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June 6, 2024

To: District Superintendents of BOCES
Superintendents of Public School Districts Outside NYC
Principals of Public Schools Outside NYC
Superintendents and Principals of State-Operated Schools
Charter School Leaders

From: Gemma C. Rinefierd, Ed.D.

Subject: Recent amendments to Commissioner's Regulation §155.17

At the April 2024 meeting of the Board of Regents, two packages of proposed amendments to Commissioner's Regulation §155.17 were presented that will become effective [July 31, 2024](#) and [July 1, 2025](#). As you are reviewing and updating your building-level emergency response plan and district-wide school safety plan for the 2024-25 school year, we encourage you to implement the changes that will become effective July 31, 2024 in anticipation of their permanent adoption at the July 2024 meeting of the Board of Regents.

Comments regarding the proposed regulation changes may be submitted to REGCOMMENTS@nysed.gov before July 1, 2024.

A summary of the proposed amendments as well as recommendations for how to implement is provided below.

[Proposed Amendment of Section 155.17 of the Regulations of the Commissioner of Education Relating to School Safety Plan Requirements](#) (effective July 31, 2024)

Change	Suggested Considerations when Implementing
<p>Adding the following terms and definitions to regulation:</p> <ul style="list-style-type: none">○ Trauma means an emotional response to a deeply distressing or disturbing experience such as, but not limited to, an act of violence, natural disaster, abuse, neglect, or loss.○ Trauma-informed means an understanding of trauma and how it affects the physical, emotional, and mental health of students and adults.○ Trauma-informed drills means avoiding tactics in training or drills that may introduce or activate	<p>Each school's building-level emergency response plan details the procedures that are in place if an emergency were to occur.</p> <p>Providing training to staff and students about the emergency procedures is an essential part of school safety. The goal in providing training and conducting drills is to practice and prepare, not to scare.</p>

Change	Suggested Considerations when Implementing
<p>trauma, such as the use of props, actors, simulations, or other tactics intended to mimic a school shooting, incident of violence, or other emergency, or inclusion of developmentally or age-inappropriate content. Drills may inadvertently prompt a negative emotional or psychological response in staff or students because of previous exposure(s) to trauma.</p> <p>Require that District-wide School Safety Plans and Building-level Emergency Response Plans ensure that that:</p> <ul style="list-style-type: none"> (1) drills and training be conducted in a trauma-informed, developmentally and age-appropriate manner; (2) drills and training do not include props, actors, simulations, or other tactics intended to mimic a school shooting, incident of violence, or other emergency; and (3) students and staff be informed when a school is conducting a drill. <p>Require that District-wide School Safety Plan:</p> <ul style="list-style-type: none"> o includes procedures regarding notification of parents or persons in parental relation regarding drills. o includes policies and procedures for obtaining written consent for students to participate in full-scale exercises in conjunction with local and county emergency responders and preparedness officials on non-school days when school activities such as athletics are not occurring on school grounds. 	<p>Schools should include school social workers, counselors, psychologists, nurses, special education teachers and other pupil personnel services staff on your safety teams to utilize their knowledge and expertise in developing training and drills that are trauma-informed and age and developmentally appropriate.</p> <p>When conducting a drill, it must ALWAYS be announced that it is a DRILL and NOT AN EMERGENCY. Use consistent language to ensure students and staff know you are conducting a drill, such as, <i>“This is a drill, not an actual emergency. This is a drill. We are now practicing how to Lockdown (or Evacuate). This is a drill.”</i></p> <p>Conduct drills in a trauma-informed manner and leave time after the drill to debrief with students and answer questions. Involve school pupil personnel services staff as needed to support students and/or staff.</p> <p>Your safety team must develop parental notification procedures regarding drills. Consider the following:</p> <ul style="list-style-type: none"> • providing annual open house presentation on safety procedures • sending an annual letter home to parents regarding safety protocols, drills, parent notification system for emergencies • informing parents about how and when notification will be provided regarding drills
<p>Require that prevention and intervention strategies that are documented in District-wide School Safety Plans include information regarding school or district-level behavioral assessment teams or county or regional threat assessment teams, <u>if applicable</u>.</p>	<p>If district or school personnel participate in such a team, this change requires that the district-wide school safety plan include information appropriate to the team. You may want to include:</p> <ul style="list-style-type: none"> • what behaviors, concerns, or situations to report • how to report a safety concern (email, telephone, web form, app, etc.) • whether reporting is anonymous or confidential • what information is collected in the report • how safety concerns will be investigated • training and outreach that is provided for parents, students, and staff • school/district or community supports for students, staff, and families.

Change	Suggested Considerations when Implementing
	<p>Note that this change does not require that districts or schools adopt a behavioral assessment team or county or regional threat assessment team.</p> <p>A suggested resource is the U.S. Secret Service Improving School Safety Through Bystander Reporting: A Toolkit for Strengthening K-12 Reporting Programs</p>
<p>Require that building-level emergency response plans include floor plans labeled with:</p> <ul style="list-style-type: none"> • the school name and address • a key to define any symbols used • a compass indicating North • labels indicating building entrances/exits with alphabetic or numeric identifiers assigned (e.g. “Door A” or “Entrance 2”) • windows, interior doors, room numbers • common areas and administrative offices labeled by use • location of water, gas and electrical shutoffs • location of fire alarm panels, fire sprinkler control valves, and if applicable fire department key boxes • location of emergency and security equipment <p>Require that building-level emergency response plans include area maps labeled with:</p> <ul style="list-style-type: none"> • the school name and address • a key to define any symbols used • a compass indicating North • labeled buildings, outbuildings, fields, parking lots • building entrances/exits with alphabetic or numeric identifiers assigned (e.g. “Door A” or “Entrance 2”); • parking area and property entrances/exits • designated fire lanes and fire apparatus access roads, evacuation routes • street names • emergency response areas 	<p>See information in Floor Plan and Area Map Tip Sheet</p>
<p>Explicitly include bus drivers and monitors in the required members of the district-wide school safety team and policies and procedures that apply to teachers and other school personnel in the district-wide plan</p>	<p>The regulation and statute require certain staff in certain titles or roles be included in safety teams, however a district may include additional staff, at their discretion.</p>

The second package of amendments that will become effective July 1, 2025, titled [Proposed Amendment of Section 155.17 of the Regulations of the Commissioner of Education Relating to Emergency Response Definitions for School Safety Plans](#) defines the following required emergency

terms to standardize terminology in all schools statewide and to eliminate confusion created from misuse of terms that sound similar:

- **Evacuate** and evacuation mean to move students for their protection from a school building to a predetermined location in response to an emergency.
- **Shelter** and shelter-in place mean keeping students in school buildings and providing them with shelter when it is deemed safer for students to remain inside rather than to return home or be evacuated.
- **Lockdown** means to immediately clear the hallways, lock and/or barricade doors, hide from view, and remain silent while readying a plan of evacuation as a last resort. Lockdown will only end upon physical release from the room or secured area by law enforcement. Lockdown is initiated during incidents that pose an immediate threat of violence in or around the school.
- **Hold** and Hold-in place mean the restriction of movement of students and staff within the building while dealing with short term emergencies.
- **Secure Lockout** means students and staff remain inside locked and secured school buildings during incidents that pose an imminent concern outside the school.

Thank you for all you do to keep students and staff safe every day. If you have questions about these changes, or suggestions for how NYSED may support schools in this area, please contact the Office of Student Support Services at SafetyPlans@nysed.gov.