that person returns, he or she is free to use the model to train others through the ESD and so establish regional expertise in this type of threat assessment.

State Auditor's Conclusions

School safety planning does not always get the attention or resources it requires, in part because it has to compete with other, more immediate demands placed on schools. However, school and community leaders must not lose sight of the value in basic planning and collaboration. In the event of a natural disaster or other emergency, that work could save lives.

The purpose of this audit was to identify concrete, cost-effective processes and programs already happening in Washington, so schools and districts can learn from one another and narrow some of the gaps in their plans. We found the biggest opportunities in the area of collaboration with other key players in safety preparedness and response, including police and firefighters, other government emergency management experts, and neighboring school districts.

School district officials and their elected boards should explore this audit and take note of ideas that may apply to their area, then work toward greater collaboration and coordination.

Recommendations

In order to address the known school safety gaps described on page 15, we recommend OSPI:

1. Determine the staffing and funding required for the implementation of a regional school safety program, and make a request for the necessary funding to the Legislature
2. As funding permits, organize and establish a statewide regional school safety program to be delivered through the educational service districts, as authorized by RCW 28A.310.505

In order to address issues the audit identified around the Rapid Responder program as described on page 11, we recommend WASPC:

3. Determine the staffing and funding required for a comprehensive review of the statewide school mapping system, and make a request for the necessary funding to the Legislature
4. As funding permits, convene a work group with representatives from the first responder community, school districts, and OSPI to consider:
 - a. How the statewide school mapping system is currently being used across the state
 - b. If the statewide school mapping system's capabilities could be better utilized
 - c. School and district cost to maintain the statewide school mapping system
 - d. How stakeholders could better coordinate the use of the statewide school mapping system for greater accountability across the state
 - e. Whether and how legislation could be updated to address the statewide school mapping system's disparate use and potential capabilities

Guidance for all Washington school districts

We consider the audit results so broadly applicable that it is in the state's best interest for every school district to undertake any relevant and repeatable practices reported by districts that participated directly in the audit. We therefore suggest all Washington state school districts consider implementing the practices highlighted in this report, working together and with the community to foster greater collaboration and coordination at a local and regional level.

Agency Response



SUPERINTENDENT OF PUBLIC INSTRUCTION

Chris Reykdal Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

February 19, 2019

The Honorable Pat McCarthy
Washington State Auditor
Insurance Building, Capital Campus
302 Sid Snyder Avenue SW
Olympia, WA 98504-0021

Dear State Auditor McCarthy:

Thank you for the opportunity to review and respond to the School Safety Planning performance audit. We appreciate the open communication and collaboration with the performance audit team as they worked to understand both historical and current school safety issues and practices.

The report provides a succinct overview of the school safety challenges and opportunities faced by school districts. It also identifies some concrete, cost-effective processes and programs schools and districts can use now to address current gaps in school safety planning.

We concur with the recommendation that the Office of Superintendent of Public Instruction (OSPI):

1. Determine the staffing and funding required for the implementation of a regional school safety program, and make a request for the necessary funding to the Legislature; and
2. As funding permits, organize and establish a statewide regional school safety program to be delivered through the educational service districts.

In October 2018, as part of its biennial budget request, OSPI submitted a set of proposals to the Governor for a comprehensive approach to school safety, including funding for a statewide and regional school safety program. In addition, during the current 2019 legislative session we are working closely with the Legislature on a number of school safety proposals, most notably House Bill 1216 and its companion, Senate Bill 5317, which also establish a statewide and regional school safety program.

School safety is foundational to academic success. We appreciate the State Auditor's efforts to identify current school safety challenges and opportunities, and look forward to working with the Auditor, the Legislature, and other partners and stakeholders to ensure our schools are safe, healthy places to learn.

Sincerely,

Chris Reykdal
Superintendent of
Public Instruction

Appendix A: Initiative 900 and Auditing Standards

Initiative 900 requirements

Initiative 900, approved by Washington voters in 2005 and enacted into state law in 2006, authorized the State Auditor's Office to conduct independent, comprehensive performance audits of state and local governments.

Specifically, the law directs the Auditor's Office to "review and analyze the economy, efficiency, and effectiveness of the policies, management, fiscal affairs, and operations of state and local governments, agencies, programs, and accounts." Performance audits are to be conducted according to U.S. Government Accountability Office government auditing standards.

