

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General



September 19, 2019

Lewis D. Ferebee
Chancellor
District of Columbia Public Schools
1200 First Street, N.E.
Washington, D.C. 20002

Dear Chancellor Ferebee:

Thank you for providing an update on the status of DCPS' efforts to implement recommendations presented in the Office of the Inspector General (OIG) report [*District of Columbia Public Schools – Special Evaluation of Emergency Response Planning and Readiness*](#), which was published on September 19, 2016. I am writing to request that DCPS provide another update no later than November 1, 2019.

The *School Emergency Response Plan and Management Guide*, created by the District's Emergency and Safety Alliance,¹ states that each school's Emergency Response Plan (ERP)² will be updated yearly and submitted for review and approval.

My Office has reviewed DCPS' August 28, 2019, response³ to my July 17, 2019, request for an update, and information you provided subsequent to your initial response. The OIG's analysis of information in the "School Year 2018-2019 Emergency Response Plan Tracker" DCPS provided concluded:

- Only 24 of 114 DCPS facilities (21 percent) had an ERP approved by the D.C. Fire and Emergency Medical Services Department (FEMS) during SY 2018-19 (after DCPS' September 7, 2018, internal deadline for submitting the ERP for approval);

¹ "The District of Columbia's Emergency and Safety Alliance (ESA) was formed as an interagency team to plan, implement, manage, and sustain emergency response planning at the individual building level. Partnership and collaboration are essential components of the emergency planning effort." [Http://esa.dc.gov/page/about-esa](http://esa.dc.gov/page/about-esa) (last visited Sept. 11, 2019).

² An ERP identifies a designated chain of command, roles for the school's emergency response team members, school-specific procedures, and building floor plans. Having an emergency plan for each individual school increases the likelihood of successfully managing a threat or emergency situation because the plan addresses site-specific conditions and identifies any particular needs (e.g., assistance due to a disability) among its staff and student body.

³ Both DCPS' August 28, 2019, response and the OIG's July 17, 2019, initial request for information are attached to this letter. After reviewing DCPS' response, the OIG requested additional information and clarification, which DCPS provided via email. While summarized in this letter, the school-specific information DCPS provided is not attached.

- 58 of 114 DCPS facilities (51 percent) had an ERP with an approval date earlier than September 7, 2018;⁴ and
- for 32 of 114 DCPS facilities (28 percent), the date on which FEMS last approved an ERP was not provided.

A current, FEMS-approved ERP is essential to a school staff's ability to prepare for and respond to a variety of possible situations, including fire, the threat of violence, and severe weather. Therefore, please provide my Office, no later than November 1, 2019, with another update on DCPS's progress toward ensuring that: (1) every DCPS facility has a current and complete ERP for SY 2019-2020; and (2) FEMS has reviewed and approved each ERP, in accordance with the procedures cited on page 4 of your August 28, 2019, response.

In the interim, if you have any questions, please contact me or Edward Farley, Assistant Inspector General for Inspections and Evaluations, at (202) 727-2540. Mr. Farley can also be reached at Edward.Farley@dc.gov.

Sincerely,


Daniel W. Lucas
Inspector General

DWL/ef

cc: See Distribution List

⁴ Some schools' ERPs were last approved by FEMS as far back as June 2017.

DISTRIBUTION:

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BY EMAIL AND FIRST-CLASS MAIL

August 28, 2019

Daniel W. Lucas
Inspector General
717 14th Street, NW
Washington, DC 20005

Dear Inspector General Lucas,

The District of Columbia Public Schools (DCPS) is in receipt of the Office of the Inspector General’s (OIG) July 17, 2019 letter requesting an update on the status of DCPS’ efforts to implement recommendations presented in the OIG’s September 19, 2016 report, *District of Columbia Public Schools – Special Evaluation of Emergency Response Planning and Readiness*. Thank you for the opportunity to provide updates on our improvements since the OIG completed its audit. DCPS’ responses to your follow-up questions are detailed below.

1. What was DCPS’ assessment of the ESA Application’s functionality? What actions did DCPS take following its assessment to improve the functionality and DCPS’ use of the ESA Application?

