



Before and After School Safety Planning Guidance

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Introduction

The purpose of this document is to provide schools with a brief review of the requirements for ensuring school safety. Although before and after school hours are not specifically addressed by existing law and regulations, schools are strongly encouraged to proactively address safety procedures during these times. This document provides recommendations for best practice for schools to take. School safety planning is a year-round process which is reviewed and revised on an ongoing basis based on several factors including but not limited to staffing, time of year, types of activities, and school and community resources.

Commissioner's Regulation §155.17 mandates that school building-level emergency response plans (ERPs) and district-wide school safety plans comprehensively address the safety of students and staff. Schools should ensure to include all before and after school activities and settings in their plan development. Specifically, school building and district plans should incorporate safety procedures for all operational periods (before, during, and after school); and be inclusive of all locations, including school buildings and grounds, including outdoor fields/ athletics facilities.¹ Specific attention should be given to safety and security protocols, training, adequate staffing, communication protocols, and visitor procedures which should be addressed in plans for before and after school activities.

Plans and procedures included in building and district plans must include how students and staff will respond in a range of emergencies, including those that require the school community to shelter/shelter in place, hold/hold-in place, evacuate, secure lockout, and lockdown.²

Before and after school activities encompass both school-sponsored activities and clubs (e.g., before and after school childcare, athletics, arts, academic enrichment, and technology-based activities) as well as non-school-sponsored activities such as those organized by community based organizations (CBOs) (e.g., extended school day programs, licensed school aged childcare programs (SACC) overseen by the Office of Children and Family Services (OCFS), clubs, and adult and community education programs.) Such activities often occur before or after regular school hours or on non-school days.

Note: Childcare programs with SACC licenses have specific requirements regarding safety drills. Schools should coordinate with the CBO running the program to collaborate on meeting differing requirements while avoiding duplication. For more information on SACC requirements, contact the office in your area: Regional Offices | Division of ChildCare Services | Office of Children and Family Services

Include Before and After School Staff on Safety Teams

School district, board of cooperative educational services (BOCES), and charter school district-wide safety teams and building-level emergency response planning teams are required to respectively develop and annually review district wide school safety and building-level emergency response plans.³ While regulations set minimum requirements for membership on these safety teams, it is important for administrators to include

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¹ See <u>September 2024 memorandum from Commissioner Rosa</u> regarding Review of School Safety Plans and Procedures for After School Activities and Events.

² Commissioner's Regulation - Section 155.17 (Effective July 2025)

³ See Commissioner's Regulation §155.17(a)

additional members to ensure emergency plans and procedures are comprehensive and inclusive of before and after school activities. This includes before and after school staff such as physical education (PE) or athletic directors, before and/or after school program directors, etc.

The emergency response team and the post-incident response team include individuals designated to carry out critical functions during and immediately following an emergency. Responsibilities include implementing emergency response protocols (e.g., lockdown, evacuation, accounting for students, providing first aid, coordinating communication) and assisting with reunification or recovery efforts. While the building's emergency response team is responsible for these critical functions during school hours, before and after school programs or activities, personnel must be trained in the emergency response procedures and understand their specific role within the school response framework.

Schools should:

- Identify and train staff representatives, when practicable, from before and after school activities to serve as emergency response team members;
- Ensure that team members are aware of their assigned role, location of emergency supplies, and the chain of command;
- Maintain rosters of trained individuals and update them seasonally or when staffing changes;
- Include before and after school safety team members in annual reviews of the building-level emergency response plan; and
- Conduct short tabletop exercises to simulate scenarios relevant to before and after hours activities (e.g., medical emergency during basketball practice)

Schools are required to submit the names and contact information for safety team members in the ERP collection in the business portal and must include before and after school staff appointed to this role.

Communicate ICS Roles to Before and After School Staff

The Incident Command System (ICS) is a component of the National Incident Management System (NIMS) used across agencies nationwide to ensure an organized and immediate response in the event of an emergency by identifying key leadership roles and responsibilities.⁴ For detailed information on ICS roles, see <u>ICS Review Document</u>.

Each school building's ERP must identify designated staff to perform each of the ICS roles and responsibilities in an emergency.⁵ In addition, schools must identify an alternate staff person to serve in each role.

Schools are required to include local law enforcement on safety/emergency response teams and should consult with local law enforcement agencies in their plan development to contribute the knowledge and experience of law enforcement experts and familiarize local law enforcement with school procedures, property, and staff.

