Planning and Response to an Active Shooter: An Interagency Security Committee Policy and Best Practices Guide

November 2015
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Message from the Interagency Security Committee Chair

One of the Department of Homeland Security’s (DHS) national priorities is the protection of Federal employees and private citizens who work within and visit U.S. government-owned or leased facilities. The Interagency Security Committee (ISC), chaired by DHS and consisting of 54 Federal departments and agencies, has as its mission the development of security standards and best practices for nonmilitary Federal facilities in the United States.

As Chair of the ISC, I am pleased to introduce the new document titled Planning and Response to an Active Shooter: An Interagency Security Committee Policy and Best Practices Guide (non-FOUO). The For Official Use Only (FOUO) version of this document was initially released to the Federal community only in July 2015. It streamlined existing ISC policy on active shooter incidents into one cohesive policy and guidance document to enhance preparedness for an active shooter incident at Federal facilities. The non-FOUO version is being made publicly available as a reference document for the private sector so that a wider audience may benefit from the information presented herein.

In many cases, active shooter incidents can be unpredictable in nature and can evolve quickly. As such, a number of guidance documents exist on how to prepare for and respond to an active shooter incident. Although previous ISC documents discussed active shooter incidents, such as the Violence in the Federal Workplace: A Guide for Prevention and Response and Occupant Emergency Programs: An Interagency Security Committee Guide, this single cohesive document with greater concentration on active shooter incidents serves as a resource for Federal agencies and departments, and enhances preparedness for an active shooter incident in a Federal facility.

This policy and guidance, approved with full concurrence of the ISC primary members, is a significant milestone and represents exemplary collaboration across the ISC and among the ISC Active Shooter Working Group in developing the first ISC document combining policy and planning guidance. This Policy and Best Practices Guide was approved November 12, 2015 and will be reviewed and updated as needed.

Caitlin Durkovich
Assistant Secretary
Infrastructure Protection
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ISC Policy

**INTENT:**

The policy outlined herein is meant to establish baseline agency/department protocols across the Federal government for active shooter situations. The Interagency Security Committee (ISC), under the authority of Presidential Executive Orders 12977 and 13286, mandates that the following policy be enacted at all nonmilitary Federal facilities. Additionally, wherever possible, it is recommended that Agencies commit to the implementation of the best practices outlined in the subsequent sections of this document: *Planning and Response to an Active Shooter: An Interagency Security Committee Policy and Best Practices Guide.*

**POLICY:**

1) Each facility shall have an active shooter preparedness plan, which is to be updated every two years, as needed. At a minimum, a plan should comprise the following elements:
   a. Security Assessments
   b. Preparedness
   c. Communication
   d. Incident Plan (i.e., actions to take during an incident)
   e. Training and Exercises
   f. Post Incident Recovery
      i. Employees
      ii. Operations

2) As plans are drafted, reviewed, and updated, each facility Designated Official or designee shall collaborate with the facility security provider (e.g. Federal Protective Service [FPS], U.S. Marshals Service [USMS], etc.), on-site law enforcement agencies (if applicable), and first responder agencies likely to address an active shooter situation.

3) Agency representatives shall collaborate with other tenants/agencies in development of the plan.

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1 The policy outlined herein is a requirement of all agencies within the Executive Branch of the Federal government. Although this is not a requirement for agencies of the Legislative and Judiciary Branches, the ISC strongly recommends that agencies within those branches of government also implement this policy.

2 An active shooter is defined as an individual actively engaged in killing or attempting to kill people in a populated area. While the majority of incidents involve the use of firearms, for the purposes of this policy, the term “active shooter” may also apply to an individual armed with any other type of weapon (e.g., firearm, knife, explosives, etc.). Throughout this policy and the subsequent best practices guidance, the ISC will use the term “active shooter” to describe any incident with a perpetrator who poses an active threat.
4) Agency representatives shall provide training, materials, and/or awareness discussions to inform employees of active shooter preparedness plans as they are updated.
   a. Employees should be aware of the Federally-endorsed run, hide, fight\(^3\) concept.
   b. Employees should be informed of the importance of having a personal plan.
   c. New employees should be given active shooter preparedness training during the initial onboarding period.

5) The active shooter plan need not be a stand-alone document. The agency/facility security officials and/or Designated Official will determine the best way to incorporate the active shooter plan into existing protocols.

6) As previously noted, the six points above are policy requirements for all agencies within the Executive Branch of the Federal government. What follows throughout the rest of this document is a set of best practices and recommendations which are not policy requirements—these are meant to assist with the implementation of an active shooter plan as mandated by this policy.

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Executive Summary

The primary mission of the ISC Active Shooter Working Group is to streamline existing ISC documents on active shooter into one cohesive policy and guidance document that agencies housed in Federal facilities can use as a reference to enhance prevention, protection, mitigation, response, and recovery efforts related to an active shooter incident. The goal of the ISC’s Active Shooter Working Group is to promote the highest chance of victim and responder survivability through awareness, prevention, education, and training.

This guidance is designed to be applicable to all buildings and facilities in the United States occupied by Federal employees. These include existing buildings, new construction, or major modernizations; facilities owned, or being purchased, or leased; stand-alone facilities; Federal campuses; where appropriate, individual facilities on Federal campuses; and special-use facilities.

