

West Irondequoit Central School District

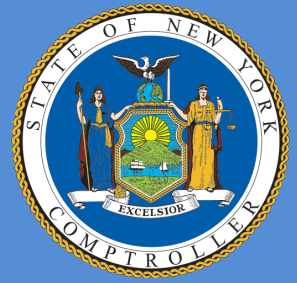
Emergency Drills

2025M-85 | November 2025

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Audit Results



West Irondequoit Central School District

Audit Objective

Audit Period

Did West Irondequoit Central School District (District) officials properly conduct and report emergency drills?

July 1, 2023 – July 10, 2025

Understanding the Audit Area

Emergency drills include instructional school building (building) evacuation and lockdown drills and emergency bus drills (bus drills). Evacuation drills practice emergency procedures, evacuation routes and evacuation sites. Evacuation is used in response to various building emergencies such as fire, gas leak, roof collapse or flooding. Lockdown drills practice the essential steps necessary to lockdown in an emergency. Bus drills are conducted to learn the location, use and operation of the emergency door, fire extinguishers, first-aid equipment and windows as a means of escape from fire or accident. These drills provide staff and students with instructions and training to help respond appropriately in an emergency.

Responsibilities for the emergency drills are delegated to various District officials as detailed in the Appendix A's Profile section.

Audit Summary

District officials did not conduct all required drills or conduct all drills within the required time frames and officials could not support that they met all drill requirements. Officials also did not conduct all required bus drills, did not ensure all students participated in bus drills, did not file the required New York State Education Department (SED) annual certification for bus drills or properly notify parents or persons in parental relations (together "parents") of drills as required in 2024-25.

Without adequate emergency instruction and training, District officials cannot ensure that staff and students are prepared for emergencies. Additionally, without properly notifying parents in advance of building drills, parents may not have sufficient information to ask questions about procedures or be prepared to discuss the drills as necessary with their children. In addition, properly informing parents can also help to avoid any unnecessary panic that an actual emergency is occurring and assists parents in recognizing and contributing to being prepared for emergencies.

The report includes four recommendations that, if implemented, will improve the District's emergency drills operations. District officials generally agreed with our recommendations, and their response is included in Appendix B.

We conducted this audit pursuant to Article V, Section 1 of the State Constitution and the Office of the New York State Comptroller's (OSC) authority as set forth in Article 3 of New York State General Municipal Law (GML). Our methodology and standards are included in Appendix C.

The Board has the responsibility to initiate corrective action. A written corrective action plan (CAP) that addresses the findings and recommendations in this report must be prepared and provided to our office within 90 days, pursuant to Section 35 of GML, Section 2116-a (3)(c) of the Education Law and Section 170.12 of the Regulations. To the extent practicable, implementation of the CAP must begin by the end of the next fiscal year. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. The CAP should be posted on the District's website for public review.

Emergency Drills: Findings and Recommendations

School district officials are responsible for ensuring student safety and compliance with applicable laws and guidance. School district requirements for conducting and reporting emergency drills for buildings and buses are established through New York State Education Law (Education Law), the Regulations of the Commissioner of Education (Regulations) and New York State Fire Code (Fire Code).

During the regular school year, District officials must conduct a minimum of 12 evacuation and lockdown drills for each building and three bus drills for each bus to provide staff and students with the training necessary to be able to respond appropriately in an emergency. District officials must also conduct two additional evacuation drills for each building that has summer school and should maintain adequate documentation to support compliance with all drill requirements. Furthermore, beginning in July 2024, District officials are required to notify parents of building emergency drills within one week of the scheduled drill.

More details on the criteria used in this report, as well as resources we make available to District officials that can help officials improve operations, are included in Appendix A.

Finding 1 – District officials did not properly conduct and report all emergency drills.

District officials did not properly conduct and report all emergency drills for buildings or buses.

Although District officials conducted the 12 required regular school year evacuation and lockdown drills for nine of the buildings during 2023-24 (108 total), they did not conduct six drills for one building, Dake Jr. High, (Figure 1) and did not conduct all of the building drills within the required time frames. Of the 80 drills required each year by December 31, District officials did not conduct five by December 31, 2023 and two by December 31, 2024 (Figure 2). In addition, District officials did not conduct nine of the 20 evacuation drills required within 10 days of the beginning of classes. District officials also did not conduct four of the 12 required summer school drills and did not conduct five summer school drills within the first week as required. District officials told us that drills were not conducted or documented due to staff turnover and were not conducted within the required time frames because some Principals were unaware of the specific requirements.

