

OVERVIEW

The purpose of this plan is to provide for the carrying out of emergency functions to save lives; establish responsibilities necessary to performing these functions; prevent, minimize, and repair damage; and ensure continuity of operations so that essential services may continue to be provided to the Campus.

This plan assigns roles and responsibilities to departments and individuals that are directly responsible for emergency response and critical support services, and provides a management structure for coordinating and deploying essential resources.

Your campus has a detailed Emergency Response Plan (ERP) procedure that outlines the procedures to be followed in case of an emergency. This document serves as a description of what you should expect in an emergency situation and actions you should take specific to your campus or location. Please contact your Campus Executive Director or President for more information about the detailed ERP procedures.

WHAT IS AN EMERGENCY?

An emergency is any situation that poses danger to the safety of persons or property, and which requires an immediate response. An emergency can be caused by air pollution, fire, flood or floodwater, storm, hurricane, epidemic, riot, earthquake, intruder, or other causes. An emergency may be beyond the control of the resources available to the campus and may require the combined efforts of the state, city, or other political subdivisions.

WHY IT IS IMPORTANT TO PREPARE

It is a primary goal of Kaplan Higher Education to provide a safe and secure environment for our students, faculty, and staff at all of our locations. However, emergencies both large and small can arise suddenly, and it is critical that site personnel know how to respond to them immediately and effectively. They must be prepared to respond in an appropriate, coordinated manner that minimizes the risks to everyone involved and allows students, faculty, and staff to resume or continue to function normally without creating additional emergencies.

The greatest mistakes leaders make in a crisis come from not knowing what steps to take or in what order to take them. Planning, preparation, training, and drills help prevent these mistakes. Site personnel will be trained at least once a year on the ERP to prepare them to respond to emergencies.

While the ERP provides guidance for how to respond to numerous types of emergencies, it cannot foresee every possible emergency. Therefore, site personnel must be prepared to evaluate all the circumstances and make sound judgments based on the situation.

COMMUNICATIONS

Clear communication is essential during an emergency. Multiple methods must be used as no one system alone can transfer information. As decisions are made, appropriate communications must be

developed and distributed in a timely manner to all key audiences: students, faculty, staff, KHE senior executives, and the general public.

In any emergency, the Campus' Incident Commander (IC) will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the campus or location notification system, unless issuing a notification will, in his/her professional judgment, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Emergency Communications:

When an emergency condition exists, the IC will notify the necessary members of the Emergency Response Team (ERT) to respond to their areas of assignment. Notifications must be given in plain language. Code words should not be used. The methods of communication the school may utilize to notify all persons on campus of an emergency include:

- a. Intercoms
- b. Two-way radios
- c. Telephones
- d. Runners

The Campus' IC will evaluate the situation and determine the best method to notify the campus community of the emergency. In some cases, e-mail, the Web, word-of-mouth, or even the media will be used to alert the campus or broader community of events on campus.

EMERGENCY RESPONSE TEAM

The ERT is responsible for controlling the overall emergency response and managing personnel, students, facilities, equipment, and communications. The team consists of several members of the Campus' faculty and staff. Your campus or location has specific policies that ERT follows. In the event of an emergency, you should carefully follow all instructions given by the ERT at your campus or location.

The ERT positions with short descriptions are as follows:

1. **Incident Commander (IC):** The IC ensures the safety of students, staff, and others on campus. The IC will assess the type and scope of emergency, determine the threat, if any, to human life and structures, and activate the rest of the ERT, if necessary. The IC will also determine the content of the emergency notification and the appropriate audience to receive the communication. Several incident-specific responses are included in this ERP for reference.
2. **Safety Officer:** The Safety Officer ensures that all emergency response related activities are conducted in as safe a manner as possible. The Safety Officer will monitor drills, exercises, and emergency response activities for safety, and identify and mitigate safety hazards and situations.
3. **Communications Officer:** The Communications Officer is responsible for coordinating all on-site communications between the ERT and the media, families of students, and the public. The Communications Officer will release statements, arrange interviews, and ensure that the privacy of students and on-site personnel is protected when communicating with the media.

