

# Conducting Trauma-Informed Drills in New York State

August 2024

In April 2024, proposed amendments to [Commissioner’s Regulations §155.17](#) were presented to the Board of Regents for consideration. These changes were adopted by the Board of Regents during its July session and are effective as of 7/31/24.

For comprehensive information on proposed changes to the regulations please see the [Memorandum to the Board of Regents](#) dated April 4, 2024 or the New York State Education Department [website](#). The following provides a summary of the proposed regulation changes related to conducting drills in New York State. Your District-Wide School Safety Team and your Building-Level Emergency Response Planning Team are responsible for developing and documenting the policies and procedures to be followed during an emergency and practiced during a drill.

*Please note: the **number** of required drills and the **type** of required drills **remains the same**.*

## BACKGROUND INFORMATION

At a minimum, what drills are required in New York State?

- Eight **evacuation** drills each year (6 must be conducted by Dec 31).
- Four **lockdown** drills each year (2 must be conducted by Dec 31).
- One **emergency dismissal** drill each school year to test emergency response procedures. This should not occur more than 15 minutes earlier than normal dismissal time.

*Note: There are additional drill requirements for residential, summer school, after school, events.*

The **number** of required drills and the **type** of required drills **remains the same**.

What are the differences between drills, tabletop exercises, and full-scale exercises?

<p><b>Drills</b> provide an opportunity to practice and prepare staff and students, and to establish procedures to be used during an emergency. During drills, the school building and grounds are used to <u>prepare</u> students and staff, <u>practice</u> responding to a scenario, and <u>test</u> operations. Drills involve students and staff.</p>	<p><b>Tabletop Exercises</b> are small-group discussions that walk through a scenario to increase awareness of roles and responsibilities. Tabletop exercises do not involve students.</p>	<p><b>Full-Scale Exercises</b> evaluate operational capability during simulated conditions with multiple partners (i.e., law enforcement). Full-Scale Exercises do not involve students.</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

PROPOSED CHANGES TO COMMISSIONER’S REGULATION §155.17

NEW definitions:

<b>Trauma</b>	Trauma means an emotional response to a deeply distressing or disturbing experience such as, but not limited to, an act of violence, natural disaster, abuse, neglect, or loss.	CRR 155.17 (b)(20)
<b>Trauma Informed</b>	Trauma-informed means an understanding of what trauma is and how it affects the physical, emotional, and mental health of students and adults.	CRR 155.17 (b)(21)
<b>Trauma Informed Drills</b>	Trauma-informed drills means avoiding tactics in training or drills that may introduce or activate prior trauma, such as use of props, actors, simulations, or other tactics intended to mimic a school shooting, incident of violence, or other emergency, or inclusion of developmentally or age-inappropriate content; and to recognize that drills may inadvertently prompt a negative emotional or psychological response in staff or students because of previous exposure(s) to trauma.	CRR 155.17 (b)(22)

NEW regulations on drills:

<p>The <b>District-Wide School Safety Plan</b> shall include procedures for review and the conduct of drills, tabletop exercises, and information about emergency procedures and drills, including information about procedures and timeframes for notification of parents or persons in parental relation regarding drills and other emergency response training(s) that include students. At their discretion, schools and districts may participate in <b>full-scale exercises</b> in coordination with local and county emergency responders and preparedness officials.</p>	CRR 155.17 (c)(1)(xiv)
<p>Drills conducted during the school day with students present shall be conducted in trauma-informed, developmentally, and age-appropriate manner and <b>shall not</b> include props, actors, or simulations or other tactics intended to mimic a school shooting or other act of violence or emergency.</p>	CRR 155.17 (c)(1)(xiv)(1)
<p>At the time that drills are conducted, students and staff shall be <b>informed it is a drill</b> (except for evacuation drills).</p>	CRR 155.17 (c)(1)(xiv)(1)

### How should drills be conducted?

Lockdown and evacuation drills practice established procedures that will be used during an emergency.

- ✓ Drills should be conducted in a trauma informed, developmentally and age-appropriate manner and shall not include props, actors, simulations, or other tactics intended to mimic a school shooting, incident of violence or other emergency.
- ✓ Drills should occur after annual training in emergency procedures has been provided to students and staff.
- ✓ Drills should be completed on different dates, different days of the week, and during different times of the school day.

CRR 155.17 (c)(2)(vii)(a), (b), (c)

### What should NOT happen during drills?

- Do **not** simulate an emergency.
- Do **not** use props, actors, simulations, or other tactics intended to mimic a school shooting or other act of violence or emergency.
- Do **not** call the Lockdown Drill an Active Shooter Drill.
- Do **not** lead anyone to believe there is an actual emergency.

