



NORTH PENN SCHOOL DISTRICT

SAFETY & SECURITY PROGRAM ASSESSMENT™ EXECUTIVE SUMMARY

MARGOLIS HEALY AND ASSOCIATES, LLC,

MAY, 2022

INTRODUCTION

Under the leadership of the Coordinator of Emergency Management and Safe Schools Mr. Chris Doerr, the North Penn School District (NPSD) retained Margolis Healy to conduct an objective assessment of the districts safety and security programs and behavioral health support systems. In addition, we worked with the districts staff and local emergency response agencies and emergency management professionals to conduct a Hazard Vulnerability Impact Assessment to help identify the threats and vulnerabilities the district may most likely be exposed to. The intention of this assessment is to identify areas in which these programs are performing well, identify areas for potential improvement, and make reasonable, actionable recommendations to close identified gaps in the most efficient and cost-effective manner.

Margolis Healy conducted our assessment of the North Penn School District, by conducting a physical inspection of the (21) individual sites that included (13) elementary schools, (3) middle schools, (1) high school/stadium and athletic field complex, (1) transportation depot, (1) credit recovery school, (1) district office, and (1) warehouse/support building. We also conducted a series of small group interviews with over 100 school safety stakeholders, designed to allow individuals the opportunity to express their perceptions, feelings, and experiences relative to school security and emergency/crisis response. These meetings included the districts leadership team, elementary/middle/high school principals, board members, staff, administrators, security staff, mental health professionals, local emergency management officials and, fire, law enforcement and EMS professionals.

Our team consisting of Executive Vice President Dan Pascale, Director of K-12 Services Rob Evans, Director of Security and Emergency Management Services Fran Mozgai and Associate Stephen Molinelli, conducted their two week site visit from March 7th, to March 17th, 2022. The primary focus areas for this assessment were to evaluate the physical security conditions and the schools emergency preparedness initiatives relative to best and promising practices or “contemporary standards.” In addition, we assessed what student services are available within the district and how they are organized, advertised and implemented. We also assessed what internal/external mental health resources are available within the district and how they are organized, advertised and implemented. In addition, we also reviewed the implementation and usage of the districts Safe2Say Something anonymous reporting system and reviewed the district’s approach to promoting programs, policies and practices that enhance school climate at all schools within the district.

Following our two-week site visit to the district, (where applicable) we identified programmatic strengths and opportunities to enhance existing programs and practices and where reasonable steps can be taken to enhance each of the areas

we assessed. In addition to our formal discussions and personal observations, we also reviewed existing policies, memorandums of understanding and standard operating procedures related to the primary focus areas of our work.

GENERAL OBSERVATIONS

Based on our interviews with school administrators, staff, our individual site assessments, and visioning workshop with the district's leadership team, we are convinced that the North Penn School District is fully committed to providing a safe, open, and welcoming educational environment for its students, faculty, staff, and visitors.

In our opinion, there is an enormous amount of school pride at NPSD among the many individuals we were able to meet with. Pride within the district not only makes for a better learning and working environment, but it can also serve to foster a more secure school district. While it is common for administrators to tell us that safety is a top priority, it was clear from everyone from the districts leadership team to the staff members, security personnel, mental health professionals and local emergency first responders, that safety and security continues to be a priority at NPSD. In fact, we found that our work with the district to identify safety and security challenges and develop mitigation strategies is not only a priority, but is welcomed by all with whom we spoke.

We believe NPSD provides a reasonably safe environment for its students and staff that in many ways meets and/ or exceeds contemporary standards at peer institutions. At the same time, we were encouraged to see that while school administrators were confident in the current security program, everyone, without exception, was open and enthusiastic about identifying opportunities to enhance security.

While we may identify areas for improvement, we believe it is important to point out several positive aspects of school security. This starts with the positive culture of the district, which fosters an environment of inclusion and encourages communication when a potential threat or hazard is observed. In addition, NPSD has made a significant investment in its physical security programs and has continued to dedicate both financial and personnel resources to enhance and build upon its existing emergency preparedness initiatives. We applaud these efforts and believe the district should be acknowledged for them.

MAJOR THEMES & ESSENTIAL CHALLENGES

1. **Physical Security Systems Management** – We feel NPSD has made significant and appropriate investments into its physical security program and associated technology. Its use of electronic access control, security cameras, and visitor management systems are meeting contemporary standards in many ways. However, we have identified several opportunities for the district to strengthen its security posture. First we recommend that NPSD formalize the decision-making process for how it uses security systems and technology through codified security practices that establish minimum security standards for each school.

Additionally, our team is concerned about the internal capacity available to manage the districts physical security program, particularly security cameras. Two district employees currently manage all aspects of security camera use, in addition to other responsibilities. With well over 700 cameras across the district, we are concerned that these employees lack the capacity to adequately maintain, troubleshoot, repair, and install cameras. We believe this staffing challenge has resulted in delays in repairing malfunctioning cameras and in the installation of new cameras. In our opinion, NPSD would greatly benefit from utilizing a third party vendor to assist with the installation, maintenance, and repair of its security cameras.

