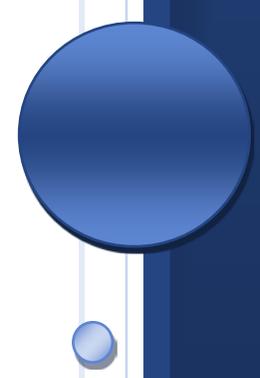


“IT’S IN THERE”

A Comparison of the Campus Resilience Enhancement System to the New Federal Guide for Developing IHE Emergency Operations Plans



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SUMMARY

Recently, a multi-agency¹ federal effort resulted in new guidance to institutions of higher education (IHEs) in formulating their emergency operations plans (in what follows, this will be referred to as the Guide).² This guide updates previous guidance documents (especially relating active shooters) and consolidates guidance previously issued by the agencies involved. For the last year, the Community and Regional Resilience Institute (CARRI) has been developing its *Campus Resilience Enhancement System* (CaRES) that focuses on campus resilience. By the time CaRES development is completed, CARRI will have had intensive weeklong engagements with seven IHEs.

CaRES is being developed to help campuses take actions so that they can both mitigate and take advantage of potential disruptions. If CaRES is to be useful to and used by IHEs, CaRES must be consistent and complete – both consistent with the Guide, and inclusive of its content. This report represents a detailed comparison of CaRES and the Guide. We have drawn the following conclusions from this comparison:

- Although the objectives of the Guide and CaRES are slightly different, they are based on exactly the same “Planning Principles,” and have the same ultimate goal – action.
- The CaRES approach is consistent with that suggested by the Guide.
- CaRES contains all of the content within the Guide.
- Thus, CaRES can be a useful way for IHEs to implement the Guide.

In the following, we provide a detailed look at the comparison and our conclusions.

OBJECTIVES

In its Introduction, the Guide states that it was developed to guide the efforts of “planning teams at IHEs responsible for developing and revising a higher ed EOP [Emergency Operations

¹ Education, Health and Human Services, Homeland Security, Justice, Federal Bureau of Investigation, and the Federal Emergency Management Agency.

² U.S. Department of Education, Office of Elementary and Secondary Education, Office of Safe and Healthy Students, Guide for Developing High-Quality Emergency Operations Plans for Institutions of Higher Education, Washington, DC, 2013.

Plan].” While this is a true statement, it is also incomplete: the Guide goes further and provides guidance on implementation. Thus, its ultimate objective is implementation of a program that includes development of an EOP, i.e., its ultimate objectives are **actions to prevent, to protect against, to mitigate, to respond to, and to recover from disruptive events.**

Although CaRES’ purpose is stated somewhat differently – to help IHEs manage change and unforeseen disruptions in turbulent times – its ultimate objective is the same as that of the Guide: **action.** The one important difference is that CaRES is concerned with any and all disruptive changes, which include the hazards normally considered in an EOP as well as other risks to the IHE. For example (as pointed out to the CARRI team by John DiNardo, Vice-Provost at Drexel University), a university’s strategic initiatives often entail risk because of the unforeseen consequences of change. A strategic initiative to increase the number of international students carries with it the risk of fines or even the loss of federal funding if the IHE has not prepared its institutional infrastructure to handle the additional demands of more students. Thus, both the Guide and CaRES have the same ultimate goal – action to reduce risk to the institution; CaRES, however, considers a broader spectrum of risks than the Guide.

“PLANNING PRINCIPLES”

The Guide stresses that a comprehensive EOP should be based on nine “Planning Principles.” CaRES is being developed using exactly the same principles (bolded statements are taken from the Guide):

- **Planning must be supported by IHE senior leadership.** As part of the CaRES process, senior campus leadership identifies and determines the significance of the risks facing the campus. They also are asked to determine whether they made the strategic decisions and taken the strategic actions necessary to assure success in crisis conditions.
- **Planning uses assessment to customize plans to the individual institution.** The assessment modules in CaRES are customized to the IHE. First, they focus on the significant threats the institution itself identifies. If a campus isn’t subject to risks that would result in extensive damage, then it is not assessed on that basis. Conversely, all IHEs are subject to the threats of an active shooter or pandemics and are all assessed in those terms. Second, because CaRES’ assessment modules are based on campus services (detailed in the “whole IHE community” item below), they naturally take into consideration how the IHE provides those services.
- **Planning considers all threats and hazards.** CaRES leads an IHE to consider all of the threats and hazards contained in the Guide and conventional emergency risk assessments. As noted above, it also helps campus leadership to consider other risks (financial, legal, regulatory) that the campus faces.