### Duties of the District Chief Emergency Officer include:

- ✓ Ensure the required evacuation and lockdown drills are conducted in a trauma-informed, and developmentally and age-appropriate manner that does not include props, actors, or simulations or other tactics intended to mimic a school shooting or other act of violence or emergency in all district buildings, as required by Education Law [Section 807](#).

CRR 155.17 (c)(1)(xix)(g)

### NEW regulation on tabletop exercises:

**Tabletop exercises** may be utilized by school and district safety teams as a training resource and may include a discussion-based activity for **staff** in an informal classroom or meeting type setting to discuss their roles during an emergency and their responses to sample emergency situations. Tabletop exercises do not include students.

CRR 155.17  
(c)(1)(xiv)(2)

### NEW regulation on full-scale exercises:

Schools and districts that opt to participate in full-scale exercises in conjunction with local and county emergency responders and preparedness officials and include props, actors, or simulations or other tactics intended to mimic a school shooting or other act of violence or emergency **shall not conduct such exercises on a regular school day or when school activities such as athletics are occurring on school grounds**. Such exercises may not include students without written consent from parents or persons in parental relation.

CRR 155.17  
(c)(1)(xiv)(3)

## BEST PRACTICES

### What are the best practices for conducting LOCKDOWN drills?

LOCKDOWN is used to secure students and staff inside locked classrooms during incidents that pose an immediate threat of violence in or around the school. LOCKDOWN means to immediately clear the hallways, lock and/or barricade doors, hide from view, and remain silent while readying a plan of evacuation as a last resort. LOCKDOWN will only end upon physical release from the room or secured area by law enforcement.

LOCKDOWN DRILLS provide an opportunity to practice, prepare, and test procedures that will be used during an incident.

Consider, *at a minimum*, the following:

Before the Lockdown Drill	During the Lockdown Drill	After the Lockdown Drill
<ul style="list-style-type: none"> <li><input type="checkbox"/> Building Level Emergency Response Planning Team determines who serves in Incident Command System roles for your school.</li> <li><input type="checkbox"/> Detailed and specific procedures for announcing, conducting, and releasing a lockdown are documented in your school’s Lockdown Functional Annex and adopted as part of the Building-Level Emergency Response Plan.</li> <li><input type="checkbox"/> Training is provided to students and staff on how to respond to a lockdown effectively. Training includes how the lockdown is initiated, steps to take in a lockdown, and how the lockdown will be released.</li> <li><input type="checkbox"/> Consideration and planning occur for how your school will support students &amp; staff with disabilities and other access and functional needs.</li> <li><input type="checkbox"/> Communication with parents and guardians about the procedures and actions that will be taken during the drill is documented in the District-Wide School Safety Plan and disseminated.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> <b>ALWAYS inform students and staff it is a drill.</b> Use clear language to announce the drill. For example, “This is a drill. LOCKDOWN, LOCKDOWN, LOCKDOWN. This is a drill.”</li> <li><input type="checkbox"/> When you hear Lockdown Drill announced, adults should model calm behavior and should move quickly to:               <ul style="list-style-type: none"> <li><input type="checkbox"/> Gather students from hallways, common areas, and restrooms adjacent/near the classroom.</li> <li><input type="checkbox"/> Close and lock the door.</li> <li><input type="checkbox"/> Move students to a safe area in the classroom out of sight of the door.</li> <li><input type="checkbox"/> Follow school procedures regarding lights and blinds.</li> <li><input type="checkbox"/> Remain silent. Silence cell phones.</li> <li><input type="checkbox"/> Take attendance. Include additional and missing students’ last known location.</li> </ul> </li> <li><input type="checkbox"/> In a real emergency, no one will be allowed to leave the secure area. <b><i>However, during a drill, situations may occur that require immediate assistance, so follow school procedures for supporting students and staff.</i></b></li> <li><input type="checkbox"/> Do not communicate through doors or answer the room phone.</li> <li><input type="checkbox"/> Do not respond to P.A. announcements or fire alarm unless actual signs of fire are observed.</li> <li><input type="checkbox"/> Stay hidden until physically released by law enforcement personnel or other designated person serving as proxy during the drill.</li> <li><input type="checkbox"/> Follow district procedures for notifying parents and guardians about the drill.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Debrief the drill with students and staff to answer questions and identify who might need additional support.</li> <li><input type="checkbox"/> Notify all concerned parties when a Lockdown Drill has ended.</li> <li><input type="checkbox"/> Debrief with your staff to determine what was supposed to happen, what happened, and how to improve.</li> <li><input type="checkbox"/> Identify any facilities modifications that might be needed.</li> <li><input type="checkbox"/> Revise your Lockdown Functional Annex to reflect lessons learned during the drill.</li> <li><input type="checkbox"/> Follow the procedures documented in the District-Wide School Safety Plan regarding notification of parents and those in parental relation about the drill.</li> </ul>

## What are the best practices for conducting EVACUATION drills?

EVACUATION is used to move students and staff for their protection from a school building to a predetermined location in response to an emergency.

