



**Department of  
Education**

Chancellor Richard A. Carranza

**Danya Labban**  
Auditor General

September 12, 2019

Mr. Kenrick Sifontes  
Audit Director  
Office of the State Comptroller  
Division of State Government Accountability  
123 William Street  
New York, NY 10038

**Re: Status Update on Recommendations in the OSC's Audit  
Report of the DOE's Compliance with School Safety  
Planning Requirements (2018-N-2)**

Dear Mr. Sifontes:

This letter constitutes the New York City Department of Education's (DOE) status update on recommendations made by the Office of the State Comptroller (OSC) on the DOE's Compliance with School Safety Planning Requirements.

The DOE is providing the following update on the status of these recommendations:

- 1. Review and amend the City Regulations to ensure they align and comply with the State Regulations and guidance.**

The DOE continues to take this recommendation under advisement. The DOE acknowledges the State time frames outlined in Report 2018-N-2 and will re-evaluate possible amendments to the City Regulations. In the interim, the DOE will continue to have schools comply with the recommended timelines outlined in Chancellor's Regulation A-414.

**Date of Implementation:** Ongoing

- 2. Work with the Education Department to develop a process for submitting School Safety Plans to the State Police, as required under both the Law and the State Regulations.**

On August 14, 2019, the DOE confirmed that the NYS Troopers does not want the NYC Public Schools to submit school safety plans through NYSED's business portal. Instead, the NYS Troopers

agreed to accept the plans electronically, sent directly to them.

The DOE will arrange to deliver a copy to the NYSED. The DOE will request written acknowledgement by both the NYS Troopers and NYSED that the files have been received, annually.

**Date of Implementation:** August 2019 and once all plans are certified.

**3. Develop and establish a system to ensure that up-to-date building floor plans are submitted as part of School Safety Plans, as required under the Law and State Regulations.**

The Division of School Facilities (DSF) compiled a list of buildings, identified the plans that are accessible, identified where plans are still needed, and is working with the School Construction Authority and the FDNY to obtain the most accurate floor plans. In September 2019, as part of the School Safety Plan revision process, school leaders will be required to review existing floor plans and revisions will be made to floor plans where necessary. Schools will be able to work on floor plans and will be supported by the Office of Safety Youth and Development (OSYD) and DSF. Schools will be required to attach floor plans to their respective building safety plans. The floor plans will be included in the files shared with the NYPD and NYS Troopers. This process was highlighted at the Summer Emergency Readiness trainings in July and August 2019, and again when the 2019-20 School Safety Plans opened for revisions at the school-level on August 26.

**Date of Implementation:** September 2019

**4. Require schools to submit School Safety Committee meeting minutes to the DOE to better document safety discussions.**

The DOE has updated the committee-meeting module to allow schools to add their meeting minutes and agendas when documenting meetings. These expectations were shared with school leaders at the summer 2019 Emergency Readiness trainings and again through the DOE's P-Weekly communications prior to school opening.

**Date of Implementation:** Summer 2019

**5. Review School Safety Committee meeting information submitted by schools to ensure the meetings take place, as required, and cover meaningful safety information.**

The DOE will continue its practice of monitoring safety committee meetings by working with Borough Safety Directors (BSDs) and the Office of Compliance Services (OCS) to ensure schools

are compliant with this requirement. The DOE has updated the committee module to encourage schools to include meeting minutes in the documentation of their meetings in addition to the agenda.

**Date of Implementation:** Ongoing

**6. Establish a minimum number or percentage of members to be in attendance for each School Safety Committee meeting.**

The DOE continues to take this recommendation under advisement. The safety of our students and staff is a paramount concern and we agree to consider improvements in this area to the extent that it will enhance the safe functioning of our schools. The DOE's official guidance on this topic is that schools should strive to meet one hundred percent attendance for School Safety Committee meetings. During the summer 2019 Emergency Readiness training, principals were reminded of the importance of holding and conducting meaningful safety committee meetings to address safety concerns and issues that arise in their school communities. During the training, principals also received guidance on who is expected to attend a School Safety Committee meeting and ways to increase attendance. Principals were reminded of the DOE's expectations concerning School Safety Committee meeting participation and documentation procedures that need to be followed through a P-Weekly announcement. The DOE will continue to message that schools are to work to ensure that all members are present at these School Safety Committee meetings.

**Date of Implementation:** Ongoing

**7. Ensure that the DOE's review of School Safety Plans addresses accuracy and completeness (e.g., correct phone numbers, required number of alternate exits).**

Nearly 1,300 school principals received Emergency Readiness training in the summer of 2019. As part of that training, principals were reminded of their obligation to ensure accurate documentation of staff, contact information, and all building-related information to ensure the safety of all students and staff. Principals were reminded again via a P-Weekly announcement shared on September 4, prior to school opening.

**Date of Implementation:** Ongoing

**8. Remind SSAs to follow the standardized visitor admission process outlined in the School Safety Plans.**

In July 2019, the DOE met with Leadership from the NYPD School Safety Division to review and develop a plan to remind and retrain School Safety Agents in the proper implementation of visitor control procedures. Visitor Control procedures were also reviewed with all principals who attended the summer 2019 Emergency Readiness training. Further, a P-Weekly was sent to all principals on September 4, 2019, as a reminder to follow proper Visitor Control procedures throughout the school year. During the year, field staff (BSDs and NYPD SSD) will also review the proper implementation of visitor procedures in the schools they visit.