Identifying clear chains of command, role-based responsibilities, and communication plans and providing this vital information to key staff in before and after school programs and activities will improve coordination, prevent duplication of effort, and align before and

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⁴ Additional information about the <u>Incident Command System is available from the Federal Emergency Management Agency (FEMA)</u>.

⁵ See Commissioner's Regulation §155.17(c)(2)(v).

after school programs and activities with the school's overall emergency plan and procedures.

Align Before and After School Safety with ERP Annexes and Site-Specific Contingencies

Functional annexes included in each school's building-level ERP describe the procedures staff and students will follow in an emergency (lockdown, evacuate, shelter/shelter-in-place, hold/hold-in-place, secure lockout, etc.). In addition, ERPs must include annexes that address the specific threats and hazards most relevant to that site, such as a fire, flooding, or medical emergency. Functional annexes and threat/hazard specific annexes developed as part of an ERP should ensure that before and after school hours and indoor and outdoor activities are included. To the extent it is practicable, emergency procedures for before and after school times should be consistent with the procedures for the regular school day. Consistency in language and procedures benefits students, staff, and emergency responders.

Carefully detailed planning for emergency situations in outdoor spaces is important as many outdoor spaces often do not have a physical structure to shield individuals from danger. Emergency procedures for outdoor spaces may call for people to seek safety inside a school building if it is nearby or may incorporate the use of structures such as storage buildings for a lockdown or shelter from extreme weather. If physical structures are not located in proximity to the outdoor space, procedures may make use of the natural landscape by seeking shelter from a human or weather threat in a low area such as drainage ditch or culvert.

A key part of emergency planning is to develop alternate or contingency procedures for use in the event that the first course of action is not practical or suitable, (e.g., planning for alternate egress, or designating an on-site and an off-site assembly point for use in an evacuation). In addition to sheltering sites, plans should establish evacuation routes and assembly points that consider potential obstacles or limitations that may exist during before and after school hours (e.g., storage buildings locked and not accessible for sheltering). Be certain that fencing or structural elements allow egress in outdoor spaces sufficient for the number of persons present (e.g., evacuating from an enclosed football stadium during a game may require multiple exit points).

Develop and Communicate Security and Visitor Policies and Procedures

Security and visitor management is a key element in maintaining safety. Building-level ERPs must include a description of security procedures as part of the security annex and should include visitor procedures for regular school day, ideally followed during before and after hours events, programs, and activities when practicable. Consider incorporating the following in district/school safety procedures:

- Establish a single point of entry to the building and install signage clearly designating the main entrance and directing visitors to that entrance.
- Consider implementing a "locked door" policy relevant to activities before and after school activities.
- Establish visitor sign in/out procedures when practicable.

⁶ See additional information at the US Department of Education's Readiness and Emergency Management for Schools (REMS) Technical Assistance Center website at: https://rems.ed.gov/IHEThreatAndHazardAnnex.aspx.

- For indoor events that include visitors, restrict building access to only the area of the building where the event is occurring.
- Install signage in indoor and outdoor public areas to assist students, staff, and visitors with wayfinding, identification of exit points, communicating visitor policies, and emergency procedures.⁷
- Install security cameras and security screening devices, as needed.

In the event of an emergency, it is essential for regular school day and before and after school personnel to have contact information of the school staff (e.g., custodian or administrator) with keys, codes or other devices for entry to interior and exterior doors, access gates, and buildings on school property. Alternatively, keys and/or devices may be placed in secured strategic locations for quick access by designated school staff. If providing keys, codes, or devices for entry directly to staff, document which staff have them along with other security procedures and equipment such as security cameras in the Security Annex of the building-level ERP for both school hours and before and after school hours.

Establish Internal and External Communication Protocols for Emergencies

Internal communication protocols include procedures for district and school officials to reach staff during an emergency, as well as procedures for staff to notify school or district officials of an emergency. These procedures should include personnel involved in school sponsored before and after school programs as well as programs hosted by an outside organization. Schools should ensure a secondary emergency communication method is in place in the event the primary communication system fails (e.g., cell phones not working, staff on- site switch to two-way radios).