DCPS has taken steps to assess and improve the functionality of the Emergency Safety Alliance (ESA) application. On March 2, 2017, DCPS met with the DC Fire & Medical Services (FEMS) Chief and Fire Inspectors assigned to both DCPS and DC charter schools regarding school Emergency Response Plan (ERP) compliance, and the ESA application’s functionality and overall capabilities. During this meeting, DCPS and FEMS agreed that the ESA application could be improved to better manage training attendance, track procedural compliance such as safety drills and house all associated data in one centralized location.

Since the 2017 assessment of ESA, DCPS has worked with the Office of the Chief Technology Officer (OCTO) to implement system upgrades to ESA to improve its functionality and reporting. For example, DCPS’ Emergency Planning and Guidance (EP&G) team recommended that OCTO make cosmetic upgrades to the drill reporting section of the ESA. The upgrades implemented also include the generation of an electronic mail notification from ESA to EP&G when FEMS approves all or a portion of an ERP.

2. Is DCPS currently using the DoE EOP software platform in conjunction with the ESA Application?

DCPS is not currently using the Department of Education’s (DOE) software platform previously identified in conjunction with the ESA. DOE’s platform required software and functional upgrades for DCPS that were not aligned to the District of Columbia Municipal Regulations (DCMR).¹ To date, DCPS continues to use the ESA application; however, we are currently procuring an alternative system, the Emergency Response Information Portal (ERIP). DCPS has committed to transitioning to the ERIP with completed implementation in all schools anticipated by the end of school year (SY)

¹ DOE’s system functionality does not allow efficient compliance and safety drill tracking and notification, as the platform does not include real-time notification to schools via a platform or web-based application.



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2019-2020. During SY2019-2020, DCPS will be phasing schools out of ESA into ERIP, beginning with high schools, then middle schools and finally elementary schools. Each school will continue to use ESA until transitioned into ERIP.

3. What percentage of DCPS schools submitted a complete and up-to-date Emergency Response Plan on the ESA Application for SY2018-2019?

100% of DCPS schools submitted their ERPs in the ESA application for SY2018-2019. Of the ERPs submitted, 67% were fully approved by FEMS. The remaining 33% required additional information prior to FEMS approval and were being worked on across teams through the course of the year.

ERP submissions for SY2019-2020 are due by August 30, 2019. As in prior years, the EP&G team will work closely with FEMS to ensure that SY2019-2020 plans are finalized and approved as soon as possible.

4. Describe DCPS’ current communication strategy for informing principals and other school leaders of their responsibilities with regard to ERPs and training.

DCPS uses several communication strategies for informing principals and other school leaders of their ERP responsibilities. These strategies include the following:

- Principal’s Weekly (PW) – a weekly e-newsletter sent to all principals, instructional superintendents, central office leaders and other DCPS staff. The most recent communication reminding principals and other leaders of DCPS’ emergency response processes and deadlines was shared in the PW in preparation for SY2019-2020 on August 16, 2019.
- School Strategy and Logistics Weekly (SSLW) – a weekly e-newsletter sent to all operational leaders at schools, who are frequently designated as members of each school’s School Emergency Response Team (SERT). The most recent SSLW communication was shared with operational leaders on August 20, 2019.
- The EP&G team sends direct email correspondence to principals, assistant principals, directors and managers of strategy and logistics (operational leaders) and business managers as needed.
- Training is provided via video conference (Webex) to reduce disruption to schools and to encourage participation from principals and other SERT team members.
- On August 14, 2019, DCPS’ Core Leadership team (Chancellor, Deputy Chancellors, Chiefs and Instructional Superintendents) attended an annual refresher training session on emergency response and communication. This training was initially provided in November 2018.

As an example of such communications, the June 7, 2019 PW communication, set forth below, was sent to schools prior to the start of our 2019 summer programming session:

Reminder: *In accordance with the School Emergency Response Plan and Management*



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Guide (“the Redbook”), at least one fire drill must be conducted during the first week of any summer Program, or any special programmed activity (e.g. summer recreation program). Safety drills and after-action reports must be documented in the ESA application located [here](#).

Additionally, schools must notify the school security command center at (202) 576-6950 prior to all drills and incidents that may require activation of the universal emergency response protocols, such as evacuation, lockdown, alert status, shelter-in-place, or severe weather.