- **Planning provides for the access and functional needs of the whole IHE community.** CaRES is a major adaptation of CARRI's Community Resilience System (CRS). "Whole of Community" was central to the CRS³, and is central to CaRES. In order to ensure that the entire IHE community is considered as well as all important campus functions, the IHE is viewed through the lens of a set of campus service areas (CaSAs)⁴. These CaSAs are intended to represent all members of an IHE community, and all aspects of an IHE's operations. The resilience of the IHE is then determined by assessing each CaSA.
- **Planning considers all settings and all times.** CaRES incorporates the concept of crisis "playbooks" – which contain detailed guidance about what should be done during a crisis, and information needed for both preparation and mitigation before and recovery after a crisis. These playbooks are to be prepared by individual units within the IHE, and reflect the particular needs of that unit.
- **Planning considers the individual preparedness of students, faculty, and staff.** As indicated above, all members of the campus community are reflected in the CaSAs. The assessment module for each CaSA leads the IHE to look at the preparedness of each member of the IHE community in the context of that CaSA.
- **Planning meets the requirements of all applicable laws.** CaRES explicitly identifies known legal and regulatory requirements, and includes them as appropriate in assessment modules. CaRES also identifies national or international standards that the IHE can measure itself against.
- **Creating and revising a model emergency operations plan is done by following a collaborative process.** The CaRES process is highly collaborative; every constituency within an IHE is included as well as all functions. The CaRES process goes further than the Guide in this regard by explicitly identifying which groups should be included in assessment and action planning, helping the IHE to be as inclusive as possible. This extends beyond the campus to include local communities, alumni, parents and others interested in the IHE.

PROCESS

The processes suggested by both CaRES and the Guide are based on an Organize – Assess – Plan – Implement – Evaluate concept. For example, the Guide suggests a six-step process (Figure 1) that starts with planning team formation and eventually reaches plan implementation and maintenance.

³ M. J. Plodinec, "The Community Resilience System: Operationalizing a Whole Community Approach," in *The McGraw-Hill Homeland Security Handbook, Second Edition*, David G. Kamien, ed (New York: McGraw-Hill, 2012) 825-46.

⁴ The CaSAs are currently: academic; administrative; campus life; communications; cultural and athletic; facilities, on-campus housing and transportation; finance; health; information and records; international students; leadership; off-campus housing; research; safety and security; and utilities.

The process embedded in CaRES looks a bit different (Figure 2), but is functionally equivalent. For example, in the process suggested by the Guide, there are explicit steps to identify the core planning team and form a common framework. Based on its extensive interactions with IHEs, CARRI has provided within CaRES suggestions on team membership, and templates that can serve as a common framework for plan development. Some of the templates (e.g., the Crisis Playbooks) can be used by individual units within the IHE. Templates used by other campuses are also provided as examples that can be used as the basis for campus-wide plans. CaRES also will provide scenarios that IHEs can use for exercises, both table-top and field. **This suggests that CaRES can be used to implement the Guide.** In the next section, we examine the detailed content and will show where the Guide's content is contained within CaRES.

It should also be noted that the CaRES process is more sophisticated than that in the Guide. CARRI has used its intensive engagements with a diverse set of seven IHEs⁵ to develop a deeper understanding of how IHEs actually function. This has resulted in a CaRES process that reflects a more functional understanding of the operation of an IHE.



Figure 1. Process suggested by the Guide for development and implementation of an EOP

⁵ Drexel University, Tougaloo College, Texas A&M University, Eastern Connecticut State University, the University of San Francisco, Green River (WA) Community College, and the Navajo Technical College.

