To Whom It May Concern:

Thank you for contacting the U.S. Department of Education's (ED) Office of Safe and Supportive Schools (OSSS) and its Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center with your request for a template to develop an emergency operation plan (EOP) for a school that is being used as an election polling location.

ED's OSSS and its REMS TA Center recommend that education agencies develop, implement, and maintain a high-quality EOP that includes an annex which outlines goals, objectives, and courses of actions that planning and response teams within schools can use in the event their buildings or grounds are used as polling sites. Development of an annex to supplement a new or existing EOP can help enhance the site's security posture to contend with a myriad of threats that may include, but not be limited to, power outages and weather emergencies created by natural or technological hazards, public health emergencies that result from biological hazards, and/or adversarial- or humancaused threats.

Planning for Emergencies During Elections

Protocols or courses of action that describe how a school will respond to potential hazards or threats while functioning as a polling place can be created through use of the six-step planning process described in the Guide for Developing High-Quality School Emergency Operations <u>Plans</u> (School Guide). With its focus on planning for all hazards and threats an education may face, the School Guide aligns and builds upon years of emergency planning work by the Federal government and is the first joint product of the U.S. Departments of Education; Justice, led by the Federal Bureau of Investigation; Homeland Security, led by the Federal Emergency Management Agency; and Health and Human Services.

Step 1: Form a collaborative planning team. Ideally, a collaborative planning team will be comprised of representatives from the school and community, including students, parents, volunteers, and SROs, as well as include involvement or input from other community partners (e.g., non-profit organizations, local law enforcement, etc.). Other key partners to consider are polling officials who may assist in set-up and tear down of polling machines, facilities management to help with building security and clean up, and human resources to manage logistics, agreements, and contracts.

Step 2: Understand the situation. In this step, the newly formed planning team will identify and prioritize potentials threats and hazards to the school and surrounding community. According to the U.S. Election Assistance Commission (EAC), election day polling station sites "should be selected based on their location within the neighborhood being served." Historically, schools have been used





as polling stations because of their central location within the community. However, other sites have been chosen and could be considered in the community's planning process for identifying polling places. For example, community centers and houses of worship are often used. Community groups can take steps to identify the best places for polling stations balancing the location and safety. If a school is chosen, there are some options. For example, some districts close school or have teacher professional development days or parent teacher conferences.

In some states and localities, school community members have expressed concerns about safety when schools are selected and used as polling sites. REMS TA Center research shows that some states currently mandate emergency planning for polling sites in schools. For example, Texas legally mandates that school districts and local law enforcement work collaboratively to develop EOPs for polling places in schools. Similarly, Minnesota legislation resulted in the creation of the Elections Emergency Planning Task Force, whose purpose is to research and recommend best practices to develop EOPs for polling places, including in schools and school districts, and across the state. Though not all states have legislation requiring the development of EOPs for polling places, including New Hampshire, many offer plans, templates, or other advisory materials that can help schools develop their own.

Schools with polling sites will want to examine the safety, security, accessibility, and emergency preparedness of their building and grounds prior to an influx of visitors to their school. In the event a school remains open on a polling day, facilities management and safety and security teams may be used to evaluate the school building and grounds to identify building access points, parking spaces, and other means to control access to ensure that voters do not interrupt the learning environment and other school functions. Schools may also consider using SITE ASSESS, which incorporates Crime Prevention Through Environmental Design (CPTED) principles, to assess the security of their doors, locks, windows, gates, and walkways.

Capacity assessments could also be conducted to determine what resources are available to manage polling procedures throughout the day. If polling continues after school hours, the planning team will encounter additional challenges to the site's security. For example, schools may need to increase the number of SROs or security staff available to provide support throughout the day, as well as work with facilities management staff to ensure staff are available after normal work hours to accommodate polling stations with extended hours and to conduct site sweeps and assessments before, during and after an election takes places. A voter may leave behind a dangerous item, e.g. a weapon, or a secure door could be inadvertently or intentionally propped open, providing an ingress point to the school for a future attacker. Capacity assessments will be a valuable tool for the planning teams to mitigate any potential threats before, during, and after the schools operating hours.