Figure 1: Building Drills at Dake Jr. High 2023-24

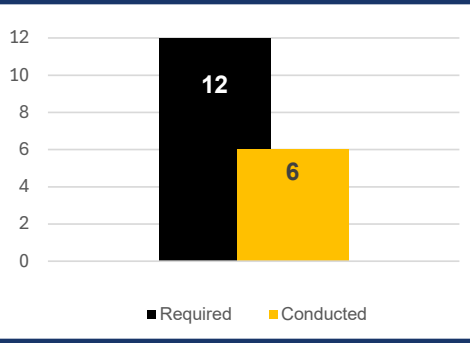
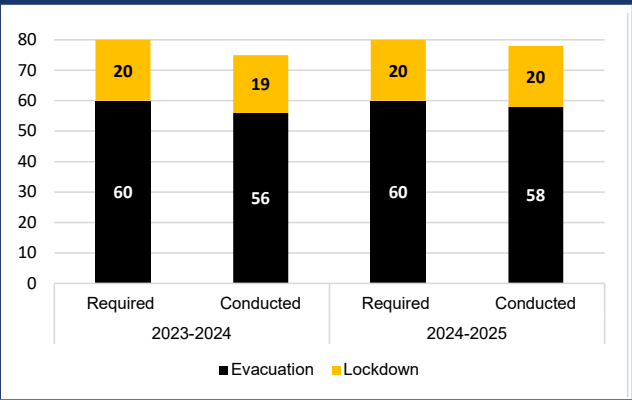


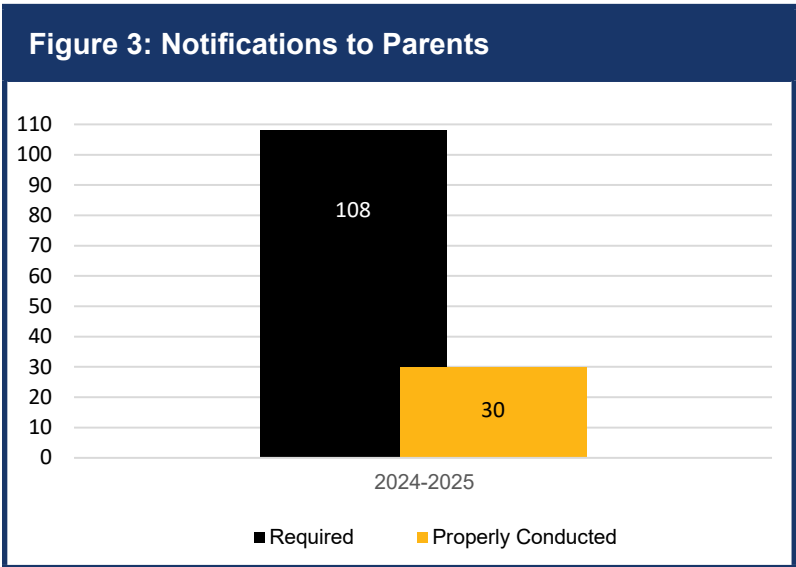
Figure 2: Building Drills (September 1 - December 31)



Additionally, District officials could not support all building drill requirements were met. District officials' documentation did not support drills for:

- Secondary egress;
- Lunch periods, assemblies, or procedural instructions when drills were not conducted during lunch or assemblies; and
- Different times of the day for nine buildings.

This occurred because District officials did not set up the record of completed drills to include all information necessary, such as the time of the drill, to document compliance with all building drill requirements. Although various District officials told us that evacuation drills included blocking hallways for secondary egress, that some drills were during lunch periods and students and staff were informed of what to do during a drill that occurred during lunch or assembly, this was not documented.



District officials also did not properly notify parents for 78 of the 108 drills that required notification: they did not send notifications for 24 drills and did not send notifications within a week before the drill or improperly included the specific dates and times of drills for 54 notifications (Figure 3). District officials did not provide adequate explanations for not sending appropriate notifications.

Furthermore, District officials did not conduct 27 of the 331 required bus drills (one in 2023-24 and 26 in 2024-25). Additionally, although bus drivers used the required SED forms, the bus drivers or District staff did not completely fill

out the forms to support information for the conducted bus drills including the drill's date. Therefore, we were unable to determine whether all bus drills were completed within the required time frames. In addition, District officials could not provide supporting documentation showing that all students participated in bus drills or were provided instruction covering the content of such drills as required. The Transportation Director also did not ensure verbal bus mini drills for trips were conducted. District officials did not provide adequate explanations for not properly conducting bus drills. Finally, the Superintendent of Schools (Superintendent) did not file the required annual SED filing for the 2023-24 school year, which certifies the dates bus drills were completed.

Conducting these building and bus drills is essential to educate students on the safety aspects of buses and emergency procedures. Without adequate emergency instruction and training, District officials cannot ensure that staff and students are prepared for emergencies. Also, without properly notifying parents in advance of building drills, parents may not have sufficient information to ask questions about

procedures or be prepared to discuss the drills as necessary with their children. In addition, properly informing parents can also help to avoid any unnecessary panic that an actual emergency is occurring and assists parents in recognizing and contributing to being prepared for emergencies.