Due to the nature of an active shooter event, this document contains guidance for all who might be involved, including law enforcement agencies, facility tenants, and the public. Certain responsibilities outlined within this document are specific to designated law enforcement officers or personnel possessing the authority and training to take immediate action to contain, apprehend, or neutralize an active threat. Other sections of this document are meant to educate facility tenants regarding actions they can take to save themselves or others.

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4 The FOUO version of this document was initially released to the Federal community in July 2015. It streamlined existing ISC policy on active shooter incidents into one cohesive policy and guidance document to enhance preparedness for an active shooter incident at Federal facilities. The non-FOUO version is being made publicly available as a reference document for the private sector. It is generally outside the scope of the ISC to promulgate policies and/or best practices for the private sector. However, the ISC has released this document so that a wider audience may benefit from the information presented herein. References to Federal facilities have not been removed. The private sector and other non-government entities may interpret this document as appropriate to their specific facility security plans.
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1 Introduction to Planning Guidance

Our Nation’s Federal agencies are entrusted with providing a safe and secure environment for our government’s most essential functions and assets, including the personnel that may occupy their facilities and the public that may pass through conducting business with the Federal government on any given day. Federal facilities are faced with planning for emergencies of all kinds, ranging from active shooters, hostage situations, and other similar security challenges, as well as natural threats to include fires, tornadoes, floods, hurricanes, earthquakes, and pandemics of infectious diseases. Many of these emergencies occur with little to no warning; therefore, it is critical for all facilities to plan in advance to help ensure the safety, security, and general welfare of all facility occupants.

The primary mission of the Interagency Security Committee (ISC) Active Shooter Working Group is to streamline existing ISC policy on active shooter incident planning and response into one cohesive policy and guidance document that agencies housed in Federal facilities can use as a reference to enhance preparedness for an active shooter incident.

The ISC defines Federal facilities as buildings and facilities in the United States occupied by Federal employees for nonmilitary activities. These include existing buildings, new construction, or major modernizations; facilities owned, to be purchased, or leased; stand-alone facilities, Federal campuses, and where appropriate, individual facilities on Federal campuses; and special-use facilities.

This document provides emergency planners, disaster committees, executive leadership, and others involved in emergency operations planning with detailed discussions of unique issues faced in Federal facilities before, during, and after an active shooter event. Occupant Emergency Plans should be living documents that are routinely reviewed and updated to consider all types of hazards, including the possibility of workplace violence, an active shooter, or terrorist incident. As our Nation continues to draw on lessons learned from actual emergencies, Federal facilities should incorporate those lessons learned into existing, or newly created, plans and procedures.

2 Background

The frequency of active shooter incidents has increased in recent years, and these incidents have affected numerous places where citizens congregate, such as schools, workplaces, places of worship, shopping malls, public meetings, and movie theaters. Unfortunately, these events highlight the need to reduce the risk of active shooter incidents while improving preparedness and strengthening ongoing efforts intended to prevent future occurrences.

The ISC defines an active shooter as an individual or individuals actively engaged in killing or attempting to kill people in a populated area. In most cases, firearms are the weapon of choice during active shooter incidents, but any weapon (such as a knife, etc.) can be used to harm innocent individuals. Typically, there is no pattern or method to the selection of victims. Active shooter situations are dynamic and quickly evolve. Often, the immediate deployment of law enforcement is required to stop the aggressive action of a shooter to mitigate harm to potential victims. However, because active shooter situations are also frequently over prior to the arrival
of law enforcement, individuals must be prepared both mentally and physically to deal with an active shooter situation prior to law enforcement arrival.

Agencies continue to evaluate active shooter events in an attempt to generate a profile of an active shooter. There are no hard links to provide an accurate profile of an active shooter. Though there is no profile, there are several possible indicators that can give clues to the possibility of a potential active shooter; see Section 5: Preparedness. Continuous evaluation of these events is necessary and should be aimed at the detection, management, and resolution of an impending crisis in order to effectively exercise early prevention mechanisms. A good basic document is the 2014 Texas State University and Federal Bureau of Investigation’s (FBI) *A Study of Active Shooter Incidents, 2000 - 2013* (see key research findings on page 4).

The ISC Active Shooter Working Group’s primary mission was to develop one cohesive active shooter document that agencies housed in Federal facilities can use as a reference to enhance preparedness for an active shooter incident(s). This document may also be useful to other local jurisdictions across the United States.

National preparedness efforts, including planning, are based on Presidential Policy Directive (PPD) 8: National Preparedness, which was signed by President Obama in March 2011. This directive represents an evolution in our collective understanding of national preparedness based on lessons learned from natural disasters, terrorist acts, active shooter events, and other violent incidents.

PPD-8 characterizes preparedness using five mission areas: prevention, protection, mitigation, response, and recovery. Emergency management officials and emergency responders engaging with Federal facilities are familiar with this terminology. These mission areas generally align with the three temporal frameworks (time frames) associated with an incident: pre-incident, incident, and post-incident environments. Most of the prevention, protection, and mitigation activities generally occur before or are modified after an incident, although these three mission areas are frequently applicable during an incident. For example, injury prevention can and should occur before, during, and after an incident. Response activities occur during an incident, while recovery activities can begin during and after an incident.