External communication protocols should include procedures to reach parent/guardians in the event of an emergency. Regardless of the type of program, it is important that district and school officials ensure procedures are established in advance, communicated to staff, and shared with parents/guardians.⁸

The following are recommended:

- For school or district sponsored before and after school events and programs that take place on or off school grounds, district and school officials should ensure there are procedures in place for emergency notifications to staff as well as emergency notifications to parents/guardians.
- Physical Education(PE) or Athletic Directors should proactively establish emergency notification procedures with schools participating in interscholastic athletics. In an emergency, the hosting school PE/Athletic director or coach should notify the visiting school's personnel. The visiting team PE/athletic director or coach(es) should communicate emergency notifications to their athletes and families.
- For events and programs that take place on school property and are run by community-based organizations (CBOs) or outside groups; district and school

⁷ The New York Edition of the I Love U Guys Foundation's Standard Response Protocol (SRP) includes posters in English and Spanish.

⁸ See the <u>Communication Checklist for Out-of-School Time Providers</u> developed by The National Center on After-School and Summer Enrichment, <u>Standard Response Protocol and Standard Reunification Method | New York State Education Department</u>, <u>Sample Annual Parent/Guardian Notification of Safety Drills</u>, and <u>Sample Parent/Guardian Notification of Upcoming Drills</u>.

officials should ensure that a procedure is established to notify the activity organizer of emergencies and for CBO personnel to contact school administration as needed. The activity organizer should establish procedures for providing emergency notifications to their staff, participants, and participant's parents/guardians - if applicable.

Conduct Staff Training and Drills

Before and after school activities may include personnel who are not present during the school day on a regular basis (e.g., coaches, referees, or program staff.) Such personnel may have limited familiarity with school procedures, buildings, or grounds, and district/school administration and staff. In addition to providing annual training to school staff, schools should provide annual training to before and after school personnel as practicable on emergency response plan procedures, ICS roles, district and building policies, procedures, and programs related to safety including violence prevention, and mental health by September 15 of each school year or within 30 days of hire (whichever is sooner). Such training may be accomplished via virtual trainings, written information or other methods to communicate the information.

Training should include personnel from CBOs (e.g., a Girl Scout troop leader or staff from a before and/or after school program not run by the school) as practicable, as the district or school remains responsible for safety during programs that take place on school grounds. Therefore, schools should establish procedures to ensure that CBO program personnel receive information or are trained in emergency procedures within a short time of the start of the program/season and whenever new staff are hired.

Information included in training before and after school personnel related to safety and emergency procedures is outlined in a sample checklist (Attachment A). This resource may be used to share essential safety information to before and after school personnel. In addition, posting signage that includes the emergency response terms and actions is a helpful way to remind staff and students of the emergency procedures.¹⁰

School and district emergency response/safety teams (which may include appropriate before and after school activities personnel) can use tabletop exercises to review safety procedures for before and after school activities. Tabletop exercises for before and after school times are a helpful tool in evaluating the effectiveness of existing plans and procedures and inform the need for improvements in a low-risk environment.¹¹

While it is not required that drills be conducted during before and after school times/activities, except as is required by before and after school aged childcare programs with SACC licenses, schools may choose to incorporate drills in before and after school programs or activities. Regardless of when drills are completed, Commissioner's Regulation §155.17(c)(2)(vii)(d) requires parent/guardian notification within 7 days in advance of all drills¹²; students must always be informed that a drill is a drill (rather than

¹⁰ NYSED's <u>Emergency Response Chart</u> is available in multiple languages at <u>The New York State Center for School Safety | nyscfss.org</u> or The New York Edition of the I Love U Guys Foundation's Standard Response Protocol (SRP) includes posters in <u>English</u> and <u>Spanish</u>.

⁹ See Commissioner's Regulation §155.17(c)(1)(xiii).

¹¹ See US Department of Education's Readiness and Emergency Management for Schools Technical Assistance (REMS/TA) Center's <u>School EOPs in-Depth: Planning for Large Events Online Course</u> for tabletop exercises and other information related to emergency planning for school events.

¹² A <u>sample parent/guardian letter about emergency procedures and drills, and sample parent/guardian notification about an upcoming drill are available at The Safe Schools Against Violence in Education Act (SAVE) | New York State Education Department.</u>

a real emergency) except for fire drills; and all drills must be trauma-informed (props, actors, scenarios are prohibited).¹³

Plan for Event Specific Safety

Safety during before and after school activities include many variables not present during the regular school day. Such activities include visiting schools and spectators, sometimes from multiple schools, adding to the complexity of planning. The following provides steps and considerations for schools at such events. The suggestions outlined in attachment A will also prove beneficial to schools when planning for various events.

