



OREGON
DEPARTMENT OF
EDUCATION

Emergency Plans and Drills Guidance: Access and Functional Needs

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School Safety and Emergency Management



Access and Functional Needs

In order to meet the needs of our whole community, emergency preparedness plans must include specific considerations for people with Access and Functional Needs (AFN). AFN considerations include people who experience barriers to mobility, information, resources and services due to specific personal needs. They may require additional support before, during and after an emergency.

To help explain AFN considerations, this document will break them down to two primary categories: mobility and procedural. Mobility challenges and considerations cover the functional aspect of AFN considerations while procedural challenges and considerations cover the accessible aspects. Many of these challenges will overlap. Consider that a student with a developmental disability may require both mobility aids and procedural assistance to safely respond to an emergency. AFN considerations should include, but are not limited to:

- People with physical disabilities or injuries.
- People with developmental, cognitive or mental disabilities.
- People with acute or chronic health conditions.
- People who are blind, low vision, deaf or hard-of-hearing.
- People with limited English proficiency.

It is important that school emergency planning thoroughly considers the needs of AFN students and staff *before* an emergency occurs. This cannot be a perfunctory check-the-boxes activity. Every person is unique. Even if two people share a similar disability, their specific needs may be very different. The point here is that a school emergency planner must connect with their responsible staff and the student or family with specific needs. Responsible staff could include the school nurse, support specialists, occupational therapists or classroom teachers. Do not assume planning considerations for students with needs. This planning should be deliberate. Careful planning that meets the diverse needs of students and staff will ensure the safety of the whole school community. It will also help with compliance of federal, state and local laws, statutes and regulations including the Americans with Disabilities Act (ADA).

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In this second of six guidance sections, the *what* and *why* of access and functional needs planning will be explained. This guide is a reference for school leaders who need a starting point or who may want to fill in potential gaps in their current Emergency Operations Plan so that it is inclusive of students of all abilities. The intent is to break down key concepts related to AFN planning, provide recommendations and considerations for various needs, and provide an explanation of a fillable plan that will help document and guide preparation, response and reunification of students with AFNs. This guidance addresses the following areas:

- Planning for Access and Functional Needs Students and Staff:
 - Mobility considerations.
 - Procedural (sensory, cognitive, behavioral, communication) considerations.
 - Challenges by drill type.
- The Personal Emergency Accommodation Plan:
 - What it is and how to use it.

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Access and Functional Needs: Mobility Considerations

Mobility considerations will apply to people with physical disabilities or injuries—all of which come in many forms. It is critical that students who use wheelchairs have clear hallways and that entryways and exits are wheelchair accessible. A heavier, motorized wheelchair may require wider exit doors. The first mobility challenge is just evacuating the building; however, an evacuation and even a reunification doesn't stop once the students and staff leave the building. Ensure that evacuation assembly areas, bus pick up areas for relocation, and reunification sites are capable of accommodating all students and staff with mobility challenges. The following are some considerations when planning for students with mobility challenges:

Multi-story buildings: Schools are required to provide students with equal access to education and must also provide instruction and educational services in the least restrictive environment. Schools must consider the educational needs of their students as well as their safety needs. Do not discourage or exclude a student's participation in a class or program of study based on their disability and your floor plan.

If an immediate evacuation from an upper floor becomes necessary, the challenge of evacuation may be significant if equipment like an Evacutrac evacuation chair is not available—other equipment or procedures may be necessary. AFN planning requires that evacuation equipment is in place, in working order and that staff are adequately trained to ensure that all students who are located on upper floors are able to evacuate safely. Leaving them behind due to improper planning is not an option.

Primary and alternate evacuation routes: When planning primary and alternate evacuation routes for classrooms and other congregate areas, make sure they evacuate through spaces that can accommodate students and staff with disabilities. For example, a narrow hallway leading away from the theater may permit a single file of walking students, but it may not accommodate a wheelchair. Hallways, routes and exits should all be considered. For instance, getting out through the doors will be a challenge if the alternate evacuation route takes a wheelchair bound student to a narrow exit or one with stairs. If any evacuation point is necessary but not accessible, make sure the teacher, therapist or school staff member has the training and equipment they need to evacuate students safely and effectively.

