

# AUDIT REPORT



CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
BUREAU OF MANAGEMENT AUDIT  
**WILLIAM C. THOMPSON, JR., COMPTROLLER**

## **Audit Report on the Department of Education's School Safety Plans for 10 Elementary Schools**

*MD03-178A*

**May 19, 2004**



THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
1 CENTRE STREET  
NEW YORK, N.Y. 10007-2341

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WILLIAM C. THOMPSON, JR.  
COMPTROLLER

**To the Citizens of the City of New York**

Ladies and Gentlemen:

In accordance with the Comptroller's responsibilities contained in Chapter 5, § 93, of the New York City Charter, my office has audited the Department of Education's (DOE) school safety plans for 10 elementary schools. We determined whether DOE has comprehensive safety plans in place at these schools to ensure the safety and security of students and staff and whether safety and evacuation plan information is communicated to parents.

The results of our audit, which are presented in this report, have been discussed with DOE officials, and their comments have been considered in the preparation of this report.

Audits such as this provide a means of ensuring that our public schools are in compliance with applicable regulations governing school safety plans and that they take adequate security and safety measures to protect students and staff.

I trust that this report contains information that is of interest to you. If you have any questions concerning this report, please e-mail my audit bureau at [audit@comptroller.nyc.gov](mailto:audit@comptroller.nyc.gov) or telephone my office at 212-669-3747.

Very truly yours,

A handwritten signature in cursive script that reads 'William C. Thompson, Jr.'.

William C. Thompson, Jr.  
WCT/fh

**Report:** MD03-178A  
**Filed:** May 19, 2004

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*The City of New York  
Office of the Comptroller  
Bureau of Management Audit*

**Audit Report on the Department of Education's  
School Safety Plans for 10 Elementary Schools**

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**AUDIT REPORT IN BRIEF**

This audit determined whether the Department of Education (DOE) has comprehensive safety plans in place at certain New York City elementary schools to ensure the safety and security of students and staff and whether safety and evacuation plan information is communicated to parents.

**Audit Findings and Conclusions**

DOE schools in our sample had comprehensive safety plans in place. The DOE Office of School Safety and Planning (OSSP) tracks the completion and approval of school plans online through its computer system. Also, in compliance with applicable safety plan regulations, annual school plans specified the following:

- Policies and procedures for the safe evacuation of students, teachers, other school personnel, and visitors to the school in the event of an emergency, as well as evacuation routes and sites, including those for limited mobility students.
- Procedures to be followed under different emergency situations such as hostage, bomb threat, hazardous materials, shooting, kidnapping, and fire emergencies.
- Visitor control procedures and designation of emergency response teams.
- Procedures for addressing medical needs and emergency notification to persons in parental relation to a student.
- Procedures to account for all students after an emergency evacuation has been completed.

However, we found the following conditions:

- The 2003 and 2004 school safety plans that we reviewed did not meet DOE deadlines for completion and approval. The 2003 school safety plans for the 10 schools in our sample

did not meet many of the DOE deadlines. Moreover, since the schools were unable to access the online system to update their 2003 plans until November 21, 2003, the 2004 school safety plans for the 10 schools in our sample had not been submitted to DOE Regional Safety Administrators (RSA)<sup>1</sup> for initial review.

- At eight of our 10 sampled schools, parents were not notified of safety and evacuation plan information.

In addition, our visits to the 10 sampled schools disclosed various violations with parts of the school safety plans, as follows:

- Four of the 10 schools had one or two exit doors that were either locked from inside while school was in session or extremely difficult to open.
- Three of the schools had one or two exit doors that did not self-close.
- Two of the schools had hazardous chemicals stored in unlocked rooms that were accessible to students.
- Three schools did not have a school floor plan readily available in the principal's office, library, or custodian's office, as required in the school safety plan.
- One school did not specify exit locations on fire drill posters in 12 of its classrooms.
- Five of our sampled schools—as of the date of our field inspections—had not held the required monthly safety committee meetings.

Although not considered a school safety plan violation, three sampled schools had safety agents who did not have two-way radios or had radios that worked only intermittently.

In addition, although defibrillators are not prescribed for in school safety plans, Commissioner's Regulation §136.4 of 2002 requires all schools to have them. All 10 sampled schools lacked defibrillators, in violation of the regulation.

In a letter dated October 31, 2003, (see Appendix) and in an e-mail dated November 10, 2003, we notified DOE about some of the above-mentioned conditions that we felt raised safety concerns for students and staff. In an e-mail dated November 13, 2003, DOE advised us that they took corrective action concerning these problems. During our exit conference, a representative of the DOE Division of School Facilities confirmed that corrective action was immediately taken to rectify the cited problems.

Based on the findings for our sample, we make 11 recommendations. Since our findings are school-specific and because there is variation in the management of individual schools, we decided that it was both unnecessary and inappropriate to expand our sample to permit meaningful statistical projection across all elementary schools. However, our recommendations may well be applicable to

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<sup>1</sup> The New York City public school system is organized into 10 regions. Each region has an RSA who is responsible for safety within that region.

other schools. The most significant recommendations are that DOE should:

- Ensure that safety plans are completed or updated and approved by all parties in a timely manner, as required by the Chancellor's Regulations.
- Ensure that parents are informed of important safety and evacuation plan information, including evacuation sites in case of an emergency.
- Ensure that custodians or their designees check all exit doors daily for compliance with applicable regulations.
- Instruct all school personnel, including custodians and teachers, to keep hazardous chemicals in locked storage and under proper ventilation.
- Ensure that every school has sufficient AEDs (automated external defibrillators) for use during emergencies and that proper training is provided to operators as required by State law.

### **DOE Response**

The matters covered in this report were discussed with DOE officials during and at the conclusion of this audit. A preliminary draft report was sent to DOE officials on February 4, 2004, and was discussed at an exit conference held on March 9, 2004. On March 25, 2004, we submitted a draft report to DOE officials with a request for comments. On April 28, 2004, we received a written response from DOE officials.

In their response, DOE officials stated that they have already taken steps to implement or partially implement eight recommendations, disagreed with one recommendation, and did not address two recommendations.

DOE officials also stated, "It is necessary to clarify that notwithstanding the Comptroller's finding that Safety Plan review deadlines were missed, all schools have in place at the beginning of each school year a certified Safety Plan that meets all security requirements. . . and are adequately prepared to respond to an emergency."

***Auditor Comment:*** The plans DOE referred to above are the previous year's certified plans. Therefore, they still require prompt review for the current school year and must be updated for changes in personnel, new organizational arrangements, or other factors to ensure their applicability to current conditions to enable schools to adequately prepare for an emergency.

The full text of the DOE response is included as an addendum to this report.

## INTRODUCTION

### Background

The New York State Safe Schools Against Violence in Education Act (SAVE), signed into law on July 2000, requires that all local boards of education adopt and implement codes of conduct for maintaining order on school property. This includes comprehensive school safety plans for schools throughout the system and codes of conduct that are annually reviewed and updated, as well as a uniform system-wide violent-incident reporting system.

To comply with SAVE and to ensure the safety and security of all students and staff, the New York City Department of Education (DOE) amended Chancellor's Regulation A-414 (originally dated October 1, 1979) on September 5, 2000. The amended regulation requires each City school to establish a school safety committee to meet on a monthly basis.<sup>2</sup> The committee is responsible for preparing an annual comprehensive safety plan that specifies procedures to be followed in case of an emergency. These procedures are developed in coordination with the New York City Police Department and the Mayor's Office of Emergency Management.

The Office of School Safety and Planning (OSSP) oversees all matters related to safety planning and emergency preparedness for City schools. It is responsible for ensuring that each school develops and maintains a comprehensive school safety plan. OSSP also coordinates all safety and security strategies between schools and other City agencies.

OSSP developed a template to be used online by all schools when completing their individual safety plans. The template is used to enter school information, such as: phone numbers of various emergency contacts; the chain of command to be followed in the absence of the school principal; the number of teachers and students in the school; evacuation plans for limited mobility students; visitor control procedures; school security guard assignments; safety plan committee members; procedures for handling intruders; and emergency contingency plans.