4. **Operations Section Chief:** The Operations Section Chief manages the direct response to the disaster, including site facility check, security, search and rescue, medical, student care, and student release. Specifically, the Operations Section Chief:
 - a. Briefs the ERT on the situation, assigns team members to their proper roles, and supervises ERT activities
 - b. When additional site personnel are available, briefs them on the situation and assigns them as needed
 - c. Supervises search and rescue operations
 - d. As information is received from operations staff, forwards it to the IC
 - e. Makes arrangements to provide shelter for students and staff; and
 - f. Ensures that operations staff follows standard procedures, using appropriate safety gear, and documents their activities.
5. **Search and Rescue Teams and Team Leader:** The Search and Rescue Team, led by a Team Leader, searches areas for on-campus occupants that may be in danger. The Team searches known hazards or situations first, then searches the campus using specific planned routes.
6. **Medical Team and the Medical Team Leader:** The Medical Team, led by a Team Leader, is responsible for providing emergency medical response, first aid, and counseling prior to the arrival of emergency medical services.
7. **Student Care Team:** The Student Care Team ensures the care and safety of all students on campus, except those who are in the medical treatment area.

GENERAL PROCEDURES

HURRICANE POLICY

Kaplan Higher Education (KHE) is committed to providing as safe, comfortable, and productive work environment as possible during periods of severe weather. **The National Weather Service will issue a HURRICANE WARNING when hurricane conditions are expected in the next 36 hours.** When a warning is issued, KHE will determine the course of action for offices in the threatened area. KHE offices in the warning area will close no later than **12 hours** after a Hurricane Warning is issued.

Affected offices will remain closed until the Warning has been lifted and the buildings have been deemed safe for re-entry. It is KHE's intention to re-open each office as soon as possible.

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EVACUATION PROCEDURE

Incident Commander (IC):

- Calls 911, if necessary

- Activates the Emergency Response Team (ERT)
- Determines if students and site personnel should be evacuated outside of building or to a relocation center
- Directs students and site personnel to follow evacuation drill procedures and the primary evacuation route, or alternate routes if the primary route is too dangerous
- Describes how ERT will provide for disabled and non-English speaking students and site personnel

Faculty:

- Direct students to follow the evacuation procedure announced by the IC
- Take class roster and emergency kit
- Take roll when safely outside
- Immediately notify the IC of any missing students
- Stay with class until relieved by another faculty member
- If evacuated to relocation center, take roll again and notify the IC of any missing students

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LOCKDOWN/SHELTER-IN-PLACE PROCEDURE

Lockdown/shelter-in-place orders may be issued in situations involving dangerous intruders or other incidents that may result in harm to persons if they were to leave the facility or campus building.

Incident Commander (IC):

- Calls 911, if necessary
- Activates the Emergency Response Team (ERT)
- Issues lockdown/shelter-in-place order by announcing a warning over PA system, sending a messenger to each classroom, or other alternate method, as deemed necessary by the situation
- Directs all students, site personnel, and visitors to seek shelter in classrooms or other secure rooms

Faculty:

- Lock classroom doors and barricade with furniture
- Close windows and, if available, close window blinds, curtains, or shades
- Direct all persons to move away from windows and doors so that they cannot be seen from outside the room
- Direct all persons to get down on the floor
- Allow no one to exit the classroom until the IC gives the all-clear signal

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REVERSE EVACUATION PROCEDURE

Reverse evacuation provides refuge for students, site personnel, and members of the public within facilities during an emergency. Shelters must be located in areas that maximize the safety of everyone

seeking shelter. Safe areas may change depending on the emergency. Implementation of lockdown/shelter-in-place procedures may be necessary once everyone is inside the shelter.