For additional questions and guidance, please email carlton.gerald@k12.dc.gov.

5. Has DCPS implemented a uniform orientation and training program for principals detailing how and when they are expected to deliver relevant emergency preparedness information to faculty, parents, and other community stakeholders. If so, please describe the key elements of the program.

DCPS implemented a training and orientation program for school-based staff detailing how and when they are expected to deliver relevant emergency preparedness information to staff, students, parents, and community stakeholders via SERT training. The target audience for this training is principals, assistant principals, directors/managers of strategy and logistics, business managers, deans of students, behavior technicians, custodial foremen and others who routinely interact with contract security officers. The key elements of SERT training are to provide members with an understanding of the importance of DCPS’ Universal Emergency Response Procedures² and the vital roles that SERT members must perform before, during and after a critical incident. Click [here](#) for example registration link. All schools are required to complete their ERPs and ensure a full SERT team is assembled and attends training as needed in the fall of each school year.

Other trainings and supports offered by DCPS include:

- An emergency response awareness video that details DCPS’ response protocols for school-based staff and students.
- The Federal Emergency Management Agency (FEMA) Student Tools for Emergency Planning Program (STEP), which is a curriculum for 4th and 5th grade students designed to teach them how to prepare for emergencies and disasters. This is a train-the-trainer curriculum that school-based staff use with their students.
- The Master Instructor in School Security (MISS) program is designed to address security risks through an Institute of Leadership Management, certified train-the-trainer program by creating capacity within schools to self-teach 20-minute micro-sessions on critical security and emergency topics. Click [here](#) for program details.

² Universal Emergency Response Procedures include: lock-down, barricade doors when safe to do so, alert status, severe weather, natural disaster, drop cover and hold, and shelter in place.



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6. What is DCPS’ and FEMS’ current process for approving School Emergency Response Plans? Where is it documented and how is it communicated to principals and other school leaders?

The following steps detail the current ERP approval process:

- Principals or their designees submit their school’s plan annually via the ESA application by an established deadline.
- DCPS conducts detailed administrative reviews of the ERPs immediately following the prescribed deadline for submission.
 - DCPS identifies and documents non-compliant data and missing/incorrect information in each school’s ERP and contacts the relevant school leader to request corrections as necessary.
 - Schools have five business days to respond and correct their respective ERP.
 - If principals do not respond in a timely manner, it is flagged for the DCPS Deputy Chief, Operations for follow up with the appropriate Instructional Superintendent (Principal supervisor). Click [here](#) for example ERP administrative review letter sent in response to a school’s submission.
- After plans are approved internally, the EP&G team emails a spreadsheet to the FEMS Chief and Fire Inspectors for final ERP approval in accordance with the DCMR.
- As plans are approved by FEMS, the ESA application notifies the EP&G via electronic mail.
- ERPs are approved and considered final.

As changes are needed, an ERP may move back and forth between approval steps (bullets 2 and 3 above) in the process. Therefore, the EP&G team provides ongoing technical assistance to schools as needed when FEMS flags issues. DCPS documents its support efforts in a QuickBase application and on the Microsoft Office 365 shared drive. Click [here](#) to access spreadsheet and email delivery to FEMS [here](#).

Thank you for conducting this audit, allowing DCPS to respond and continuing to partner with us to improve our preparedness for emergencies within our schools. Please do not hesitate to contact me with any questions.

Sincerely,

Lewis D. Ferebee, Ed.D.
Chancellor
District of Columbia Public Schools

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General



July 17, 2019

Lewis D. Ferebee
Chancellor
District of Columbia Public Schools
1200 First Street, N.E.
Washington, D.C. 20002

Dear Chancellor Ferebee:

I am writing to request an update on the status of DCPS’ efforts to implement recommendations presented in the Office of the Inspector General report *District of Columbia Public Schools – Special Evaluation of Emergency Response Planning and Readiness*, which was published on September 19, 2016.¹

As stated in the OIG’s *Fiscal Year 2019 Audit and Inspection Plan*,² the OIG would like to assess the progress and improvements DCPS has made to develop, implement, and practice emergency response protocols for active shooters, tornadoes, and other emergencies since publication of the September 2016 evaluation.