In addition, the law identifies nine elements that are to be considered within the scope of each performance audit. The State Auditor's Office evaluates the relevance of all nine elements to each audit. The table below indicates which elements are addressed in the audit. Specific issues are discussed in the Results and Recommendations sections of this report.

I-900 element	Addressed in the audit
1. Identify cost savings	No. The audit did not identify cost savings. However, the audit did suggest practices that could help district conserve resources.
2. Identify services that can be reduced or eliminated	No. The audit did not identify services that can be re-duced or eliminated.
3. Identify programs or services that can be transferred to the private sector	No. Programs or services were not identified that could be transferred to the private sector.
4. Analyze gaps or overlaps in programs or services and provide recommendations to correct them	Yes. The audit determined school safety planning gaps and provided recommendations to address the gaps through district practices related to plan devel-opment, coordination, training, and oversight.
5. Assess feasibility of pooling information technology systems within the department	No. The audit did not assess information technology systems. However, the audit did identify challenges with Rapid Responder, the state school mapping sys-tem, and recommended WASPC convene a workgroup to consider how to best address them.

I-900 element	Addressed in the audit
6. Analyze departmental roles and functions, and provide recommendations to change or eliminate them	No. The audit did not analyze departmental roles and functions, however, it did recommend OSPI establish and coordinate a statewide regional school safety program.
7. Provide recommendations for statutory or regulatory changes that may be necessary for the department to properly carry out its functions	No. The audit did not recommend statutory changes.
8. Analyze departmental performance data, performance measures and self-assessment systems	Yes. While the audit did not analyze individual school safety plans or district performance, it identified gaps in statewide school safety planning and provided recommendations to help districts address them.
9. Identify relevant best practices	No. The audit identified practices districts are using to address safety planning gaps, however, it did not evaluate the practices' effectiveness or identify any as best practices.

Compliance with generally accepted government auditing standards

We conducted this performance audit under the authority of state law (RCW 43.09.470), approved as Initiative 900 by Washington voters in 2005, and in accordance with generally accepted government auditing standards as published in Government Auditing Standards (December 2011 revision) issued by the U.S. Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The mission of the Office of the Washington State Auditor

To provide citizens with independent and transparent examinations of how state and local governments use public funds, and develop strategies that make government more efficient and effective.

The results of our work are widely distributed through a variety of reports, which are available on our website and through our free, electronic [subscription service](#). We take our role as partners in accountability seriously. We provide training and technical assistance to governments and have an extensive quality assurance program.

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Appendix B: Scope, Objectives and Methodology

Scope

This audit reviewed practices in place at school districts across the state to identify opportunities to address gaps in K-12 school safety planning. The sample included 58 large, medium and small school districts representing urban, rural, eastern and western parts of the state. These districts all indicated having practices in place within the identified gap areas in their responses to 2014-15 statewide surveys. We requested information from districts about practices in place during our interview period from January 2017 to June 2018. The following districts provided the State Auditor's Office with information regarding their safety planning practices:

Almira, Auburn, Battle Ground, Blaine, Brinnon, Burlington-Edison, Central Valley, Cle Elum-Roslyn, Coupeville, Ephrata, Evergreen (Clark), Ferndale, Fife, Freeman, Kelso, Kennewick, La Center, Lake Quinalt, Lake Stevens, Lake Washington, Monroe, Mount Vernon, Mukilteo, North Kitsap, North Mason, North Thurston, Northport, Oak Harbor, Ocosta, Olympia, Omak, Orting, Pateros, Puyallup, Raymond, Richland, Rochester, Roosevelt, Seattle, Sedro-Woolley, Shoreline, Sprague, Stanwood-Camano, Stevenson-Carson, South Kitsap, Southside, Sultan, Tacoma, Toledo, Toutle Lake, Union Gap, Vancouver, Walla Walla, West Valley Spokane, White Salmon Valley, Yakima, Yelm, Zillah

We also spoke with all nine Educational Services Districts (ESD)s, the state's two largest risk management pools, the Pierce County Consortium, the Washington Association of Sheriffs and Police Chiefs (WASPC), six first responders, the creator of the Salem-Keizer threat assessment model, Spokane Emergency Management, a lessons learned group created after the Freeman High School shooting and various stakeholders attending the School Safety Advisory Committee meetings each month.