Step 3: Determine goals and objectives. At this step, the planning team identifies which threats and hazards identified in step 2 will be addressed in the EOP and goals and objectives are created to address each of them. Goals are broad statements that illustrate the desired outcome to be achieved in the event of some threat or hazard. Objectives are the specific actions that need to be taken in order to complete the goals.

For example, the planning team may identify targeted violence at school as a threat that needs to be addressed in the EOP. The team could create the following goals and objectives in advance to support planning and response teams. Find a few sample objectives for one example goal below.

- Goal 1: Prevent violence on school property that is being used as a polling place.
 - Objective 1 (before): Provide local or school-based law enforcement officers with a list of polling locations on school property.
 - Objective 2 (during): Throughout the day, ensure exit doors are not blocked.
 - Objective 3 (after): Work with polling officials and volunteers to promptly remove all voting equipment and signage from school property.

When creating goals and objectives, schools can work with partners identified during step 1 to ensure that roles and responsibilities are confirmed and clarified, checklists are created for staff supporting the before, during and after objectives; and mitigative measures are set up, such as creating zones that separate students and voters if polling is held during learning hours and setting up surveillance to ensure that school buildings and grounds can be monitored throughout the day. e

Step 4: Plan development. In this step, the planning team develops action steps for accomplishing the goals and objectives identified in step 3. These action steps will answer the "who, what, when, where, and how" questions that arise during the planning process. Using Objective 3 as an example, the planning team will want to determine who is responsible for removing voting equipment, what resources are needed to remove the equipment, when will the equipment be removed, and how.

Step 5: Prepare, review, and approve the plan. In this step, the planning team creates a draft EOP, circulates the draft to obtain feedback from those responsible for implementing the plan, makes edits based on those comments, and obtains approval from the appropriate leadership. ED's OSSS and its REMS TA Center also recommend that education agencies ensure that plan and checklists are shared with the appropriate staff and/or partners, such as local law enforcement, or others with whom MOUs or MOAs have been signed to support the process. After the plan has been approved, copies of the plan should be sent to the appropriate school staff and community partners, such as local law enforcement or partners that have signed MOUs or MOAs to support this process, and other organizations that may use the school building.





Step 6: Implement and maintain the plan. Finally, once the plan is approved, it should undergo regular review and revision. For example, after an election, the planning team may want to meet to discuss any issues or oversights that the current plan did not address to drive the development of an after-action report used to update the EOP. In addition, education agencies should ensure that the involved parties are trained on procedures and resource development to be able to fully enforce the plan should a threat arise.

Federal Partner Resources to Support Plan Development

In 2017, the U.S. Department of Homeland Security (DHS) designated elections systems as part of our nation's critical infrastructure. DHS defines critical infrastructure as "systems and assets, whether physical or virtual, so vital to the United States that the incapacity or destruction of such systems and assets would have a debilitating impact on security, national economic security, national public health or safety, or any combination of those matters." To support efforts to strengthen and protect critical infrastructure on the federal, state and local level, DHS uses the National Infrastructure Protection Plan (NIPP), which outlines steps for developing critical infrastructure plans across sectors. Various sectors are included in our nation's NIPP, including one—Government Facilities—that is broken down into three subsectors which include Elections, National Monuments and Icons, and Education Facilities. These sectors operate via the collaborative efforts of federal agencies such as ED and DHS, and the U.S. Departments of Energy, Defense, Health and Human Services. ED's OSSS manages the Education Facilities Sector and the DHS Cybersecurity and Infrastructure Security Agency manages the Elections Sector with support from the U.S. Election Assistance Commission (EAC), which was established by the Help America Vote Act of 2002 (HAVA) to support the development of "voluntary voting system guidelines" and to provide information on election administration to state and local agencies.

The following resources developed by federal partners in school emergency preparedness may help provide additional insight to support your planning process.

- Election Infrastructure Outreach Security Checklist (DHS). The Federal Emergency Management Agency developed this checklist based on their Building Vulnerability Assessment Checklist, but with a focus on areas that are specific to government agencies and elections infrastructure sub-sector facilities. (See attached)
- Six Tips for Contingency and Disaster Planning (EAC). In collaboration with local election officials, the EAC has developed a quick tip guide to showcase best practices for developing contingency plans in the event of an emergency during an election. This resource does not specifically focus on polling places in schools, but the information here will help you learn how emergencies can impact polling stations and the voting process.





