
MEMORANDUM

TO: Superintendents and Independent School Heads

FROM: Heather Bouchey, Interim Secretary, Vermont Agency of Education;
Michael Desrochers, Director, Division of Fire Safety; Vermont School
Safety Center

SUBJECT: Updated Guidance Regarding Egress Evacuation and Options Based
Response Drills for the 2023-2024 Academic Year

DATE: October 10, 2023

Purpose

On September 5, 2023, the Agency of Education, Vermont School Safety Center, and Vermont Division of Fire Safety jointly released annual guidance for school Emergency Drills (“Drill Guidance”).

This re-issued memo from October 10, 2023 clarifies guidance regarding Emergency Drills, which can be broken down into two categories: Emergency Egress (“Fire”) Drills and Options-Based Response to Violent Intruder Drills.

Emergency Egress (“Fire”) Drills

Under the National Fire Prevention Association (NFPA) Life Safety Code, schools must complete Emergency Egress (“Fire”) Drills. Under the code, schools are required to complete the minimum number of drills and method of drills (detailed below). For the 2023-2024 school year, the code includes a recommended schedule of Fire Drill completion dates and Drill methods (Egress vs. Relocation).

Egress (evacuation) drills result in a complete evacuation of the school. Two egress drills per school year must result in the complete evacuation of the school. The remaining four (4) fire drills, at the discretion of the school, may alternate between a relocation drill and an egress drill.

Relocation drills provide schools with an opportunity to practice the relocation of students to an alternate location (building) in the event the primary school building is compromised in such a way that it cannot safely be occupied. These drills can be coordinated for the end of the school day in such a manner that the school community can practice the relocation process and parents can become familiar with the process of picking up their children at this alternate site.



- Emergency evacuation plans are designed to evacuate the school in the most efficient and safe manner without panic. Without practicing drills, occupants including faculty will not know how to implement their emergency action plans.
- School fires and other emergency conditions may arise warranting the complete evacuation of the school in a timely manner. Thus, schools must be prepared to initiate such emergency evacuations.

Act 29 16 V.S.A. § 1481 includes a reference to “options-based response drills, including fire drills” and requires that all drills, must be age appropriate. Therefore, more planning is required to ensure options-based response drills, particularly Response to Violent Intruder drills, are age appropriate than for age-appropriate fire drills. The guidance provided below includes trauma-informed best practices for implementing options-based response drills.

Announcing Fire Drills

The AOE recommends that fire and relocation drills should not be announced with “**specific details**” about the date and time of the drill. It is the opinion of the AOE that announcing the date and time of the drill creates an undue risk to students and school staff.

Instead, the AOE and VSCC recommend that fire and relocation drills should be announced several days before the drill with a “**general statement**” that a drill will be held in the coming days, no later than X day. This approach is designed to balance the safety of students and school staff who participate in the drill with parents' need to be informed of an upcoming drill.

Recommended Schedule for Emergency Egress (“Fire”) Drills for 2023-2024 School Year

To meet the requirements of the NFPA Life Safety Code, schools must complete the minimum number of drills—six—and method of drills listed below. Schools may choose to complete additional drills at their discretion.

Month	Egress (“Fire”) Drill
September	Required Egress Only
October	Required Egress Only
November	
December	Required either Egress or Relocation
January	
February	Required either Egress or Relocation
March	
April	Required either Egress or Relocation
May	
June	Required either Egress or Relocation

Options-Based Response to a Violent Intruder Drills

Since 2015, the Vermont School Safety Center has been strongly encouraging schools and school districts to move away from the traditional (Lockdown) approach to an active shooter.

Review of different response methods and data analysis related to past active shooter incidents has shown that no one-size response plan fits each active shooter incident. Teachers, administrators, and students need to have an options-based response approach available to them, based on specific circumstances at the time of the incident.

Requirements Under Act 29

Under Act 29, passed May 30, 2023:

- Schools must complete age-appropriate, trauma-informed, Options-Based Response to Violent Intruder Drills in the fall and spring semesters.
 - For the 2023-2024 school year, this guidance includes a recommended schedule of Options-Based Response to Violent Intruder Drill completion dates and Drill Options. The VSSC strongly recommends that the spring Options-Based Response to Violent Intruder Drill occur in January or February, at the start of the spring semester.
- Schools must report the completion of these fall and spring semester drills to the VSSC. The AOE will provide schools with a reporting tool in a subsequent communication.
 - By October 15, 2023, SU/SDs and independent schools will assure that:
 - They will hold the drills as required by Act 29 in the 2023-2024 school year.