2. **Emergency Notification** – While we were impressed with the districts investment in the Alertus Emergency Notification System, we are concerned that the lack of consistent deployment of this technology in the district has led to some schools being better equipped to manage a critical incident than others. We are also concerned that many staff expressed different levels of familiarity on the systems use, its capabilities and activation processes. In addition, we feel the district should look to integrate the Alertus system into each schools internal public address system to ensure all students, faculty, staff and visitors can be effectively notified of an emergency or critical incident.
3. **Emergency Preparedness** – While we commend the district for developing a comprehensive All Hazards Emergency Operations Plan, we are concerned that the Board has not approved the plan and the appropriate actions steps have not been taken to ensure the plan is properly promulgated throughout the district and with key emergency first response resources. In addition, we feel an opportunity exists for individual school leadership teams to enhance their familiarity with the districts school crisis planning initiatives and to ensure all school based Critical Event Response Kits contain the appropriate planning and crisis response materials, outlined in the districts planning guidance.

4. **Access Control and Visitor Management** – We were impressed with the district’s use of electronic access control and its visitor management practices. All schools are locked during the school day and utilize a secure vestibule with an AIPhone (audio/visual monitoring device) for visitors to use when gaining access to the school. All staff must visibly display their employee ID and all visitors who enter a school are vetted by the Raptor visitor management platform and are issued a visitors pass. With the exception of one incident, all schools/staff were following the districts “Gatekeeper” protocols and staff appeared well versed in the districts visitor management policies and protocols.

We feel the district should explore the use of door forced/held open alarming capability currently available through the districts SIPASS access control system. Door alarms are critical to building security because they alert the school to doors forced opened from the outside without the use of a valid credential and doors that are propped open, allowing anyone to enter without using a credential. While we acknowledge that it will be a substantial financial undertaking, we believe the district should consider integrating the door alarm functions into future physical security initiatives.

Finally our team encountered a handful of malfunctions with the Raptor visitor management system. We are concerned that system malfunctions can result in the failure to properly assess all visitors who want to gain access to a school. We recommend that the NPSD security team routinely conduct system checks of the districts Raptor stations and create a policy specifying that malfunctions are immediately reported and repaired without delay.

5. **Campus Lighting** – As part of our assessment, we conducted a sampling of district schools at night to see firsthand how they appear after dark, when visibility is at its lowest. Our focus was on parking areas and main entrances likely used for authorized evening/after school activities. Overall, we found that exterior lighting across the district was not meeting contemporary standards. In fact, of the 34 readings taken, 22 or 65% were below recommended levels. A significant contributor in our opinion was the number of light fixtures that were not operating. For example, all lights located at Pennbrooke’s main entrance visitor parking were not functioning, resulting in a “zero” light meter reading. Additionally the lights were not functioning at Pennfield’s main entrance and the high school’s receiving door which resulted in lower than favorable readings.

As a result, we recommend that representatives from NPSD security and/or facilities staff, conduct night time tours of each school at least twice a year. The purpose should be to identify lights in need of repair as well identifying areas in need of lighting enhancements. Additionally we recommend that NPSD assess the main entrances, loading docks, and parking areas known to be used for night time activities and enhance lighting as needed.

6. **Threat Assessment** – We were pleased to see that the district has adopted a comprehensive behavioral threat assessment program. However, we identified a critical gap that will require additional training and awareness for key school leadership on how these assessments are conducted, who should be included on school based threat assessment teams and the triggers associated with when schools should notify the district of on-going threat assessment work. In addition, we feel an opportunity exists for the district to leverage existing mental health and student support professionals in the behavioral threat assessment process and in the development of school based safety plans and other violence reduction strategies.
7. **All Hazards Training and Exercises** – We believe an opportunity exists for NPSD to develop a formal training and exercise plan designed to test and evaluate existing emergency response plans, policies, and procedures. We reviewed the district’s annual school drill guidance which incorporates drills for fire evacuation, lockdown, hold, shelter in place, weather/shelter, off site evacuation and SAFE2SAY training. In our interviews with individual school leadership teams, we heard a blend of responses as to their compliance with the districts drill guidance. While many school leaders advised they were following the guidance, others advised they had not conducted a leadership led evacuation drill and some said more training was needed for faculty and staff to better understand how to respond to an active shooter or violent intruder.

In considering the overall scope of the districts emergency preparedness training efforts, the district’s leadership team should focus its planning, training, and exercise resources on the threats that are mostly like to impact the school.

As a part of our engagement, we facilitated a Hazard and Vulnerability Impact Assessment (HVIA) in collaboration with the districts internal stakeholders and members of the districts local emergency management and emergency response professionals. We facilitated this assessment to identify the threats and vulnerabilities the district will most likely be exposed to and the response capabilities within the district and surrounding communities to respond to each of these threats. Through this assessment, we identified that incidents such as a flood, arson, labor strike, structural collapse or civil unrest would have profound and long last impacts for the district. While we acknowledge the importance of training for those high impact and low probability events such as active shooter, we encourage the district to utilize the HVIA (Section VI of this report) and the threats identified in it, that most likely will occur when planning future training and exercise initiatives.