Assembly areas: Assembly areas should be large, open spaces that can accommodate the entire school. Playgrounds and sports fields are often used as assembly areas following an evacuation for this reason. However, they are also places that can bog down a wheelchair or make it difficult to walk over. If a real-world event requires your school to evacuate and then relocate, don't compound the problem by disabling a wheelchair or getting students stuck in the mud. Use monthly drills to assess designated assembly areas and how they are accessed.

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Access and Functional Needs: Procedural Considerations

For the purposes of this guidance, procedural considerations would include any other need that is not one requiring mobility aids or assistance. Procedural needs can vary dramatically by situation and student. They may also not be immediately apparent. Also, a student who requires mobility assistance may need additional help understanding response procedures, following response procedures, or staying safe during a response. Procedural considerations will require planning to ensure that students are accommodated and cared for. Below are some procedural challenges to consider:

Language and communication barriers: Language and communication barriers can include English Language Learner (ELL) students and those with hearing disabilities or comprehension issues. Everyone needs to both understand and follow the instructions of whatever drill is being conducted. A school that uses the Standard Response Protocols from the I Love U Guys Foundation may call a Secure drill (“get inside, lock outside doors”). All students and staff must be able to understand and follow the instructions of that drill to stay safe from outside threats. If an ELL student does not understand the procedures for a particular response type, they could end up endangering themselves or others. This could also be true for someone with a hearing disability or other disability that affects their understanding of response procedures that are communicated over loudspeakers. Identify these students ahead of time and plan accordingly. Regardless of the situation, ensure that students who may struggle with understanding mass notification have the necessary assistance to understand and respond as needed.

Students requiring medication: Prior planning related to medication, including the accessibility of medications during an emergency, is necessary to ensure the safety of all students and staff. Different drills and different emergencies may require different planning to meet a student’s needs. A student with diabetes may be okay for a 15-minute evacuation drill. But they may require medication or accommodation during a lockdown that lasts a couple hours—or a relocation and reunification that lasts six hours. Students with life-threatening allergies may require immediate access to an EpiPen. Don’t be caught without necessary and lifesaving medication just because the alarm went off. This is one area where schools should both consult with and support their school nurse (or counterpart) to ensure that students who require medication are both planned and provided for.

Cognitive, sensory and behavioral: Students with these challenges may face difficulties during emergencies and drills, including sensory overload, disorientation, confusion, and elevated levels of stress. The key to assisting these students is staff training and scaffolding the learning through a crawl, walk, run structure. If a student has a sensory barrier, have alternate alert capabilities and ensure staff know who needs assistance during a response and what assistance they need. It may be important to utilize visual supports and sensory modifications, conduct regular emergency response rehearsals, and provide staff training on supporting students with cognitive or behavioral challenges during emergency situations. Make sure that more than one staff member knows how to support students with these challenges.

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Challenges by Drill Type

Each drill type provides its own challenges for everyone. The following guidance covers all required drills from ORS 336.071 and is illustrated with the Standard Response Protocols (SRP) developed by the I Love U Guys Foundation (links to information and free resources in the Resources and Guides section). Each drill will be explained with the language used for the alert, as well as considerations for students with AFNs.