After a school safety plan committee approves a safety plan, it is entered online and is immediately available for review by an OSSP Regional Safety Administrator (RSA). Once approved by an RSA, the Safety Plan is electronically available for review and final approval by the Police Department School Safety Division (NYPD).

According to Chancellor's Regulation A-414, each year, schools must complete plans and submit them for approval to the appropriate RSA by the end of the third week of September. The approved plan must then be submitted to the NYPD by October 15. Schools must make changes requested by the NYPD, have the RSA recertify them, and resubmit them to the NYPD by November

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<sup>2</sup> The amended Chancellor's Regulation A-414 states, "The committee shall be comprised of the following individuals: Principal of the host building; Principal/Designee of any other program cooperating within the building; U.F.T. Chapter Leader; Custodial Engineer/Designee; School Safety Agent; local precinct Commanding Officer/Designee; Parent Teacher Association President; Dietician/Designee of food services for the site; any other person or persons deemed essential by the committee." Newly appointed parent coordinators may also be part of a safety committee.

15 of each year. According to the OSSP Director, safety plans must receive final NYPD approval by December 15 of each year.<sup>3</sup>

### **Objective**

The objective of this audit was to determine whether the DOE has comprehensive safety plans in place at certain New York City public elementary schools to ensure the safety and security of students and staff and whether safety and evacuation plan information is communicated to parents.

### **Scope and Methodology**

The scope of our audit covered school years 2003 and 2004.

To gain an understanding of the policies, procedures, and regulations governing school safety plans, we reviewed the SAVE, Chancellor's Regulation A-414 dated September 5, 2000, and §155.17 of the Regulations of the New York State Commissioner of Education dated March 27, 2001. We also reviewed the State Comptroller's audit report, *School Violence Prevention and Response*, dated February 21, 2001, and the follow-up review of that office dated June 28, 2002.

To gain an understanding of the internal controls and operations of OSSP, we interviewed the OSSP Director and received a demonstration of their computer system. In addition, we obtained from OSSP a model school safety plan and the *Summary Guide to School Safety and Emergency Preparedness* (parent and teacher editions). We also interviewed the manager of the Assessment and Safety Plan Unit of the NYPD to obtain an understanding of how the unit approves safety plans.

To select our audit sample, we obtained from the OSSP Director a population database of all 893 City schools with students in elementary grades--pre-kindergarten to sixth grade. To conduct our testing, we randomly selected a sample of 10 schools that included two schools from each borough. Because most of the findings were school-specific and because there is variation in the management of individual schools, we decided that it was both unnecessary and inappropriate to expand our sample to permit meaningful statistical projection across all elementary schools.

To determine whether the school year 2003 safety plans for our sampled schools were accurate, complete, approved, and submitted in a timely manner, according to the Chancellor's Regulations, we obtained and reviewed their 2003 school safety plans and their plan histories. Plan histories are used by OSSP for monitoring and tracking the status of the plans. They show, chronologically, approval dates of safety committees, required revisions, and approvals by the designated district staff<sup>4</sup> and the NYPD. We also obtained and reviewed final plan approval dates by the school, district and the NYPD for the entire population database of 893 schools.

To determine whether the school year 2004 safety plans for our sampled schools were completed, approved at the school level, and submitted to an RSA and the NYPD in a timely manner,

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<sup>3</sup> This deadline is not part of Chancellor's Regulation A-414.

<sup>4</sup> For school years prior to 2004, designated community school district personnel were responsible for reviewing and approving safety plans for submission to the NYPD.



we visited these schools from October 7, 2003, to November 5, 2003, and requested a copy of their updated school year 2004 safety plan.

We evaluated sampled plans to determine whether policies and procedures were clearly stated, comprehensive, and in compliance with applicable safety plan regulations. During our visits to the sampled schools, we used a questionnaire to determine whether policies and procedures were in place, as specified in their plans. We checked visitor control procedures, health and medical protocols, evacuation procedures for limited mobility students, roles and responsibilities of a school's crisis response team, and internal and external communication systems for emergencies, and checked for the existence of evacuation sites. We determined how the school safety and evacuation plan information was communicated to parents. We also contacted principals or administrators of school-designated evacuation sites to determine whether they were aware of plan procedures and prepared to accommodate evacuated students and staff.

We determined whether a violent or disruptive incident reporting system is in place at the sampled schools as required by § 2802 of the Commissioner's Regulations. We also determined whether the schools scheduled and conducted monthly safety committee meetings.

To determine compliance with various fire and safety regulations specified in their safety plans, we inspected means of egress to determine whether all exit doors were unlocked, could be readily opened from inside, and were self-closing, that corridors were free of obstructions, and that evacuation routes were posted in classrooms. We inspected storage locations of hazardous materials for proper ventilation and locked access. We obtained schedules of fire drills reported online as having been conducted. We also determined whether school floor plans were available.

Although school-based defibrillators are not prescribed for in school safety plans, we ascertained whether the sampled schools had complied with the Commissioner's Regulation §136.4, which took effect in 2002, requiring them to have defibrillators and trained personnel to operate them in case of emergencies. Schools are instructed to indicate on their school safety plans whether they have defibrillators. We therefore checked the plans for the presence of defibrillators and during our visits, we asked principals or school nurses whether they had them and whether they received the applicable training.

This audit was conducted in accordance with generally accepted government auditing standards (GAGAS) and included tests of the records and other auditing procedures considered necessary. This audit was performed in accordance with the responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

### **DOE Response**

The matters covered in this report were discussed with DOE officials during and at the conclusion of this audit. A preliminary draft report was sent to DOE officials on February 4, 2004, and was discussed at an exit conference held on March 9, 2004. On March 25, 2004, we submitted a draft report to DOE officials with a request for comments. On April 28, 2004, we received a written response from DOE officials.

In their response, DOE officials stated that they have already taken steps to implement or

partially implement eight recommendations, disagreed with one recommendation, and did not address two recommendations.

DOE officials also stated, “It is necessary to clarify that notwithstanding the Comptroller’s finding that Safety Plan review deadlines were missed, all schools have in place at the beginning of each school year a certified Safety Plan that meets all security requirements. . . and are adequately prepared to respond to an emergency.”

***Auditor Comment:*** The plans DOE referred to above are the previous year’s certified plans. Therefore, they still require prompt review for the current school year and must be updated for changes in personnel, new organizational arrangements, or other factors to ensure their applicability to current conditions to enable schools to adequately prepare for an emergency.

The full text of the DOE response is included as an addendum to this report.

## FINDINGS AND RECOMMENDATIONS

DOE schools in our sample had comprehensive safety plans in place. The DOE Office of School Safety and Planning (OSSP) tracks the completion and approval of school plans online through its computer system. In addition, in compliance with applicable safety plan regulations, annual school safety plans specified the following:

- Policies and procedures for the safe evacuation of students, teachers, other school personnel, and visitors to the school in the event of an emergency, as well as evacuation routes and sites, including those for limited mobility students.
- Procedures to be followed under different emergency situations such as hostage, bomb threat, hazardous materials, shooting, kidnapping and fire emergencies.
- Visitor control procedures and designation of emergency response teams.
- Procedures for addressing medical needs and emergency notification to persons in parental relation to a student.
- Procedures to account for all students after an emergency evacuation has been completed.

However, we found the following conditions:

- The 2003 and 2004 school safety plans that we reviewed did not meet DOE deadlines for completion and approval. The 2003 school safety plans for the 10 schools in our sample did not meet many of the DOE deadlines. Moreover, since the schools were unable to access the online system to update their 2003 plans until November 21, 2003, as of that date, the 2004 school safety plans for the 10 schools in our sample had not been submitted to RSAs for initial review. As a result, the plans missed DOE deadlines for submission to RSAs and the NYPD for certification. In addition, although all 2003 school safety plans for our 10 sampled schools were certified by the NYPD, we were informed by an NYPD official that as of December 11, 2003, the NYPD had received the 2004 preliminary school safety plans for certification from only three schools.
- At eight of our 10 sampled schools, parents were not notified of safety and evacuation plan information.