School Athletic Events

Large athletic events present unique features that affect safety and security planning. Careful planning is important and is done far enough in advance to ensure safety needs are met. The following considerations should be included in safety plans for these events:

- ✓ Advance assessment of area for physical security needs inclusive of lighting, camera angles, access to other parts of school, parking lots, locker rooms, points of egress, and check electronic equipment and software to ensure functioning a(e.g., cell phones are charged and work in the event location, testing of emergency notification apps/software are functioning properly).
- ✓ Sufficient numbers of school staff are present to manage and supervise the event. Staff should be assigned roles, and be readily identifiable (e.g., badges, vests, colored shirts, etc.)
- ✓ For outdoor events, identify shelters ahead of event for use as needed (e.g., nearby structures) and ensure they are accessible when needed. This may include ensuring a staff member present at the event has keys, codes, or other devices for entry.
- ✓ For outdoor events, plan for adverse weather conditions and emergencies and how sheltering or evacuating students, coaches, school personnel and spectators will be accomplished. Ensure school staff are trained in the procedures.
- ✓ Coordinate with emergency medical services(EMS) in advance of the event. EMS may decide to have an ambulance on standby or on site to provide first aid and emergency care as needed.
- ✓ Event entry and reentry procedures should be developed and communicated to all school staff at the event.
- ✓ Ensure accessibility for disabled persons for entry and egress.
- ✓ Create a detailed plan for parking procedures, traffic flow, parking lot staffing during entire game, and related issues. Advise students in advance to coordinate pick-ups by parents outside of the parking lots on the perimeter of the grounds.
- ✓ Have signage for parking, exits, first aid station, and other essential information.
- ✓ Consider having security personnel or local law enforcement present to monitor crowds, perimeter, ticket sales, entrance/exit points, parking lots and public areas (i.e., restrooms, concessions etc.)
- ✓ Ensure fire lanes are not blocked.
- ✓ At outdoor events, consider blocking or reinforcing areas vulnerable to forced vehicle entry.

¹³ Additional information about requirements related to trauma-informed drills is available in NYSED's <u>FAQ:</u> <u>Amendments to Commissioner's Regulation §155.17, Effective July 31, 2024</u>.

- ✓ At indoor events, ensure exits are not locked such that they prevent egress for attendees.
- ✓ Consider posting signs of items prohibited (e.g., weapons, tobacco/vapes, alcohol, coolers etc.) these must be written and communicated to be enforceable.
- ✓ For indoor events, limit access to areas of the building and classrooms not in use (e.g., gates, lock room doors etc.)
- ✓ Visiting team members, coaches, and bus drivers should be greeted and instructed in areas they can use (benches, locker room, etc.) and be provided an overview of safety procedures and how to identify home school personnel. Ideally, a review of the home school's safety procedures is communicated to the visiting team prior to the game.
- ✓ Provide separate seating areas for each team's attendees when possible.

A sample announcement for an outdoor event is provided below which is meant to be tailored to each event and environment. Such an announcement may be made over a loudspeaker or public address (PA) system, if available. If necessary, an announcement may be made using a bullhorn from a sideline.

"Thank you for attending our XX game today. We have a few announcements to share with you before the game begins. Please note emergency exits are located ______ and are marked as exit points. If an emergency occurs we will make an announcement and provide additional instructions. If an emergency should occur that requires us to stop the game and evacuate the field or take shelter, follow instructions from event staff/coaches (state how they can be identified, e.g., badges, vests, colored shirts, etc.) Thank you for your cooperation and enjoy the game! Please rise for our national anthem."

CBO Programs/Activities at School

Before and after school activities held at school may not be run by school personnel, and schools should provide direction and guidance to those visitors using the school facilities. Considerations include:

- ✓ Ensure CBO staff are have information or are trained in the school's emergency procedures. Provide printed information to staff, such as Attachment A, contact information for school personnel, and map of exits (not the confidential map for the school's ERP)
- ✓ Assign an onsite contact person (administrator, security personnel, custodial staff, athletic staff) at the school and provide information on how to contact them.
- ✓ For indoor events/activities, use a sign in/sign out process at entrance when practicable, and limit access to areas of the building and classrooms not in use (e.g., gates, lock room doors etc.)
- ✓ Provide CBO staff with information on the location of AEDs, fire alarms and fire extinguishers.
- ✓ Provide CBO staff with information on entrance/exit points, parking areas, and rest room location.
- ✓ Provide information on how the school will communicate with the CBO and who the CBO can contact if the onsite contact person is unavailable in event of emergency.
- ✓ For outdoor events, identify shelters ahead of event/activity for use as needed (e.g., nearby structures) and ensure they are accessible when needed. This may

include ensuring a staff member present at the event has keys, codes, or other devices for entry.

