

MARYLAND CENTER for SCHOOL SAFETY

June 27, 2022

The Honorable Larry Hogan
Governor
100 State Circle
Annapolis, MD 21401

The Honorable William C. Ferguson IV
President
Senate of Maryland
State House, H-107
Annapolis, MD 21401

The Honorable Adrienne A. Jones
Speaker
House of Delegates
State House, H-101
Annapolis, MD 21401

Re: Critical Life Threatening Incident Report required by Education Article § 7-1502(g)(21) (MSAR #11851) and Education Article §7-1510(g)(3) (MSAR #11594)

Dear Governor Hogan, President Ferguson, and Speaker Jones:

Pursuant to Education Article § 7-1502(g)(21), Education Article §7-1510(g)(3), and State Government Article §2-1257, the Maryland Center for School Safety (MCSS) respectfully submits the following report, which contains identified lessons learned and school safety recommendations following a critical life-threatening incident on public school grounds.

If you have any questions about this report or would like additional information, please contact MCSS Deputy Director, J. Dino Pignataro at joseph.pignataro@maryland.gov or 410-281-2335.

Sincerely,



Kate Hession
Executive Director

Maryland Public School

Critical Life-Threatening Incident

After-Action Summary

On January 21, 2022 there was an incident involving a school within Montgomery County Public Schools (MCPS) that met the criteria to be considered a *Critical Life-Threatening Incident* pursuant to Md. Ed. Art. § 7-1510 (g) and COMAR 14.40.05.

Notification [COMAR 14.40.05.04A]

On January 21, 2022, the MCPS School Security Coordinator (SSC) notified the Maryland Center for School Safety of the incident.

After-Action Meeting [COMAR 14.40.05.04B]

On April 07, 2022, an after-action meeting was held involving school representatives, law enforcement, and a representative from MCSS.

After-Action Report [COMAR 14.40.05.04C]

On May 13, 2022, MCPS submitted an after-action report to MCSS.

Lessons Learned

Based upon the after-action review led by the MCPS, the following lessons learned were identified:

1. When possible, the school staff who are handling and treating a life-threatening incident should be those providing information to 911 call centers to ensure it is as accurate as possible. However, in the event this is not possible, school staff, particularly front office staff, should be trained in how to best communicate with a 9-1-1 call center so that complete and accurate information is shared during an emergency situation including the severity/mechanism of injury.
2. Bleeding control kits, and staff trained to use them, are a valuable resource used to assist staff in controlling bleeding and preventing further blood loss for a victim, before more advanced medical help arrives.

3. Rapid response by Community Engagement Officers (CEOs)¹ is essential in order to properly assess the incident and to determine if a threat still exists to the school community.
4. School Administrators, school staff, and school system leadership need training on the National Incident Management System (NIMS)² and Incident Command System (ICS).³
5. Schools should test, evaluate, and improve as necessary the technology and mechanisms used to communicate with staff during an emergency.
6. Schools should review the issuance of school key fobs to ensure that law enforcement can have immediate access to schools during an emergency.

School Safety Recommendations

1. Schools must review and update emergency plans--to include response protocols and procedures--annually, incorporating recommendations from MCSS and improvements identified following real-world events and exercises.⁴
2. Maryland requires public schools to conduct annual emergency preparedness exercises that test their emergency plans.⁵ However, additional drills or exercises should be added to the school or school system training and exercise schedule when areas for improvement are identified and following the implementation of corrective actions. Exercising following the implementation of corrective actions helps to ensure the improvements have the desired effect.⁶ Additionally, systems

¹ MCPS Community Engagement Officers (CEOs) are considered school resource officers (SROs) as defined under Md. Ann. Code Ed. Art. §7-1501(j).

² NIMS sets forth national guidance on the prevention, protection, mitigation, response to, and recovery from incidents. FEMA, *National Incident Management System* Third Edition (2017), https://www.fema.gov/sites/default/files/2020-07/fema_nimsDoctrine-2017.pdf.