In addition, our visits to the 10 sampled schools disclosed various violations with parts of the school safety plans, as follows:

- Four of the 10 schools had one or two exit doors that were either locked from inside while school was in session or extremely difficult to open.
- Three of the schools had one or two exit doors that did not self-close.
- Two of the schools had hazardous chemicals stored in unlocked rooms that were accessible to students.

- Three schools did not have a school floor plan readily available in the principal's office, library, or custodian's office, as required in the school safety plan.
- One school did not specify exit locations on fire drill posters in 12 of its classrooms.
- Five of our sampled schools—as of the date of our field inspections—had not held the required monthly safety committee meetings.

Although not considered school safety plan violations, three sampled schools had safety agents who did not have two-way radios or had radios that worked only intermittently.

In addition, although defibrillators are not prescribed for in school safety plans, Commissioner's Regulation §136.4 of 2002 requires all schools to have them. All 10 sampled schools lacked defibrillators, in violation of the regulation.

In a letter dated October 31, 2003 (see Appendix) and in an e-mail dated November 10, 2003, we notified DOE about some of the above-mentioned conditions that we felt raised safety concerns for students and staff. In an e-mail dated November 13, 2003, DOE advised us that they took corrective action concerning these problems. During our exit conference, a representative of the DOE Division of School Facilities confirmed that corrective action was immediately taken to rectify the cited problems.

These conditions are discussed in the following sections of the report.

### **Untimely Completion and Submission of School Safety Plans**

The 2003 and 2004 school safety plans did not meet DOE deadlines for completion, submission and approval. The 2003 school safety plans for the 10 schools in our sample did not meet many of the DOE deadlines. Moreover, since the schools were unable to access the online system to update their 2003 plans until November 21, 2003, as of that date, the 2004 school safety plans for the 10 schools in our sample had not been prepared and submitted to RSAs for initial review. As a result, the plans missed DOE deadlines for submission to RSAs and the NYPD. The missed DOE deadlines for the school safety plans are detailed in Table I, following:

**Table I**

**School Safety Plan Deadlines**

<b>Deadlines</b>	<b>Deadline Date</b>	<b>School Year 2003 Range of Tardiness for Submitted Plans</b>	<b>School Year 2004 Dates Plans Were Submitted</b>
School safety plan must be submitted to an RSA	Third week of September	One month to four months late	As of Nov. 21, 2003, plans were not submitted for any of the 10 schools.
School safety plan must be approved by an RSA and submitted to NYPD	October 15	Two weeks to four months late	As of Nov. 21, 2003, plans were not approved by RSAs and submitted to NYPD for any of the 10 schools
Revised School safety plan based on NYPD changes must be submitted to NYPD	November 15	One week to five months late	As of Nov. 21, 2003, plans were not submitted for any of the 10 schools.
Final NYPD certification	December 15	One month to four months late*	As of Nov. 21, 2003, plans were not certified for any of the 10 schools.

\* This represents seven of the 10 plans. Three plans were approved on time.

Chancellor’s Regulation A-414 states, “Safety plans must be updated annually by the school safety committee in order to meet changing security needs and conditions.”

During school year 2003, plans for all 10 of our sampled schools were submitted to an RSA from four weeks to four months late. This delay caused the initial and final submissions to NYPD to be late. Initial submissions to NYPD were from two weeks to four months past the October 15, 2002 deadline. Final submissions to NYPD were from five days to five months past the November 15, 2002 deadline. According to the OSSP Director, final certifications of safety plans by NYPD should occur by December 15 of each year. However, seven of the 10 sampled plans in school year 2003 were certified by the NYPD from 27 days to four months past the December 15 deadline.

In addition, our review of all school year 2003 safety plans revealed that for 864 (97%) of the 893 plans the final submission dates were an average of two months past the November 15, 2003, deadline; and 441 (49%) of the school safety plans were approved and certified by NYPD from one month to five months past the December 15 date for final NYPD certification.

School officials stated that they were unable to access the school year 2004 safety plan template online until November 21, 2003. Therefore, they had not been able to update the prior school year’s plan online; thus, plans had not been approved by the safety committees by the third week of September, as needed for an RSA initial review. Some principals and administrators at our sampled

schools manually updated their plans during our visits. From these updates, we noted there had been many changes since the prior year in the staffing chain of command, class schedules, after-school programs, and emergency response team assignments.

Problems with the timely submission of school safety plans for review and final approval by the NYPD were discussed in an audit issued by the State Comptroller's Office, *School Violence Prevention and Response*, dated February 21, 2001, and a follow-up review dated June 28, 2002. The initial audit stated that "only 31 percent of the schools had NYPD approved plans as of May 2000, more than five months after the due date for submitting plans for review."

The follow up review stated:

"The Board [then, the Board of Education] has established a web-based system . . . to monitor the status of every New York City safety plan and to allow each school to submit these plans on-line. Board officials have advised us that all plans have been received, reviewed and approved for the 2000-02 school year."

Because of the inability of schools to access the 2004 safety plan template online until November 21, 2003, none of the safety plans for all schools could have been electronically updated and, therefore, they missed the DOE deadline of November 15, 2003 for final submission to NYPD. In addition, final NYPD approval and certification for these plans will most likely be delayed.

Furthermore, DOE did not have contingency plans in place to compensate for online problems. DOE should have schools implement contingency plans for manually updating school safety plans and having them approved by school safety plan committees. Such contingency plans would enable the school itself to prepare the correct information and have it ready for entering online into the DOE system as soon as it were possible.

If school plans are to be effective tools in helping to provide the optimum level of safety for students, staff and visitors, the plans must be promptly completed or updated, reviewed, and approved by all required parties. Changes in personnel, local conditions, and other factors necessitate prompt periodic review and updating of plans to ensure their applicability.

### **Recommendations**

DOE officials should ensure that:

1. The OSSP safety plan template is promptly made available to school administrators.
2. Safety plans are completed and approved by all parties in a timely manner, as required by the Chancellor's Regulations.
3. Contingency plans are developed so school safety plans can still be updated and approved at the school level when there is a problem with the DOE online system.

**DOE Response:** "This year, because of the reorganization of the Department of Education, the certified safety plans had to be realigned within the new structure of schools within regions. This

reconfiguration . . . caused a delay in the posting of the plan interface on the DOE website. It is important to note, that schools still had the ability to print their certified plan at any time.

“Chancellor’s Regulations A-414 will be reviewed to ensure that the language appropriately reflects the online process and supports the concept that plans previously certified are current for the new school year. In addition, the DOE is meeting regularly with NYPD/SSD both formally and informally to discuss issues associated with the review process in an attempt to streamline the process and therefore shorten the time it currently takes to complete a recertification.”

**Auditor Comment:** As we mentioned earlier, previous year’s certified plans still require review for the current school year and must be updated for changes in personnel, new organizational arrangements, or other factors within the school to ensure their applicability to current conditions.

### **Parents Not Notified of Safety and Evacuation Information**

At eight of our 10 sampled schools, parents were not notified of safety and evacuation plan information. At the other two schools in our sample, one principal sent a letter to parents notifying them of the evacuation sites, media contacts, the DOE Web site, and *The Parents’ Guide for Talking to Their Children About War*, published by the National Center of Children Exposed to Violence posted on the DOE Web site. Another principal posted the school’s evacuation sites on the school’s Web site.

The *Chancellor’s Message to Parents on Security and Safety in Our Schools*, posted on the DOE Web site, states, “I have asked principals to be sure that information about evacuation routes and outside evacuation locations is available to all parents.”

In addition, a memorandum sent to principals regarding the *Summary Guide to School Safety and Emergency Preparedness* included the template of a letter to be used by school administrators to notify parents of a *Summary Guide for School Safety and Emergency Preparedness – Parent Edition*, available to parents who request it from their school. This guide indicates portions of a school safety plan that should be distributed to parents. It includes information that all parents should know to understand the procedures to be implemented in case of an emergency, such as contact information and sites that students and staff will be evacuated to in case of an emergency that renders the school unsafe.

