

Section 6

Prevention Protocols

"Act well at the moment, and you will have performed a good action for all eternity."

(John Casper Lavater)





Prevention Protocols

Introduction

Section 6 of the *School Emergency Response Plan and Management Guide* includes Protocols on safety, health, and security-type issues and encompasses many Federal and District laws, regulations, and policies.

A safe and healthy environment is essential for District of Columbia schools to promote student achievement within a productive learning and work environment. All employees are required to comply with all applicable District and Federal health and safety laws and to follow procedures, rules, and guidelines established by each Local Education Agency (LEA) concerning safe and health school environments.

This Section contains Protocols developed and implemented by District of Columbia Public Schools and can be used as a guideline for other District LEAs. Each LEA should review and edit each Protocol to conform to their procedures and contact information.

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PREVENTION PROTOCOL

Asbestos Management*

Depending on Assistance Needed, Call:	
OPEFM Regulatory Environmental Compliance	202-576-8962
LEA Contact	
Other	

Situation Description

In order to protect children from hazards associated with asbestos-containing building materials, the United States Congress enacted the Asbestos Hazard Emergency Response Act (AHERA). Under this law, comprehensive regulations were developed to address asbestos hazards in elementary and secondary schools. These regulations require schools to conduct inspections for asbestos, develop written plans for addressing any potential asbestos hazards discovered, and implement any needed remedial response actions in a timely manner. Our program for fulfilling these responsibilities is outlined in your building’s Asbestos Management Plan (AMP). AMP contains information on inspections, reinspections, response actions, and post-response action activities that are planned or are in progress.

- Consult the AMP before all maintenance and/or construction activities.
- Outside contractors, as well as school personnel, must review the AMP before conducting any activity that may disturb an asbestos-containing building material.
- Never assume; check the AMP.
- If asbestos-containing materials are involved, or if you are unable to determine from the plan whether or not a building material contains asbestos, contact the OPEFM, Regulatory Environmental Compliance Office at 202-576-8962 for assistance.

Each school must maintain a copy of the AMP in the main office of each building, and an identical AMP must be maintained at the OPEFM Regulatory Environmental Compliance Office. The AMP will be consistently updated as new information and records become available. The AMP must be available for inspection by parents, employees, outside vendors, and other interested parties upon request.

Procedures

Each facility must annually notify parents, legal guardians, and employees of the availability of their building’s AMP.

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- OPEFM Safety, Regulatory and Environmental Compliance sends Annual Notification Letters to each school annually and home to parents and guardians each school year.
- Post the notification letter at the location customarily used for posting of notices to employees. This letter must remain posted throughout the year.
- Maintain a copy of your Annual Notification Letter in your AMP.
- Six-Month Surveillance Reports
 - Building Services Managers are required to carry out a visual inspection of all asbestos-containing materials listed in the AMP every six months. The Regulatory Environmental Compliance Office will send every school a reminder letter and the proper form required.
 - Maintain a copy of this completed inspection form with your AMP and send a copy to the Regulatory Environmental Compliance.
- New Occupancies
 - Before students or employees can occupy any new building or portion of a building, it must be inspected for asbestos-containing materials. Contact the Regulatory Environmental Compliance so this inspection can be conducted prior to occupancy.

All questions or concerns regarding asbestos should be directed to the OPEFM Regulatory Environmental Compliance Office.

PREVENTION PROTOCOL

Bloodborne Pathogens*

Depending on Assistance Needed, Call:	
OPEFM Regulatory Environmental Compliance	202-576-8962
Office of School Health Policy	(202) 442-5042
LEA Contact	
Other	

Situation Description

Bloodborne pathogens are pathogenic micro-organisms in human blood that can cause disease. They include the Hepatitis B virus (HBV), which attacks the liver, and the human immunodeficiency virus (HIV), which causes AIDS (Acquired Immunodeficiency Syndrome).

Occupational transmission of HIV is relatively rare, but the lethal nature of HIV requires that every possible measure be taken to prevent exposure. This Protocol recommends guidelines to limit occupational exposure to blood and other potentially infectious materials because any exposure could result in transmission of a bloodborne pathogen that could lead to a serious disease or death.

Procedures

The primary routes of HBV and HIV infection are through inoculation, injection, and sexual intercourse. Potentially infectious materials include any human body fluid that is visibly contaminated with blood, and all body fluids, which are difficult or impossible to differentiate.

The Exposure Control Plan includes a combination of engineering and work practice controls, as well as personal protective equipment and will identify and list the jobs, tasks, and procedures in which occupational exposure may occur while at work. (See Section 6–Appendices, Exposure Control Plan, for details.)

Job classifications in which school employees have potential occupational exposure to blood, body fluids, or potentially infectious materials are:

- Nurses, medical professionals/paraprofessionals, health assistants, physical/occupational therapists and assistants, health aides;
- Principals/assistant principals—if involved in school discipline;
- Special education and teachers, teacher aides, attendants if dealing with students who cannot control body fluids or cannot control their behaviors;

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- Physical education teachers, athletic coaches/trainers, locker room attendants—if required to handle blood, body fluids, or other potentially infectious material (e.g., general first aid).
- Early childhood teachers, teacher aides (prekindergarten and kindergarten only) if required to handle/clean up body fluids or provide general first aid;
- School security personnel; and
- All designated First Responders at each school or support facility.

Workers must wear gloves and other protective equipment to lower risk of exposure to blood and body fluids. Specific precautions must be taken with dirty linen, trash, and used sharp objects. Any potentially infectious material must be placed only in designated containers that prevent leakage during collection, handling, processing, storage, transport, and shipping. Such containers must be properly closed, sealed, and labeled. Containers for storage, transport, or shipping of any potentially infectious materials must be:

- Appropriately labeled or color-coded; and
- Closed prior to being stored, transported, or shipped.

If outside contamination of the primary container occurs, it must be placed within a second regulation leak-proof container, appropriately labeled, and properly closed. Materials that require precautions include:

- Human blood and any products that include human blood or parts made from human blood;
- Semen, vaginal secretions;
- Cerebrospinal, synovial, pleural, pericardial, peritoneal, or amniotic fluids;
- Saliva in dental procedures;
- Any body fluid that is visibly contaminated with blood; and
- Any unidentifiable body fluid.

Cleaning and Disinfecting—Staff trained and equipped to work with potentially infectious materials must immediately contain and clean all spills and contamination.

- All surfaces exposed to blood, body fluids, or other potentially infectious materials must be wiped clean and appropriately disinfected using a 1:10 bleach solution or other EPA-registered disinfectant.
- Cleanup kits must be used to clean items, equipment, and surfaces that are exposed to blood, body fluids, or other potentially infectious materials.
- Surfaces exposed to blood, body fluids, or other potentially infectious materials should be cleaned and disinfected by employees appropriately trained to use cleanup kits and disinfectants.

Housekeeping—

- Worksites must be maintained in a clean and sanitary condition.
- All equipment, environmental areas, and working surfaces must be cleaned and decontaminated by trained staff after contact with blood, body fluids, or other potentially infectious materials. All contaminated surfaces must be decontaminated with an appropriate disinfectant.

PREVENTION PROTOCOL

Child Abuse and Neglect*

Depending on Assistance Needed, Call:	
Child and Family Services Agency (CFSA)	202-671-7233
Office of School Security	202-576-6962
Metropolitan Police Department (if needed)	911
LEA Contact	
Other	

Situation Description

DC Codes 4-1321.01 through 4-1321.07 mandate immediate reporting of any suspected child abuse or neglect case. Waiting for proof may involve grave risk to the child. Reporting suspected child abuse and neglect indicates that a child may be abused or neglected, not that parents are necessarily the cause. School personnel should not try to resolve or investigate a suspected case of child abuse or neglect. *School personnel are legally obligated to report the incident.*

Immunity is provided from any civil liability or criminal penalty to all employees and volunteers who, in good faith, participate in making a report, the investigation of child abuse or neglect, or in any judicial proceedings.

Procedures

In conjunction with the above factors, school personnel must report cases of suspected child abuse and neglect following the steps below:

- Call the Child and Family Services Agency (CFSA) hotline at 202-671-7233 and report the information.
- If a crime is in progress, contact MPD at 911.
- Contact the Office of School Security at 202-576-6962.

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PREVENTION PROTOCOL

Computer Crimes

Depending on Assistance Needed, Call:	
Police	911
Security	
LEA Contact	
Other	

Situation Description

As the Internet’s potential to provide unparalleled benefits to society continues to expand, there is an increasing recognition that the internet can also serve as a powerful new medium for those who wish to commit serious crimes - including extortion, computer hackings, and fraud.

