



October 12, 2020

MI Safety & Drill Planning Considerations for the 2020-2021 School Year

In Michigan last year, there was a total of 103 fires in K-12 schools. As many school districts have re-started classes in person, there are new students and teachers in every school and those returning have been away from the classroom for an extended amount of time. This year, as a result of the coronavirus (COVID-19) pandemic, Michigan schools are facing the difficult challenge of finding ways that allow teachers and students to return to the classroom while observing both social distancing and increased sanitation requirements, and continuing to provide a quality education for students. For these reasons, it is important to conduct regulated safety drills and follow the requirements set forth in law.

This guidance differentiates from schools educating at a distance, in-person, and in a hybrid. This guidance is a collaboration among the Michigan Department of Education (MDE) and the Michigan Licensing and Regulatory Affairs' (LARA) Bureau of Fire Services and the State Fire Marshal to assist school administrators and staff in providing a safe learning environment. While MDE does not have authority over emergency drill compliance, the department has been receiving many questions about emergency drills during the COVID-19 pandemic.

The [MI Safe Schools: Michigan's 2020-21 Return to School Roadmap](#) (MI Safe School Roadmap) provides required and strongly recommended safety protocols to keep school communities safe based on the status of the coronavirus. Additionally, the MI Safe School Roadmap provides recommendations across mental and social-emotional health, instruction, and operations within each phase of the [MI Safe Start Plan](#) to support all schools in Michigan as they establish their return to school planning work and move towards implementation. Ultimately, reopening is a local decision based on which options work best for individual districts and how those options will be implemented, according to data and needs in the community. Incorporating the guidance in the MI Safe School Roadmap, this guidance will look at safety planning actions that can be taken to assist districts and schools with choices for their students in school. These suggestions are made with district, school, classroom, and home activities in mind.

School districts are still bound by [emergency drill requirements](#), which will have to be adapted to the new conditions. Some drills may be simple to practice with different instructional models. All will require additional planning and adaptations.

Below are three different instructional models and how to conduct drills during each.

In-person Instruction

While drills will still need to be conducted, evacuation drills will have to take social distancing into account. Because part of the fire drill is to 'sound the alarm' and everyone will need to evacuate when that alarm sounds, it may take more time to conduct the drill and accommodate the need for social distancing. That is ok! When the alarm sounds, you can stagger classrooms as they dismiss, allowing a small amount of time between each classroom's evacuation to accommodate social distancing. There may need to be different

evacuation locations for the various classes to accommodate social distancing. Work with your local emergency manager and fire department to decide how best to conduct your drills so social distancing can be followed while still evacuating the entire building as needed.

Hybrid Instruction

If groups of students attend school in person on alternating days, there will need to be a drill schedule that accommodates this instructional model. Drills will need to be conducted with each group of students on their respective days in school. Per the State Fire Marshal, each drill conducted with a group may count as separate drills. For example, group A attends in-person instruction on Monday and Tuesday. Group B attends in-person instruction on Thursday and Friday. School administration conducts drills with group A on Tuesday and group B on Thursday. This will count as *two drills*. The first set of three drills must be conducted before December 1. Each group must have at least one drill before the designated deadline.

While conducting drills, whether during in-person instruction or during hybrid instruction, schools will need to consider evacuation locations, space, and distancing depending on the specific size and layout of the school, campus, or community. Below are some suggestions to help with drill planning and implementation:

- Review mandated [drill requirements](#).
- Discuss drills and drill requirements during staff meetings.
- Review the purpose of drills, and the processes in implementing them.
- Use scenarios or tabletops with staff. Make them building specific.
- Build the results of staff discussions into classroom lessons. Talk with students about the why and how of safety drills.
- Schools are strongly encouraged to work with their special education directors and teachers to include considerations of students with special needs in their planning. Visit the [CDC website](#) (scrolling to the section titled "Students with disabilities or special healthcare needs" near the bottom of the page) for guidance.
- Collaborate with local emergency managers and first responders to plan and problem solve. It may also be a good idea to work with your local fire safety inspector found on this interactive [map](#).
- Partner and communicate with families. Some safety drills and activities usually done in school can be shared and practiced at home. This may be an important way of bringing home and school safety together, especially for younger students.
- Encourage families to attend community days at their local first responders' buildings to give children a chance to meet local responders and check out the equipment. This may help alleviate the fear some children may feel if first responders need to come to their aid.
- Reunification planning will take some special consideration.
 - Location:
 - Inside/outside: Will reunification take place from within the school itself, or will it take place at a campus site outside of the school?
 - On-site/remote: If an evacuation moves staff and students to an off-site location, will that site be prepared to receive them? Is it safe and secure? Is it currently accessible?
 - Vehicles:
 - Traffic flow: How will traffic be accommodated to ensure safety and distancing? How will drivers be identified if they are wearing masks?
 - Sign-in/sign-out:
 - How will this be accomplished while adapting to current safety guidelines?

Ultimately, in district or school planning for these topics in the current pandemic environment, many decisions will come down to reasonableness, common sense, and risk assessment *within* an emergency *within* the pandemic. Collaborating with families and community partners is critical!

Learning at a Distance

If a school is operating fully remotely, it should be noted that at this time, there is not a legal mechanism to issue waivers from the drill requirements. A statutory change from the legislature is likely needed to provide additional flexibility. MDE understands that this seems peculiar at the moment and we are working to address it with the administration and the legislature to change state law to help local schools and local school districts in this instance.

COMPREHENSIVE DISTRICT AND SCHOOL SAFETY PLANNING

Emergency Operations Plans

Districts and schools are required to have an [Emergency Operations Plan](#) (EOP).

Comprehensive EOPs consider prevention, mitigation, protection, response and recovery from all threats and hazards, natural, biological, technological, or man-made.