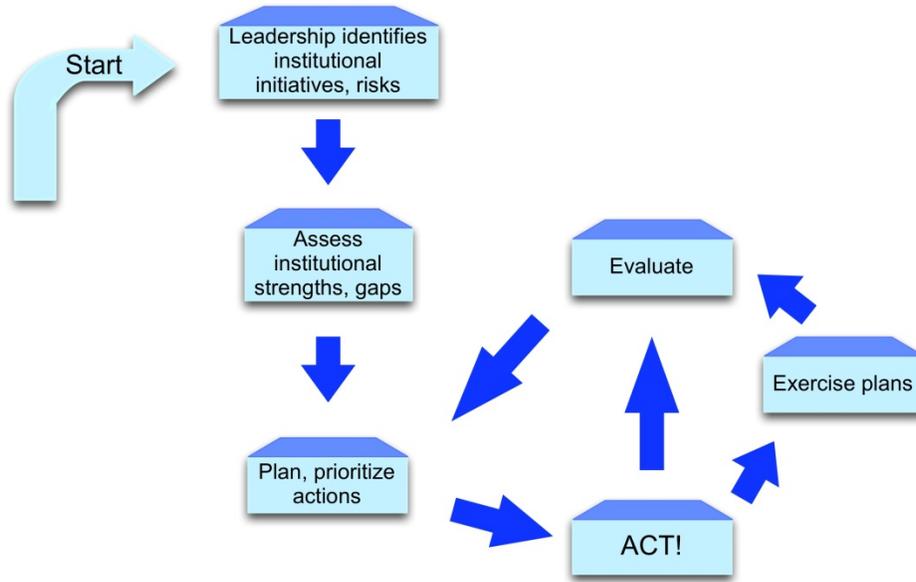


Figure 2. CaRES process

CONTENT

The Guide is a rich source of ideas and questions that an IHE should consider in planning. If, as suggested in the previous section, CaRES could be a way of implementing the Guide, then CaRES must contain Guide’s detailed content. In the following table, we have identified in where the detailed content of the Guide is incorporated into CaRES. As noted in the table, CaRES includes many elements of campus life not treated by the Guide.

Guide Content	Included in CaRES (Service Area or Process)
Planning Team members (Table 1) Academic Affairs Business Office Central Administration Counseling and Mental Health Services Emergency Management Environmental, Health and Safety Facilities and Operations Food Services Health Services Human Resources Information Technology Legal Counsel Public Information Office	Leadership; Academic Administrative Leadership Campus Life Leadership; Safety and Security Safety and Security; Academic; Research; Facilities; Leadership Facilities Campus Life Administrative Leadership; Information and Records Leadership Communications; Safety and Security Safety and Security

Guide Content	Included in CaRES (Service Area or Process)
Public Safety Operations Residential Life	Campus Life; Facilities; Off-campus Housing; Cultural and Athletic CaRES also includes the Athletic Director, the financial development officer(s), as well as the local community, faculty, students and staff in various aspects of the planning process.
Communication with and accounting for academic faculty in an emergency; identify and prioritize critical academic support systems; coordinate need for information technology for courses with campus IT department	Academic
Plans for alternate facilities for academics	Academic CaRES is structured so that each organizational unit of the IHE will identify what is needed to provide service to the campus community so that the IHE's facilities organization can plan to provide them.
Identify and help ensure recovery of critical assets and information	Academic; Information and Records
Participate in threat assessment; identify IHE liabilities during emergencies; ensure messaging within and outside the campus is consistent and accurate; designate a campus spokesperson; ensure compliance with applicable state and federal laws and regulations	Leadership
Tracking time and issuing paychecks; emergency procurement; documenting emergency costs; business office continuity plan; alternative administrative facilities; staff augmentation	Administrative
Provide leadership and resources during emergencies; protocols for declaring an emergency; volunteer recruitment and acceptance; keeping prohibited items and materials off campus	Leadership; Safety and Security

Guide Content	Included in CaRES (Service Area or Process)
Donation management	Financial; Campus Life
COOP for central administration	Administrative; Leadership
Meet the increased demand for mental health services during an emergency through use of members of the campus community or via agreements with off-campus agencies; review threat assessment from viewpoint of mental health needs; assist communications professionals in messaging students, faculty, staff and families during and after emergencies	Campus Life
Mobilize resources needed for significant longer-term emergencies; forge mutual aid agreements	Leadership; Finance; Safety and Security
Vulnerability assessments and periodic inspections of facilities including housing; detailed building information including location of critical services; readiness to pre-position equipment; potential partners for mutual aid agreements relating to facilities, utilities, housing or transportation; installation and maintenance of warning systems;	Facilities
Mitigation strategies for threats to food safety; provision of food to students, faculty and staff during an emergency; mutual aid agreements for providing food if campus facilities are compromised	Campus Life. CaRES also considers provision of supplies and shelter to the local community.
Evaluate the adequacy of emergency medical supplies (including – if appropriate – those needed for the local community; develop mutual aid agreements for health care; assist in development of plans for infectious diseases; track disease spread; coordinate with local and state health partners	Health
Maintain employee pay and benefits during an emergency; develop means for maintaining contact with faculty and staff if normal channels are unavailable	Administrative