³ ICS is a standardized national approach to managing emergencies. *Id.*

⁴ Maryland requires emergency plans to be updated and submitted for review to MCSS. The U.S. Dept. of Ed. Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center notes that “EOPs should be continually updated and enhanced based on lessons learned from school emergencies, exercises conducted, and insight from the whole school community.” A checklist https://rems.ed.gov/docs/SchoolEOPChecklist_508C.pdf.

⁵ COMAR 13A.02.02.04C.

⁶ “By continually examining the implementation of corrective actions, jurisdictions/organizations can identify capability gaps and determine what corrective actions require validation through exercises. Improvement Planning activities can help shape a jurisdiction’s/organization’s preparedness priorities and support continuous improvement in the building and sustaining of capabilities.” FEMA, *Homeland Security Exercise Evaluation Program* 6-3 (2020),

should conduct exercises which include first responders, 9-1-1 representatives, and other stakeholders in order to adequately and fully test emergency operations plans.

3. School buildings should be equipped with an adequate number of bleeding control kits and administration, nursing, security, transportation, and other critical staff should be trained on their use. Schools should also consider providing bleeding control training to all school personnel and students.
4. School systems should annually review and update the memorandum of understanding (MOU) between the school system and law enforcement agencies providing school resource officers and adequate law enforcement coverage. School Administrators and SROs should review these agreements each year and again when there are staffing changes within the school administration staff or officers providing coverage.
5. To effectively understand the coordination among school staff and first responders during an emergency, local school systems should require school and school system staff, including leadership, to enroll in Department of Homeland Security/Federal Emergency Management Agency (FEMA) training on the National Incident Management System (NIMS) and Incident Command System (ICS). At a minimum, these trainings should include:
 - a. IS-700.b⁷: An Introduction to the National Incident Management System; and
 - b. ICS-100.c⁸: Introduction to the Incident Command System.
6. The testing of equipment, including emergency communication equipment, should be part of a regular school school safety assessment.⁹ Additionally, while conducting required annual exercises,¹⁰ schools should

<https://www.fema.gov/sites/default/files/2020-04/Homeland-Security-Exercise-and-Evaluation-Program-Doctrine-2020-Revision-2-2-25.pdf>.

⁷ <https://training.fema.gov/is/courseoverview.aspx?code=IS-700.b>

⁸ <https://training.fema.gov/is/courseoverview.aspx?code=IS-100.c>

⁹ The Safe to Learn Act 2018 requires school systems to conduct regular safety assessments of their schools. MCSS recommends schools conduct annual assessments of their facilities, emergency plans, and their preparedness activities (e.g., training, drills). A facility assessment requires staff to walk in and around buildings and grounds in an effort to identify vulnerabilities. In addition to the physical grounds, assessments must be made of school policies, plans, or procedures in response to emergencies, both during school or at school-sponsored events after school or off school grounds. A summary of these assessments is required to be submitted to MCSS as they are completed. Md. Ed. Art. §7-1510(a)-(b).

¹⁰ COMAR 13A.02.02.04C.

develop an exercise scenario that allows the school to meet the exercise objectives while also testing their crisis communication systems including email, text, phones, radios, intercom, and public address systems.

Identified areas for improvement should be reported in the school systems annual emergency plan performance summary report¹¹ and school safety assessment summary report.¹² Following the implementation of corrective actions additional exercises should be conducted to ensure the improvements have the desired effect.

7. As part of the regular school safety assessment, school systems should assess who has access to school buildings and how access is provided to local first responders during emergencies. Assessments should be conducted of the interior and exterior grounds, safety equipment (e.g., access control, communication systems, locks, lighting, cameras), and emergency plans. Additionally, it is recommended that schools include law enforcement officers, either assigned or providing coverage, as part of the team conducting their mandated school safety assessments. Conducting these safety and vulnerability assessments in partnership with law enforcement has the benefit of allowing responders to become familiar with the layout of the school and at the same time providing the opportunity to test key or keycard access to the school buildings.

¹¹ Emergency plan performance summary reports are required to be submitted to MCSS by August 1, each year. Md. Ed. Art. §7-1510(f).

¹² Md. Ed. Art. §7-1510(b)(3).