Despite the Chancellor’s message, school administrators for eight of the 10 sampled schools did not notify parents of safety and evacuation plan information, such as appropriate emergency school contact telephone numbers, the protocols and procedures to be followed in case of an emergency, and the location of evacuation sites to which children would be sent. Nor did we find evidence that letters discussed in the memorandum to principals were sent to parents informing them of a *Summary Guide for School Safety and Emergency Preparedness – Parent Edition*, available to those who request it. One principal even stated that he was not aware of the guide.

Although parents who have accessed the DOE Web site may be aware that they can request a guide from their child’s school, parents at the eight sampled schools that received no information on the safety plan and who do not have online access or have not visited the Web site may not be aware of the guide.

The importance of communication with parents about a school's safety plan is clearly stated in DOE memorandum to principals:

“Clear, accurate and prompt communication with parents before, during and after a crisis will calm fears and reassure them about their children's safety. Our experience shows that these notifications and updates can go a long way to reduce the understandable level of concern that parents have when an emergency or disaster occurs. Parents have often been frustrated by their lack of knowledge of the protocols that are to be followed during an emergency. In particular, the locations and contact information for each site that their child may be evacuated to is information every parent should have available to them.

“In addition, parents and relatives often converge at the school during an emergency to reunite with their children. These actions can in fact, impede the response of emergency or law enforcement officials. . . . Instead, parents given appropriate details before a crisis will feel confident that their child is safe and would know to use the media or the DOE website . . . to access information about how to proceed.”

As stated in the DOE memorandum to principals, schools need to do everything possible to ensure that parents receive all relevant information regarding school protocols and where students will be in case of an emergency. As stated by the Chancellor in his Web site message to parents, at a minimum, all parents should be sent notices regarding “information about evacuation routes and outside evacuation locations.”

### **Recommendation**

4. DOE should ensure that parents are informed of important safety and evacuation plan information, including evacuation sites, in case of an emergency.

**DOE Response:** “The Department of Education's *Parent Summary Guide* is to be made available to any parent requesting a copy. . . . The DOE is considering posting this on the website where parents will have direct access to view, and print a school specific copy. In addition, the regional safety administrators are working with the parent coordinators to present and inform parents in their regions about this and other safety issues.”



**Safety Plan Violations**

Our visits to the 10 sampled schools found various violations of parts of their school safety plans. Table II, following, indicates the violations by school. The violations are also discussed in detail below.

**Table II**

**Safety Plan Violations by School**

<b>School</b>	<b><i>Exit Doors Locked or Not Easily Opened</i></b>	<b><i>Exit Doors Not Self-Closing</i></b>	<b><i>Chemicals Kept in Unlocked Rooms</i></b>	<b><i>Lack of Floor Plans</i></b>	<b><i>Exit Locations Not Specified on Fire Drill Posters for Classrooms</i></b>	<b><i>Monthly Safety Committee Meetings Not Held</i></b>
MS 101- Bronx	X		X			
PS 95 - Bronx			X	X		
PS 144-Queens						
PS 26 – Queens						X
PS 20- Manhattan						
PS 208-Manhattan		X				X
PS 30- Staten Is.						
PS 48- Staten Is.	X	X		X		X
PS 20- Brooklyn	X			X	X	X
PS 224-Brooklyn	X	X				X

**Exit Doors Locked or Not Easily Opened**

Four of the 10 schools had one or two exit doors that were either locked from inside while school was in session or were extremely difficult to open.

DOE safety plans require that “all exit doors must be readily operable from the inside whenever the building is occupied. The chaining or padlocking of fire doors is a punishable violation of the Administrative and Fire Safety Codes.”

The New York City Building Code, Subchapter 6, Article 5, §27-371, requires, “Exit doors and corridors shall be readily operable at all times from the side from which egress is to be made.”

In case of a fire or emergency situation, locked exit doors and doors that are extremely difficult to open can impede the evacuation of students and staff and, at worst, can trap them inside a building.

### **Exit Doors That Did Not Self-Close**

Three schools had one or two exit doors that did not self-close.

The Building Code Article 5, §27-371, states, “Doors for required exits shall be self-closing swinging doors.” After exit doors are opened, it is important that they should self-close, locking automatically, to prevent intruders from entering the buildings.

### **Chemicals Kept in Unlocked Rooms**

Two of the schools had chemicals stored in unlocked rooms that are accessible to students. One of these schools had an unlocked door to a science lab room that stored chemicals on open shelves, and the other school had unlocked doors to rooms that stored cleaning materials used by a custodian, such as ammonia and bleach.

The school safety plans state, “All hazardous materials should be kept in an appropriate area that is locked!”

In a letter dated October 31, 2003 (see Appendix A), and in an e-mail dated November 10, 2003, we notified DOE about the above-mentioned conditions concerning exit doors and chemicals storage since we felt they raised safety concerns for students and staff. In an e-mail dated November 13, 2003, DOE advised us that they took corrective action concerning these conditions. During our exit conference, a representative of the DOE Division of School Facilities confirmed that corrective action was immediately taken to rectify the cited problems.

### **Recommendations**

5. DOE should ensure that custodians or their designees check all exit doors daily for compliance with applicable regulations.
6. DOE should instruct all school personnel, including administrators, custodians and teachers, to keep hazardous chemicals in locked storage areas.

***DOE Response:*** “Upon notification of these findings in October and November 2003, the Division [of School Facilities] immediately sent staff to the schools to investigate the exit doors and chemical storage room conditions cited. These conditions were subsequently corrected.

“In addition, the School Facilities’ staff re-inspected the schools in February and March 2004 to confirm that the schools were still in compliance with fire and safety regulations

“The two applicable recommendations concerning exit doors and custodial cleaning chemicals have been previously implemented.

“Custodians are already required per the Rules and Regulations for the Custodial Force in the Public Schools of the City of New York to conduct daily inspections of their buildings, including checking that exit doors are unlocked during school and public use

hours. If these doors are not operating properly, repair requests are to be called in immediately.

“The custodians are also required ‘to keep cleaning supplies in storage rooms which can be locked when not in use.’

“These requirements have been periodically reiterated in Plant Operations Circulars sent to the custodians as reminders.”

### **Lack of Evacuation Floor Plans**

Three of the schools did not have a school floor plan readily available in the principal’s office, library, or custodian’s office, as required in the school safety plan.

A safety agent at one of the three schools remarked that he did not understand the complicated blueprint that was provided to him by the school custodian. A floor plan, showing the physical layout of school and exit locations, would be easier to understand and would be more helpful in effecting a rapid evacuation.

At the exit conference, DOE officials stated that a school custodian is not required to develop a floor plan unless instructed to do so by the principal. However, according to an NYPD official, school safety plans require that schools must have floor plans readily available for use, in hostage situations in particular. Quick access to floor plans is vital for obtaining immediate and efficient assistance from emergency response teams and fire and law enforcement officials.

### **Recommendation**

7. DOE should ensure that floor plans are readily available, as required in the school safety plans.

**DOE Response:** “The individual Safety Plan does not require the school to have a floor plan available on site; they are not maintained at the site level due to the sensitive nature of the material. The CD that is provided yearly to all emergency responder agencies, (NYPD, FDNY and OEM) includes each school’s safety plan and the floor plans, as provided by the DOE’s Division of School Facilities.”

**Auditor Comment:** Seven of the ten schools we visited maintained their floor plans on site for availability to emergency response teams. In addition, DOE school safety plans that we reviewed specifically stated that for hostage and shooting situations, “Floor Plans are to be readily available in the Principal’s Office, Library, Custodians Office, Security Office and Neighboring School(s).”

### **Exit Locations Not Specified on Fire Drill Posters for Classrooms**

One school did not have exit locations specified on fire drill posters in 12 of its classrooms. Guidelines in school safety plans state, “Instructions involving fire drills and evacuation paths to be used

shall be posted in every classroom, auditorium and cafeteria.”

Missing exit numbers in fire drill posters may cause confusion and chaos in the event of an emergency.

### **Recommendation**

8. DOE should advise school administrators to check that all their fire drill posters inside classrooms and near the doors are accurately completed and specify the evacuation exit paths.

*DOE Response:* DOE did not address this recommendation in its response.

### **Monthly Safety Committee Meetings Not Held**

As of the date of our field inspections, five schools had not held monthly safety committee meetings as required.