In Michigan, each EOP is required at a minimum to address:

- School violence and attacks
- Threats of school violence and attacks
- Bomb Threats
- Fire
- Weather-related emergencies
- Intruders
- Parent and pupil reunification
- Threats to school-sponsored activities or events regardless if they are held on school premises
- Plan to train teachers on mental health and pupil and teacher safety
- Plan to improve school building security
- Vulnerability assessment

Each district or school EOP is designed for that location in partnership with local emergency responders and managers. Many of the topics that are often viewed separately, such as student health and well-being, should be addressed and included as part of the overarching, comprehensive plan. Districts are strongly encouraged to collaborate with their school and local mental health professionals to address needs and resources for the EOP.

Communications

Communication processes are critically important moving forward. In recent months, everyone has likely experienced more varied forms of communication than ever before. With respect to safety planning, consider revisiting what is currently in place and update or add specific communication lines with your different stakeholders in mind. For example:

- Staff—Update phone trees and text options; train on effective use of Zoom, Skype, or other platforms used for meetings and trainings.
- First Responders—Ensure that responding staff know and have access to appropriate contacts and protocols.
- Families—Update family contact information; maintain an easily accessible web site; create a web page that is not immediately public, with emergency-specific information that can be quickly made public, as needed.
 - Encourage students and families to have and post current emergency contact lists. Identify safe places within homes during emergencies, as well as safe family reunification points in and around neighborhoods.
 - Be sure to accommodate the language needs of families and students.
- Anonymous reporting—Provide call, text, and web resources for students, staff, and families. Michigan uses the Ok2Say tip line. Additional information on Ok2Say can be found at <https://www.michigan.gov/ok2say/>. Suggestion or communication drop boxes can also be an effective way for students to reach out for help.
- Media—Identify your district's public information officer; make sure that everyone knows who this is and how to contact that person.

- Schools are required to ensure that documentation of a completed school safety drill is posted on its website within 30 school days after the drill is completed and is maintained on the website for at least three years.
- Watch for executive orders that could potentially waive emergency drill requirements when virtual learning is occurring.

Assessments

Within a comprehensive EOP, assessments are a key component for planning. Assessing physical surroundings (sites), the climate and culture, and the capacity to respond will help determine current and future needs. Survey staff to assess and compile their specific skill sets that would be useful in case of emergency. Identify assets and resources within campus buildings and assess potential needs for the future.

Digital Safety

Zoom, Google Classrooms, and other platforms are filling in for in-person instruction, gatherings, and meetings. They are becoming our new best way of connecting with students, staff and friends. Within that context, the reports of hacking and other cybercrimes make ensuring the safety and security of your students, districts, and school networks more critical. This [Department of Homeland Security Cybersecurity](#) page provides critical information.

Specifically with educators, parents, and students in mind, the [Cyberbullying Research Center](#) and [StaySafeOnline](#) provide a wide array of resources to help keep kids safe. For home, links and pages from these sites can be shared with students and families. It is important to keep in mind that most young people are safe and productive online most of the time. However, given the amount of time and number of activities for which students are online, especially in light of instruction being completed online, it is important for adults to be aware of students' time and activities and to be prepared to step in to keep them safe.

Visitors

As the school year continues, and as schools adjust to various schedules and safety accommodations, it is important to note that visitors will likely be arriving wearing masks. In addition, with varying new work schedules for families, not everyone coming to school may be a familiar face. Adapt the plans to accommodate changes that may need to be implemented to visitor screening and sign-in procedures. It is strongly recommended that visitors remain in the school office area.

Alcohol-based Hand Rub (Sanitizer)

With an increase in the amount of sanitizer being kept and used in schools, it is important to remember that alcohol-based hand rub (ABHR) is a flammable liquid and requires careful storage and use. NFPA 101, Life Safety Code, 2012 Edition is referenced by the school fire safety rules and has specific requirements for use of ABHR as follows:

- Dispensers shall be installed in rooms or spaces separated from corridors and exits and are NOT permitted in corridors
- The maximum individual dispenser fluid capacity shall be as follows:
 - 0.32 gal (1.2 L) for dispensers in rooms
 - 0.53 gal (2.0 L) for dispensers in suites of rooms
- The dispensers shall be separated from each other by horizontal spacing of not less than 48 inches (1,220 mm)
- The dispensers shall not be installed over, or directly adjacent to, an ignition source such as light switches or receptacles
- Dispensers installed directly over carpeted floors shall be permitted only in sprinklered rooms or spaces
- The storage of ABHR is strictly regulated due to its flammability; storage of more than five gallons is required to meet the following conditions:
 - ABHR may not be stored in a basement.
 - Quantities of more than five gallons shall be stored in a listed flammable

- liquids storage cabinet.
- If the above criteria cannot be met, the ABHR should be stored in a separate building from the school and only dispensed as needed.

Building Modifications

To accommodate social distancing requirements and increase ventilation, it is important to be aware of the following laws regarding what is considered a building modification and what is not.

- Modifications to the building are not permitted without approval by the bureau of construction codes and the bureau of fire services as required by Public Act 306 of 1937, Construction of School Buildings. The following are examples of building modifications that require approval:
 - Modifying fire doors (equipped with self-closing devices) to have them held open by means of additional hardware, wedges, or other means other than those that automatically release upon activation of the fire alarm system
 - Utilizing other non-student spaces for classrooms such as conference rooms, offices, or other spaces
 - Modifying egress routes that prevent their use in an emergency
 - Note: Signage to indicate one-way traffic for regular use is not considered a modification

If you have any questions or need additional information, please contact the LARA Bureau of Fire Services at lara-bfs@michigan.gov or 517-388-1761 or Mary Teachout at the Michigan Department of Education at TeachoutM@Michigan.gov.