Incident Commander (IC):

- Calls 911, if necessary
- Activates the Emergency Response Team (ERT)
- Identifies safe areas in each building
- Directs students, site personnel, and members of the public to assemble in the safe areas

Faculty:

- Take class roster and emergency kit
- Close all exterior doors and windows
- Barricade doors and windows with furniture
- Turn off any ventilation leading outdoors
- Move everyone away from windows and doors
- If advised, instruct everyone to cover mouth and nose with handkerchief, cloth, paper towels, or tissues
- Take roll of students and staff after securing the safe area
- Immediately notify the IC of any missing people
- All persons must remain in safe areas until notified by the IC that the emergency has ended

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GENERAL EMERGENCY

- The person who recognizes the emergency should call 911, if necessary
- The person who recognizes the emergency should notify the Incident Commander (IC)
- The IC will seal off high-risk area
- The IC will announce emergency via intercom, if necessary
- The IC will take charge of area until incident is contained or relieved

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POST-CRISIS PROCEDURE

Select site personnel and students will meet with mental health workers to determine level of intervention required.

- The Campus Executive Director will:
 - Designate rooms as private counseling areas
 - Escort affected students, siblings, close friends, and other “highly stressed” students or site personnel to counselors
 - Debrief all students and site personnel
 - Assess stress level of all students and site personnel

- Recommend counseling to overly stressed students and site personnel
- Follow up with students and site personnel who received counseling
- Designate site personnel to attend funeral(s), if necessary
- Allow for changes in normal routines or test schedules following any injuries or deaths

INCIDENT-SPECIFIC RESPONSES

FIRE

In the event a fire or smoke from a fire has been detected:

- The person who recognizes the fire should activate fire alarm or call 911
- The ERT will evacuate students and site personnel to a safe distance outside of building
- Follow the primary fire drill route as detailed by your campus location, or the alternate route if the primary route is too dangerous
- Instructors and managers take roll after evacuating and immediately notify the IC of any missing people
- IC may move students to an alternate relocation center if the weather is inclement or the building is damaged
- No one may re-enter the building(s) until entire building(s) is declared safe by fire or police personnel

Your campus or location has specific policies that the ERT follows. In the event of an emergency, you should carefully follow all instructions given by the ERT at your campus or location.

WEAPONS

If a person is suspected of carrying a weapon into a KHE facility or onto a campus:

- The person who believes someone has a weapon should immediately call 911
- The person who believes someone has a weapon should immediately notify the Incident Commander (IC)
- If suspect threatens you with a weapon, do not try to disarm him or her. Back away with your arms up. Remain calm.
- The ERT should escort police on search through the building, if requested

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ASSAULT/FIGHTS

- The person who witnesses an assault or fight should call 911, if necessary, and notify the Incident Commander (IC)
- The ERT will diffuse the situation, if possible
- The ERT should seal off area where assault/fight took place, if possible

- The ERT will document all activities and ask victim(s)/witness(es) for their account of incident, including details about whether:
 - A weapon was used; or
 - A victim has a physical injury causing substantial pain or impairment of physical condition; or
 - Victim was assaulted involving sexual contact (this means intentional touching of anus, breast, buttocks, or genitalia of another person in a sexual manner without consent, including touching of those areas covered by clothing)

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WILD ANIMALS

- The person who discovers a wild animal on the premises should call 911, if necessary
- The person who discovers a wild animal on the premises should notify the Incident Commander (IC)
- If possible, the ERT will seal off the area if the animal is still present

Your campus or location has specific policies that the ERT follows. In the event of an emergency, you should carefully follow all instructions given by the ERT at your campus or location.

BOMB THREAT

- The person who receives a bomb threat should immediately call 911
- The person who receives a bomb threat should notify the Incident Commander (IC)
- IC initiates Evacuation Procedures
- Follow Evacuation Procedures to a safe distance outside of building
- No one may re-enter building(s) until entire building(s) is declared safe by fire or police personnel

Your campus or location has specific policies that the ERT follows. In the event of an emergency, you should carefully follow all instructions given by the ERT at your campus or location.