Presented below are the evaluation’s four findings and corresponding recommendations, followed by DCPS’ September 2016 response to each recommendation. The OIG has included six (6) additional questions, which will help assess DCPS actions taken to date and its progress toward completing planned tasks and initiatives. I am requesting DCPS provide their responses to these questions, to include any other information that will assist the OIG in evaluating improvements made in DCPS’ emergency response planning and readiness capabilities, by August 2, 2019. DCPS’ response to this letter will be included in the OIG’s final, publically available report.

OIG Finding 1:

Sixty percent of DCPS schools (67 of 111 schools) had a complete School Emergency Response Plan (ERP) in the Emergency and Safety Alliance³ (ESA) Application, but none of the plans appeared to be current; two plans were dated 2013, while the other 65 were not dated.

¹ D.C. Code § 1-301.115a(a-1)(3) (Supp. 2018) requires the OIG to “provide a means for keeping the Mayor, Council, and District government department and agency heads fully and currently informed about the . . . necessity for and progress of corrective actions.”

² [Click here](#) to access the OIG’s *Fiscal Year 2019 Audit and Inspection Plan*.

³ “The District of Columbia’s Emergency and Safety Alliance (ESA) was formed as an interagency team to plan, implement, manage, and sustain emergency response planning at the individual building level.” [Http://esa.dc.gov/page/about-esa](http://esa.dc.gov/page/about-esa) (last visited Jul. 10, 2019).

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OIG Recommendation 1:

Coordinate with ESA partner agencies to conduct a thorough assessment of the ESA Application’s functionality, and implement an action plan to ensure that the ESA Application gives DCPS personnel the information technology capabilities they need to meet Red Book⁴ annual requirements regarding completion of School Emergency Response Plans, scheduling, completion, and documentation of orientation and training events and drills.

DCPS’s September 2016 Response to Recommendation 1:

DCPS agrees with the recommendation. DCPS Emergency Planning and Guidance (EPG) team will coordinate with FEMS and HSEMA by March 30, 2017, to 1) conduct a full assessment of the ESA application’s functionality and 2) implement a complete action plan that will provide monitoring capabilities including time and date stamps for ERPs and the completion of orientation and training events and drills, that will include appropriate participation documentation. DCPS has dedicated resources to the monitoring of this work through the creation of the EPG, set to launch October 3, 2016.

DCPS identified an Emergency Operation Plan (EOP) software platform administered through the U.S. Department of Education’s (DOE), Office of Safe and Healthy Students Readiness and Emergency Management for Schools Technical Assistance Center, which provides DCPS with the necessary functionality and monitoring capabilities for school ERPs. The EOP software provides the recommended six steps for planning, including sample plans, emergency plan calendars and training documents to further assist schools in the development of site ERPs. Schools will continue to report and document the required information in the ESA application. We anticipate using the DOE platform in combination with ESA beginning spring 2017. We have a target date of November 30, 2016 for schools to submit their drill plan and activities. The EPG team will monitor a sample of school drills as well as monitor the ESA website to ensure schools are reporting their drill activities appropriately.

DCPS is asked to respond to the following:

- (1) What was DCPS’ assessment of the ESA Application’s functionality? What actions did DCPS take following its assessment to improve the functionality and DCPS’ use of the ESA Application?
- (2) Is DCPS currently using the DoE EOP software platform in conjunction with the ESA Application?
- (3) What percentage of DCPS schools submitted a complete and up-to-date Emergency Response Plan on the ESA Application for SY 2018-2019?

⁴ ESA created the *District of Columbia School Emergency Response Plan and Management Guide*, referred to as “The Red Book,” which includes protocols for responding to various emergencies and templates and instructions for schools to use to create and complete their individual School Emergency Response Plans.

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OIG Finding 2:

For the 20 schools we sampled, the OIG found little evidence that any had scheduled or held staff orientation and training events in SY 2014-2015 as required by The Red Book.

OIG Recommendation 2:

Implement a communication strategy that informs principals throughout the school year of their responsibilities to complete and update School Emergency Response Plans and conduct and document orientation and training events and drills.