According to the Chancellor’s Regulation A-414, “Principals are responsible for ensuring that every school establishes a school safety committee and that the committee meets on a monthly basis.”

Although OSSP has the capability to collect attendance information and agendas for each meeting through its online system, it did not follow up with principals who failed to schedule or hold meetings, to hold them accountable for noncompliance with the regulations.

Monthly safety committee meetings are important in facilitating meaningful dialogue among teachers, school leaders, public safety agencies, and others within the school community in addressing school safety issues and identifying school needs and strategies to meet those needs.

### **Recommendation**

9. DOE should hold principals accountable for scheduling and holding monthly safety committee meetings.

*DOE Response:* “The DOE is monitoring the scheduling and convening of monthly safety committee meetings. The regional safety administrators have access to online documentation that schools are required to provide each time a meeting is held.

“When it appears that a school is not meeting regularly, the regional safety administrator makes a visit to the school to investigate this situation. If it is determined that compliance is not maintained, the Local Instructional Superintendent will be notified.”

### **Safety Agents without Radios and Others with Radios That Work Only Intermittently**

Two schools have safety agents who did not have two-way radios for communication. Another school had a safety agent and a school aide with two-way radios that were old and worked

intermittently because of loose antennas secured by masking tape.

Guidelines in school safety plans state, “When applicable, walkie-talkie radios will be used by the assigned School Safety Agents and the Principal and/or Designee. These radios will enable each person to keep in constant communication with the other, and to notify each other in case an intruder is present, or other serious conditions emerge.”

Each of the safety agents without radios is the sole agent for a school and may need to call for assistance when necessary. In one case the agent has to call the school’s administrative office via the intercom system; the office then assigns someone to assist him. The other agent, who does not have access to the school’s intercom, has to leave her assigned post and go to the administrative office to request assistance. It is important each school safety agent has a functional two-way radio that can be relied on at all times.

It is NYPD’s responsibility to provide radios to safety agents. However, given that the safety of students and staff is DOE’s most critical objective during emergencies, it needs to ensure that working radios are provided to safety agents.

### **Recommendation**

10. DOE should meet with NYPD officials to discuss providing operable two-way radios to school safety agents who lack them.

*DOE Response:* DOE did not address this recommendation in its response.

### **Other Issue**

#### **Lack of Defibrillators**

All sampled schools lacked automated external defibrillators (AEDs).

Section 917 of the Education Law enacted in May 2002 and effective September 1, 2002, required all schools to have at least one functional, automated, external cardiac defibrillator for use during emergencies and at least one trained operator on site at the schools and at any school athletic event held elsewhere. In July 2002, the New York State Legislature passed an amendment to the law that allowed DOE, which was unable to comply with the legislation by September 1, 2002, to delay implementation until December 1, 2002. To comply with the State law, on July 18, 2002, the Board of Regents approved emergency regulations, Commissioner’s Regulation §136.4, requiring AEDs in public school facilities.

DOE purchased approximately 3,000 AEDs and chose a contractor to provide the hours of training, equipment maintenance, and ongoing staff certification. DOE must monitor the training for administrators, staff, and extracurricular advisers and coaches as part of their commitment to provide a safe and secure environment for students, staff, and parents.

However, one year past the deadline, school officials reported that they still had not been notified by DOE when their schools will receive AEDs and had not been notified of a training schedule

for their staff.

**Recommendation**

11. DOE should ensure that every school has sufficient AEDs for use during emergencies and that proper training is provided to operators as required by the Commissioner’s Regulation.

**DOE Response:** “The Department of Education, through its vendor Cardiac Science, Inc., is providing the necessary training to accompany AED placement. To date, 5,313 DOE professionals have been trained and certified in CPR and in the use of AEDs.

“All New York City public elementary and junior/middle/intermediate schools are in the process of receiving defibrillators and their necessary installation components, from the manufacturer. Each high school is also in the process of receiving at least one defibrillator.

“At this point, based upon a review of the implementation schedule, all schools will have an AED and staff trained in its use by the end of its current school year.”



Greg Brooks  
DEPUTY COMPTROLLER  
POLICY, AUDITS, ACCOUNTANCY & CONTRACTS

THE CITY OF NEW YORK  
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October 31, 2003

Mr. Rick Stewart  
Auditor General  
New York City Department of Education  
Office of the Auditor General  
65 Court Street, 11<sup>th</sup> floor  
Brooklyn, NY 11201

Dear Mr. Stewart:

The Comptroller's Office is currently conducting an audit of the safety plans for New York City schools. As part of the audit, my staff conducted inspections of four schools from October 7, 2003, to October 10, 2003. During these inspections, the auditors found conditions that raise safety concerns for the students and staff. I am bringing this to your attention now, before a preliminary draft report is issued, so that you can take immediate action.

The following summarize some of these conditions:

**School:** MS 101—The Edward Byrne School  
**Address:** 2750 Lafayette Avenue, Bronx, NY 10465  
**Principal:** Myrna Rodriguez (718) 829-6372

- One of the auditorium's exit doors was locked (the left door when facing the stage, which leads directly to another exit door that opens onto Lafayette Avenue). In the school's safety plan, these exit doors are listed as a means of egress and should be unlocked to ensure a quick and safe evacuation in case of an emergency.
- Chemicals and other equipment for a science laboratory are stored on open shelves in an unlocked room (room 320).

**School:** PS 144—The Jeromus Remsen School  
**Address:** 93-02 69<sup>th</sup> Avenue, Forest Hills, NY 11375  
**Principal:** Susan Bahaloul (718) 268-2775

- Hazardous cleaning chemicals, paint, and other such items are stored in a locked room in the sub-basement (referred to as the boiler room in the safety plan,). The room does not appear to

be properly ventilated. It was permeated by fumes .

School: PS 95–TheSheila Mencher School  
Address: 3961 Hillman Avenue, Bronx, NY 10463  
Principal: Elizabeth Lopez (718) 796-9200 (replaced Frances Ott as principal, as of 10/1/03)

- Some PS 95 students are situated on the first floor of the Workman's Circle (WC), at 3990 Hillman Avenue, Bronx. When we asked the WC custodian where the cleaning supplies and other hazardous materials are kept, he led us to two unlocked rooms, one on the first floor and the other in the basement. Both rooms are accessible to students. He stated that he keeps them unlocked so that he can quickly gain access.

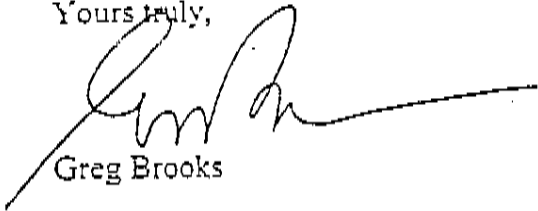
School: PS 26–The Rufus King School  
Address: 195-02 69<sup>th</sup> Avenue, Fresh Meadows, NY 11365  
Principal: Dina Koski (718) 464-4505

- There are no school crossing guards to assist students in crossing the busy street in front of the school during the morning hours. Due to their concern for public safety, the principal and another school aide help out in directing the morning traffic. The safety agent informed us that the school has requested that a crossing guard be provided or, failing that, a traffic light be installed.

We noted that all the schools we visited still lack automated external defibrillators (AED). The New York State law that took effect in 2002 requires all public schools to have AEDs on-site. Furthermore, since the current year Safety Plan template is still not accessible online, the schools have not been able to make the needed modifications to last year's plan. Those plans were supposed to be modified and submitted to the regional security administrators for approval by the third week of September. In case of an emergency the current plans in use will not reflect the current conditions at the schools.

Please advise me concerning the actions you plan to take with regard to this matter. We will visit other schools to perform inspections and continue to bring matters that raise safety concerns to your attention.