Obtaining electronic evidence and tracing back to the electronic wrongdoer present unique challenges to law enforcement.

K-12 educational communities shall work with law enforcement to support the identification, termination, and prosecution of crimes committed by-students and staff using the technology resources in schools and offices. Critical factors are:

- Preservation of evidence for effective investigation and prosecution;
- Knowledge of the scope of unlawful conduct that violates federal and district laws;
- Knowledge of School policy and rules that set forth acceptable and safe use of technology by students and staff
- Prevention from the risks of unlawful conduct by teaching students ethical uses of technology;
- Prevention from the risks of unlawful conduct by informing staff in the ethical uses of technology.

Procedures

Immediate Response—How to Preserve Potential Computer Crime Evidence for Federal Violations: Perpetrator’s Computer employees

- To ensure the integrity of digital information, transactions, and time footprints, should do the following:
 - Do not attempt to access computer files, documents, and/or programs. If the computer is ON, do not turn it OFF. If the computer is OFF, do not turn it ON.

- Notify immediate supervisor, administrator, and the School Resource Officer (SRO) when applicable. If the SRO is not available, contact 911 for an officer to respond.
- If the computer is on, the SRO or responding officer will first photograph the screen and then unplug the computer’s electrical source from the rear of the computer ONLY. Note the date and time the computer was unplugged.
- Do not move the computer; disconnect any peripherals, wires, or network connections. Isolate and secure the computer in its present location until seized by the investigating officer.

How To Preserve Potential Computer Crime Evidence for Federal Violation: Victim/Receiver’s Computer

To ensure the integrity of digital information, transactions, and time footprints, employees should do the following:

- Make a hardcopy of the evidence including header information.
- Save a digital copy of disk and hard drive.
- Notify immediate supervisor, administrator, and/or School Resource Officer (SRO) where applicable. If the SRO is not available, contact 911 for an officer to respond.
- Office heads/principals will notify appropriate executive director.

How to Report Potential Violations of Policy

- Make a hardcopy of the evidence including header information.
- Save a digital copy of disk and hard drive.
- Notify immediate supervisor administrator.

Types of Unlawful Conduct	Examples of Potentially Applicable Federal Laws
Internet Fraud	15 U.S.C. §§ 45, 52 (unfair or deceptive acts or practices; false advertisements) 15 U.S.C. § 1644 (credit card fraud) 18 U.S.C. §§ 1028,1029,1030 (fraud in connection with identification documents and information; fraud in connection with access devices; and fraud in connection with computers) 18 U.S.C. § 1341 et seq. (mail, wire, and bank fraud) 18 U.S.C. § 1345 (injunctions against fraud) 18 U.S.C. § 1956, 1957 (money laundering)
Online Child Pornography, Child Luring, and Related Activities	18 U.S.C. § 2251 et seq. (sexual exploitation and other abuse of children) 18 U.S.C. § 2421 et seq. (transportation for illegal sexual activity)
Internet Sale of Firearms	18 U.S.C. § 921 et seq. (firearms)
Internet Gambling	15 U.S.C. § 3001 et seq. (Interstate Horseracing Act) 18 U.S.C. § 1084 (transmission of wagering information) 18 U.S.C. §§ 1301 et seq. (lotteries) 18 U.S.C. § 1952 (interstate and foreign travel or transportation in aid of racketeering enterprises) 18 U.S.C. § 1953 (interstate transportation of wagering paraphernalia) 18 U.S.C. § 1955 (prohibition of illegal gambling businesses) 28 U.S.C. §§ 3701-3704 (professional and amateur sports protection)

Types of Unlawful Conduct	Examples of Potentially Applicable Federal Laws
Internet Sale of Alcohol	18 U.S.C. § 1261 et seq. (liquor traffic) 27 U.S.C. §§ 122, 204 (shipments into states for possession or sale in violation of state law)
Online Securities Fraud	15 U.S.C. § 77e, 77j, 77q, 77x, 78i, 78j, 78l, 78o, 78ff (securities fraud)
Software Piracy and Intellectual Property Theft	17 U.S.C. § 506 (criminal copyright infringement) 17 U.S.C. § 1201 et seq. (copyright protection and management systems) 18 U.S.C. § 545 (smuggling goods into the United States) 18 U.S.C. §§ 1341, 1343 (frauds and swindles) 18 U.S.C. § 1831 et seq. (protection of trade secrets) 18 U.S.C. §§ 2318-2320 (trafficking in counterfeit labels for phonorecords, copies of computer programs or computer program documentation or packaging, and copies of motion pictures or other audio visual works)

PREVENTION PROTOCOL

Corporal Punishment*

Depending on Assistance Needed, Call:	
Office of School Security	202-576-6950
Fire & EMS Department	202-727-1600
LEA Contact	
Other	

Situation Description

District of Columbia Municipal Regulations, Chapter 24—Corporal Punishment, Section 2403, state:

- 2403.1** For the purpose of this section, *corporal punishment* is defined as the use, or attempted use, of physical force upon, or against, a student, either intentionally or with reckless disregard for the student’s safety, as a punishment, or discipline.
- 2403.2** The use of corporal punishment in any form is strictly prohibited in and during all aspects of the school environment or school activities. No student shall be subject to the infliction of corporal punishment by any teacher, other student, administrator, or other school personnel.
- 2403.3** No teacher, administrator, student, or other person shall subject a student to corporal punishment or condone the use of corporal punishment by any person under his or her supervision or control.
- 2403.4** Permission to administer corporal punishment shall not be sought or accepted from any parent, guardian, or school official.
- 2403.5** Conduct prohibited by this section includes actual or attempted use of physical force against a student in accordance with 2403.1, provided that the conduct is not prompted by reasonable efforts at self defense or the defense of others; is necessary to maintain or regain order; or is necessary for the safety of the educational environment. Examples of prohibited contact include, but are not limited to, the following:
 - Shoving;
 - Striking;
 - Grabbing;
 - Shaking;

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- Hitting;
- Throwing of objects;
- Unreasonable restraint; and
- Directing others to inflict any of the above on a student.

2403.6 The nature and amount of physical contact reasonable necessary for self defense, defense of others, protection of the educational environment, or to regain or maintain order shall be dependent upon the factual circumstances of each case. When reviewing those circumstances, the following shall be considered:

1. If the action was taken in self defense or the defense of others, whether the action taken against the student was (1) proportionate to the student's conduct, and (2) the least intrusive means of controlling the situation.
2. If the action was taken against a student for the protection of the educational environment or to regain or maintain order, whether the action taken against the student was (1) taken as a last resort after all other reasonable means had been exhausted, and (2) the least intrusive means of controlling the situation.

2403.7 All allegations of the use of corporal punishment shall be promptly reported and investigated. Discipline shall be administered against any employee who violates this section. Students shall be permitted, but not required, to testify at any proceeding relating to the allegation of corporal punishment.

2403.8 Employees found to have violated this provision will be subject to discipline in accordance with Section 1401 of these Board Rules, 5 DCMR 1401, and the appropriate collective bargaining agreement, if applicable.

To enhance this section, the Metropolitan Police Department (MPD) has issued a Standard Operating Procedure (SOP) entitled Handling Cases of Suspected Corporal Punishment in DC schools. The SOP is in conjunction with this Section and is included as part of this Guide.

PREVENTION PROTOCOL

CPR/First Aid Designated Backup*

Depending on Assistance Needed, Call:	
Office of Student Services (Youth Engagement)	202-442-5099
LEA Contact	
Other	

Situation Description

At least one adult in each school, other than the designated school health services professional and any school health services aide, must be certified in both the First Aid Program of the American Red Cross or its equivalent and in Adult and/or Pediatric Cardio-Pulmonary Resuscitation (CPR). One certified person must be available onsite during the regular school day and at all school-sponsored athletic events.

Procedures

- Designate one employee other than school nurse and/or health assistant to serve as CPR/First Aid Backup.
- Submit name of employee to Office of School Health Policy.
- Required recertification:
 - CPR—Bi-annually; and
 - First Aid—Every three years.

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PREVENTION PROTOCOL

DC-OSHA Inspections*

Depending on Assistance Needed, Call:	
OPEFM Safety Unit	202-576-8962
LEA Contact	
Other	

Situation Description

Code of Federal Regulations, 29 CFR 1903.1, states that “each employer shall furnish to each of his employees employment and a place of employment, which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees.” The District of Columbia Occupational Safety and Health Agency (DC-OSHA) can inspect your site for several reasons including general schedule inspections, a fatality or catastrophe, an imminent danger complaint, or an employee or ex-employee complaint.