Planning teams at Federal facilities responsible for developing and revising occupant emergency plans and procedures should use the concepts and principles of the National Incident Management System (NIMS) to incorporate planning efforts into existing emergency programs and plans that are related to active shooter incidents and other hostile threats. One component of NIMS is the Incident Command System (ICS), which provides a standardized approach for incident management, regardless of cause, size, location, or complexity of the event. By using the ICS during an incident, Federal facilities will be able to work more effectively with the first responders in their communities.6

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Examples of recommended practices and matters to consider have been included in this document for planning and implementation purposes; however, Federal facility emergency managers—with the support of their leadership and in conjunction with local emergency managers and responders—must consider what is most appropriate for that facility and its occupants. Additionally, planning teams should consider Federal, state, and local laws and regulations.

There are various documents, studies, and websites devoted to the awareness of active shooter incidents; reference Section 9: Resources/Templates for a list of resources and links that may be useful in developing or reviewing active shooter plans. These websites are constantly evolving and being updated as lessons are learned. The resources vary in content, ranging from providing an overview of past shooting incidents, findings, a background analysis of the shooter, weaponry used, resolution of events, training, equipment, and best practices. The inclusion of certain references does not imply endorsement of any documents, products, or approaches. Other resources may be equally helpful and should be considered in creating or revising existing plans and procedures.
Figure 1: Key Research Findings\textsuperscript{7, 8}

- 160 Active Shooter incidents occurred between 2000 and 2013.
- An average of 11.4 incidents occurred annually: an average of 6.4 annually in the first seven years of the study and an average of 16.4 annually in the last seven years.
- Shootings occurred in 40 of 50 states and the District of Columbia.
- The 160 incidents resulted in 1,043 casualties: 486 killed and 557 wounded, not including the shooter.
- In incidents, the median number of people killed was two, the median wounded was two.
- Approximately 60 percent of the incidents ended before police arrived.
- 64 (40 percent) of the incidents ended with the shooter committing suicide.
- In 21 incidents (13.1 percent), the incident ended after unarmed citizens safely and successfully restrained the shooter. Of note, 11 of the incidents involved unarmed principals, teachers, other school staff, and students who confronted shooters to end the threat.
- In 45 of the 160 (28.1 percent) incidents, law enforcement had to engage the shooter to end the threat. In 21 of those 45 (46.7 percent) instances, law enforcement suffered casualties with nine killed and 28 wounded.
- In 64 cases where the duration could be ascertained, 44 (69 percent) ended in less than five minutes with 23 ending in two minutes or less.
- In five incidents (3.8 percent) the shooting ended after armed individuals who were not law enforcement personnel exchanged gunfire with the shooters.
- Active shooter incidents occurred most frequently in areas of commerce (46 percent), followed by educational environments (24 percent), and government properties (ten percent).

\begin{itemize}
    
    \item[8] Note: this study examines all active shooter incidents occurring in the United States, not just those at Federal facilities. The FBI identifies the criteria for an active shooter event as “individuals actively engaged in killing or attempting to kill people in populated areas (excluding shootings related to gang or drug violence).” The study contains a full list of the 160 incidents used, including those that occurred at Virginia Tech, Sandy Hook Elementary School, the U.S. Holocaust Memorial Museum, Fort Hood, the Aurora (Colorado) Cinemark Century 16 movie theater, the Sikh Temple of Wisconsin, and the Washington Navy Yard.
\end{itemize}
3 Applicability and Scope

Pursuant to the authority granted to the ISC in Section 5 of Executive Order (EO) 12977, as amended by EO 13286, this ISC guidance is intended to be a reference document to provide agencies with enhanced preparedness for an active shooter incident. The goal of the ISC’s Active Shooter Working Group was to promote the highest chance of victim and responder survivability through awareness, prevention, education, and training.

This guidance was designed to be applicable to all buildings and facilities in the United States occupied by Federal employees. These include existing buildings, new construction, or major modernizations; facilities owned, being purchased, or leased; stand-alone facilities; Federal campuses; where appropriate, individual facilities on Federal campuses; and special-use facilities.

Due to the nature of an active shooter event, this document contains guidance for all who might be involved in an active shooter event, including law enforcement agencies, facility tenants, and the public. Certain responsibilities outlined within this document are specific to designated law enforcement officers or personnel possessing the authority and training to take immediate action to contain, apprehend, or neutralize an active threat, while other sections of this document are meant to educate facility tenants.

4 Incorporating Active Shooter Considerations into the Occupant Emergency Program

A mutually supportive relationship exists between the risk management process, facility security assessments, and the Occupant Emergency Program (OEP). The OEP establishes basic procedures for safeguarding lives and property in and around the facility during emergencies. 41 Code of Federal Regulations (CFR) requires Federal agencies to have an OEP. The OEP should contain the Facility Security Plan (FSP) and the Occupant Emergency Plan (OEP). As mandated by 41 CFR, facility Designated Officials are responsible for establishing, staffing, and training an Occupant Emergency Organization (OEO) which will develop, implement, and maintain the OEP.