Yours truly,



Greg Brooks

cc: Stephanie D'Amore, Director - Department of Education's Office of Safety Planning  
 Carl Marmo, Commanding Officer - NYPD School Safety Division  
 Nader Francis, Director - Office of Auditor General





# THE NEW YORK CITY DEPARTMENT OF EDUCATION

JOEL I. KLEIN, *Chancellor*

## OFFICE OF THE DEPUTY CHANCELLOR

Kathleen Grimm, Deputy Chancellor for Finance and Administration  
 52 Chambers Street, Room 320 • New York, New York 10007  
 (212) 374-0209 (Voice) (212) 374-5588 (Facsimile)

April 23, 2004

Greg Brooks  
 Deputy Comptroller  
 The City of New York  
 Office of the Comptroller  
 One Centre Street  
 New York, NY 10007-2341

Re: Draft Audit Report on the Department of  
 Education's School Safety Plans for Ten  
 Elementary Schools (MD03-178A)

Dear Mr. Brooks:

This letter, with attachments, reflects the New York City Department of Education's ("Department") response to the findings and recommendations made in the City of New York Office of the Comptroller ("Comptroller") Draft Audit Report on the Department of Education's School Safety Plans for Ten Elementary Schools ("Report").

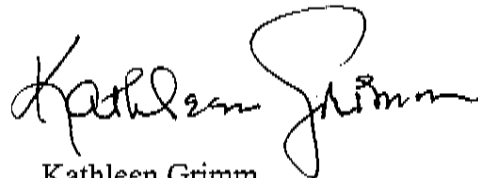
At the outset, it is necessary to clarify that notwithstanding the Comptroller's finding that Safety Plan review deadlines were missed, all schools have in place at the beginning of each school year a certified Safety Plan that meets all security requirements outlined by the State Education Department and are adequately prepared to respond to an emergency. However, inasmuch as we seek to improve our performance, I am confirming that Chancellor's Regulation A-414 will be reviewed to ensure that the language appropriately reflects the online process and supports the concept that plans previously certified are current for the new school year. Additionally, the Department is meeting regularly with the New York City Police Department School Safety Division to develop a method to streamline the Safety Plan review process and therefore shorten the length of time it currently takes to complete a re-certification.

As for improving dissemination of notification to parents of safety and evacuation information, the Parent Summary Guide will be made available to any parent requesting a copy. Additionally, Regional Safety Administrators are working with Parent Coordinators to inform parents about this and other safety issues. We are also reviewing the feasibility of posting the Parent Summary Guide on the Department's website.

Further, with respect to the Comptroller's recommendation that the Department should ensure that every school has sufficient automated external defibrillators ("AED") for use during emergencies and that proper training is provided to operators as required by Commissioner's Regulation §136.4, all New York City public schools are in the process of receiving defibrillators, necessary installation components and AED training through its vendor Cardiac Science, Inc. Based upon review of the implementation schedule, all schools will have an AED and staff trained in its use by the end of this current school year.

Finally, I would like to thank the Comptroller for bringing to the Department's immediate attention certain safety issues that the auditors observed during their field visits. That timely notification gave the Department the opportunity to respond quickly and correct the noted conditions.

Sincerely,



Kathleen Grimm  
Deputy Chancellor for Finance and  
Administration

KG:nf

Enclosures

C: Joel I. Klein  
Maureen Hayes  
Benjamin Tucker  
Jamie Smarr  
Brian Fleischer  
Timothy George  
Robert Meeker

Carmen Farina  
Michele Cahill  
Chad Vignola  
Rick Stewart  
Ava Mopper  
Thomas Keaney

Martin Oestreicher  
LaVerne Srinivasan  
Stephanie D'Amore  
Marlene Malamy  
John O'Connell  
Nader Francis

## **Response to Audit MD 03-178A**

### **Untimely Completion and Submission of School Safety Plans**

When schools reopen each September, all sites have a certified Safety Plan in place. Since implementing the online safety plan process, schools annually review and update their plans which then go through an extensive review process that is outlined in the report. Once a plan is certified by NYPD/SSD, schools have the ability to make any changes to the plan that occur during the school year in order to keep the plan current and accurate at all times. This report implies that by not meeting deadlines schools are not properly prepared when in fact they do have a current, certified plan. In fact, it is important to note, that the areas addressed in the plan are consistent with the central plan in that they meet all the security requirements outlined by the State Education Department. Since there were no substantial changes in the content areas of the plans this year, the existing certified plans provided a framework for safety and security procedures for schools at the beginning of the school year.

At the beginning of the school year, principals are instructed to meet with their safety committees to review and prepare any updates that will be required for that school year. While this is occurring, the school is using the latest certified plan. This year, because of the reorganization of the Department of Education, the certified safety plans had to be realigned within the new structure of schools within regions. This reconfiguration of the framework for over 1100 plans and the associated data, caused a delay in the posting of the plan interface on the DOE website. It is important to note, that schools still had the ability to print their certified plan at any time. As this was a one time reorganization, the DOE will provide access to plans so they are available when the school year begins.

Chancellor's Regulations A-414 will be reviewed to ensure that the language appropriately reflects the online process and supports the concept that plans previously certified are current for the new school year. In addition, the DOE is meeting regularly with NYPD/SSD both formally and informally to discuss issues associated with the review process in an attempt to streamline the process and therefore shorten the length of time it currently takes to complete a recertification each year.

### **Parents Not Notified of Safety and Evacuation Information**

The Department of Education's Parent Summary Guide is to be made available to any parent requesting a copy. As stated in the report, principals are instructed to inform parents by letter of the availability of their plan and have printed copies ready for distribution. The Principal has access to this summary copy on their safety homepage along with all other safety related items. The DOE is considering posting this on the website where parents will have direct access to

view and print a school specific copy. In addition, the regional safety administrators are working with the parent coordinators to present and inform parents in their regions about this and other safety issues.

### **Floor Plans Not Readily Available**

2801-a of state education law says that school plans must have "procedures for assuring that crisis response and law enforcement have access to floor plans, blueprints, schematics or other maps to the school interior, school grounds and road maps of the immediate surrounding area". The individual Safety Plan does not require the school to have a floor plan available on site; they are not maintained at the site level due to the sensitive nature of the material. The CD that is provided yearly to all emergency responder agencies, (NYPD, FDNY and OEM) includes each school's safety plan and the floor plans, as provided by the DOE's Division of School Facilities.

### **Safety Committee Meetings**

To ensure compliance with Chancellor's Regulation A-414, the DOE is monitoring the scheduling and convening of monthly safety committee meetings. The regional safety administrators have access to online documentation that schools are required to provide each time a meeting is held. Reports are generated to update the safety administrator of each schools monthly progress. When it appears that a school is not meeting regularly, the regional safety administrator makes a visit to the school to investigate this situation. If it is determined that compliance is not maintained, the Local Instructional Superintendent will be notified.



## THE NEW YORK CITY DEPARTMENT OF EDUCATION

JOEL I. KLEIN, *Chancellor*

## DIVISION OF SCHOOL FACILITIES

MARTIN OESTREICHER, CHIEF EXECUTIVE, OFFICE OF SCHOOL SUPPORT SERVICES

44-36 Vernon Boulevard, Long Island City, NY 11101

Telephone: (718) 349-5799

Fax: (718) 349-5766

Reference No. 2004 – 31

April 2, 2004

MEMORANDUM

TO: Nader Francis  
Director of External Audit Services  
Office of the Auditor General

FROM: James Lonergan *JL*  
Executive Director, Division of School Facilities

SUBJECT: Division of School Facilities' Response to the N.Y. City  
Comptroller's Draft Audit Report Entitled: "Audit Report on the  
Department of Education's School Safety Plans for 10 Elementary  
Schools" Report No. MD03-178A

This is the Division of School Facilities' response to the findings of the subject draft audit report and the status of implementation of two applicable recommendations.

Concerning the findings under the draft report section Safety Plan Violations on Pages 14 and 15, please note that upon notification of these findings in October and November 2003, the Division immediately sent staff to the schools to investigate the exit doors and chemical storage room conditions cited. These conditions were subsequently corrected.

In addition, School Facilities' staff re-inspected the schools in February and March 2004 to confirm that the schools were still in compliance with fire and safety regulations.

It is the Division of School Facilities' assessment that the two applicable recommendations concerning exit doors and custodial cleaning chemicals have been previously implemented. The schools' custodians are required by the Rules and Regulations for the Custodial Force in the Public Schools of the City of New York and by Plant Operations Circulars to conduct a daily inspection of their schools to ensure that exit doors are in proper working order and are not locked during the time when the schools are occupied by students, staff, or the public.