- **Lockdown:** During a lockdown drill we will lock the doors to our classrooms, turn off the lights and get out of sight (“locks, lights, out of sight”). This is done because a threat has entered the building. After practice, this may be quite easy for most classrooms. It may be fairly easy because no one should be leaving the classroom. However, the lockdown drill can be psychologically stressful. Students with behavioral or sensory challenges may have difficulty staying quiet or remaining in place. Such challenges may not have an easy answer beyond knowing your students and how best to redirect their behavior. Fidget toys are commonly used to both redirect and focus behavior. Have fidget items in the go bags and classrooms of students who need them. Better yet, have them in all classrooms just in case. Just make sure they are silent and don’t make a ruckus! Students who require medication may also be impacted by a lockdown drill—particularly if the lockdown lasts an extended period of time. For this reason, have a plan in place to support students who need medication. Getting medication to students who need them may be tricky. But the lockdown will be lifted eventually. One solution for this is to have a secure case in the administrative or nurses’ office that can be grabbed and taken by a nurse or administrator as soon as the lockdown is lifted.
- **Secure:** During a secure drill we will get everyone inside and lock outside doors (“get inside, lock outside doors”). This is done when a potential threat has been identified outside the building. The part where we get everyone inside may be the greatest physical challenge. Communication can be an even bigger challenge whether everyone is already inside the building or not. Students and staff need to know what the expectations are during this drill. The outer doors cannot be opened for visitors, or a student’s friend, or just because someone wants fresh air. Communication and understanding are key to a successful secure drill. If you have ELL students or students with other communication challenges, make sure translations or alternative communication methods are used so that everyone understands the expectations.
- **Hold:** Just like with a secure drill, a hold drill relies on understanding the procedures. A hold drill is used to keep the hallways and other access ways clear when needed (“hold... in your room or area”). A hold drill may also introduce challenges for students who need access to regular medication.
- **Evacuate:** This is the big one that gets everyone out in the parking lot (not on a soggy playing field!). Everyone must leave the building during an evacuation because it has become too dangerous to occupy. An evacuation is done if there is a fire, after an earthquake, if there is a gas leak or a collapsed wall. It is also done following a lockdown at law enforcement direction. This drill requires all the following considerations:
 - Communication: can everyone understand the instructions and follow them?
 - Mobility considerations: can everyone get out of the building? Can everyone reach and then leave the assembly area?

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- Other procedural considerations: does everyone have everything they need to potentially relocate to a reunification site? This includes mobility aids, behavioral and communication aids, access to medication and care instructions.
- **Shelter-in-place:** Earthquakes may be the most common hazard that a shelter-in-place drill is used for in Oregon (“drop, cover and hold on”). However, a shelter-in-place drill is also used for hazards such as poor outdoor air quality, tornadoes or other severe weather events. Regardless of the hazard, communication and understanding are the biggest challenges during a Shelter-in-place. The standard earthquake response of “drop, cover and hold on” is done to protect people from falling debris. In classrooms, this is often accomplished when students drop to the ground, get under their desks for cover, and hold onto the desk until the shaking stops. Protecting the head from falling debris is the foremost concern for everyone during an earthquake. For students who may not be able to drop to the ground and get under a desk, holding a thick book or other resilient material over their head could provide protection. In spaces without desks or the potential to get under a sturdy table, have students move to an interior wall and away from hanging objects that could fall on them.
- **Relocation and Reunification:** A very serious event must have taken place to require a relocation and reunification of the entire school. Such an event itself can be stressful but the act of relocating the entire school to a safer location and then going through the process of reunifying students with families can add layers of stress on top of an already stressful day. These actions will definitely include all the challenges already explained here, both physical and procedural. How will you get a student with disabilities onto a bus from a non-typical assembly area, then to a reunification site, all while ensuring their safety and keeping them calm? For these actions, a go bag will be a must have item. And the one thing that should also be in that go bag is the Personal Emergency Accommodation Plan that will include details on what aids or assistance is required for the student.

The Personal Emergency Accommodation Plan

The Personal Emergency Accommodation Plan (PEAP) is a form used to help identify the needs of a student with a disability during an emergency. These students may already have an Individualized Education Plan (IEP) or 504 plan. Including the PEAP in the IEP or 504 planning process will ensure that their emergency needs are considered alongside their educational needs. The PEAP (linked below in the Resources and Guides section) will:

- Identify the responsible staff member.
- Provide contact information for the parent or guardian.
- List contents needed in a “go bag”.
- Detail emergency procedures for each drill and response type.
- Provide a distribution list for all people who need to review and reference the PEAP.
- Includes recommendations for routine updates and implementation.