Once risks to a facility are accurately assessed, including those posed by an active shooter event, facility security managers and Designated Officials can determine whether countermeasures in place are adequate to mitigate those risks or whether additional countermeasures are required. Procedural, programmatic, and physical security countermeasures resulting from the facility security assessment regarding active shooter events and other emergency situations should be included in the Occupant Emergency Program, Occupant Emergency Plan, and Facility

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10 41 CFR 102-74.230 through 102-74.260

11 As differentiated from the occupant emergency program, an occupant emergency plan is a document describing the actions occupants should take to ensure their safety in a particular emergency situation.
Security Plan. These plans are intended to minimize the risk to personnel, property, and other assets within the facility if an incident occurs inside or immediately surrounding the facility by providing facility-specific response procedures for occupants to follow.\footnote{For more information, see \textit{Occupant Emergency Programs: An Interagency Security Committee Guide, March 2013}. The guide can be accessed at: \url{http://www.dhs.gov/publication/isc-occupant-emergency-programs-guide}.}

Since the September 11, 2001 attacks, various Presidential Directives and Executive Orders have been issued requiring Federal agencies to develop and implement plans, policies, and procedures for dealing with and responding to emergency situations. Agencies can use existing guidance such as OEPs, disaster response plans, and Continuity of Operations (COOP) plans when developing an active shooter or workplace violence prevention program and plan. As with any threat or hazard that is included in an OEP, goals, objectives, and courses of action should be established for an active shooter response plan. These plans should be included in the OEP as an addendum or a functional annex. For example, evacuation will be different during an active shooter incident than it would be for a fire.

Incorporating the concept of facility protection into the site’s OEP can help reduce the likelihood of workplace violence incidents (including active shooter scenarios), increase the effectiveness of response, and limit casualties. Most acts of workplace violence occur as some form of verbal or non-verbal threat, bullying, harassment, or non-fatal physical assault. However, it is important to remember acts of physical workplace violence might start as some form of non-physical assault, so agencies must take all threats seriously and respond appropriately. It is also important to note a threat will not lead to a violent act in the great majority of cases. The threat itself, however, damages workplace safety and must be addressed.

While active shooter events are rare, the random and unpredictable nature of the threat and operating area present a complex challenge to Federal security and law enforcement personnel. Ideally, Federal security and law enforcement will deter and prevent active shooter attacks altogether. Should deterrence and prevention fail, however, occupant knowledge and application of emergency procedures and protective actions will save lives. Therefore, an OEP that delineates procedures to protect life and property in federally occupied space during emergency conditions is an essential tool, both before and during an active shooter incident.

Plans should be created with input from internal and external stakeholders. Internal stakeholders may include leadership, security, facility owners and operators, property managers, the human resources department, risk managers, and the training department. External stakeholders should include local police, emergency medical services (EMS), emergency management, and fire personnel.

An effective active shooter plan will include the following:

- Proactive steps that can be taken by facility tenants to identify individuals who may be on a trajectory to commit a violent act.
- A preferred method for reporting active shooter incidents, including informing all those at the facility or who may be entering the facility.
- How to neutralize the threat and achieve life safety objectives.
• Evacuation, shelter-in-place, hide, and lockdown policies and procedures for individual offices and buildings.
  o Emergency escape procedures and route assignments (e.g., floor plans, safe areas), including where to evacuate and how to evacuate when the primary evacuation routes are unusable.
    ▪ Plans should clearly explain shelter-in-place and lockdown procedures, including the differences between the two.
  o How to select effective “hide” locations.
    ▪ Optimal locations have ballistic protection known as “cover” which include thick walls made of steel, cinder block, or brick and mortar; solid doors with locks; and areas with minimal glass and interior windows. These areas can be stocked with accessible first aid and emergency kits designed for hemorrhage control, communication devices, and telephones and/or duress alarms.
    ▪ Designated “shelter-in-place” locations are often designed for natural hazards (earthquakes, tornadoes, etc.) and may not be ideal for active shooter incidents. Facilities and/or agencies should consider the development of safe rooms when selecting or renewing a leased facility or new construction. See below for a discussion of safe rooms.
  o Personnel involved in such planning should ensure all sheltering sites and evacuation routes are accessible for persons with disabilities.

• Integration with the facility incident commander and the external incident commander.

• Information concerning local area emergency response agencies and hospitals (i.e., name, telephone number, and distance from the location), including internal phone numbers and contacts.

• How operations will be restored.

After the procedures are approved, occupant personnel should become intimately familiar with the OEP and active shooter plan through training and exercises before an emergency strikes. Drills and exercises should occur at least annually but preferably more frequently. For building-specific risk assessments, reference the Risk Management Process for Federal Facilities: An Interagency Security Standard.13

4.1 Challenges

Preparing for and responding to an active shooter incident at Federal facilities poses unique challenges. Prior to finalizing or updating incident plans, the agency/facility officials should expect to confront many potential difficulties. These challenges include but are not limited to:

facility size, facility population, existing security practices, agency mission, child care centers, protection of sensitive and classified information, interaction with the public (e.g., visitor centers, courts, multi-tenant facilities), campus environments, areas of ingress and egress, and mixed-use spaces (e.g., retail shops). It is important to note that each site will pose a unique set of challenges. For this reason, it is important that each facility’s active shooter preparedness plan is tailored to address the particularities posed by the site.

Addressing these challenges requires coordination between facility managers, security personnel, emergency management personnel, employees and Federal, state, and local law enforcement. Agencies housed in Federal facilities can use this ISC guidance document to mitigate and prepare for an active shooter incident and to promote the highest chance of victim and responder survivability through awareness, prevention, and education.