Objectives

The audit answers the following questions:

1. What challenges contribute to gaps in school safety preparedness?
2. What opportunities exist to address known gaps in K-12 school safety planning?

Methodology

To answer the audit questions, we analyzed previously conducted surveys and gathered qualitative data based upon those survey responses and stakeholder feedback. For the identified gaps, we also determined potential causes and recommendations based on stakeholder and school district feedback.

Identifying gaps

We reviewed two surveys of Washington school districts conducted by the Office of Superintendent of Public Instruction (OSPI) in 2014 and the federal Department of Education (Education) in 2015. These surveys asked districts if they used certain required and recommended safety planning practices. First, we determined the OSPI and Education survey response rates were 78 and 51.5 percent, respectively. Then, we identified questions relevant to the audit objectives and analyzed district responses to identify safety planning practices for which only 70 percent or fewer responded they had a practice in place. We grouped those survey questions into the following larger five gap categories:

Plan Development

- Districts do not have Memorandum of Understanding/Memorandum of Agreement with Law Enforcement, Fire Districts and 911 Dispatch
- Plans do not include law enforcement and fire participation or observation of safety drills
- Plan development process does not include Community Partners and Community Organizations
- Plan development process does not include Parents and Guardians
- Plans do not include Continuity of Operations
- Plans do not include Information Collection and Analysis
- Plans do not include Finance and Logistics

Coordination

- Schools do not have mass notification systems for first responders
- Districts do not have mass notification plans for first responders
- Plans do not include regularly scheduled meetings with law enforcement, fire and 911 dispatch

Oversight

- Plans do not include a process for reviewing and updating plan
- Plans do not include regularly coordinated review with district and law enforcement

Training

- Administrators are not trained in collaboration with law enforcement
- Administrators are not trained in Rapid Responder
- Principals are not trained in National Incident Management System and Incident Command System

Identifying school districts

Upon identifying the gaps, we selected school districts from the same survey that indicated they had practices in place for the identified gaps. School districts were selected based on size (small/medium/large), location (east/west as well as urban/rural), their risk of a threat or natural disaster based on OSPI's most recent Hazard Mitigation Plan, and suggestions from stakeholders based on their knowledge of certain districts and their practices. Districts were considered small if they had zero to 1,000 students, medium if they had 1,000 to 9,999 students, and large if they had 10,000+ students.

Identifying opportunities to address gaps and their contributing challenges

We contacted 100 school districts, and either received written responses or conducted interviews with 58 of those districts. Auditors asked school districts about those specific practices from the OSPI and Education surveys that they indicated having in place, as well as more general practices based on stakeholder feedback and a national report on safety planning practices. We then synthesized the qualitative information we received from school districts, and from this drew practices that multiple districts reported as being successful. We did the same with qualitative information received from the nine ESDs and other stakeholders. In this process, we also observed high-level themes that districts or stakeholders reported as challenges that could be contributing to the identified gaps.

Appendix C: Opportunities to Address Gaps

Key to table: C = Improves coordination A = Establishes accountability

Plan development

The practice: Regional or district standardization of plan components

Why this gap area is important: Allows school administrators to efficiently create a school safety plan, while also ensuring that vital emergency planning elements are included in the plan.

How addressed	District examples	C	A
District-wide template customized for each school	<ul style="list-style-type: none"> Used a template from the Federal Emergency Management Agency (FEMA) to create their school safety plans: <i>Almira, Omak</i> Adapted templates from the Washington State Military Department and the Salem-Keizer threat assessment model: <i>Stanwood-Camano</i> Used Seattle School District's safety plan template: <i>Richland</i> Similar building plans across the district, which is helpful for staff who work in more than one building or who may be visiting a different building: <i>Stevenson-Carson</i> Continuity between plans throughout the district instead of each school having its own: <i>Rochester</i> 		A
Threat Assessment Template	<ul style="list-style-type: none"> Uses/modified Salem-Keizer Threat Assessment Model: <i>Sultan, Olympia, Battle Ground, all districts in Pierce County</i> <ul style="list-style-type: none"> County-wide or multi-county use of Salem-Keizer: <i>Clark and Cowlitz counties, Pierce County</i> 		A
Regional sharing of plans to create consistency	<ul style="list-style-type: none"> Consulted with surrounding districts to see what they had in place and reviewed as a staff: <i>Roosevelt</i> District's safety committee looks at templates from other districts to ensure formatting is all the same, in attempt to streamline and gather districts together: <i>North Kitsap</i> Partakes in regional safety meetings where plans are shared with other districts: <i>Shoreline</i> 	C	A

