July 16, 2020

Emergency Evacuation Planning and Drills
Fire Code and COVID-19 Guidance for PreK-12 and Colleges and Universities

As students and staff prepare for the return to PreK-12 schools or institutions of higher learning, there are inherent challenges regarding the reentry procedures and how these procedures are influenced by emergency evacuation drills and lock down planning required by the Statewide Fire Prevention Code. The following serves as a reminder of the required fire and emergency evacuation drills to ensure the health and safety of all occupants and to provide guidance on areas to consider during the planning for these drills in light of the COVID-19 pandemic.

Fire and emergency evacuation drills in schools are designed to educate students and staff on how to respond to safely exit, assemble and ensure accountability of all occupants. Drills are practiced as if the emergencies were real and occupants should respond accordingly.

The 2015 Virginia Statewide Fire Prevention Code requires educational occupancies to have an approved fire safety and evacuation plan and conduct emergency evacuation drills monthly for all occupants. College and university buildings must have an approved fire safety and emergency evacuation plan and are required to conduct four emergency evacuation drills annually. In addition, they must comply with the following emergency evacuation drill requirements.

- **First emergency evacuation drill.** The first emergency evacuation drill of each school year shall be conducted within 10 days of the beginning of classes.
- **Time of day.** Emergency evacuation drills shall be conducted at different hours of the day or evening, during the changing of classes, when school is at assembly, during recess or gymnastics periods or during other times to avoid
distinction between drills and actual fires. One required drill shall be held during hours after sunset or before sunrise.

- **Assembly points.** Outdoor assembly areas shall be designated and shall be located a safe distance from the building being evacuated so as to avoid interference with fire department operations. The assembly areas shall be arranged to keep each class separate to provide accountability of all individuals.

**Lockdown Plans**
Where facilities develop lockdown plans they shall be approved by the fire code official and include:

- **Initiation** - The plan shall include instructions for reporting an emergency that requires a lockdown.
- **Accountability** - The plan shall include accountability procedures for staff to report the presence of occupants.
- **Recall** - The plan shall include a prearranged signal for returning to normal activity.
- **Communication and coordination** - The plan shall include an approved means of two-way communications between a central location and each secured area.
- **Notification** – the method of notifying building occupants shall be separate and distinct from the fire alarm signal.

The training frequency shall be included in the lockdown plan and the Virginia Department of Criminal Justice Services Center for School and Campus Safety has provided guidance on the initial and subsequent timelines for drill frequency and associated exceptions.

It is important to note that evacuations made necessary by the unplanned activation of a fire alarm system or by any other emergency shall not be substituted for a required evacuation drill, and lockdown drills shall not substitute for any of the fire service and evacuation drills required in the Statewide Fire Prevention Code.

**Planning considerations for safely executing emergency evacuation drill requirements**

If a school opening model reflects an alternative attendance schedule there will be a need to practice more drills to accommodate that schedule to give each student an opportunity to practice and understand the evacuation process and assembly areas.

The following are some suggestions to help drill planning and implementation:

- Review mandated drill requirements.
- Discuss drills and drill requirements during staff meetings.
- Review the purpose of particular drills, and the processes in implementing them.
- Conduct scenarios and table top exercises with staff. Make plans building specific.
- Review roles, reconfigurations of travel routes, and designated assembly areas.
- Build the results of staff discussions into classroom lessons.
• Talk with students about the whys and hows of safety drills.
• Include and involve first responders in conversations and emergency evacuation and lock down planning.

School buildings that are in an operational status have been instructed to follow CDC guidelines for schools. During planning for emergency evacuation drills, hand hygiene and respiratory etiquette can be included. The following are considerations:

• Fire exit door monitors that prevent the constant touching of door hardware that could cause viral transfer from contaminated surfaces.
• Handwashing or using hand sanitizer with no touch dispensers.
• Cleaning and disinfecting surfaces that students and staff may contact in exit routes of travel prior to and after drills.
• Encourage covered coughs during evacuation and while in assembly areas and place trash receptacle at entry for disposal of tissues used to cover sneezes/coughs.
• Ensure use of cloth or other recommended face coverings.
• Use hand held signs to communicate and direct students while wearing face coverings that may interfere with voice projection.
• Ensure there are preferred and alternative means for notifying occupants of a fire or an emergency.

While planning for outside assembly areas with modify layouts that incorporate social distancing, consideration must be given to the following:

• Routes for fire department access.
• Fire hydrant locations.
• Evacuation assistance for those unable to use the general means of egress unassisted.
• Emergency situations that may lead to defend in place.
• Assigning additional staff to assist with evacuation and assembly.
• Determine if available outside space will allow the schools occupancy capacity to properly social distance based on the modified plan.
• Consideration of markers to easily identify acceptable separation for social distancing and accountability.

Fire doors shall be maintained and not prevented from operating as designed during an alarm activation. Considerations for the use of physical barriers that are used to guide or direct students and staff cannot obstruct the width and increase travel distance requirements or reduce the number of required exits in the means of egress.

The use and placement of separation membranes must be carefully considered to ensure that the material used are flame resistant and/or fire retardant. Separation barriers or membranes cannot be placed that will obscure the view of required signage that directs occupants along the means of egress or prevent the function of fire suppression systems such as fire sprinklers or smoke and fire detection systems.
When a school's operational model incorporates an alternate attendance schedule, students at home can still participate in fire safety drills. This can be accomplished through instructional activities that could involve the whole family. Some examples include:

- Home fire safety tips.
- Fire safety tips for dorms.

Questions:

Will schools still be required to conduct emergency evacuation drills with reduced student capacity due to COVID-19? Yes, schools will still be required to conduct emergency evacuation drills and plans should include best practices and CDC guidance regarding COVID-19.

With a split school week that causes half the student population to potentially miss a required monthly emergency evacuation drill, what is the best practice for students to receive the necessary training to ensure students and staff understand the procedures to exit a school safely? Emergency evacuation plans should take into consideration the need to provide all students and staff the opportunity to participate in planned emergency evacuation drills. This may require an increase in the number of drills needed per school year to ensure adequate exposure for the safety of all occupants.

How should schools perform fire drills during exiting while maintaining social distancing? Each school administration will need to discuss the means for accomplishing social distancing during emergency evacuation drills while considering the number of occupants, assessing travel routes in the means of egress based on staff and student population on any given day, and assessing available space to properly social distance at assembly points.

How shall students and staff congregate in the designated outside assemble areas while maintaining social distancing? The school's operation model will determine the space needs at designated assembly areas. The social distance tactic deployed will vary based on available space needed to safely assemble and allow emergency service access. If a real emergency exist be it fire, weather related, environmental, or lockdown, that warrant the immediate safety of students and staff, social distancing considerations should not supersede the safe exit, assembly, or defend in place needed to protect occupants.

Be sure to contact your local fire department for discussion on your emergency evacuation plans or fire code official on questions pertaining to fire prevention code requirements.