5 Preparedness

A major component of any active shooter program or plan is preparedness. This section focuses on measures that can be taken to reduce the risk of violent behavior; as well as mitigate the impacts of violent behavior should it occur. All workplace violence prevention, including active shooter programs, should meet minimum requirements set forth in Section 19 of the Occupational Safety and Health (OSH) Act of 1970, EO 12196, and the basic program elements under 29 CFR Part 1960.

The 2013 Report on the National Summit on Multiple Casualty Shootings14 identified five non-linear components of mass casualty violence prevention:

- Identifying a person posing a potential threat of violence;
- Notifying the appropriate authorities with this information;
- Evaluating the threat credibility;
- Intervening to prevent the threat; and
- Documenting the intervention and disseminating the information within applicable laws and regulations.

Internal and external partners, programs, and processes can assist with these steps.

No profile exists for an active shooter; however, research indicates there may be signs or indicators. Facility employees should learn the signs of a potentially volatile situation that could develop into an active shooter incident. Each employee should be empowered to proactively seek ways to prevent an incident with internal resources or additional external assistance.

By highlighting pre-attack behaviors displayed by past offenders, researchers have sought to enhance the detection and prevention of tragic events, including active shooter situations. Several agencies within the Federal government continue to explore incidents of targeted violence in an effort to identify these potential “warning signs.” Lessons learned from incidents during the last decade have aided first responders in better understanding how these incidents occur and how to prevent them.

While current studies are underway, past research has proven a valuable resource. For example, in 2002, the FBI published a monograph on workplace violence, including problematic behaviors of concern that may telegraph violent ideations and plans.\(^{15}\) In 2010, the U.S. Secret Service (USSS), U.S. Department of Education, and the FBI collaborated to produce the report *Campus Attacks: Targeted Violence Affecting Institutions of Higher Education*, which examined lethal or attempted lethal attacks at U.S. universities and colleges from 1900 to 2008.\(^{16}\) The report featured several key observations related to pre-attack behaviors, including the following:

- Concerning behaviors were observed by friends, family, associates, professors, or law enforcement in 31 percent of the cases. These behaviors included, but were not limited to, paranoid ideas, delusional statements, changes in personality or performance, disciplinary problems on site, depressed mood, suicidal ideation, non-specific threats of violence, increased isolation, “odd” or “bizarre” behavior, and interest in or acquisition of weapons.

- In only 13 percent of the cases did subjects make verbal and/or written threats to cause harm to the target. These threats were both veiled and explicit and were conveyed directly to the target or to a third party about the target.

- In 19 percent of the cases, stalking or harassing behavior was reported prior to the attack. These behaviors occurred within the context of a current or former romantic relationship and in academic and other non-romantic settings. They took on various forms, including written communications (conventional and electronic), telephone contact, and harassment of the target and/or the target’s friends and/or family. Subjects also followed or visited the target(s) or their families or damaged property belonging to the target(s) or their families prior to the attack.

- In only 10 percent of the cases did the subject engage in physically aggressive acts toward the targets. These behaviors took the form of physical assault, menacing actions with weapons, or repeated physical violence to intimate partners.

Specialized units in the Federal government, such as the FBI’s Behavioral Analysis Unit (BAU), continue to support behaviorally-based operational assessments of persons of concern in a


variety of settings (e.g., schools, workplaces, places of worship, etc.) who appear to be on a trajectory towards violence. A review of current research, threat assessment literature, and active shooting incidents, combined with the extensive case experience of the BAU, suggests that there are observable pre-attack behaviors that, if recognized, could lead to the disruption of a planned attack.\(^\text{17}\) While checklists of various warning signs are often of limited use in isolation, the FBI has identified some behavioral indicators that should prompt further exploration and attention from law enforcement and/or facility security. These behaviors often include:

- development of a personal grievance;
- contextually inappropriate and recent acquisitions of multiple weapons;
- contextually inappropriate and recent escalation in target practice and weapons training;
- contextually inappropriate and recent interest in explosives;
- contextually inappropriate and intense interest or fascination with previous shootings or mass attacks; and
- experience of a significant personal loss (whether real or perceived) in the weeks and/or months leading up to the attack, such as a death, breakup, divorce, or loss of a job.

Few offenders had previous arrests for violent crimes.

The profile of an applicant for a security clearance could contain indicators of possible future psychological or behavioral abnormalities. For this reason, investigators and screeners should be aware of such behavioral patterns revealed during an applicant’s examination. If not of sufficient magnitude for immediate rejection of the clearance, additional examination should focus on the questionable elements that suggest a potential problem. These findings should be recorded and reported to the proper officials.

### 5.1 Reporting Indicators, Warnings, and Incidents of Workplace Violence

Procedures for reporting violent incidents vary according to the type and intensity of violence involved; most Federal workplaces have a variety of reporting options. Depending on the nature of the situation, available resources, and the need for security/law enforcement involvement, the report may be made by or be provided to:

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• the employee’s manager;
• the employee’s colleagues and co-workers;
• in-house security;
• Human Resources or organizations such as Equal Employment Opportunity (EEO), Sexual Assault Response Coordinator, or other Federal equivalent, etc.;
• threat assessment team;
• appropriate agency security (e.g., personnel security, adjudicators, etc.);
• Federal Protective Service (FPS);
• local mental health agencies or crisis intervention organizations; or
• local police departments.