Mr. Nader Francis  
April 2, 2004  
page two

In addition, the requirements for the locking of doors to rooms used for the storage of cleaning or other chemicals are also detailed in the Rules and Regulations for the Custodial Force in the Public Schools of the City of New York.

JL:pl

Attachments

c: Marty Oestreicher  
John O'Connell  
Salvatore Calderone  
Mark David  
Robert Meeker  
File

BOARD OF EDUCATION OF THE CITY OF NEW YORK  
OFFICE OF AUDITOR GENERAL  
External Audit Services

RESPONSE DATE: March 2004

AUDIT TITLE: Audit Report on the Dept. of Education's  
School Safety Plans for 10 Elementary Schools

AUDITING AGENCY: New York City Comptroller's Office

DIVISION: Division of School Facilities

DRAFT REPORT DATE: March 25, 2004

AUDIT NUMBER: MD03-178A

**A. RECOMMENDATION WHICH THE AGENCY  
HAS IMPLEMENTED**

- 5. Ensure that custodians or their designees check all exit doors daily for compliance with applicable regulations.

**RESPONSE TO RECOMMENDATION - IMPLEMENTATION PLAN**

- 5. Custodians are already required per the Rules and Regulations for the Custodial Force in the Public Schools of the City of New York to conduct daily inspections of their buildings, including checking that exit doors are unlocked during school and public use hours. If these doors are not operating properly, repair requests are to be called in immediately.

These requirements have been periodically reinforced through the distribution of Plant Operations Circulars. Attached are examples of previous circulars which have been issued on the subject of exit doors.

We believe that given the requirements already in place which govern the inspection and repairs of exit doors, that the Division is in compliance with this recommendation.

**IMPLEMENTATION DATE**

Current Procedure

**RESPONSIBILITY CENTER**

Signature: *John J. O'Connell*  
John J. O'Connell  
 Print Name: John O'Connell

4/2/04  
 Date

Print Title: Director, Field Operations

BOARD OF EDUCATION OF THE CITY OF NEW YORK  
 DIVISION OF SCHOOL FACILITIES  
 OFFICE OF BUILDING SERVICES

June 21, 2001

# FIRE SAFETY

PLANT OPERATIONS CIRCULAR NO. 25 - 2000/01

NOTE: All Circulars are to be kept in a permanent file  
 TO CUSTODIAN ENGINEERS & BUILDING MANAGERS

All Fire Safety and/or Life Safety issues are to be treated as emergencies. As such, repair/replacement requests for equipment such as exterior doors, stairway doors, interior fire alarms, etc., shall be telephoned into the Duty Plant Manager at the respective Borough Office.

Enclosed you will find information regarding **FIRE SAFETY** that has been issued in past circulars. All custodial employees who perform Fire/Safety inspections must possess a valid Certificate of Fitness from the New York City Fire Department and the Certificate of Fitness holder must log those entries in the Fire Safety Log. In addition to holding all required Certificates of Fitness for the building, any and all alternates designated by you to assume your responsibilities in your absence, must be trained and familiar with all fire safety procedures. Please keep this in mind during the summer months to adjust your work schedule accordingly.

During summer school, please assist the administration in formulating building evacuation plans, if requested. For your information, all summer school Principals are required to conduct two (2) fire drills during the summer school session. The first fire drill must be performed during the first three (3) days of school. The second fire drill is to be scheduled during the third or fourth week. A lesson on fire drill procedures must be conducted on the first day of class. Records of fire drills must be kept on site by the Principal.

Patricia Zedalis  
 Chief Executive  
 Division of School Facilities

PZ/TG:ns

Enclosures: Plant Operations Circular No. 3 - 2000/01  
 Chancellor's Circular No. 29 - 1988/89  
 Plant Operations Circular No. 15 - 1998/99  
 Plant Operations Circular No. 14 - 1995/96  
 Plant Operations Circular No. 15 - 1996/97  
 Plant Operations Circular No. 20 - 2000/01



August 29, 2000

PLANT OPERATIONS CIRCULAR NO. 3 - 2000/01

NOTE: All Circulars are to be kept in a permanent file

TO SCHOOL CUSTODIAN ENGINEERS AND SCHOOL CUSTODIANS

1. FIRE SAFETY GUIDELINES

In light of the recent Fire Safety Audit that is presently being conducted by the New York City Comptroller Office, please be guided by the following:

→ Locked Exit Doors

Chancellor's Circular #29 - 1988/89 states that all locks including deadbolts that prevent egress through exterior doors are to be "UNLOCKED" during occupancy of the premises by students, staff, and/or the public, including evening and other after-school activities. Any individual who locks an exit door or forgets to re-open it during occupancy of the premises by students, staff and/or the public, without an existing emergency and compliance with the procedures set forth herein, and as a result receives a criminal summons from the New York City Fire Department or the Department of Buildings, shall be held PERSONALLY LIABLE. Also the 1977 Rules and Regulations guiding The Custodial Force section 9.3 specifically require that all exits be unlocked prior to the start of each school occupancy. See attached Chancellor's Circular #29 - 1988/89.

Fire Extinguishers

All custodians shall be reminded to follow the 1977 Rules and Regulations for The Custodial Force regarding fire extinguishers, section 9.5.4. All fire extinguishers are to be inspected on a monthly basis. The custodian must inspect the gauge, hose, nozzle, seal, pin, etc., to ensure that all fire extinguishers are in proper working order at all times. The indicator on the pressure gauge must always be in the green colored area. The Fire Department will issue a violation if the indicator is not within the green area. This must be checked on a daily basis. Replacement fire extinguishers may be picked up at the depository. Only replacement of missing or broken fire extinguishers will be honored.

Sprinkler/Standpipe Systems

Plant Operation Circular #15 - 1998/99 outlines the proper protocol required for operating and maintaining any sprinkler/standpipe system. A valid Certificate of Fitness issued by the New York City Fire Department must be maintained. Copies of these certificates must be kept in your fire log. Attached for your reference is Plant operation Circular #15 - 1998/99 regarding Sprinkler/Standpipe Systems.

BOARD OF EDUCATION OF THE CITY OF NEW YORK  
OFFICE OF AUDITOR GENERAL  
External Audit Services

RESPONSE DATE: March 2004

AUDIT TITLE: Audit Report on the Dept. of Education's  
School Safety Plans for 10 Elementary Schools

AUDITING AGENCY: New York City Comptroller's Office

DIVISION: Division of School Facilities

DRAFT REPORT DATE: March 25, 2004

AUDIT NUMBER: MD03-178A

**A. RECOMMENDATION WHICH THE AGENCY  
HAS IMPLEMENTED**

- 6. Instruct all school personnel, including administrators, custodians and teachers, to keep hazardous chemicals in locked storage areas.

**RESPONSE TO RECOMMENDATION - IMPLEMENTATION PLAN**

- 6. Custodians are required by the Rules and Regulations for the Custodial Force in the Public Schools of the City of New York to keep cleaning supplies in storage rooms which can be locked when not in use. These requirements have been periodically reiterated in Plant Operations Circulars sent to custodians as reminders. See the attached sample circular concerning the securing of storage rooms and also a page from the Rules and Regulations relating to locking doors to rooms containing supplies which may pose a risk.

Given the existence of appropriate rules and regulations governing the storage of cleaning supplies and other chemicals, we believe that the Division has implemented this recommendation.

**IMPLEMENTATION DATE**

Current Procedure

**RESPONSIBILITY CENTER**

Signature: John J. O'Connell  
John J. O'Connell  
Print Name: John O'Connell

4/2/04  
Date

BOARD OF EDUCATION OF THE CITY OF NEW YORK  
 DIVISION OF SCHOOL FACILITIES  
 OFFICE OF BUILDING SERVICES  
 DEPARTMENT OF PLANT OPERATIONS

January 15, 1997  
 Revised January 27, 1997

PLANT OPERATIONS CIRCULAR NO. 15 - 1996/97

NOTE: All Circulars are to be kept in a permanent file.