DCPS’s September 2016 Response to Recommendation 2:

DCPS agrees with the recommendation. By November 30, 2016 the EPG team will implement a communication strategy that will inform principals and other school leaders of their responsibilities for ERPs and training. We will utilize the following DCPS resources to achieve this goal:

- *We will disseminate emergency planning guidance and documentation requirements to principals and other responsible school-based leaders by July 15th annually, so the information can be shared in cluster meetings with principals during the summer.*
- *We will send monthly reminder emails about posting and documenting drill activity to principals and other responsible school leaders on the 15th day of each month through the Daily Update sent by the Chief of Schools.*
- *We will announce updates in the Director/Manager of Strategy & Logistics (DSL/MSL)[] monthly, electronic newsletter. These updates will be included by the 15th day of each month.*
- *School Operations Specialists will include EPG updates in person and in writing in their monthly check-ins with principals and/or DSLs/MSL.*

DCPS is asked to respond to the following:

- (4) Describe DCPS’ current communication strategy for informing principals and other school leaders of their responsibilities with regard to ERPs and training.

OIG’s Finding 3:

According to information in the ESA Application, only 1 of the 20 schools we sampled completed the required number of emergency drills in SY 2014-15. Seven of the 20 schools we sampled recorded no completed drills for SY 2014-15.

OIG’s Recommendation 3:

Develop and disseminate a uniform orientation and training program to principals so that they understand how and when they are expected to deliver relevant emergency preparedness information to faculty, parents, and other community stakeholders.

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DCPS’s September 2016 Response to Recommendation 3:

DCPS agrees with the recommendation. By November 30, 2016, the EPG team will formalize the SERT training that began November 2015 and provide templates to schools for documenting the school-level orientations and trainings conducted. Annually in August, during the two (2) weeks leading up to school opening, we will provide school leaders with our expectations around the planning and execution of drills, including the documentation of such in the ESA portal.

The EPG team will also provide a sample agenda and training materials to be presented to school staff to ensure that all staff is aware of the school procedures in various emergency situations. We will also require that schools provide sign-in sheets for all who attended. We will have schools post emergency preparedness information on the school website for the broader community. We will also provide templates for schools to disseminate at back-to-school events and to make copies available in the main office.

DCPS is asked to respond to the following:

- (5) Has DCPS implemented a uniform orientation and training program for principals detailing how and when they are expected to deliver relevant emergency preparedness information to faculty, parents, and other community stakeholders. If so, please describe the key elements of the program.

OIG’s Finding 4:

FEMS did not approve any SY 2015-16 School Emergency Response Plan as required by The Red Book.

OIG’s Recommendation 4:

Develop and disseminate a written procedure that defines the process through which the Office of the Fire Marshal will review and approve, annually, completed School Emergency Response Plans in the ESA Application.

DCPS’s September 2016 Response to Recommendation 4:

DCPS agrees with the recommendation. The EPG team will coordinate a review of the established process in the Red Book and work with the appropriate FEMS staff to identify a time line for FEMS to annually approve school EOPs. Upon agreement of a review process, DCPS will develop and implement a written procedure by March 30, 2017.

Note: DCPS emailed the OIG two attachments on March 30, 2017, referencing its efforts to implement Recommendation 4. One attachment was an announcement on DCPS letterhead from the Office of the Chief Operating Officer, Division of School Security. It stated:

EP&G will conduct an administrative compliance review of all schools Emergency Response Plans by November 1, of each school year. Schools that are identified as non-compliant will be notified via email to correct, or add information within (5) business days

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upon receiving notification from EP&G. Schools Emergency Response Plans that are found to be in compliance will be forwarded by email to FEMS for final approval. FEMS will identify and notify EP&G by email of schools Emergency Response Plans that have areas of concern and or rejected for final approval. EP&G will provide guidance and technical assistance to those schools not approved by FEMS.

DCPS is asked to respond to the following:

- (6) What is DCPS’ and FEMS’ current process for approving School Emergency Response Plans? Where is it documented and how is it communicated to principals and other school leaders?

In the interim, if you have any questions, please contact me or Edward Farley, Assistant Inspector General for Inspections and Evaluations, at (202) 727-2540. Mr. Farley can also be reached at Edward.Farley@dc.gov.

Thank you for your attention to this matter and supporting the work of the OIG.

Sincerely,


Daniel W. Lucas
Inspector General

DWL/ef