In addition to established reporting procedures, agencies should allow employees who have safety or reprisal concerns to submit anonymous (to the extent possible) reports. Regardless of the specific reporting procedures, maintaining a successful violence prevention and response program requires agencies to investigate all reports and follow up with the appropriate actions where necessary. However, agencies should keep in mind that if there is no complainant, a law enforcement entity may feel there is no crime to investigate.

Accurate and early reporting that allows for a well-timed intervention can be instrumental in resolving issues of workplace incivility and bullying before they have the opportunity to escalate into physical violence. Developing and implementing reporting procedures for workplace interpersonal issues are just as important as establishing procedures for reporting physical violence. Employees who feel they are victims of bullying, verbal or electronic harassment/cyber bullying (e.g., emails, text messages, web pages), psychological violence, emotional abuse, or any type of domestic violence need to report the problem, as these behaviors can have negative impacts on the victim, work environment, and employee productivity. Employees should be encouraged to document the incidents in order to assist with remembering details, dates, and frequency of the incidents.

Early reporting of perceived abuse allows management to quickly address and correct a problem before it becomes more severe. The level of the management chain where an employee reports this type of violence will depend on who is committing the violence. If a direct supervisor is the perpetrator, then the employee needs to move up one or more levels on the management chain to report the violence. Additionally, employees need to be encouraged to report these incidents and be ensured of non-reprisal. It is recommended that a system be created, if not already in place, so that employees have the opportunity to speak to someone (non-affiliated in the reporting chain) who can determine the appropriate measures (e.g., counseling, reporting etc.) and to whom the incident is to be reported.

5.2 Threat Assessment Teams

Research shows that perpetrators of targeted acts of violence engage in both covert and overt behaviors prior to the attacks. Another resource most agencies can use to identify, evaluate, and
address these troubling signs is a multidisciplinary Threat Assessment Team (TAT). The Threat Assessment Team’s objective is to use internal agency specialists (which could include personnel from the internal security office, Office of the Inspector General, Office of the Chief Human Capital Officer, Office of General Counsel, etc.) to prevent violence from occurring. Members are responsible for addressing threats, confronting violent behavior, and assisting in assessing potential for violence. TAT members consider, plan, prepare, share, and, in some cases, move on to action. The TAT serves as a central convening body that ensures that warning signs observed by multiple people are not considered isolated incidents and do not slip through the cracks, as they actually may represent escalating behavior that is a serious concern.

Federal entities should keep in mind, however, the importance of relying on factual information (including observed behavior) and avoid unfair labeling or stereotyping to remain in compliance with civil rights, privacy, and other applicable Federal and state laws. TATs are already an established protocol in most educational settings and have proven quite valuable. TATs were pushed to the forefront of concern following the 2007 shooting at Virginia Polytechnic Institute and State University in Blacksburg, Virginia, where 32 individuals were killed. For smaller facilities who do not have this capability and would like to utilize a TAT, look to the parent agency for support, or the possibility of partnering with other federal agencies who utilize a TAT.

For the purposes of consistency and efficiency, a TAT should be developed and implemented in coordination with applicable Federal policies and practices. A TAT with diverse representation will often operate more efficiently and effectively. Team members may consist of human relations/labor relations personnel, security specialists, supervisors or managers, medical and mental health professionals, general counsel, and employee assistance specialists. In addition, any other individuals or groups within the Federal organization already working to identify staff needs can be a critical source of information on troubling behavior for a TAT.

The TAT reviews disconcerting or threatening behavior of employees, visitors, staff, or other persons brought to their attention. The TAT utilizes a holistic assessment and management strategy that considers the many aspects of the potentially threatening person’s life—familial, work, social, academic, and residential. More than focusing on warning signs or threats alone, the TAT assessment involves a unique overall analysis of changing and relevant behaviors. The TAT takes into consideration, as appropriate, information about behaviors, various kinds of communications, information that has not been substantiated, any threats made, security concerns, family issues, or relationship problems that might involve a troubled individual. The TAT also may identify any potential victims with whom the individual may interact. Once the TAT identifies an individual who may pose a threat, the team will identify a course of action for addressing the situation. The appropriate course of action—whether law enforcement intervention, counseling, or other actions—will depend on the specifics of the situation.

Law enforcement can help assess reported threats or troubling behavior quickly and privately and reach out to available Federal resources as part of the TAT process or separately. The FBI’s behavioral experts in its National Center for the Analysis of Violent Crime (NCAVC) at Quantico, Virginia, are available on a 24/7 basis to join in any threat assessment analysis and

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18 Team members should be cognizant of Health Insurance Portability and Accountability Act (HIPAA) Privacy Rules. Reference Section 9: Resources/Templates for a link to HIPAA information and privacy pocket cards.
develop threat mitigation strategies for persons of concern. The law enforcement member(s) of
the TAT should contact the local FBI office for this behavioral analysis assistance.

Each FBI field office has an NCAVC representative available to work with TATs and coordinate
access to the FBI’s BAU, home to the NCAVC. For non-Federal entities, the FBI supports
requests that are made through local police departments. The analysis focuses not on how to
respond tactically to an active shooter incident but rather on how to prevent one. Early
intervention can prevent a situation from escalating by identifying, assessing, and managing the
threat. The TAT should consult with its agency’s/organization’s administration and develop a
process to seek these additional resources.