We applaud the fact that the district has supported an “options based” response methodology to an active shooter that moves beyond the traditional lockdown approach. We recognize that there are a variety of options based response

methodologies available to schools that include; the U. S. Department of Homeland Security’s Run, Hide, Fight, and A.L.I.C.E. Alert/Lockdown/Inform/Counter/Evacuate. Through our conversations with some school leadership teams, we are concerned that some faculty and staff may not feel empowered to make individual and classroom based lifesaving decisions and may wait to be told what to do, and when to do it. Moving forward, it will be important for the district to take intentional steps to continue to reinforce this type of training and ensure all faculty, staff and students can effectively respond to this type of threat.

Through our work, we have found that while many school leaders have become very proficient in managing critical incidents, these same leaders lack a basic awareness and familiarity of the Incident Command System (ICS), used by fire, EMS and law enforcement professionals when managing critical incidents. In conversations with internal stakeholders. We found the same to be true within NPSD. We recommend all members of the districts leadership team, individual school leadership teams and members of the CERT at each school, at a minimum attend ICS 100 which can be completed on-line through FEMA’s on-line training portal. We also recommend that the districts leadership team and each CERT conduct a discussion based or table top exercise each semester that tests and evaluates the team’s ability to manage a variety of emergencies that may take place during normal business hours, during after school activities, and when students/staff may be traveling off campus for school related activities.

8. **Security Staffing** – The district has made a significant financial investment in its security staffing. We commend the Coordinator of Emergency Management and Safe Schools for his leadership of this staff and for the policies and procedures established that provide the operational framework for this important work.

However, we feel an opportunity exists for the security staff to work with individual school leadership teams to define the roles and responsibilities of security officers and school staff when managing disruptive student behaviors. In addition, we noted a considerable amount of tension between security staff and some school leadership teams about the lack of cooperation and collaboration when managing class transition times, cafeteria monitoring and student drop off and pick up. We also believe the security department should conduct a staffing or calls for service analysis to assess the effectiveness of its current staffing model and to identify potential future staffing needs.

9. **Safe2Say** – As a part of our engagement, we reviewed the districts SAFE2Say Something Anonymous Reporting System. Like many districts across the country, the district is utilizing the reporting system framework of Sandy Hook Promise, a non-profit organization that has a wide national reach in providing

school safety resources and anonymous reporting tipline best practices. We were pleased to see that all the SAFE2SAY Something information is student centered, easy to follow, with detailed tipline information for students, faculty/ staff and families. We found the on-line link form to the reporting system easy to find on the website and the form itself was easy to complete and contained all the necessary information to submit a comprehensive anonymous tip.

However, during our review and in discussions with key stakeholders, we did not learn of any specific board policy that documents what is found in the above document, into formal district policy. To highlight the importance of this policy development process, we heard from a number of stakeholders about their concern over the inappropriate use of the tipline to make false complaints against staff and other students. We encourage the district to develop a formal SAFE2SAY Something policy that defines the assessment process for tips that protects the legitimacy of the tipline and protects stakeholders from false allegations. Once this policy is developed, the district should ensure all stakeholders are informed of its existence, receive the appropriate training on the policy and ensure the policy is updated as needed.

10. **Mental Health Support Systems** – During our assessment, we conducted a high level review of the districts behavioral support systems, how they are organized, advertised and utilized. North Penn School District has developed a comprehensive behavioral support resource guide for staff and educators. In addition, the district has instituted the MTSS multi-tier response system to address the academic and non-academic needs of students. To assist in this endeavor the district has enlisted Merakey, an outside agency to oversee the Student Assistance Program (SAP) and Lakeside Counseling to administer more intensive and comprehensive behavioral services.

Many school counselors within the district described a challenging relationship with Merakey and spoke to the revolving door of counselors from this service provider and the significant wait times for service and capacity challenges within the district. Many with whom we spoke, felt the district should invest in a future hiring initiative that would increase the number of internal district staff capable of addressing the mental health and student support needs across the district. We feel strongly that the district should conduct a comprehensive assessment of the services being provided by Merakey, to ensure they are meeting their contracted mental health support obligations.

11. **Site Specific Physical Security Assessments** – During our two week site visit, members of our team had the opportunity to visit each school and several administrative and support buildings within the district. The purpose of these site visits was to not only identify opportunities to enhance the physical security practices at each location we visited but to also acknowledge where systems and practices have been put in place that have led to a safer school environment.

During each site visit, members of our team had the opportunity to meet with individual school/building leadership teams to gain a better understanding of the unique safety and security challenges experienced at each school and building we visited. Due to safety and security nature of this specific focus area of our work, the individual physical security recommendations identified for each site are only included in the comprehensive report detailing our work.



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