Key to table: C = Improves coordination A = Establishes accountability

Oversight

The practice: Accountability mechanisms in place

Why this gap area is important: Provides more accountability in the absence of state-level oversight

How addressed	District examples	C	A
Scheduled and coordinated process for safety plan review	<ul style="list-style-type: none"> District committees review the safety plan monthly with their school resource officers: <i>South Kitsap</i> Reviews safety plan with a committee, and conducts post-drill/incident reviews to go over lessons learned: <i>Southside</i> Reviews parts of their plan by season, ensuring a set schedule and making the review process more manageable: <i>Seattle</i> Includes the local sheriff when updating school safety guides: <i>Cle Elum-Roslyn</i> Local police chief reviews safety handbook: <i>Fife</i> Committees comprised of law enforcement review school safety plans: <i>Lake Quinault, Southside</i> Reviews safety plan after drills: <i>Ephrata, Northport</i> Conducts facility safety review with law enforcement: <i>Ephrata</i> ESD and school safety insurance pool conduct an annual risk assessment: <i>Northport</i> 	C	A
Scheduling and tracking mechanisms for drills	<ul style="list-style-type: none"> Yearly drilling template: <i>Monroe</i> Scheduled active shooter drill on early release day: <i>Rochester</i> Conducts two drills every month in each school building: <i>Vancouver</i> Conducts full-scale exercises on non-school days with first responders, personnel and students who are willing to participate: <i>Stanwood-Camano</i> Secretary sends district staff calendar invites about the scheduled drills: <i>Evergreen (Clark)</i> Records monthly drills on its calendar: <i>Brinnon</i> Developed templates for drill reporting and safety meeting minutes, which are sent to the district safety office monthly for review and documentation: <i>Vancouver</i> 	C	A
Reports on school safety to district leadership	<ul style="list-style-type: none"> District staff member reviews schools' safety competencies and sends a report card to the district superintendent: <i>Monroe</i> Creates safety score cards, allowing principals to prioritize trainings: <i>Seattle</i> Annual safety survey sent to all teachers and results shared with school principals: <i>Yakima</i> 	C	A

Key to table: C = Improves coordination A = Establishes accountability

Training

The practice: Regional train the trainer model and creatively scheduling training

Why this gap area is important: Train the trainer and creative scheduling are ways for districts to rely on the expertise their own staff have acquired and conserve resources.

How addressed	District examples	C	A
Regional train the trainer model	<ul style="list-style-type: none"> District's safety specialist became certified as an Incident Command System trainer for free, and now has internal training capability to train new administration: <i>Mukilteo</i> Trained in ALICE (active shooter training) and reported they could train others in ALICE: <i>Walla Walla</i> Trains its own trainers in ALICE in order to provide training to other staff: <i>North Mason</i> 	C	A
Creatively scheduling training	<ul style="list-style-type: none"> Uses Monday afternoon early release time for safety issues about once a month: <i>Yakima</i> Devotes 20 minutes to school safety during monthly principals' meeting, with new lessons each meeting related to different school safety topics: <i>Auburn</i> Held active shooter training on a Saturday: <i>White Salmon Valley</i> Uses weekly early release for staff professional development: <i>White Salmon Valley</i> Breaks into groups for training in order to keep the day-to-day operations going: <i>Pateros</i> Uses one staff meeting for training, and two half-days a year to bring staff together for safety issues: <i>Fife</i> Paid for substitute teachers as needed so that full-time staff can attend trainings: <i>Yakima</i> 	C	A

Key to table: C = Improves coordination A = Establishes accountability

Coordination

The practice: Collaborating regularly with other school districts, first responders and stakeholders

Why this gap area is important: Helps avoid redundancy or districts “re-inventing the wheel,” holds districts accountable, and allows involved parties to share and conserve resources.