**Date of Implementation:** July – September 2019 and will be on-going.

**9. Develop a policy regarding when door alarms should be armed to ensure they fulfill their intended purpose of identifying when students leave the building during school hours.**

Door alarm procedures and best practices for use and operation (including when alarms should be armed) were developed and shared with school leaders, school staff, and those who support these efforts including the NYPD SSD, OSYD, and DSF when alarms were first installed and again after the release of the audit report. These procedures were incorporated into the summer 2019 Emergency Readiness trainings for principals. This protocol also lives on the DOE's Infohub where staff can access it anytime. Further, these protocols were highlighted in the opening day faculty conference training/opening day memo sent to all principals for training sessions in September 2019 to be reviewed with all school staff in accordance with the training requirements outlined in NYS Education Law 2801-a. During the year, field staff (BSDs) will provide oversight and support in ensuring schools are following applicable policies and protocols.

**Date of Implementation:** July – September 2019

**10. Develop and implement guidance regarding the use of emergency radios.**

Best practices regarding the use of two-way radios were included in the summer Emergency Readiness trainings (July and August 2019). In addition, there will be scheduled training opportunities where OSYD staff work with school Building Response Teams and this information will be shared with all staff who are assigned two-way radios in school buildings.

**Date of Implementation:** This effort began in July 2019 and will be ongoing.

**11. Remind principals of the proper storage of School Safety Plans as outlined in the City Regulations.**

As part of the summer 2019 Emergency Readiness training, principals were reminded that safety plans contain confidential information that cannot be disclosed and therefore that these plans must be properly stored. Principals were also reminded in a P-Weekly announcement sent on September 4 of their obligation to secure School Safety Plans (SSPs).

**Date of Implementation:** Summer 2019

**12. Incorporate the GRP into the District Plans and include information on how they test drills in coordination with local and county emergency responders and other preparedness officials.**

The GRP is already included in the safety plan template which each school must use in developing their individual school safety plan. The template is incorporated in our existing District Safety plan. However, in response to this recommendation, we have provided a description of each of the GRPs in the proposed revisions to the Code of Conduct and District Safety Plan and included appropriate information about drills and coordination with first responders in the proposed revisions (see response to recommendation 15 below for further information about the proposed revisions to the Code of Conduct and District Safety Plan). Further, as part of the July 2019 meeting with the NYPD School Safety Division, it was advised that School Safety Agents be made aware and participate in drills to the extent possible.

**Date of Implementation:** Ongoing

**13. Update the list of District Safety Team members to include a school board representative, as required.**

The DOE added the appropriate member of the Panel for Education Policy to serve as the "school board member" on the District Safety Team.

**Date of Implementation:** Ongoing

**14. Update the list of District Emergency Response Team members to include an official from the FDNY, as required.**

The DOE remains committed to following the guidance on this topic as outlined by State law. In the DOE, these emergency response teams are established in each school building which is in compliance with State law. In accordance with State law and implementing regulations, each

school has an emergency response team with the appropriate local first responders included (NYPD and FDNY).

To improve the support offered by the district to each school, the DOE now includes a FDNY liaison as part of the District Safety Team.

**Date of Implementation:** August 2019

**15. Comply with Education Department guidance and:**

- **Make the District Plan available for a 30-day public comment period; and**
- **Hold at least one annual public hearing on the District Plan.**

The DOE posted proposed revisions to the Code of Conduct and District Safety Plan for review and public comment at the end of August and scheduled a public hearing for September 27. This will allow for consideration and revision (if necessary) and submission to the NYSED on October 1.

**Date of Implementation:** Ongoing

**16. Review the Bureau of Compliance procedures for monitoring emergency drills to ensure that all drills required by law are completed within the required time frames.**

The DOE will review its practice of monitoring emergency drills. The DOE will work to improve monitoring procedures implicated by this review process. BSDs and OCS will continue to ensure schools are compliant with this requirement.

**Date of Implementation:** Ongoing

**17. Update the District Safety Plan format to make it a comprehensive document that includes all the required information.**

The proposed revised NYCDOE District Wide Safety Plan includes all of the components required by State law and will be displayed in an accessible format that best meets the needs of all families whose children are served by the DOE.

**Date of Implementation:** Ongoing

**18. Require schools to conduct shelter-in-place drills as part of their School Safety Plan testing.**

The DOE is still taking this recommendation under advisement. While there is no requirement for any schools within New York State to conduct Shelter-In Drills, this suggestion is already part of our ongoing training. The DOE will continue to stress the importance of conducting drills that assess the school community and its ability to properly use all emergency response procedures (Evacuation, Lockdown, and Shelter-In) during the school year. Schools will continue to receive extensive guidance in this area and school communities will continue to be trained in General Response Protocols which includes Shelter-In.

**Date of Implementation:** Ongoing

**19. Take steps to ensure that key personnel who are designated as BRT members and floor wardens actually work at the school.**

Nearly 1,300 school principals received Emergency Readiness training in the summer of 2019. As part of that training, principals were reminded of their obligation to ensure accurate documentation of staff, contact information, and all building-related information to ensure the safety of all students and staff. Principals were again reminded through a P-Weekly announcement shared on September 4 that linked to OSYD's Opening Day Memo.

**Date of Implementation:** Summer 2019

The DOE's efforts outlined above effectively address the report's recommendations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Danya Labban', with a long horizontal flourish extending to the right.

Danya Labban  
Auditor General