GAS LEAK

If gas odor has been detected in the building:

- The person who smells the gas odor should immediately call 911
- The person who smells the gas odor should immediately notify Incident Commander (IC)
- The person who smells the gas odor should use the fire alarm pull station
- The ERT will evacuate students and staff to a safe distance outside of building
- Follow the primary evacuation route as detailed by your campus or location, or the alternate route if the primary route is too dangerous
- Instructors and managers take roll after evacuating
- Immediately notify the IC of any missing people
- IC may move students to an alternate relocation center if the weather is inclement or the building is damaged
- No one may re-enter building(s) until entire building(s) is declared safe by fire or police personnel

Your campus or location has specific policies that the ERT follows. In the event of an emergency, you should carefully follow all instructions given by the ERT at your campus or location.

If gas odor has been detected outside the building:

- The person who receives the report of the gas odor should immediately call 911
- The person who receives the report of the gas odor should immediately notify the Incident Commander (IC)
- IC determines whether to shelter in place or evacuate (fire personnel will assist with decision)

Your campus or location has specific policies that the ERT follows. In the event of an emergency, you should carefully follow all instructions given by the ERT at your campus or location.

If advised to evacuate:

- The ERT will designate team member to evacuate students and staff to a safe distance outside of building
- Follow the primary evacuation route, or the alternate route if the primary route is too dangerous
- Instructors and managers take roll after being evacuated
- Immediately notify the IC of any missing people
- IC may move students to an alternate relocation center if the weather is inclement or the building is damaged
- No one may re-enter building(s) until entire building(s) is declared safe by fire or police personnel

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HAZARDOUS MATERIALS EVENT

Incident occurred in a KHE facility or campus:

- The person experiencing the event should immediately call 911, if necessary
- The person experiencing the event should immediately notify the Incident Commander (IC)
- IC determines whether to shelter in place or evacuate (fire personnel will assist with decision)
- Follow procedures for sheltering or evacuation
- IC seals off area of leak/spill
- IC takes charge of area until fire personnel contain incident
- No one may re-enter the building(s) until entire building(s) is declared safe by fire or police personnel

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Incident occurred near KHE facility or campus:

- The person experiencing the event should immediately call 911, if necessary
- The person experiencing the event should immediately notify the Incident Commander (IC)

- IC determines whether to shelter in place or evacuate (fire personnel will assist with decision)
- Follow procedures for sheltering or evacuation
- No one may re-enter the building(s) until entire building(s) is declared safe by fire or police personnel

Your campus or location has specific policies that the ERT follows. In the event of an emergency, you should carefully follow all instructions given by the ERT at your campus or location.

RADIOLOGICAL EVENT

KHE campuses within 10 miles of a nuclear facility will be prepared for a radiological event. Should a radiological event occur, it is standard protocol for the nuclear facility to blast a steady siren for 3 to 5 minutes. If this siren is heard, seek additional information from an Emergency Alert Station (EAS) on a radio. A radiological release may require protective actions. There are two basic protective actions: sheltering-in-place and evacuation. The procedures are described in the General Procedures section of this document.

Your campus or location has specific policies that the ERT follows. In the event of an emergency, you should carefully follow all instructions given by the ERT at your campus or location.

SERIOUS INJURY/DEATH

If a serious injury or death occurs in a KHE building or on a campus:

- The person who encounters the serious injury or death should immediately call 911
- The person who encounters the serious injury or death should notify the Incident Commander (IC)
- If possible, the ERT will isolate the affected person
- IC notifies KHE Communications team
- If it is an injury, the IC designates a staff member to accompany the injured person to the hospital
- KHE Communications team determines the method of notifying the family of the affected person, students, and site personnel

Your campus or location has specific policies that the ERT follows. In the event of an emergency, you should carefully follow all instructions given by the ERT at your campus or location.