By law, DC-OSHA inspectors may enter any establishment without delay at any reasonable time to inspect the premises. Trained inspectors and industrial hygienists conduct unannounced onsite inspections to identify hazardous conditions and secure their timely correction. At the beginning of an inspection, the inspector will present credentials and inform the person in charge of the reason for the visit and generally discuss the scope of the inspection, records to be reviewed, and the possibility of employee interviews. A walk-around occurs and may take several hours or several days depending on the size of the site. The inspector may ask employees questions or ask them to demonstrate procedures taught in applicable training programs. The inspector will request areas he/she wants to view, and the inspection should be limited to these areas.

Following the walk-around, the inspector will have a closing conference with the building administrator of the school. Any conditions or practices that constitute a violation will be discussed with steps necessary to correct the violation.

Procedures

- Develop procedures and inform personnel in front office or reception area of procedures to be followed if DC-OSHA inspectors visit your site.
- Identify employer and employee representatives who will accompany inspector on inspection.
- Know location of program and applicable training records required to be kept by DCOSHA:

Hazard Communications Program;
MSDS sheets and Chemical Information List;

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Bloodborne Pathogens Program; and
Personal Protective Equipment Program (if applicable).

- Participate in closing conference and note violations discussed.
- Contact the OPEFM Safety Unit for assistance with corrections of violations, through the Violation Abatement Management Protocol (VAMP) (see Appendices).
- Begin process to correct noncontested violations as soon as possible.
- If a hearing is required for a contested violation, work cooperatively with OPEFM Safety Unit personnel.

PREVENTION PROTOCOL

Fire Alarm Evaluations*

Depending on Assistance Needed, Call:	
OPEFM Safety Unit	202-576-8962
OPEFM Customer Service Desk	202-576-7676
LEA Contact:	
Other	

Situation Description

The single most important factor in the evacuation of a school is the early warning and notification provided by fire alarm systems. The Automatic Fire Alarm Association estimates that 50 percent of all fire alarm systems in schools (national average) are currently experiencing some mechanical difficulty or are outside the code-required period for maintenance and testing.

With this in mind, the following procedures have been implemented and incorporated into the monthly fire drill requirement to allow school personnel to proactively evaluate and report any fire alarm deficiencies for repair.

This is not meant to be a self test program and it does not eliminate the need for inspection and service by industry professionals. It does, however, provide guidance to school administrators concerning the need to maintain and check fire alarm systems.

Procedures

The fire alarm system should be checked daily to ensure that it is online and fully operational (e.g., reset from previous use, not silenced, etc.).

During the required monthly fire drill, an inspection of building fire alarm systems must be conducted as follows:

- Activate the fire alarm system:
 - Pull a fire alarm “pull station.”
 - Be sure to initiate the alarm from a different pull station each month.
- Look and listen:
 - Walk the building with custodial/building service staff.
 - Ensure that all areas of the building have working occupant notification devices. The fire alarm system may be equipped with sound and/or visual notification devices. Note:

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If you see one visual device, there will be others, and synchronization is required. Not all buildings have visual notification devices.

- Identify any damaged or missing devices (e.g., pull stations, bells, exposed electrical wiring, etc.).
- Inspect the fire alarm panel:
 - Look at the fire alarm panel for any physical damage and abnormal signals.
 - Note any yellow LEDs and/or *trouble* indicators and the affected *zone*, if indicated. Some systems have digital text displays that indicate system status.
 - Make certain to reset the fire alarm system at the conclusion of the drill.
- Document:
 - Document the results of the Fire Alarm Evaluation on the Fire Drill and Alarm Status Report.
 - Notify the appropriate Instructional Superintendent

Immediately report any problems discovered during the evaluation by calling in an *Emergency Work Request* to the OPEFM Customer Service Desk at 202–576–7676.

In the event of total system failure, immediately contact the OPEFM Customer Service Desk as described above, and then call the OPEFM Safety Unit at 202–576–8962 for assistance with the implementation of a fire watch, if necessary

Please note that your fire alarm system must be fully reset after every alarm. This includes emergencies, fire drills, and nuisance/false alarms. The system must be operational 24/7.

PREVENTION PROTOCOL

Fire Safety*

Depending on Assistance Needed, Call:	
OPEFM Safety Unit	202-576-8962
Fire & EMS Department	202-727-1600
OPEFM Maintenance Customer Service	202-576-7676
LEA Contact	
Other	

Situation Description

Prevention is the key to eliminating the conditions that may contribute to the cause of any fire or loss of life. Apart from arson, major causes of school fires include improper handling and storage of flammable liquids, overloaded electrical outlets, and excessive cumulative combustible materials.

The following compilation will assist you, your school administrators, and personnel responsible for the daily maintenance of physical facilities in your school. It includes building features, maintenance, and operational requirements from the International Fire Code (2006 Edition) and applicable National Fire Protection Association (NFPA) standards.

Procedures

Maintenance of means of egress—

- Principals and teachers must inspect all exit facilities daily in order to make sure that all stairways, doors, and other exits are in proper condition. Exit discharge areas and outside steps must be kept clear of snow, ice, or debris accumulations that could impede egresses.
- Exit doors must be easily opened from the side of egresses. Only one locking or latching device is permitted on any exit door. Locking devices that require the use of a key, tool, or special knowledge to open from the egress side of the door are strictly prohibited.
- Exit doors must never be chained, locked, slide-bolted or barred against an egress when a building is occupied. (A building is considered to be occupied when 10 or more adults or one student is present in a facility.)
- Means of egress must be marked with illuminated signs except where locations of exits are otherwise obvious.
- Storage of any type is prohibited in a stairway. Clothing and personal effects must not be stored in hallways unless the building is protected by an automatic sprinkler system, the

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hallway is protected by a smoke detection system, or storage is in metal lockers. Combustible or flammable materials must not be placed, stored, or kept in any portion of an exit.

- Any fire door (e.g., stairwell door) that is designated to normally be kept closed (equipped with a self-closing mechanism) must not be blocked open. These doors may be equipped with a magnetic hold-open device if it releases the door automatically upon activation of smoke detectors, which are supervised by the building's fire alarm system.
- Mirrors must not be placed in or adjacent to an exit in a way that would confuse the direction of egress. Draperies and similar hangings must not obscure an exit.
- Vending machines, display boards, signs, coat racks, and any other movable equipment that obstructs the path of egress travel is prohibited. Exit access corridors shall be not less than six feet clear width.
- Any penetrations through fire separation walls, ceilings, or floors must be sealed with an appropriate sealing compound or device. Ordinary caulking or duct seal are not acceptable for this purpose.

Decorations and art work—

- Student-prepared artwork and teaching materials may be attached directly to the walls and must not exceed 20 percent of wall areas.
- Draperies, curtains, and similar furnishings and decorations must be flame resistant and certified as passing the flame resistance testing of NFPA 701 and must not exceed 10 percent of wall and ceiling area.
- Display of live or fresh-cut trees, even during the holiday season, is prohibited in all educational buildings. Noncombustible artificial trees may be displayed in locations that will not interfere with egress.

General housekeeping—

- Only items associated with operations of the boiler room and/or mechanical rooms should be stored in these areas. No combustible materials are to be stored in these areas.
- Storage areas and supply rooms must be kept neat and orderly. Empty cartons, old decorations, and other items should not be allowed to accumulate. Storage of these materials must be separated from heat sources. Pallets are *not* required for storage of combustible materials/boxes or for keeping them “off of the floor.”
- Maintain storage height to 24 inches or more below the ceiling in nonsprinklered buildings, or a minimum of 18 inches below sprinkler head deflectors in sprinklered areas of the building.
- All materials subject to slow oxidation (e.g., paint rags, wax rags, oil mops, etc.) should be stored in approved, closed metal containers until they can be either laundered or disposed of properly.

Storage of flammable materials—

- Volatile and flammable liquids (duplicating fluids, paints, paint thinners, oils, wax, gasoline, etc.) must be stored in approved containers. Use of these materials is prohibited in areas where there are open flames, electrical sparks, and running motors. Bulk storage of such materials must be in specified flammable-liquid storage rooms only. In the absence of such a special room, they must be stored in outside areas such as tractor storage rooms.
- Power lawn mowers must be stored in tractor rooms or in flammable-liquid storage rooms.
- Refer to the Classroom HAZMAT Storage Checklist to be utilized in schools, as provided by the DC Fire Department (see Section 6, Appendices).