Before and after school emergency planning is a critical component of a comprehensive school safety strategy to ensure the safety of all participants. By establishing clear procedures, training personnel, coordinating with local emergency services, and maintaining consistent communication with parents/guardians schools can effectively prepare for and respond to a wide range of emergencies. Proactive planning not only protects students and staff but also reinforces community trust and resilience. Schools should regularly review and update their before and after school emergency plans to reflect current risks, available resources, and lessons learned from drills or real incidents.

Additional resources related to safety and emergency planning are available at NYSED's Office of Student Support Services webpages (<u>The Safe Schools Against Violence in Education Act (SAVE) | New York State Education Department</u>), <u>The New York State Center for School Safety | nyscfss.org</u> and in Attachment B.

Attachment A

Before and After School Emergency Procedure Checklist for School Activities

Safety Protocols:

- Visitor and building access policies
- Emergency protocols and procedures and, if applicable, information about drills
- Building map with entrances/exits identified (ERP confidential maps are not to be shared with CBOs)
- Procedures for supervision and safety of students, including staff to student ratio, if applicable
- Building and district emergency contacts and protocols, including custodial or maintenance staff and other staff with keys, codes or other devices for entry.
- Procedures for reporting and documenting incidents
- Dismissal procedures/protocols for releasing students at the conclusion of an activity (e.g., how would staff know who is authorized to pick up a child?)

Communication Protocols:

- Procedures for informing parents/guardians about activities, incidents, and important announcements
- Procedures for contacting parents/guardians in emergencies and students' emergency contact information.
- Procedures for updating parent/guardian contact information

First Aid Procedures:

- Location of First Aid and/or Stop the Bleed kits, AED devices, and other emergency medical supplies and/or medications (e.g., epinephrine, naloxone.)
- Procedures for reporting and documenting injuries and illness
- Emergency contact information: ensure all staff have access to up-to-date emergency contact information for local emergency services if not calling 911.

Outdoor Safety:

- Outdoor supervision: assign dedicated staff for outdoor activities and maintain close supervision
- Weather monitoring: monitor weather conditions and cancel outdoor activities if necessary
- Outdoor protocols for use of insect repellent or sunscreen by students
- For outdoor events, identify shelters ahead of event for use as needed (e.g., nearby structures) and ensure they are accessible when needed. This may include ensuring a staff member present at the event has keys, codes, or other devices for entry.
- For outdoor events, plan for adverse weather conditions and emergencies and how sheltering or evacuating students, coaches, school personnel and spectators will be accomplished. Ensure school staff are trained in the procedures.

Appendix B

Additional Resources

US Department of Education's REMS TA Center

#REMSontheAir Podcast Episode 33: Emergency Preparedness for After-school Programs: includes the 21st Century Community Learning Center's National Technical Assistance Center (NTAC) to provide suggestions for providing safety training.

<u>School EOPs In-Depth: Planning for Large Events Online Course</u>: Includes tabletop exercises for large event

<u>The Role of Athletic Directors in School Safety Efforts Webinar</u> Developed for separate roles in emergency—see below

Other Federal Resources

<u>Emergency Action Planning in School-Based Athletics: A Systematic Review</u> (U.S. Department of Health and Human Services, National Institutes of Health, National Library of Medicine)

<u>Extending Schoolwide Systems to Support Extracurricular Activities</u> (Center on Positive Behavioral Interventions and Supports): resources to support positive behavior at events

<u>Out-of-School Time Emergency Preparedness, Response, and Recovery Toolkit</u> (U.S. Department of Health and Human Services, Administration for Children and Families)

https://rems.ed.gov/docs/repository/MHSAA Sports Event Security Plan.pdf A sample school security plan for role assignments, developed by the Michigan High School Athletic Association.

Other Resources

Athletics Safety and Security Best Practices Guide

After School Activities and Community Use - School SecuritySchool Security

School Athletic Event Security - School SecuritySchool Security