- The Quick Start Management Guide for Contingency and Disaster Planning (EAC). This document provides guidelines and topics to consider when developing EOPs for polling areas. This resource does not specifically focus on polling places in schools, but the information here will provide concrete steps to take to ensure safety plans are well-developed and all-inclusive.
- Polling Contingency Plan Examples (EAC). This Web page lists a collection of contingency plans for polling places and election officials from the state and local levels. There are several videos, sample EOPs, guides, and other resources that may be helpful to you.

REMS TA Center Resources to Support Plan Development

The resources highlighted below were developed by the REMS TA Center to support schools with this topic, and with overall emergency preparedness, including site assessment.

- Beyond the School Walls: Community Events and Their Impact on Schools was developed to provide suggested action steps for schools to take if they are being used as a polling location. Topics to consider include exterior and interior security, parking, signage, and working with local law enforcement.
- SITE ASSESS is a free and secure mobile app for schools (nonpublic and public) and school districts to use as they conduct site assessments. This comprehensive mobile app may be installed on Android or iOS mobile devices and allows personnel to walk through a school building and grounds and examine their safety, security, accessibility and emergency preparedness.
- EOP ASSIST is a free and Web-accessible software app that generates a customized school emergency operation plan that may be exported as a Word document. This app must be downloaded and installed on a local server by IT personnel at the host agency--a school (public or nonpublic), school district, regional education agency, state agency, or community partner--and is then deployed to users through the Internet and accessed with log-in credentials.

Resources from State Agencies to Support Plan Development

Although we were not able to locate any resources on schools as polling places that are specific to the state of New Hampshire, we would like to provide contact information for the representatives who support school emergency preparedness efforts in your state and who are also regular contacts with whom we collaborate, including through the Grants to States for School Emergency Management (GSEM) Program and our School Preparedness Leadership Group. You may already be familiar with these individuals and the work they do in your state.

New Hampshire Department of Education





- Marjorie Schoonmaker, Former Grants to States for School Emergency Management Project Director; marjorie.schoonmaker@doe.nh.gov
- New Hampshire Department of Safety
 - Sean Heichlinger, Supervisor, School Readiness Program; sean.heichlinger@dos.nh.gov

In addition, we have shared resources from other state partners that you might find useful as you develop, review, and revise your EOP.

- Polling Place Safety Checklist (Texas School Safety Center). This checklist provides instruction for safe and secure schools before, during, and after polling on campuses. This checklist was developed to be used by the administrators in charge of managing school polling places within the community.
- Schools as Polling Places (Texas Association of School Boards). This article explores legal requirements that schools need to consider so they may "preserve the integrity of the election process" while simultaneously safeguarding school and student safety. Even though these laws may differ from state to state, there are several legality issues presented here that may be helpful to you including, cell phone and camera use, weapons, bystanders, and managing visitors.
- Minnesota Elections Emergency Planning Task Force (Minnesota Secretary of State). This resource details the purpose and recommendations of the Elections Emergency Planning Task Force, as established by Minnesota legislation, to assist in the development of emergency operation plans for schools.

We hope that you find the information provided in this response helpful. If you have any additional questions or would like to continue the conversation, please do not hesitate to reply to this message. For additional resources and information on emergency preparedness, please visit the REMS TA Center Website or call us toll-free at 1-855-781-REMS [7367]. We also encourage you to follow us on Twitter.

Thank you, once again, for contacting the REMS TA Center. We appreciate you reaching out to us for assistance!

Sincerely, OSHS and the REMS TA Center team





About the REMS TA Center

Since 2004, the REMS TA Center has provided free safety, security, and emergency management training, tools, technical assistance, and information to schools, school districts, institutions of higher education, local education agencies, state education agencies, and their community partners, including law enforcement, fire officials, and public and mental/behavioral health practitioners. Efforts focus on providing supports to help these groups create high-quality emergency operations plans and increase their preparedness capacity in consideration of the five preparedness missions—prevention, mitigation, protection, response, and recovery. Topic-specific support—in collaboration with federal partners—is provided in emergency management functions (e.g., continuity of operations and lockdowns); threats and hazards (adversarial and human-caused threats, biological hazards, natural hazards, and technological hazards), and planning basics and principles (e.g., meeting the needs of those with access and functional needs).