Guide Content	Included in CaRES (Service Area or Process)
<p>Develop and maintain the IHE's emergency operations program; Clery Act compliance; participate in vulnerability and hazard assessments; review and update standard operating procedures to align with the EOP; review and update processes and procedures for state and federal disaster declaration requests; develop, review, and update state and federally required environmental emergency response plans; coordinate with public information office to develop the process and procedures for messaging during emergencies; identify the need for and provide emergency communication devices (e.g., ham radios, cell phones) as well as warning systems; as appropriate, coordinate with local law enforcement officials (e.g., during investigations); develop the process and procedures for mobilizing campus personnel during an emergency (e.g., law enforcement); ensure the campus EOP conforms to NIMS and ICS requirements; maintain the IHE's EOC in a state of readiness; ensure that hazardous materials handling practices and procedures conform to state and federal regulations; Campus Community Emergency Response Team; law enforcement responsibilities</p>	<p>Safety and Security</p>
<p>Develop procedures and systems for dissemination of emergency information via a website, cell phone, e-mail, and other mechanisms; identify and provide continuity of information technology resources needed to facilitate the emergency operations of all campus departments; cyber security</p>	<p>Information and Records</p>
<p>Coordinate communications to provide unified and factual messages to students, staff, faculty, families, and the media using multiple modalities, and in consideration of different language needs or accommodations, including effective communication with individuals with</p>	<p>Communications; International Students; Facilities; Campus Life; Safety and Security</p>

Guide Content	Included in CaRES (Service Area or Process)
disabilities and others with access and functional needs, such as those who are blind or deaf; ensure that all obligations under the Americans with Disabilities Act are considered throughout the planning and implementation of the higher ed EOP; ensure that the plan is accessible to students whose primary language is not English	
Establish pre-agreements with the media about how information will be provided during and after an emergency	Communications
Coordinate needs for housing and shelter of members of the campus community whether residing on or off-campus;	Facilities; Off-campus Housing
Mobilize residential life personnel during an emergency; establish an on-call system for staff; identify students needing special assistance in evacuation; Develop reunification procedures in collaboration with community reunification initiatives	Campus Life
Develop procedures for checking student affairs facilities and equipment, including those relating to on-campus recreation, student organizations, on-campus employment, community service, and volunteerism	Campus Life; Culture and Athletics; Administrative
Integration of the IHE's communications systems with local communications networks; communication with community partners; training of staff members in equipment usage and in messaging; communications with those with disabilities (including language);	Communications
Emergency contact information for students, faculty and staff	All CaSAs.
Develop procedures for addressing the needs of students living in Greek housing or off-campus facilities	Off-campus Housing
Develop parent or family notification procedures	Communications; Health; Safety and Security; International Students

Guide Content	Included in CaRES (Service Area or Process)
Develop procedures for mobilizing campus wide transportation for an emergency and for maintaining control of traffic from private vehicles; develop evacuation procedures from various campus locales; develop procedures for IHE-sponsored transportation (e.g., buses); security of buildings and facilities	Facilities; Safety and Security
Develop procedures for staff to support COOP during crises, including ongoing management of the access to the Student and Exchange Visitor Information System (SEVIS); develop procedures for international students to communicate safety concerns, location, and short-term plans during an emergency; coordinate beforehand with all staff and international students to distribute communication procedures during an emergency	International Students
Site and "Climate" Assessments	All CaSAs. These are done across the entire campus using an assessment instrument specific to each CaSA
Threat Assessment	In CaRES, the threat assessment is performed in a cross-campus collaborative manner. In addition, the assessment for Campus Life queries the IHE about behavioral intervention teams.
Capacity Assessment	All CaSAs. In particular, the "Crisis Playbooks" for each unit documents the unit's capacity in terms of resources, personnel, roles and responsibilities.
Planning	"Planning" is one of the process steps in CaRES. Plans for individual units are contained in the "Crisis Playbooks." The Safety and Security CaSA deals with the institution-wide EOP. CaRES will point to the template in the Guide as a format for an EOP.
Third-party use of campus grounds	Leadership
Tracking students, faculty and staff transported to another location; information sharing among hospitals, families and the IHE	Health; International Students; Safety and Security

Guide Content	Included in CaRES (Service Area or Process)
HIPAA, FERPA compliance	Leadership; Administrative; Health
COOPs and recovery annexes	All CaSAs. Guidance is provided within the context of the "Crisis Playbooks."
Security at athletic events	Culture and Athletics CaRES also considers security at cultural and entertainment events held on campus
Security for sensitive facilities	Academic; Research
Post-event information collection	Facilities; Leadership; Safety and Security
Threats/Hazards	CaRES contains all of the threats listed in the guide as well as financial crises.

CONCLUSION

CARRI has carried out an in-depth comparison of the content of the Guide with its Campus Resilience Enhancement System (CaRES). This detailed comparison demonstrates that CaRES incorporates all of the content in the Guide, and that its process is consistent with that suggested by the Guide. Thus, we conclude that CaRES can be a useful way for IHEs to implement the Guide.