Recommendations

The Superintendent should ensure District officials:

1. Properly conduct and document emergency drills.
2. Amend the building drill documents to capture all building drill requirements to ensure compliance.
3. Send appropriate parental notifications.
4. Complete, for his certification and filing, required reports to SED that bus drills were conducted.

Appendix A: Profile, Criteria and Resources

Profile

The District operates 10 buildings, each with a Principal or Interim Principal responsible for conducting drills within their building. The Transportation Director is responsible for the general oversight of transportation services, including bus drills, for approximately 3,600 students. The District uses three providers for student transportation services. The Superintendent serves as the Chief Emergency Officer and is responsible for ensuring required emergency drills are conducted at all buildings. The Executive Director of Operations and Director of Safety and Security are responsible for completing certain required SED reports and the Superintendent is responsible for filing the SED reports.

The District's boundaries include the Town of Irondequoit in Monroe County. The elected seven-member Board of Education is responsible for the District's general management including emergency preparedness.

The District had one Principal that started in January 2024, two Principals and an interim Principal that started in July 2024 and two other Principals that started in October 2024.

Criteria – Emergency Drills

School district officials should conduct emergency drills as required and should maintain adequate documentation to support compliance with all drill requirements.

Education Law Section 807 and Regulations Section 155.17 require that school district officials conduct at least eight evacuation drills and four lockdown drills with students each school year, with six evacuation drills and two lockdown drills occurring between September 1 and December 31. Also, Fire Code requires that the first evacuation drill occurs within 10 days of the beginning of classes. In addition, four evacuation drills must use the fire escapes on buildings where fire escapes are provided or use an identified secondary egress, such as through different corridors, hallways, stairways and exit doors. All building drills are to be conducted on different dates at different times during the school day. School district officials must also provide students and staff with procedural instructions for evacuation and lockdown drills during the lunch period or assemblies, if drills are not completed during these times. When a building has summer school, two additional evacuation drills are required with one conducted within the first week. Beginning in July 2024, school district officials are required to provide parents notification of all building drills within one week before the drill. The notification should include the type of drill and general time frame, but not include specific dates and times.

Education Law Section 3623 and Regulations Section 156.3 require a minimum of three emergency drills conducted on each bus during the school year, with the first conducted between the first seven days of school, the second between November 1 and December 31 and the third between March 1 and April 30. The bus drills must be conducted in accordance with the SED form. In addition, Regulations Section 156.3 also requires that students who do not participate in bus drills be provided with classroom

instruction covering the content of such drills. The Regulations also state that verbal bus mini drills should be conducted for students prior to the beginning of every sports or activity trip and that school district officials must certify on the annual report to SED that the school district has complied with all requirements addressed in Regulations Section 156.3.

Additional Resources

Our website can be used to search for audits, resources, publications and training for officials: <https://www.osc.ny.gov/local-government>.

Appendix B: Response From District Officials



West Irondequoit Central School District

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October 23, 2024

Office of the New York State Comptroller
Division of Local Government and School Accountability
Albany Office
110 State Street
Albany, NY 12236

RE: West Irondequoit Central School District- AUDIT RESPONSE LETTER

To Whom it May Concern,

The West Irondequoit Central School District and Board of Education would like to thank the Office of the New York State Comptroller for the thorough and professional manner in which the recent audit on safety and security was conducted. We appreciate the auditors' clarity throughout the process, their attention to detail in examining our systems and procedures, and the respectful, collegial approach they brought to every interaction. Their professionalism and commitment to uncovering facts and data fairly and transparently made this an informative and constructive experience for our district team.

We deeply appreciate the Comptroller's focus on safety and security, an area that has long stood at the center of our District and Board of Education's priorities. With the Board's strong and steady support, we recently undertook a comprehensive review of our practices, combining careful data analysis with meaningful community engagement to better understand perceptions of safety and opportunities for growth. Guided by this insight, we have strengthened both our staffing and our systems by adding building security personnel and youth assistants who serve as trusted adults for students, reinstated the Director of Safety and Security position to lead coordination, planning, and compliance efforts, and enhanced our preparedness through clearer reunification plans and full-scale emergency management drills. The feedback from this audit will help us to refine and deepen this work even further. We are committed to implementing the recommendations with care and precision, ensuring not only full compliance with state regulations but also an even stronger culture of readiness, responsiveness, and safety for every student, staff member, and family we serve.

The following comments provide the West Irondequoit Central School District's formal response to the audit findings and recommendations.