If a member of the campus community dies or is seriously injured off-site:

- The person who encounters the serious injury or death should notify the IC
- IC notifies KHE Communications team
- KHE Communications team determines method of notifying students and site personnel

STUDENT UNREST

- The person who discovers the unrest should call 911
- The person who discovers the unrest should notify the Incident Commander (IC)
- The ERT will ensure the safety of students and site personnel in the immediate vicinity
- IC warns site personnel of the unrest

- IC warns other students, if necessary, of the unrest
- IC will seal off the affected area, if possible
- IC determines whether or not to issue a lockdown order (if it determined that a lockdown is necessary, see the Lockdown/Shelter-in-Place Procedure section)
- Instructors and managers make a list of all the students that are absent from their classrooms and deliver this information to the IC

Your campus or location has specific policies that the ERT follows. In the event of an emergency, you should carefully follow all instructions given by the ERT at your campus or location.

SUICIDE

If a suicide attempt occurs in a KHE building or on a campus:

- The person who discovers the attempt should immediately call 911
- The person who discovers the attempt should notify the Incident Commander (IC)
- IC activates ERT
- The IC or other designated person should attempt to calm suicidal person
- The ERT should isolate suicidal person from other students or site personnel, if possible
- Stay with the person until a counselor or suicide intervention team arrives
- **Do not leave the suicidal person alone**
- IC notifies the designated suicide intervention service

Your campus or location has specific policies that the ERT follows. In the event of an emergency, you should carefully follow all instructions given by the ERT at your campus or location.

TERRORIST ATTACK

Weapons of mass destruction likely to be employed by terrorists fall into a few basic categories: nuclear and conventional.

Nuclear

Defense against nuclear weapons depends primarily on distance from the point of detonation. If a nuclear device is detonated:

- The person who discovers the attack should immediately call 911
- The person who discovers the attack should immediately notify the Incident Commander (IC)
- The ERT will utilize PA system or other system to notify campus occupants of the emergency
- The ERT will move students and staff to specifically identified basement or lower level rooms; interior hallways may be used as an alternative
- Campus personnel should close all doors leading into hallways to minimize flying glass
- The ERT should shut down all utility systems to the building (gas and electricity are the priorities)
- Shelter in place to protect from fallout, if attack is far enough away
- Keep students and site personnel inside buildings
- Allow students and site personnel to leave at their own discretion once cleared to do so by public safety, emergency management, or military authorities

Conventional

The danger from the blast effect of conventional explosive devices is similar to nuclear devices with a higher rate of survival. If responding to the threat of an imminent blast nearby:

- The person perceiving the attack should immediately call 911
- The person perceiving the attack should immediately notify the Incident Commander (IC)
- If the source of the threat is outside, the ERT will:
 - Reverse-evacuate all people into school buildings
 - Move students and staff to specifically identified basement or lower level rooms; interior hallways may be used as an alternative
 - Close all doors leading into hallways to minimize flying glass
 - Shut down all utility systems to the building (gas and electricity are the priorities)
 - All people assume the duck, cover, and hold position on the ground
 - Keep students and site personnel inside buildings
 - Allow students and staff to leave at their own discretion once cleared to do so by public safety, emergency management, or military authorities
- If the source of the threat is inside a KHE building, the ERT will:
 - Evacuate students and site personnel to a safe distance outside of building
 - Follow the primary fire drill route, or the alternate route if the primary route is too dangerous
 - Instructors and managers take roll after evacuating
 - Immediately notify the IC of any missing people
 - IC may decide to move students to an alternate relocation center
 - No one may re-enter the building(s) until entire building(s) is declared safe by public safety, emergency management, or military authorities
- The ERT will seek medical treatment for any students or site personnel affected by the explosive device

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ANNUAL TEST

The campus will test these procedures once per year, and will include:

- Drills that may be announced or unannounced;
- Publicizing its emergency response and evacuation procedures in conjunction with at least one test per calendar year; and
- Documenting, for each test, a description of the exercise, the date, time, and whether it was announced or unannounced.