Fire extinguishers—

- All portable fire extinguishers must be checked monthly for obvious damage, broken seals, and to ensure that the gauge is in the operable range or, if not equipped with a gauge, for the proper weight. School-based personnel are responsible for monthly inspection of fire extinguishers.
- Pressurized water extinguishers (or any other extinguisher that carries a 2-A rating) in hallways must be placed so that the travel distance to reach extinguisher is no more than 75 feet (distance between extinguishers cannot exceed 150 feet). All laboratories, shops, mechanical and boiler rooms, and other areas containing special hazards must have an extinguisher(s) rated for use with A, B, and C-type hazards. Portable fire extinguishers must be installed in all kitchens and must be compatible with the automatic suppression system agent used in the hood suppression system.
- A thorough inspection by trained personnel, following maintenance procedures in NFPA 10, the Standard for Portable Fire Extinguishers, is required annually. The Office of Facilities Management will conduct annual fire extinguisher inspections.

Location of classrooms—

- Rooms normally occupied by preschool, kindergarten, or first-grade pupils must not be located above or below the story of exit discharge. The story of exit discharge is that floor or stories of the building from which exits are primarily doors discharging directly outside, essentially at grade level. Where no such floor exists, the story of exit discharge must be that with the smallest elevation change needed to reach the level of exit discharge.
- Rooms normally occupied by second-grade pupils must not be more than one floor above the story of exit discharge.

Emergency lights—

- All emergency lighting systems must be tested for proper operation for a minimum of 30 seconds every month. School-based personnel are responsible for the monthly inspection of emergency lights.
- On an annual basis, a test must be conducted for 1 ½ -hour duration. Equipment must function properly during the test.
- Written records of all tests must be maintained for review by the fire marshal.

Areas of assembly (auditoriums, gymnasiums, multipurpose rooms)—

- All assembly rooms must post a sign displaying the maximum capacity as determined by the Department of Regulatory Affairs.
- When utilizing areas of assembly during school hours or for any other purpose, the maximum capacity may not be exceeded.
- When arranging folding seats or chairs for programs, exit aisles must be maintained. Aisles must not be less than 36 inches wide where serving seats on one side only, and not less than 42 inches wide where serving seats on both sides. The space between parallel rows of seats must not constitute an aisle. Not more than six seats shall intervene between any seat and an aisle (12 seats per parallel row). All aisle spaces must remain unobstructed.

Electrical equipment and wiring—

- Cords and plugs on electrical equipment as well as extension cords must be visually inspected before each use. This required inspection should include an examination for external damage and defects (such as missing or deformed prongs, loose parts, or damaged

outer jacket or insulation) as well as evidence of possible internal damage (such as a pinched or crushed outer jacket).

- Never overload an electrical outlet. Never interconnect or *daisy-chain* power strips. Use surge protectors only with electronic computer equipment and equipment that requires such protection.
- Use only UL-approved grounded, three-prong plug heavy duty *extension cords*. Extension cords should never be used in lieu of permanent wiring and can only be used for portable equipment.
- Keep wiring away from doorways and windows. Never run wiring or extension cords under carpeting, above ceilings, or through walls.

Fire drills—

- At least two fire drills must be conducted during the first two weeks of the school year, and one a month thereafter, for a total of 10 per year. When weather is severe during the winter months, at least six drills must be held at the beginning of the school year, and four drills after the winter months to complete the 10 required drills.
- Conduct a Fire Alarm Evaluation following the Prevention Protocol outlined above in Section 6 of this Guide.
- Announce the first fire drill of the school year in advance so that instructions can be given and procedures established. Procedures, not time, should be most important for the first drill.
- At least one fire drill in the fall and one in the spring should be conducted for adult education programs.
- At least one fire drill during the first week of any summer school program, or any special programmed activity (e.g. summer recreation program) must be conducted.
- Fire drills should be conducted under a variety of conditions: different times of school day, during lunch periods, during class changes, during assemblies, etc., to avoid distinction between drills and actual fires.
- Drills should be conducted with a primary exit route blocked to test use of secondary exit routes.
- Each time a fire drill is conducted, the Office of School Security must be contacted to alert personnel monitoring all school fire alarm systems that a building evacuation drill is being conducted (not an actual emergency situation). Once the drill has been completed, a follow-up call should be placed to the Office of School Security to verify that the building's alarm signal was received by monitoring personnel.
- A record of each fire drill must be maintained at each school and office for review by the fire marshal. Also, a copy must be transmitted electronically to safety.department@dc.gov. These reports must include the following:
 - Time and date the drill was conducted;
 - Weather conditions at the time of evacuation;
 - Number of occupants evacuated;
 - Total time of evacuation; and
 - Other information relevant to the drill.
- DCPS specific requirements:
 - Number of mobility impaired persons present during drill;
 - Number of mobility impaired persons assisted out of the building;
 - Areas of refuge or staging areas used for the mobility impaired; and
 - Fire alarm system operational.

- Refer to your school's specific Emergency Evacuation Plan for specific information.
- Note any fire alarm deficiencies discovered during the drill and call in an emergency work order to the OPEFM Customer Service Desk at 202-576-7676.
- Fire alarms do not notify Emergency Responders. This must be done with a call to 9-911 either directly or through an alarm monitoring service.

Fire watch—

- If the fire alarm system is inoperable, the authority having jurisdiction (AHJ) requires that a fire watch be implemented until service is restored. Please contact the OPEFM Safety Unit at 202-576-8962 for instructions.
- Fire watch forms are available on the web-based application (DC Emergency and Safety Alliance Web site).

Fire emergency—

- If a fire is discovered, the fire alarm must immediately be activated and the building evacuated without delay. After evacuation has been initiated, personnel trained in fire extinguisher operation may attempt to suppress the fire if, in their judgment, this can be accomplished without risk of injury. Evacuation should never be delayed to attempt fire suppression.
- Once the building has been evacuated, no one must be allowed to reenter the school until fire fighting units have arrived and they completely search the building. All students and personnel must remain at the evacuation staging area until the fire incident commander declares the building safe to enter.
- If school personnel suspect a fire, or determine that an actual fire exists, they must immediately activate the fire alarm evacuation signal and call the fire department at 911. All fires, regardless of magnitude, must be reported to the fire department. This is strictly enforced by the fire marshal.
- Refer to your school's Emergency Evacuation Plan for specific information.

For situations that are not fully addressed, or if further clarification is required, the principal/designee should refer to the OPEFM Safety, Regulatory and Environmental Compliance Section at 202-576-8962.

During inspections by the FEMS Fire Inspector, the principal/designee must accompany the fire official during the entire facility assessment. Other officials having a role during the inspection process include building maintenance staff, facility manager, safety officer, etc. At the conclusion of the inspection, obtain a copy of the field report prepared by the Fire Inspector and retain this for school records. Fax a copy of the report to the OPEFM Safety, Regulatory and Environmental Compliance Section at 202-576-6709.

Contact the OPEFM Safety, Regularity and Environmental Compliance section either by phone at 202-576-8962 or via electronic mail at safety.department@dc.gov, with any questions, to schedule a consultation, or for assistance with the abatement of fire code violations through VAMP (see Appendices).

PREVENTION PROTOCOL

Food Safety*

Depending on Assistance Needed, Call:	
Office of Food Services	202-576-7400
LEA Contact	
Other	

Situation Description

DC Department of Health (DOH) regulation (DCMR 4300.1) prohibits preparation of food for consumption by any persons in schools or school-sponsored events in nonlicensed food production facilities. Any potentially hazardous foods, such as food requiring hot or cold temperature control, cannot be brought to or served in the school at school-sponsored functions by unlicensed individuals or groups. This direction is to prevent the possibility of a food-borne illness.

Procedures

- Schools should use licensed food service facilities.
- Food purchased from a licensed food production facility that requires temperature control in transporting may be brought to school when:
 - School administrators ensure that the food was transported and handled in a safe and sanitary manner from an approved source.
 - The package is unopened.
 - Food not cooked immediately is transferred to a refrigerator maintained at 41 degrees Fahrenheit or below, or a freezer at zero degrees Celsius (32 degrees Fahrenheit) or below.
- Field trips to unregulated facilities serving food or beverages—for example, farms—should be reviewed in advance by the Office of Food Services.
- Parents/volunteers who prepare food for school-sponsored events, such as grilling hamburgers or hot dogs, must do so under supervision of the Office of Food and Nutrition Services or the DOH. The employee in charge must be trained in safe food handling and sanitation. Also, the employee must be a Certified Food Manager.
- Home-prepared food for a single student does not fall under this regulation.