- School boards will develop and approve a policy that aligns with the requirements of Act 29, including that they will follow the guidance presented in this memo.
 - SU/SDs and Independent Schools can complete the assurance through the [Act 29, August 1, 2023 Assurances Webform for SU/SDs, Independent Schools and CTE Districts](#).
- A school district policy for options-based response drills is required. Districts should regularly review the policy to ensure compliance with the Act.
- All Options-Based Response to a Violent Intruder Drills must be announced to parents and guardians “not later than one school day before an options-based response drill is conducted.”
 - This will limit the anxiety associated with these drills and ensure these drills are conducted in a safe and effective manner. When conducting all drills, schools have the flexibility to plan these drills for dates and times that minimize disruption to the academic day.

Guidelines for Conducting Options-Based Response to a Violent Intruder Drills

Prior to conducting these drills, school leadership teams should review two important resources to help ensure that all options-based drills are age-appropriate and trauma-informed:

- [Best Practice Considerations for Armed Assailant Drills in Schools](#), produced by the National Association of School Psychologists and the National Association of School Resource Officers
- [Creating School Active Shooter/Intruder Drills](#), produced by the National Child Traumatic Stress Network Guidance document, which states: “*Safety drills need to incorporate a lockdown response but also an “option-based” approach. An option-based approach means that there are different actions educators and students can take if confronted by an active shooter/intruder (e.g., run away, keep out, and hide). The district needs to evaluate which approach is best and to adapt that approach to the developmental level of their students, including for students with disabilities, language barriers, and mobility needs.*”

Recommendations for Age-Appropriate, Options-Based Drills in Response to a Violent Intruder

The VSSC and the Vermont School Crisis Planning Team strongly encourage all schools to adopt the *Run, Hide, Fight* methodology for responding to a Violent Intruder instead of *A.L.I.C.E.* (Alert, Lockdown, Inform, Counter, Evacuate) or other response methodology.

Schools shall take attendance once the building has been evacuated and shall retain records of the drills conducted for reporting purposes.

Run, Hide, Fight is the U.S. Department of Homeland Security's recommended actions when responding to a Violent Intruder. It does **not** replace current safety protocols for evacuation, sheltering in place or other emergency response procedures. Instead, Run Hide, Fight gives additional tools that may be used to respond to a Violent Intruder.

The **Run, Hide, Fight** concept is to:

1. **Run** – If you can safely escape the area of the threat, you must make a decision based on the best information available.
 - Can be faculty, staff or student initiated
 - Have an escape route and plan that includes identified assembly areas located a safe distance away from the incident (Accountability)
 - Leave personal belongings behind
 - Must be prepared to change evacuation/run routes based on situational awareness
 - Be prepared to transition to a hide or fight option based on situational awareness
 - Keep your hands visible
2. **Hide** – Find a safe location to hide and avoid detection and potentially reinforce and “harden” your location. **Take steps to barricade, reinforce, or fortify your location.**
 - Lock doors and use items such as desks, chairs, bookshelves to barricade the door
 - Turn lights off
 - Hide in an area out of the view of the potential threat (try to ensure students and staff are not all congregated in one area)
 - If safe to do so, close all window shading
 - Maintain silence
 - Do not open the door
 - Silence cell phones
3. **Fight** – When faced with no other option, you may need to confront an active threat with the resolve that you will survive the encounter.
 - Last option for survival
 - Must assess individual capabilities
 - Enhance survivability by utilizing available resources (fire extinguisher, books, heavy objects) to defend or protect yourself
 - Consider developing a plan with others in your location to determine the best options for your survival (Swarming, distraction)

Recommended Schedule for Options Based Response to Violent Intruder Drills for 2023-2024 School Year

Month	Options-Based Response Drills
September	Recommended
October	
November	
December	
January	Recommended
February	
March	
April	
May	
June	

Vermont School Bus Evacuation Drill Guidance

Vermont State Law Title 23 V.S.A. § 1285 requires school authorities to conduct school bus evacuation drills twice a year for any student who is transported in a school bus. This includes students who ride the bus to and from home as well as those who may ride it during a field trip, sporting event, or other school related activity. The following are guidelines for safe riding practices and conducting an evacuation drill.

- Conduct the instruction and drill once at the beginning of the school year and once after the Winter Holiday Break.
- Have the driver conduct the actual drill and instruction. School Administration should be present and observe.
- Do front and rear exit drills.
- Show students how to use roof hatches and emergency exit windows. Instruction should include:
 - Emergency procedures
 - Expected behavior on the bus and at bus stops
 - Loading / Unloading procedures, including roadway crossing

Remember any student who will potentially ride a school bus **must** take part in these drills.

Contact

For questions regarding the requirements of Act 29, please contact Jill Briggs Campbell, Agency of Education, at jill.briggscampbell@vermont.gov.

For technical questions on drill recommendations by the Vermont School Safety Center, please contact Vermont's School Safety Liaison Officer Rob Evans at revans@cosecure.com or (802) 839-0448 or School Safety Programs Manager, Sunni Eriksen at sunni.eriksen@vermont.gov or (802) 760-7117, or visit the [Vermont School Safety Center's website](#).