TATs or Federal representatives should also work with local law enforcement to gain an
understanding of the threats from outside their agency/organization that may affect the facility so
that, in partnership, appropriate security measures can be established.

5.3 Employee Assistance Program

It is important to properly implement and promote an Employee Assistance Program (EAP). The
effectiveness of any workplace violence program that includes active shooter preparedness is
greatly enhanced in an organization with an active, well-known EAP presence. Agencies with
active programs promote the EAP by issuing periodic statements from top management
endorsing the program and reminding employees of the services offered by the EAP; having
counselors attend staff meetings to familiarize agency employees with the counselors; having
counselors give special briefings and seminars for managers, employees, and union stewards;
and reminding employees that by law, all services provided by the EAP are confidential.

Active and frequent information dissemination is required to adequately support EAPs. EAPs
often provide booklets, pamphlets, and lend libraries of books and videos about such topics as
domestic violence, stress reduction, and dealing with angry customers. Another helpful resource
is *Violence in the Federal Workplace: A Guide for Prevention and Response*. Early
involvement in organizational change is essential. For an agency facing reorganization,
restructuring, or other organizational change that may have a negative effect on employees, for
example, the EAP can help provide individual or group sessions to maintain information flow,
keep feelings under control, prevent potential outbursts, provide constructive outlets for feelings,
and help employees plan for the future.

Much of the employee training described in this section is conducted by EAP staff. For example,
counselors can train employees on topics such as dealing with angry coworkers and customers,
conflict resolution, and communications skills. Since EAP staff understands how important it is
that supervisors (and coworkers) not diagnose an employee’s problem, they are in an excellent
position to explain the delicate balance between identifying problem behavior early on and
labeling an individual as potentially violent. EAP counselors can train supervisors to deal with
problems as soon as they surface.

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19 The guide can be accessed at:
http://www.dhs.gov/sites/default/files/publications/ISC%20Violence%20in%20the%20Federal%20Workplace
%20Guide%20April%202013.pdf
5.4 Law Enforcement and First Responder Coordination

Federal, state, local, tribal, and territorial law enforcement personnel can be an invaluable resource in developing a prevention and preparedness component of an active shooter program. As such, it may be in the best interest of the facility and/or agency to establish a written memorandum of agreement with local law enforcement entities who may respond to an active shooter situation or other emergency. Building strong partnerships with law enforcement, fire personnel, and EMS includes ensuring they also know the location of available public announcement systems, two-way communications systems, security cameras, and alarm controls. Equally important is information on access to utility controls, medical supplies, and law enforcement equipment. Providing this detailed information to first responders allows them to move through a facility rapidly during an emergency, to ensure areas are safe, and to tend to people in need.

6 Training and Exercises

Training and exercises are the best activities to help prepare personnel to react quickly and effectively in emergency situations. When considering training options for establishing awareness and providing appropriate responses to the threat of an active shooter, the Federal agency should conduct a thorough review to identify the best training approach for their facility occupants. This review should assess the specific features of the facility itself along with the needs and capabilities of the personnel occupying the facility.

Following the examination of the target population, a needs assessment should be conducted under the assumption that the risk of an active shooter event is high. Therefore, the assessment should formulate the most favorable actions for all persons likely to be involved, including community resources. Not unlike periodic fire drills, continual awareness campaigns of the active shooter threat can ensure a much higher chance of reacting quickly and surviving an actual situation. The target population should include individuals occupying or visiting the facility on a day-to-day basis, including security personnel, law enforcement officers, and members of the public frequenting the facility. Training participation opportunities should be extended to the external emergency responders likely to support the facility in an active shooter situation.

Each target group has different training needs. For example, members of the general public are less likely to attend formal training and could be exposed to essential information through posters, brochures, or radio and television spot announcements. Employees would benefit from briefings and participation in active shooter drills. On-site law enforcement/armed security, as well as external responders, would benefit from hands-on scenario-based training; knowledge of the facilities’ physical features such as entrances, exits, and construction features; and knowledge of and familiarity with the capabilities of the internal security force.

An active shooter preparedness plan should be the source document used in the development of a training program. If no plan exists, the information gained through the needs analysis would be beneficial in developing a plan.

Once the needs are identified, a survey of existing training programs should be conducted to determine if a suitable training solution already exists. More often than not, training needs can be satisfied by an existing program from a sister agency such as FEMA or through the Federal Law
Enforcement Training Center (FLETC). Other courses are available through private sector and non-governmental entities.

In some situations, the uniqueness of the target population may require the design and development of an entirely new training instrument or the modification of an existing one. This could involve the use of professional or experienced instructional designers if sufficient in-house talent is unavailable.

6.1 Training and Awareness Material

The method of instruction delivery depends on several factors. Instructor-led training is more formal and requires a time commitment from participants for the duration of the course. In some cases, online or web-based instruction is a suitable alternative that can reduce or alleviate scheduling conflicts or travel requirements.

Posters and other visual aids illustrate key learning points and should be situated in prime locations at the facility. These resources remind facility occupants of the objectives of the training program, strengthen their retention of essential information, and ensure occupants are aware of the possibility of an active shooter event.