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PREVENTION PROTOCOL

Hazard Communication and Toxic Substances*

Depending on Assistance Needed, Call:	
OPEFM Regulatory Environmental Compliance	202-576-8962
LEA Contact	
Other	

Situation Description

Occupational Safety and Health Agency (OSHA 1910.1200) general industry standards provide employees information about hazardous substances found in their workplaces. A hazardous substance is any chemical which exhibits either a physical hazard or a health hazard. Almost every chemical product found in our facilities poses some potential hazard. The goal of this Protocol is to make employees knowledgeable of these hazards and provide the necessary tools to protect themselves and others.

Key to this requirement is the Material Safety Data Sheet (MSDS). Each chemical product has an MSDS with information on proper handling of the product, proper storage of the product, personal protective equipment needed when using the product, hazardous ingredients in the product, and proper disposal of the product. MSDSs must be onsite for any chemical product brought into the building. MSDS sheets are kept in a binder in the Health Suite.

Procedures (building administrator/designees)

Conduct a chemical inventory—

- Survey your facility for all chemical products, regardless of quantities.
- As you conduct your inventory, record the name of each product, information about the manufacturer, and the general work area where the product is found within the building.
- Refer to Prohibited Chemical List & Safety Checklist in Section 6, Appendices.

Collect Material Safety Data Sheets —

- If the MSDS is not available, request a copy of the document from the manufacturer or distributor for each substance noted during your survey.
- Check with the person(s) who purchase your supplies to see if they have already obtained MSDS sheets for products delivered to your facility.
- The MSDS binder should be kept in the health suite. Additional MSDS sheets may be kept with the instructional program.

Prepare a chemical information list—

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- Arrange your MSDSs in alphabetical order by common name or trade name.
- Prepare a chemical information list for your facility (using the MSDSs and your inventory to prepare your list). The list must:
 - Be arranged in alphabetical order according to the common name or trade name of each product.
 - Include the chemical name.
 - Identify the work area(s) where the hazardous chemicals are found within your facility.
 - Include the date the chemical was added to your list.
 - Include the name and address of your facility, the date of preparation, and the name and telephone number of a contact person.
- Mail a copy of your facility's chemical information list to:

OPEFM Regulatory Environmental Compliance Office
1709 3rd Street NE
Washington, DC 20002
- Keep documentation that you submitted your list to OPEFM.

Develop a system for updating the chemical information list—

- When new chemical products are obtained, add them to your chemical information list within 30 days. As new chemical products arrive at your facility, make sure you receive MSDS sheets. Be sure to include the date the chemical is added to your list.
- At a minimum, your chemical information list must be realphabetized every two years and submitted to the OPEFM Regulatory Environmental Compliance at the above address.

Check To See That All Containers Are Labeled

- Inspect all containers of chemical substances to ensure they are labeled, tagged, or marked to identify the product and any appropriate hazard warnings.
- Do not remove or deface existing labels on containers.

Ensure That Training of All Employees Has Occurred

- Provide training that covers all of the following items:
 - Explain the purpose of this law and employee rights under this law;
 - Explain how the chemicals found in your facility can be hazardous;
 - Discuss how to control exposure to hazardous chemicals by using appropriate work practices and control measures;
 - Explain how employees can obtain information on what hazardous substances are used in their facility;
 - Explain how to use the information found on MSDS and product labels; and
 - Discuss the importance of properly labeling portable receptacles used to store chemical substances.
- Document that training was given. Be sure to keep records that include:
 - Names of persons trained;
 - Dates and lengths of training sessions;
 - Name of individual(s) who conducted the training; and
 - Type of training provided, including an outline or lesson plan.

- Train new employees prior to their initial assignment.
- Provide additional training when new hazardous substances are introduced to your facility, when exposure to an existing hazardous chemical increases, or when additional information is available on a product.
- Additional training guidelines may be obtained by contacting the Regulatory Environmental Compliance Office at 202-576-8962.

Write and Make Available a Site-Specific Hazard Communication Program

- Have available in writing how your facility's Right-to-Know Program meets all the requirements of this law. Your written program must include:
 - Directions for gaining access to your chemical information list and MSDSs Safety.
 - A description of your employee training and education program.
 - An explanation of how containers are labeled.
 - A description of the hazards associated with chemicals in unlabeled pipes.
- Update written program when changes occur.

By law, each school facility must, on request, provide access to and copies of the Chemical Information List, the written Hazard Communication Program, and MSDS sheets to employees, employee-designated representatives, DCOSHA inspectors, fire officials, and other entities sharing the facility.

PREVENTION PROTOCOL

Hazardous Waste Disposal*

Depending on Assistance Needed, Call:	
OPEFM Regulatory Environmental Compliance	202-576-8962
LEA Contact	
Other	

Situation Description

At times, it is necessary to dispose of hazardous waste. Below are suggested procedures for the proper disposal of various materials that may produce health hazards.

Procedures

Waste oil—

- Put down absorbent material (i.e., sawdust) to block oil from drains or sewer lines.
- Call Regulatory Environmental Compliance. DCPS has a contract in place for pickup and disposal of waste oil, waste oil with water, and antifreeze.

PCB leakage from fluorescent light ballast—

- Use gloves, eye protection, cloth, and Varsol.
- Spray enough Varsol to completely cover the contaminated surface. Complete the wash/rinse a second time with Varsol to sufficiently cleanse contaminated surface.
- Take precautions to contain any runoff resulting from the cleaning. Contaminated cleaning materials (e.g., gloves, rags, etc.) must be placed in a plastic bag and disposed of in a container marked *hazardous material*.

Paint—

- If paint can has one inch or less of liquid, take off lid, let paint dry out, then dispose of can and dry material in dumpster.
- If paint can has more than one inch of liquid, consolidate cans, if necessary, into five-gallon containers with lids (e.g., old paint can), then generate a work order form to request removal of paint waste from your building.

Solvents—

- Leave materials in original containers. Do not mix any solvents.
- Store in safe area until pick-up of material.

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- Call Regulatory Environmental Compliance 202–576–8962.

Laboratory chemicals (spill control procedures for flammable acids and bases)—

- Each laboratory should have access to a spill kit that includes acid and base neutralizers and spill control procedures that should be followed.
- Combustible organic materials (sawdust, excelsior, wood scraps and shavings, paper, rags, or burlap bags) should never be used to absorb or clean up spillage.
- Attend to anyone who may need medical attention. If medical attention is needed contact 9-911 and the OPEFM Regulatory Environmental Compliance Unit.
- Notify occupants in the immediate area about the spill.
- Keep students and staff stay away from the spill area.
- If the spill material is flammable, turn off all ignition and heat sources to include magnetic stirrers.
- Avoid breathing vapors of the spilled material.
- Turn on fume hood and open windows, where possible, to increase ventilation.
- Verify that protective apparel is resistant to spill material.
- Review MSDS (chemical data sheet) for cleanup information.
- Confine or contain spill to original spill area.
- Proceed with cleanup measures as instructed in the chemical data sheets.
- Call Regulatory Environmental Compliance at 202–576–8962.
- Refer to Prohibited Chemical List, Section 6, Appendices.

Unknown substances—

- Leave material alone. Do not disturb.
- Secure area so that school personnel are not exposed to toxic substances.
- Do not wet material or mix anything with it.
- Call OPEFM Regulatory Environmental Compliance at 202–576–8962.

PREVENTION PROTOCOL

Indoor Air Quality*

Depending on Assistance Needed, Call:	
OPEFM Regulatory Environmental Compliance	202-576-5585
LEA Contact:	
Other	

Situation Description

Factors which include energy conservation measures, new building materials, maintenance practices, and changes in building use can contribute to potential problems with air quality. It is important to take measures to provide for good air quality and adequate ventilation, and that issues potentially related to indoor air quality be investigated and handled appropriately.

Procedures

The Quality Building Environment Program (QBE) was established to ensure a safe and healthy building environment. This program is structured to provide an atmosphere that is conducive to learning. The quality of the indoor environment is directly related to the cleanliness of the building and proper maintenance of its various systems. OPEFM has developed procedures, schedules, and standards to use in all areas of building operations and maintenance affecting the building environment.