WELCOME. NURTURE. INSPIRE.

Recommendation 1: Properly conduct and document emergency drills.

- The district is actively working to verify unrecorded drills at Dake Junior High by obtaining reports from Johnson Control and Rapid Response.
- All School Emergency Drill Schedules have been revised to clearly outline drill types, required completion dates, and specific scenarios such as lunch period drills and block egress simulations.
- Summer school drill requirements and timelines have also been incorporated to ensure full compliance across all sessions.
- The Transportation department provides instruction and forms associated with mini-safety drills for activities including athletics and field trips.
- Transportation staff will ensure the return of the completed and legible Safety drill forms; our staff will review each to ensure proper completion, and a system is now in place to identify areas where documentation of the required drill is missing.

Recommendation 2: Amend Building Drill Documents to Ensure Compliance:

- Updated schedules now include detailed instructions for conducting drills on varied days and times to meet regulatory standards.
- The first two evacuation drills within the first 10 days of school are now explicitly noted to prevent future oversights.
- These enhancements ensure that all building-level documentation captures the full scope of drill requirements.

Recommendation 3: Send Appropriate Parental Notifications:

- The district has embedded notification protocols into the drill schedules, requiring schools to inform parents/guardians at least one day and no more than seven days prior to a drill. Building administrators must provide this specific communication to families in addition to any general communication made through school building newsletters.
- Staff onboarding materials have been updated to reinforce these expectations, and a standardized notification template has been developed to ensure consistency and compliance with NYSED guidelines.

Recommendation 4: Complete, for their certification and filing, required reports to SED that bus drills were conducted:

- We have collaborated with the Pupil Transportation Unit at the NYSED to provide the Superintendent with the certification of bus drill completion moving forward.

Respectfully Submitted,

Matthew Sullivan
President, Board of Education

Aaron R. Johnson, Ed. D
Superintendent of Schools

Cc: Board of Education
J. Brennan
J. Conti
C. Shellard

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Appendix C: Audit Methodology and Standards

We obtained an understanding of internal controls that we deemed significant within the context of the audit objective and assessed those controls. Information related to the scope of our work on internal controls, as well as the work performed in our audit procedures to achieve the audit objective and obtain valid audit evidence, included the following:

- We interviewed District officials and employees and reviewed written policies to gain an understanding of the District's emergency drill procedures and determined whether District officials filed the 2023-24 SED annual report certifying bus drill completion.
- We reviewed the emergency drill logs for all 10 buildings for 2023-24 and 2024-25 (through March 31, 2025) to determine whether emergency drills were properly conducted and reported, and documentation was maintained to support compliance with Education Law, Regulations and Fire Code.
- We determined whether District officials sent notifications to parents for building drills conducted from July 31, 2024 through March 31, 2025 within the required time frame and whether the notifications' content was appropriate.
- We reviewed the list of District buses and routes to determine the number of required bus drills for 2023-24 and 2024-25. We then reviewed the completed bus drill forms for 2023-24 and 2024-25 (fall, winter and spring bus drills) to determine whether all required drills were properly conducted.

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

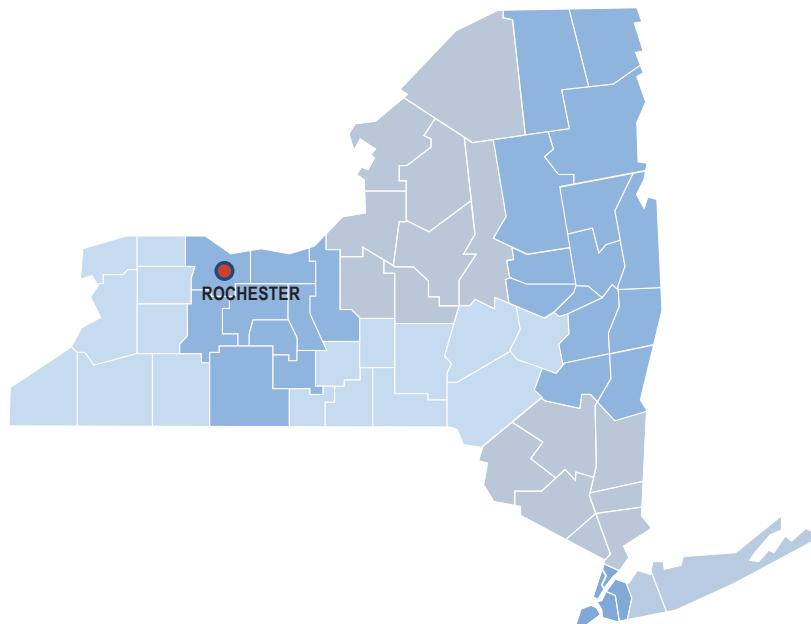
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