TO SCHOOL CUSTODIAN ENGINEERS AND SCHOOL CUSTODIANS

1. BUILDING SAFETY CHECK

Please check that the following areas are secured and inaccessible to building occupants other than service personnel and maintenance employees.

Special attention should be given to:

- a. Dust chutes
- b. Air Shafts
- c. Elevator Shafts
- d. Roof Access Stairs (bulkheads) or windows.
- e. Areaway Gratings, Playyards, Manhole Covers
- f. Boiler Rooms, Machine Rooms, Mechanical Spaces
- g. Storage Rooms and Slop Sinks
- h. Unused Spaces
- i. Tunnels

Daily safety checks should be performed while touring your facility. Custodial employees should also be instructed to take notice of and report any potential safety concerns to the School Custodian for immediate attention.

2. ENERGY SIGN-IN SHEETS

Enclosed are blanks of a Sign-In Sheet to be utilized by the Con Edison meter reader. This sheet is to be posted conspicuously on the wall next to the Electric meter(s) in your building.

Please send the Sign-In Sheets that were used in 1996 to Frank Cardello, at 28-11 Queens Plaza North, Room 540, Long Island City, New York 11101, no later than February 28, 1997.

## Rules & Regulations of the Custodial Force

**3.3.1 Opening and Closing.** The Custodian shall have all the gates or doors leading from the street to the building open thirty minutes before the school session or extra activity starts. He shall close them thirty minutes after the close of the school session or extra activity. The main entrance normally shall be kept open or attended until 4:45 p.m. and from 8 a.m. until 12 noon on Saturday.

**3.3.2 Doors.** At the end of the day the Custodian shall see that interior and exterior doors are securely locked. Insofar as the Custodian is responsible, doors of shops, homemaking rooms, science rooms, auditorium, gymnasium, pool and shower rooms and any other rooms containing supplies or equipment likely to present a risk shall be kept locked during periods when such rooms are not in use. Pupils shall not be permitted to enter those rooms at such times unless a teacher is present. Services and machinery rooms shall be kept locked unless occupied.

**3.3.3 Playground Gates.** Playground gates shall be closed and locked at the end of each day (not earlier than 5 p.m.) between November 15th and March 15th unless otherwise directed. At other times playground gates shall be left open. Exceptions to this rule may be made by the Director on the recommendation of the Assistant Superintendent or Community Superintendent of Schools for the District.

**3.3.4 Disconnecting Electric Current.** The Custodian shall not disconnect electric lights and power current at the main service switch or the main switchboard upon leaving the building each night. The Superintendent may designate certain buildings where special conditions warrant the disconnection of electric current.

**3.3.5 School Gardens.** If there is a school garden at the building, it should be open during the school day when directed by the Principal. School gardens should not be opened unless a teacher is present. The tool house should be opened only at the request of the teacher-in-charge.

**3.3.6 Dental Clinics.** In certain schools as designated from time to time, dental clinics shall remain open to serve patients during the summer, Monday to Friday, inclusive, from 8:45 a.m. to 4 p.m.

**3.3.7 Shutting off Water.** Water is not to be shut off at the end of the school day or night activity. Exceptions to this rule are listed in Paragraph 5.6.1 (b).

### 3.4 Inspections by Custodian.

**3.4.1 Daily Inspection.** The Custodian shall make a daily inspection of the entire building and grounds.

**3.4.2 Inspection before Closing.** The Custodian or one of his assistants shall visit every room, toilet, passage, stairway, yard, etc., of the school premises before closing.

**3.4.3 An Inspection Shall Be Made before any Occupancy.**

**3.5 Property Responsibility.** The Custodian will be held accountable for all school property committed to his care and may be required to replace any such property which may be lost, or stolen, if proved by his negligence.

**3.5.1 Prevention of Removal of Articles.** The Custodian shall see that no articles are removed from a school building by any person except on a written order on an official letterhead, from the Principal, Executive Director, Division of School Buildings, Directors of the Bureau of Plant Operation, Maintenance or Construction, Manager of Bureau Shops, or the head of any other Bureau or Division of the Board of Education having responsibility for the equipment being moved. Pianos shall be moved only after clearance with the Director of Music. The written order shall be kept in the Custodian's file.

**3.5.2 Transfer of Supplies.** The Custodian shall honor all written requests made by the Director, the Director of Bureau of Supplies or the Manager of Bureau Shops for the transfer of school supplies from one school building to another.

When a custodian is transferred from one school to another he shall not take supplies with him. In the event of change of Custodians at a building a joint inventory of supplies is required.

**3.5.3 Responsibility for Supplies During Vacation.** The Custodian should at the end of each school year receive from the Principal all keys to supply storerooms. He shall take all the necessary precautions to protect these supplies, materials, etc., during the summer vacation. If necessary, he shall relocate valuable material to a more secure location.

**3.5.4 Unused Surplus Furniture.** Accumulations of excess furniture above the need of the building or furniture in need of repair, shall be listed and reported where, when and as directed through the Bureau

NEW YORK CITY DEPARTMENT OF EDUCATION  
OFFICE OF AUDITOR GENERAL  
External Audit Services

PAGE 1 of 2

RESPONSE DATE: March 26, 2004

AUDIT TITLE: School Safety Plans for 10 Elementary Schools  
AUDITING AGENCY: New York City Comptroller's Office  
DIVISION: Office of Youth Development & School-Community Services  
DRAFT REPORT DATE: March 25, 2004  
AUDIT NUMBER: MD 03 – 178A

**B. RECOMMENDATION WHICH THE AGENCY  
HAS PARTIALLY IMPLEMENTED**

Other Issues – Lack of Defibrillators Page 17

"DOE should ensure that every school has sufficient AEDs for use during emergencies and that proper training is provided to operators as required by the Commissioner's Regulation."

**WHAT HAS BEEN IMPLEMENTED?**

Section 917 of the Education Law mandates that each school have an AED and at least one staff person trained in CPR and AED usage present at each school-sponsored event and during the school day. The Report points to the delay in implementing the AED program. However, initially, since the mandate was not funded by the State of New York, the DOE first had to identify sources for the \$8 million cost for implementing the program, ultimately re-directing funds from other priorities. While the State initially estimated that the statewide implementation cost to place AEDs in all schools would approximate \$5 million, DOE has spent substantially more funds than the state estimate on its own AED program. Moreover, DOE expected that the implementation date of the AED program would be pushed back to at least September 2003 in that DOE and the other "Big Five" school districts had lobbied the State Legislature to amend the implementation deadline to between October 2002 and January 2003. When these efforts failed, DOE moved forward with its AED program.

Currently, the Department of Education, through its vendor Cardiac Science, Inc., is providing the necessary training to accompany AED placement. To date, 5,312 DOE professionals have been trained and certified in CPR and in the use of AEDs. Upon installation of the AED, each school receives an AED Site Response Plan. The AED Site Response Plan is based on information collected from the school during the implementation process. The Plan is posted, distributed to staff, and incorporated into the School Safety Plan. Cardiac Science subsequently conducts drills at each school to test operation of the AED Site Response Plan; tracks machine usage; responds to repair and routine maintenance requests; and proactively addresses the need for AED/CPR re-certification system-wide.

It should be noted that information about the Law and required training has been made available through:

- A memorandum to all school principals from Deputy Chancellor Kathleen Grimm
- A memorandum to Regional Instructional Superintendents and Regional Directors of Student Placement, Youth and Family Support Services
- Principal's Weekly on-line newsletters on two separate occasions
- The Council of Supervisors and Administrators' newsletter and website
- An alert to all schools on the ATS system
- Links on the DOE and PSAL websites

WHAT HAS TO BE IMPLEMENTED?

All New York City public elementary and junior/middle/intermediate schools are in the process of receiving defibrillators and their necessary installation components, from the manufacturer. Each high school is also in the process of receiving at least one defibrillator.

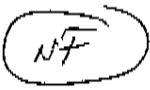
EXPECTED IMPLEMENTATION DATE

At this point, based upon a review of the implementation schedule, all schools will have an AED and staff trained in its use by the end of this current school year.

RESPONSIBILITY CENTER

Office of School Health

Signature:

Ava Moper 

Print Name:

4/21/2004  
Date

Print Title:

Director, Office of School Health