To achieve improved mechanical maintenance and proper housekeeping, individual tasks within these areas and required schedules for performing the necessary tasks were created. OPEFM has restructured and reassigned responsibilities to address these tasks that play an important role in maintaining a quality building environment. A comprehensive building assessment system-wide is in place as needed to establish a base line and identify maintenance, safety, environmental, and housekeeping activities required to ensure that the building environment is maintained at the preferred level. If these procedures are performed correctly, in a timely manner, and with adequate oversight, many of our environmental situations will be prevented.

QBE is an evolving program that will be evaluated yearly to determine its effectiveness any needed changes.

We are confident that the increased effort, an enhanced OPEFM, the additional building assessments, and staffing accountability will result in cleaner buildings and more functional mechanical systems.

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The components of QBE address and control the major factors affecting the building environment of education facilities in the District of Columbia. QBE components include:

Preventive maintenance schedules and checklist—Preventive maintenance (PM) schedules and checklists identify maintenance items critical to good indoor environment for mechanical and electrical systems that are general building maintenance. Schedules identify the maintenance sections responsible for each maintenance task.

Housekeeping schedules and checklists—A list of the housekeeping items that relate to a good indoor environment. Building custodial staff will follow procedures that have been developed. A written set of criteria and checklists have been developed to perform the building evaluation.

Integrated pest management—All pest control work will follow the Integrated Pest Management (IPM) procedures included in this program. The techniques, materials, and schedules are an integral part of the QBE and include logs of pest sightings, site inspections, and interviews with administrators, pest exclusion work, and, as a last resort, pesticide application. The IPM program also includes notification of staff and parents prior to pesticide application as required. All pest control work will be fully documented.

School-based building walk-through inspections—A checklist with instructions for use in performing a walk-through inspection of the school has been developed to guide school-based personnel.

Good Practices Checklist for school staff—A checklist to provide guidance to school staff in assessing their work environment. It is used as a resource tool to help identify those things that could impact on the building environment.

Program verification—Monthly, 16 building assessments inspectors will be performed by inspectors from the Environmental Health and Safety Section. The assessment will consist of examining various completed checklists and other documentation on file for the building. The actual condition of the building, cleanliness, mechanical maintenance, and pest control will be evaluated to determine if they are consistent with the information provided. All building assessments will be completed annually to allow for evaluation and modification of the program, if needed.

Building environment complaint response—Requirements for a QBE team support our complaint investigations. The team will be comprised of professionals with expertise in areas that are pertinent to the indoor environment. Environmental health issues should be directed to the Environmental Health and Safety Section. The complaint will be quickly investigated and as needed by all or selected members of the team.

Program Protocol

The health and safety of students and staff is our first priority. OPEFM has established an environmental health-issue Protocol to ensure that all complaints/concerns are thoroughly investigated. This Protocol will be followed any time a community group, student, parent, or staff member alleges one of the following:

- Building or air quality is causing illness or ongoing symptoms to an individual.
- Building or air quality is causing loss of work/school time.
- A member of the medical profession states that the building is causing illness to building occupants.
- A doctor's letter states an illness is caused by the building environment.

Environmental Health Issue Team—Environmental Health Issues Team (EHIT) members will be responsible for investigating all complaints/concerns that involves DCPS buildings. The team will be comprised of the following Offices:

- OPEFM Environmental Health and Safety Office;
- DCPS Office of School Health Programs;
- DC Risk Management Office;
- DC Department of Health; and
- District Department of the Environment.

Comprehensive services—are provided under the following activities:

- Initial investigation and consultation with building occupants who have reported existing health problems or discomfort, which they attribute to the building environment.
- Investigation and inspection of the building envelope, exterior building systems, and mechanical system.
- Air sampling, testing, and monitoring as necessary by a Certified Industrial Hygienist due to results of the initial assessment.
- Employee-authorized consultation with a Contracted Occupational Healthcare Provider as necessary to review and discuss environment with the building user and building user's primary healthcare provider.
- Remediation of housekeeping, mechanical, and building deficiency as necessary to abate identified health hazard.
- Closeout reporting noting assessments conducted, testing performed, remediation efforts initiated.
- Report all issues related to indoor air quality concerns from students or staff to Environmental Services immediately.
- Cooperate with investigation and provide information that is relevant to investigation process. It may be necessary for other departments and offices such as Health Services and Risk Management to be involved, based upon the situation.

For additional information, contact the OPEFM Safety, Regulatory and Environmental Compliance Office at 202-576-8962.

PREVENTION PROTOCOL

Injury Reporting*

Depending on Assistance Needed, Call:	
OPEFM Safety Unit	202-576-8962
Office of School Security	202-481-3096
DC Disability Compensation Program	1-888-832-2524
LEA Contact:	
Other	

Situation Description

Every injury, including those which do not result in serious injury or property damage, should be reported. Proper reporting is the first step in the process of proper injury investigations and documentation. The information gathered by this process will be analyzed to:

- Identify the principal causes (materials, machines, tools, methods);
- Assess the degree of damage and the value of losses;
- Reveal the size of the accident problem relative to various departments and among various trade/personnel categories;
- Indicate the possible need for engineering revision by identifying unsafe equipment and materials;
- Disclose inefficiencies in operating processes and procedures;
- Reveal unsafe practices, which call for employee training;
- Reveal improper placement of personnel;
- Provide supervisors with essential and timely information about accidents; and
- Permit an objective evaluation of the progress of a particular safety program adopted by OPEFM and DCPS.

Prompt reporting will ensure appropriate injury investigation and recommended action that must be taken to correct deficiencies or provide necessary training. Accident investigations will be *fact finding* rather than *fault finding*. Fairness and impartiality are essential.

Procedures

- In cases where an injury has resulted in hospitalization or death, significant property damage, or extended interruption of operations, you must report it immediately to the OPEFM Safety Unit 202-576-8962 and DCPS School Security 202-576-6962.

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- If the injured subject is an employee, contact the Office of Risk Management in regards to the Disability Compensation Program to submit a claim at 1-888-832-2524. If a non-work related injury occurs and a claim is to be submitted, refer to the Property Damage/General Liability Claim Report Form under Risk Management Forms in Section 7, Appendices.
- When an injury is investigated, it will be done with full concentration on the facts surrounding the events leading up to the accident. To get these facts, it is important not to allow the scene of the accident to be disturbed before the investigation is complete.
- All injuries will be investigated regardless of severity of injury or amount of property damage. Near misses should also be reported for investigation.
- It is important to obtain full statements from all witnesses soon after the accident. It may be most helpful to get witnesses to write down their observations in addition to interviewing them and recording the essence of their comments. This information will be included in the Report Form.
- The Injury Report Form is to be completed and submitted to the OPEFM Safety Unit within 24 hours of the incident. The form is to be submitted through the web-based application at <http://esa.dc.gov>.

Injury Report Form

Name: _____ Student Employee Third Party

Address: _____

School: _____ Age: _____ Grade: _____ Sex: _____

Date: _____ Time: _____ Who Reported Accident: _____

Place Accident occurred: (gym, classroom, hall, cafeteria, etc.) _____

Describe Accident: _____

Part of body Injured: _____

Type of Injury: (bruise, sprain, scrape, etc.) _____

Was first aid given? _____ By Whom? _____

Describe First Aid Care Administered: _____

Injured Disposition To:

Class Home Hospital Doctor's Office Other _____

By Whom: _____

Name and Address of Physician Handling Case: _____

Parent or guardian notified? _____ How? _____

Witness to accident or illness:

Name and address: _____

Name and address: _____

Signature of Person Filing Report

Date

Signature of Principal

Date

Submit copy of the Report within 24 hours via the web-based application at <http://esa.dc.gov>
OPEFM Safety Unit, Penn Center: Phone: 202-576-8962 E-mail: Safety.department@dc.gov

PREVENTION PROTOCOL

Mail Handling of Suspicious Packages*

Depending on Assistance Needed, Call:	
Office of School Security	202-481-3096
Office of Instructional Superintendents	202-442-5055
LEA Contact	
Other	

Situation Description

U.S. mail and interdepartmental mail may be used as a way to threaten schools and offices. To protect the health and safety of staff and students, the following procedures should be followed.

Procedures

- Mail received in schools or offices should be sorted in a separate room or isolated area, if possible.
- If a separate room is selected to open mail, choose an area where limited ventilation and no wind drafts are present.
- Staff who sort and open mail should be aware that vinyl gloves are available for them to wear. Vinyl gloves can be purchased when ordering supplies.
- All staff members should be made aware of the procedure for Handling of Suspicious Letters or Packages (see OSHA procedures, below).
- *Under no circumstances* should students, unless enrolled in a work study program, be allowed to handle, sort, or open mail in schools.