The PEAP, like any emergency plan, is only useful if it is practiced, put into action and kept up to date. The PEAP should be reviewed and updated at least once a term or any time the student’s schedule or needs change. It should also be pulled out and referenced any time a school conducts a drill. Any time

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an alarm goes off for any reason, the PEAP should be consulted and go bags should be checked—particularly if they accompany the student regularly as items can be removed, used, or go missing. No one wants to discover that a critical aid or medication is missing when it is needed the most.

The importance of planning deliberately for students and staff with Access and Functional Needs cannot be over stressed. If we do not deliberately plan for and with them, an emergency may arise that leaves them vulnerable and at risk. Upfront, deliberate planning ensures inclusivity, equity, and the safety of all members of the school during emergencies. A small bit of effort today can ensure that no one gets left behind tomorrow.

Links to the PEAP, additional resources on Access and Functional Needs planning, and other emergency preparedness resources can be found at the end of this document under Resources and Guides.

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Resources and Guides

- Oregon Department of Education Personal Emergency Accommodation Plan:
 - [https://www.oregon.gov/ode/schools-and-districts/grants/Documents/Office%20of%20School%20Facilities/SSEM/Training/PEAP_Template\(2024\).docx](https://www.oregon.gov/ode/schools-and-districts/grants/Documents/Office%20of%20School%20Facilities/SSEM/Training/PEAP_Template(2024).docx)
- Oregon Department of Education's School Safety and Emergency Management Program:
 - <https://www.oregon.gov/ode/schools-and-districts/grants/Pages/School-Safety-and-Emergency-Management.aspx>
- I Love U Guys Foundation: The Standard Response Protocol:
 - <https://iloveuguy.org/The-Standard-Response-Protocol.html>
- Readiness and Emergency Management for Schools (REMS): Integrating K–12 Students With Disabilities Into School Emergency Management Planning:
 - https://rems.ed.gov/docs/DisabilitiesFactSheet_508C.pdf
- Readiness and Emergency Management for Schools (REMS): Addressing Access and Functional Needs in School and IHE Emergency Operations Plans:
 - https://rems.ed.gov/docs/Resources/AFNWebinarResourceGuide_508C.pdf
- National Association of School Psychologists: School Safety Drills and Exercises for Students with Autism Spectrum Disorder (ASD): Tips and Resources for Educators:
 - https://www.nasponline.org/assets/Documents/Resources%20and%20Publications/Resources/Crisis/School_Safety_Drills_and_Exercises_for_Students_With_ASD-Educators.pdf
- American Red Cross: Disaster Safety for People with Disabilities:
 - <https://www.redcross.org/get-help/how-to-prepare-for-emergencies/inclusive-preparedness-resources.html>
- Earthquake Country Alliance: Accessibility Webinar and other accessibility resources:
 - <https://www.earthquakecountry.org/accessibility/>
- Oregon Health and Science University: READY NOW! Emergency Preparedness Tool Kit for People with Disabilities:
 - <https://www.ohsu.edu/university-center-excellence-development-disability/emergency-preparedness-people-disabilities>
- Federal Emergency Management Agency (FEMA): Responding to the Disabilities and Access and Functional Needs Community Webinar:
 - <https://www.youtube.com/watch?v=FXG5aS4J7T8>
- U.S. Department of Justice Civil Rights Division - The Americans with Disabilities Act : Laws, Regulations and Standards:
 - <https://www.ada.gov/law-and-regs/>
- Oregon Department of Emergency Management Local and Tribal Emergency Managers List:
 - https://www.oregon.gov/oem/Documents/locals_list.pdf
- Oregon Health Authority, Local Public Health Authority Directory:
 - <https://www.oregon.gov/oha/ph/providerpartnerresources/localhealthdepartmentresources/pages/lhd.aspx>