EVACUATION DRILLS provide an opportunity to practice, prepare, and test procedures that will be used during an incident.

Consider, *at a minimum*, the following:

Before the Evacuation Drill	During the Evacuation Drill	After the Evacuation Drill
<ul style="list-style-type: none"> <li><input type="checkbox"/> Building Level Emergency Response Planning Team determines who serves in Incident Command System roles for your school.</li> <li><input type="checkbox"/> Detailed and specific procedures for announcing and conducting an evacuation are documented in your school's Evacuation Functional Annex and adopted as part of the Building-Level Emergency Response Plan.</li> <li><input type="checkbox"/> Evacuation routes, assembly points, attendance, and reunification processes are planned and documented.</li> <li><input type="checkbox"/> Confirm that emergency equipment (e.g., alarm systems, lighted exit signs, and emergency lighting) are functioning properly and have adequate back-up power.</li> <li><input type="checkbox"/> Training is provided to students and staff on how to evacuate effectively.</li> <li><input type="checkbox"/> Consideration and planning occur for how your school will support students &amp; staff with disabilities and other access and functional needs.</li> <li><input type="checkbox"/> Communication occurs with parents and guardians about the procedures and actions that will be taken during the drill, as documented in the District-Wide School Safety Plan.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Adults should model calm behavior, and should move quickly to:</li> <li><input type="checkbox"/> Gather students from hallways, common areas, and restrooms adjacent/near the classroom.</li> <li><input type="checkbox"/> Remain silent. Silence cell phones.</li> <li><input type="checkbox"/> Follow evacuation procedures and routes. Proceed to assembly points.</li> <li><input type="checkbox"/> Take attendance. Include additional and missing students' last known location.</li> <li><input type="checkbox"/> In a real emergency, no one will be allowed to leave the secure area. <b>However, during a drill, situations may occur that require immediate assistance, so follow school procedures for supporting students and staff.</b></li> <li><input type="checkbox"/> Follow district procedures for notifying parents and guardians.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Debrief the drill with students and staff to answer questions and identify who might need additional support.</li> <li><input type="checkbox"/> Notify all concerned parties when an Evacuation Drill has ended.</li> <li><input type="checkbox"/> Debrief with your staff to determine what was supposed to happen, what happened, and how to improve.</li> <li><input type="checkbox"/> Revise your Evacuation Functional Annex to reflect lessons learned during the drill.</li> <li><input type="checkbox"/> Follow the procedures documented in the District-Wide School Safety Plan regarding notification of parents and those in parental relation about the drill.</li> </ul>

## FOR MORE INFORMATION

Training Modules are available from the [NYS Center for School Safety](#) and the [NYS Education Department](#):

### [Lockdown Drills 101: Preparing For, Conducting, and Assessing Your Practices](#)

This four-part self-paced training program provides an in-depth look at the practice of lockdown drills and how to ensure they are conducted effectively while using a trauma-informed approach. Developed and presented by Dr. Jaclyn Schildkraut and Dr. Amanda Nickerson for the NYS Education Department.

### [Emergency Response Planning Video Series](#)

The NYS Education Department has created a series of 13 short video modules designed to support districts and schools in developing their District-Wide School Safety Plan and their Building-Level Emergency Response Plan.

### [Developing and Enhancing Memoranda of Understanding \(MOUs\) with your Community Partners](#)

### [The Incident Command System \(ICS\)](#)

### [Integrating the Needs of Students and Staff with Disabilities and Other Access and Functional Needs](#)

### [Initial Annual Safety Plan Training](#)

This recorded slide presentation is designed to be used as a group training session and provides an overview of student mental health, violence prevention, and includes prompts to guide your school or district through an overview of your District-Wide School Safety Plan and Building-Level Emergency Response Plan.

Additional Resources to develop District-Wide School Safety Plans and Building Level Emergency Response Plans: [Safety Plan Resource Page](#)

Climate Connection: [Supporting Students with Autism with Lockdown Drills](#)

From the National Association of School Psychologists [Mitigating Psychological Effects of Lockdowns](#)

*The NYS Center for School Safety is a contracted technical assistance provider for the NYS Education Department*