The U.S. Department of Labor, Occupational Safety and Health Administration, recommends the following protective measures:

General mail handling—

- Be on the lookout for suspicious envelopes or packages.
- Do *not* open suspicious mail.
- Open all nonsuspicious mail with a letter opener or another method that minimizes skin contact with the mail and is least likely to disturb contents.
- Open mail with a minimum amount of movement.
- Do not blow into envelopes.
- Keep hands away from nose and mouth while opening mail.

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- Turn off fans, portable heaters, and other equipment that may create air currents.
- Wash hands after handling mail.

Characteristics of suspicious packages and letters—

- Discoloration, oily stains, or an unusual odor;
- Crystals, powder, or powder-like residue on the surface;
- Suspicious or threatening language on the outside of package or letter;
- Postmark that does not match return address, or no return address;
- Restrictive endorsements such as "Personal" or "Confidential";
- Distorted handwriting, block-printed or poorly typed addresses;
- Excessive tape or string;
- Rigid, uneven, irregular, or lopsided package;
- Package with soft spots, bulges, or excessive weight;
- Handwritten, block-printed or poorly typed addresses;
- Excessive postage;
- Title but no name or incorrect title;
- Misspelled addressee's name, title, or location;
- Misspelled common words;
- Addressee unknown or no longer with organization;
- Protruding wires or aluminum foil;
- Ticking sound; and
- Unexpected mail from a foreign country.

If you receive or discover a suspicious package or letter—

- Do *not* open the package or letter.
- Do not shake, empty, or otherwise disturb its contents.
- Put the package down and do not handle it further.
- Do not touch or try to clean up the substance.
- Alert others nearby.
- Do not remove *any* items from area.
- Leave the area and gently close the door.

After leaving the area—

- Wash hands well with soap and water.
- Contact your supervisor, designated responder, or other appropriate authority.
- Limit movements within the building to prevent spread of substance.

Designated responders or another appropriate authority will determine the need for further actions, which may include:

- Directing further evacuation;
- Reporting the incident to building security and notifying appropriate authorities such as local police or Federal authorities;
- Perform additional decontamination activities as directed by the proper authorities;
- Reporting the incident to facility managers so they can cut off electrical power and shut down ventilation systems serving the potentially contaminated areas; and
- Compiling a list of names of all potentially affected individuals, including those who were in area when the suspicious mail was encountered.

PREVENTION PROTOCOL

Person Protective Equipment*

Depending on Assistance Needed, Call:	
OPEFM Safety Unit	202-576-8962
LEA Contact	
Other	

Situation Description

Title 29, *Code of Federal Regulations* (CFR) Part 1910.132, requires employers to assess the workplace to determine if hazards are present or likely to be present, which would necessitate the use of personal protective equipment. If such hazards are present, or likely to be present, personal protective equipment must be selected and issued to all affected employees. Training is also required for all affected personnel on the need and proper use of all personal protective equipment. Examples of personal protective equipment which may be required include hard hats, goggles, face shields, ear plugs, steel-toed shoes, respirators, and gloves.

To determine personal protective equipment needs, a workplace hazard assessment must be completed and kept on file at the site. Refer to *Workplace Hazard Assessments, Instructions and Form* in Section 6, Appendices for specific information.

Procedures

- Ensure that a workplace hazard assessment has been conducted for appropriate employee groups. Provide written certification that assessment has occurred using the form found in Guidelines packet. Certification needs to be readily available and may be requested by DCOSHA during an inspection.
- Purchase and ensure that appropriate personal protective equipment is distributed and utilized.
- Ensure that required training has taken place. Provide written certification of training using form found in Guidelines packet in Section 6, Appendices. Certification needs to be readily available and may be requested by DCOSHA during an inspection.
- Keep appropriate records.

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PREVENTION PROTOCOL

Playground Safety*

Depending on Assistance Needed, Call:	
OPEFM Safety Unit	202-576-8962
OPEFM Grounds	202-576-7676
LEA Contact	
Other	

Situation Description

Accidents occurring on playground equipment are a major source of injuries. Children can be expected to use equipment in unintended and unanticipated ways, adult supervision is crucial to playground safety. Nationally, the most common playground accident reported involves falls. Nearly half of reported injuries that result from falls are to the head and range from minor bruises to skull fractures, concussions, brain damage, and even death. Other potential playground hazards include impacts by swings or moving equipment, collisions with stationary equipment, and contact with such hazards as protrusions, pinch points, sharp edges, hot surfaces, and debris found in the playground area.

Procedures

- Ensure that all teachers and building staff are knowledgeable on the basics of playground safety and appropriate use of apparatus areas.
- Ensure that all students are informed of proper playground and playground equipment use at the start of each school year. These procedures should be included in the student handbook.
- Document and report all injuries in accordance with procedures as outlined in the Injury Reporting Section (see Injury Report Form,).
- Ensure that all playground areas are inspected daily by building maintenance staff for broken glass and other dangerous debris.
- When repairs to playground equipment become necessary, ensure that repairs are made by authorized Grounds Services personnel or the manufacturer’s authorized representative only.
- Playgrounds are designed and constructed for age-specific users. Ensure that students only use playground equipment appropriate for their age (ages 2–5 and ages 5–12).

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PREVENTION PROTOCOL

Property Loss/Damage Reporting*

Depending on Assistance Needed, Call:	
OPEFM Safety Unit	202-576-8962
LEA Contact	
Security	
Other	

Situation Description

Property loss and damage need to be reported to ensure proper recovery and expedite a loss investigation. Follow these guidelines and utilize the Property Loss/Damage Report Form on the web-based application.

Note: If any damages or injuries involve a motor vehicle, utilize the DCORM Motor Vehicle Accident Report Form in Section 7.

Report Property Loss If:	Examples
It involves DCPS property	Playground equipment, computers, musical instruments, windows
It involves personal property of employees	Instructional materials, tools, items damaged during an assault
It involves personal property of students in our care and control	Instruments, medication
It involves property of a third party (e.g., member of the public)	Vehicle damage

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Procedures

Step 1	
For fire, theft, or vandalism	Immediately call 911
For loss/damage from other causes	Go to Step 3
Step 2	
Call Security	_____
Step 3	
Call Instructional Superintendent	_____
Step 4	
Administrator to complete the Property Loss/Damage Report Form	Submit via the web-based application.
Step 5	
OPEFM Safety Unit and/or DCORM will log and/or investigate.	Cooperate with any loss investigation

Property Loss/Damage Report Form

Name of Person Reporting Loss: _____
School/Site Reporting Loss: _____
Phone #: _____ Date Reported: _____ Date of Loss: _____
Time: _____ Location Loss Occurred: _____

Loss/Damage result of:
 Fire Water Damage Vandalism Theft
 Act of Nature Other: _____

Loss/damage involves:
 DCPS Property Grounds Building
 Tools Playground Computer Equipment
 Musical Instruments Instructional Materials
 Other: _____

Personal Property (excluding vehicles)
 Employee Student Third Party Other

Name of Property Owner: _____
Address: _____

Phone Numbers: Home: _____ Work: _____
*(*If more than one owner, list information on additional sheet.)*

Details of Damage/Loss: (include make, model, serial #, color, location, etc.)

Estimated amount of damage/loss: _____

Documentation of loss/value: Attached To follow

Report filed: Police Fire Security Other
Report # (s): _____

Submit copy of the Report within 24 hours via the web-based application at <http://esa.dc.gov>
OPEFM Safety Unit, Penn Center: Phone: 202-576-8962 E-mail: Safety.department@dc.gov

PREVENTION PROTOCOL

Safe Drinking Water*

Depending on Assistance Needed, Call:	
OPEFM Regulatory Environmental Compliance	202-576-8962
LEA Contact	
Other	

Situation Description

The Safe Drinking Water Act, passed by Congress in 1974 and amended in 1986 and 1996, was implemented to protect the public health, regulate the Nation’s public drinking water and its valuable water sources (i.e., rivers, lakes, reservoirs, ground water, and springs). This framework for legally protecting drinking water is enforceable by the U.S. Environmental Protection Agency (EPA). The EPA regulates the National Primary Drinking Water Regulations such as total coliform, lead, and nitrates. Secondary Drinking Water Regulations are nonenforceable guidelines adopted by the individual States, such as pH, color, and iron. Maximum contaminant levels and goals are established for each naturally occurring and manmade pollutant.