How addressed	District examples	C	A
Coordination with other school districts through regional meetings	<ul style="list-style-type: none"> Pierce County Consortia serves all school districts in Pierce County to help coordinate school safety needs for the region. Cowlitz County Safe Group serves as a coordination resource for county school safety efforts, including planning county-wide drills. WESEMA is a regional group set up as a venue for participating school district staff to share ideas or request help. WESEMA uses the Washington State Fusion Center’s website as an information portal for sharing resources. 	C	A
Coordination with stakeholders	<p><i>Parents and students</i></p> <ul style="list-style-type: none"> Community day with parents, staff and first responders: <i>Kennewick</i> Safety handbook published specifically for students and their parents: <i>Northport</i> Students and building staff receive training from principals, school resource officers and guests from emergency response agencies on topics like lockdowns: <i>Puyallup</i> Annual training with staff and students: <i>Toutle Lake</i> Parent meetings sometimes include safety components: <i>Zillah</i> Parent advocacy committee that advises the superintendent: <i>Central Valley</i> Communicates the purpose of drills with students, especially for lockdowns, and holds post-drill discussions with students to receive input: <i>Tacoma</i> Uses an automatic caller, School Messenger, to provide information to parents and community members: <i>Ephrata, Lake Quinault</i> Reviews plan annually with students and parents to collect input: <i>Southside</i> Has included parents in drills at the high school and middle school: <i>Stanwood-Camano</i> 	C	A

Key to table: C = Improves coordination A = Establishes accountability

How addressed	District examples	C	A
Coordination with stakeholders	<p><i>Community stakeholders</i></p> <ul style="list-style-type: none"> • Pierce County Consortium solicited support in establishing their countywide threat assessment model by reaching out to a local hospital and substance abuse center. • Established protocol with local hospitals: <i>Ferndale, Kennewick</i> • Memorandum of understanding with Pierce County Health Department: <i>Tacoma</i> • District staff member meets with city public health: <i>Seattle</i> • Established agreements with local hospitals, Spokane Regional Health and Frontier Behavioral Health to provide evaluations free of charge: <i>Freeman</i> • Brings in mental health professionals for second tier threat assessments: <i>Monroe</i> • Partnered with Skagit County Department of Emergency Management for training efforts, such as Community Emergency Response Training: <i>Mount Vernon</i> • Uses two local notification apps (the Department of Energy Hanford Incident Notification system and “Code Red” notification system for Benton County Emergency Management): <i>Richland</i> • Participate in Thurston Regional Planning Council Hazards Mitigation Plan: <i>Olympia</i> • Joint participation in week-long FEMA Multi-hazard Emergency Planning for Schools training between City Manager and district staff: <i>Pateros</i> • Includes city personnel in monthly leadership meetings: <i>Sultan</i> • District Superintendent and Chief Financial Officer meet monthly with the city (including the mayor, city manager and chief of police): <i>Kelso</i> • Coordinates with the city’s disaster management committee, city council and the emergency management office: <i>Seattle</i> 	C	A

Key to table: C = Improves coordination A = Establishes accountability

How addressed	District examples	C	A
Coordination with first responders	<p>District staff meet with law enforcement daily: <i>Rochester</i></p> <p>Holds monthly inter-agency meetings with courts and law enforcement to discuss information or situations that the other entities should know about: <i>Yakima</i></p> <p>Conducts various drills with Washington State Patrol and first responders on oil train derailments or pipeline spills: <i>Kennewick</i></p> <p>Law enforcement and federal border agents get to know district facilities by conducting first responder drills in district school buildings: <i>Blaine</i></p> <p>District personnel and first responders jointly attended a FEMA training in Washington, D.C.: <i>Auburn</i></p> <p>Local police and fire department staff conduct annual training with campus security officers and building administrators (including traumatic wound care, survival mindset and defensive tactics): <i>Puyallup</i></p> <p>Planned an active shooter seminar with the Okanogan County Sheriff's Department and all district staff: <i>Pateros</i></p>	C	A
Coordinating with outside entities for grant opportunities	<p>Used ESD grant to pay for conference training: <i>Shoreline</i></p> <p>Used ESD grant to pay for 911 dispatch buttons: <i>White Salmon Valley</i></p> <p>Applied for FEMA grant through the Washington State Military Department's Emergency Management division; grant paid for flights, lodging and classes: <i>Evergreen (Clark), Auburn, Pateros</i></p> <p>Received grant from United States Department of Education Readiness and Emergency Management for Schools for safety planning: <i>Seattle, Shoreline</i></p>	C	



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– Pat McCarthy, State Auditor

Washington State Auditor's Office
P.O. Box 40031 Olympia WA 98504

www.sao.wa.gov

1-866-902-3900



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