The Lead in Water Management Program is responsible for testing and remediation of elevated lead levels discovered in drinking water in education facilities throughout the District of Columbia. This program ensures a healthy environment for students, staff, and community members using DCPS facilities.

EPA regulates water delivered to our buildings to be less than 15 parts per billion for lead. The main sources of lead in our drinking water usually are from plumbing materials made from copper, lead services lines connecting the buildings to public water mains, and lead solder. Lead solder was commonly used before 1990 to join lengths of copper pipes together. Lead also comes from faucets, taps, and fountain bubbler heads containing brass or bronze internal parts. These components can contain lead impurities.

Under the 1996 amendments to the Safe Drinking Water Act (SDWA), “lead free” brass can contain as much as eight percent lead by weight, which is enough to contribute significant amounts of lead to our water. If the water supplied by DCWASA is highly or even moderately corrosive, some of the lead and/or copper in plumbing materials may be released into drinking water.

Lead and copper in drinking water present a potential health risk to building users. Children are especially susceptible to lead and copper exposure because their bodies absorb these elements at higher rates than the average adult. Children younger than six are most at risk due to their rapid rate

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of growth. Exposure to high levels of lead and copper can present a health risk to children and adversely impact classroom performance. Education facilities are also occupied or used by parents, teaching staff, and maintenance personnel. Studies have found that pregnant women who have accumulated exposure to lead through time may also be at risk during pregnancy. For these critical and important reasons, safe drinking water must be provide at education facilities.

Under the Lead in Water Management Program, samples for lead and/or copper will be taken periodically. In order to reduce lead exposure to students and staff, remedial action will be initiated where levels of lead exceed the EPA Action Level.

Procedures

If any concern with drinking water is suspected, contact the OPEFM Safety, Regulatory and Environmental Compliance Office at 202-576-8962.

PREVENTION PROTOCOL

Safety Inspections*

Depending on Assistance Needed, Call:	
OPEFM Safety Unit	202-576-8962
LEA Contact	
Other	

Situation Description

Inspections are essential to maintaining acceptable standards of safety for physical facilities, work environments, and instructional practices. Outside agencies may require and carry out these inspections, or if not, required internal inspections and documentation of results need to be maintained on file. Forms are provided for regularly performed external and internal inspections.

Additional Inspections—Other areas or materials that should be inspected on an ongoing basis by appropriate school personnel include:

- All electrical cords and plugs;
- Chemical storage rooms;
- Physical education equipment and apparatus;
- Tools and related equipment;
- Personal protective equipment; and
- Walkways and roadways.

Procedures

- Assist inspectors when necessary.
- Maintain required documentation in appropriate locations.
- Complete work order requests for any areas that need repairs.

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External Inspections		
Type of Inspection	Performed by	Time Period
Fire protection & prevention	DCFEMS	Annually
-Compliance with health & safety regulations -Response to a received complaint -Re-inspection	DC-OSHA	Unannounced at any time; followup visits may be scheduled
Kitchen inspections	DCDOH	Twice a school year
Fire extinguishers	Outside contractors	Annually
Pressure vessels (e.g., boilers, hot water storage tanks, etc.)	DCRA	Every two years
Emergency generators	Outside contractors	Annually
Asbestos-containing materials	Accredited inspectors	Every three years
Automatic sprinkler systems	Outside contractor	Annually
Elevators, chair lifts, dumbwaiters	DCRA	Annually

Internal Inspections		
Type of Inspections	Performed by	Time Period
Property and safety inspections	OPEFM Safety Unit	Annually and as needed
Playground equipment	Appropriate school personnel OPEFM Safety Unit	Weekly Annually
Fire extinguishers	Appropriate school personnel	Monthly
Asbestos-containing Materials	OPEFM Regulatory Environmental Compliance	As needed
Fire alarms	Designated maintenance personnel	Annually and as needed
Bleachers	Appropriate school personnel	Monthly
Emergency lights	Designated maintenance personnel	Monthly Annual one-hour test
Eyewash stations & drench showers	Appropriate instructional staff member	Monthly

PREVENTION PROTOCOL

Search Procedures*

Depending on Assistance Needed, Call:	
Office of Instructional Superintendents	202-442-5055
Office of School Security	202-481-3096
Metropolitan Police Department	911
LEA Contact	
Other	

Situation Description

Individualized searches must be undertaken if reasonable suspicion exists, or that student discipline rules, criminal laws of the District of Columbia or the Federal Government have been violated or, if a search is part of an overall effort to maintain security and safety of DC schools, it is in accordance with provisions (see DCMR Title 5, Chapter 25).

Reasonable suspicion presumes any one or more of the following circumstances exist:

- School officials observe contraband or other prohibited property, or conduct suggests the presence of contraband or other prohibited property.
- General, suspicious conduct, such as a student being in a restricted area without approval.
- A tip from an informant, either known to the school official to be reliable or, if anonymous, possessing some attribute, knowledge, or relationship to the school, student, or community that gives credence to the information.
- Observation of furtive or evasive behavior to suggest concealment of a weapon, contraband, or stolen property or perpetration of an offense in violation of school regulations or laws.

In deciding whether to undertake a search, the student’s age, history, and school record must be considered in the context of the nature of the infraction,.

Random searches of students and lockers will be undertaken in a manner consistent with overall need to maintain safety and security of DC schools. Searches must occur under the auspices of the DCPS Office of School Security and, where appropriate, the MPD and the DCPS Office of the General Counsel unless circumstances compel immediate action to avoid imminent danger to self or others.

Except where otherwise necessary to avoid immediate harm or immediate disposal or contraband, all student searches must occur in the privacy of an office or unoccupied room, and all searches must be

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made in the presence of a third party. Under no circumstances are strip searches to be conducted by school system personnel. In the event that there is reason to believe that such a search would uncover evidence of criminal conduct, notify the MPD.

Subsequent to any search, whether based on individualized suspicion or at random, the principal must prepare a written report detailing the scope of the search and circumstances giving rise to the search. Copies of this report must be filed with the appropriate Instructional Superintendent, the Office of School Security, and the Office of the Attorney General (OAG).

Magnetometers and other metal-detecting devices are utilized by school officials at entrances to schools when deemed appropriate by the Chancellor of Schools to deter weapons being brought on to school grounds. These devices should be regularly checked and calibrated.

All lockers, desks, and other property provided by DC schools to students for storage of personal belongings and school supplies are the property of and shall remain under the jurisdiction of DC the schools. The use of these items by student is a privilege. School officials retain the right to open and search lockers, desks, and other school property and their contents, with or without the presence of the student(s) at any time to enforce school policies, rules, or regulations or for any other reason.

Students must assume full responsibility for the contents of lockers and must lock all lockers and locks after use. No student will place, keep, or store, or allow to be placed, kept, or stored, in his/her locker, desk, or other school property, any firearm, knife, explosive, other dangerous object or illegal contraband; the use or possession of these items is prohibited.

Principals must provide information on DCPS policies regarding searches to students and their parents on a regular basis, including at the beginning of each school year.*

*Source: Final Rulemaking published at 35 DCR (December 30, 1988): as amended by Final Rulemaking Publish at 41 DCR 4934 (July 22, 1994). Title 5 District of Columbia Municipal Regulations.

PREVENTION PROTOCOL

Security Surveys*

Depending on Assistance Needed, Call:	
Office of School Security	202-481-3096
LEA Contact	
Other	

Situation Description

Ensuring the security of students, staff, property, and facilities is critical to providing a safe and productive learning and working environment. Incidents may occur when an administrator is faced with circumstances related to security that may be beyond his or her ability to effectively manage without assistance. Some areas of concern may include access control, environmental, Internet security, intrusion detection, lighting, maintenance, physical security, surveillance, theft, and vandalism. The following procedures were developed to help in these instances.

Security assessments—District of Columbia Public Schools offers safety and security assessments under the direction of the Office of School Security. To initiate the process, an administrator/designee must contact the Office of School Security at 202-576-6962 to request a Security Survey. These assessments are conducted by the Physical Security Section of the Office of School Security.

If a situation warrants the need for an assessment by a consultant, the circumstances will be reviewed by the Office of School Security first, which will generate strict guidelines governing the area(s) the assessor investigates. Only after this, and with the approval of both the Chief of Security and the Chancellor, will an outside agency be requested to perform a security assessment.

Currently, MPD offers free security assessments to the school system and is considered the consultant. Guidelines will be set by a joint venture with the Office of School Security and MPD in regard to how these assessments will be completed, on a case-by-case basis.

Procedures

- Contact the Office of School Security at 202-576-5240 to request an assessment.

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