An active shooter training video, entitled "Run, Hide, Fight" was developed and produced by the Houston Mayor’s Office of Public Safety and Homeland Security and funded by the U.S. Department of Homeland Security (see Section 7: Response for further detail). This six-minute video, endorsed by multiple Federal agencies, dramatizes an active shooter incident in the workplace exemplifying the unpredictability and quick evolution of active shooter situations. Its purpose is to educate the public by demonstrating response actions during such an incident so that they can prepare for an active shooter situation. Active shooter events often appear spontaneous and evolve quickly, therefore preparation is essential. This preparation should include training and planning that maximizes the possibility of survival.

In order for information to be actionable, it must be accessible. For example, visual and/or auditory aids and cues (such as posters, sirens, etc.) are only useful if the audience can see and/or hear them. For those with a hearing or visual disability, the information conveyed through these means may not be accessible. Partnering with local disability entities such as Americans with Disabilities Act (ADA) Centers, governor's disability councils, mayoral task forces, independent living centers, etc., for assistance with tools, methods, resources and protocols can make life saving differences for employees and visitors with a variety of access and functional needs or disabilities.

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6.2 Occupant Self-Help and First Aid

Facility staff may be trained in the basics of hemorrhage control so that care can be initiated as quickly as possible. This training can include basic information on how to improvise a bandage and apply direct wound pressure. Tourniquets have been shown to be lifesaving, but it is unlikely that commercial tourniquets will be immediately available in most circumstances. Training for staff could therefore include when to use a tourniquet, how to improvise a tourniquet, and the correct application.

6.3 Considerations for Medical First Responders (Fire and EMS)

As previously noted, it is highly recommended that facilities coordinate plans with any responding officials, including fire departments and emergency medical services. Medical first responders may already have training in the care of injuries associated with active shooter events. Facilities will need to collaborate with fire personnel and EMS during an active shooter incident. Therefore, in order to ensure facility plans do not conflict with Fire or EMS training and response, it is important that site officials familiarize themselves and their employees with the training and resources available to fire personnel and EMS organizations.

Fire personnel and EMS entities that could respond to an active shooter event should ensure that they have adequate training to provide treatment or accept patients that have received treatment. First responders will likely need additional training on safely moving to waiting ambulances, ensuring a means of ambulance egress, and making transport destination decisions in case of multiple casualties. Whenever possible, these training programs should be developed and practiced in partnership with responding law enforcement agencies.

6.4 Exercises

Most Federal facilities practice evacuation drills for fires and take protective measures for tornadoes, but conduct far fewer preparedness exercises for active shooter incidents. To be prepared for an active shooter incident, facilities should train facility occupants and on-site security staff in what to expect and how to react. After conducting training sessions, it is absolutely essential to reinforce the classroom or on-line instruction with realistic exercises. Exercises should be designed for the needs of the individual agency and conducted in a manner that includes all people normally involved in the mitigation of an active shooter incident. People with disabilities and others with access and functional needs should be included in helping develop all phases of exercises, because they are the subject matter experts regarding their disabilities and needs whose life experiences will add reality to any exercise scenario. Phases of exercises include: concept design/development, testing/designing objectives, execution/conduct, evaluation, alteration and ongoing conduct, and evaluation and alteration of exercise design.

Good planning includes conducting exercises with first responders and facility security teams, including any security or law enforcement officers who are employed in the facility. Valuable partners are one of the most effective and efficient ways to ensure that everyone knows not only
his or her role but also the role of others at the scene. These exercises should include a walkthrough of the facility to allow law enforcement officials to provide input on shelter sites and be familiar with hazardous areas within the facility (e.g., magnetic resonance imaging [MRI] devices and radioactive areas). This will also familiarize first responders with the site, including shelter locations, evacuation routes, and locations where they may find occupants who may be unable to evacuate, such as persons with access or functional needs. The facility should also consider and plan for how to care for the critically injured from the event.

There are many types of exercises, starting with discussion-based exercises such as seminars and tabletop exercises. Activities can graduate to operations-based exercises utilizing personnel and equipment from multiple jurisdictions culminating in a full-scale exercise. Exercises can be designed to involve the entire facility population, to include local responders, or be narrower in scope to address a smaller portion of the facility or population. All drills and exercises should be announced prior to conducting them. Some recommendations for exercise programs include:

- pre-designated assembly points for people who need assistance evacuating;
- verified points of accessible egress;
- internal exercise training program for all employees including volunteers to respond to specific assembly areas;
- established alert and notification procedures;
- pre-determined communications capabilities; and
- identify employees who have current and valid credentials in EMS, law enforcement, or fire services that could assist safety or security officers, if needed.

Several active shooter scenarios should be considered due to the fact that an actual event is unpredictable. Feedback from these exercise sessions will be valuable in determining weaknesses in the plan and improving both plans and training. Exercises should be conducted on a recurring basis to keep the active shooter threat fresh in the minds of the participants, and should include the latest mitigation techniques and any recent changes in the overall plan. Information for the design and conduct of exercises is available from FEMA’s Independent Study (IS) program.21

FEMA Independent Study courses that would be beneficial in exercise planning and conduct:

- IS-120.A: An Introduction to Exercises
- IS-130: Exercise Evaluation and Improvement Planning
- IS-139: Exercise Design

Planning for an OEP exercise may include the following phases: initial planning conference, venue selection, midterm planning conference, advanced ICS workshop, crime scene preservation seminar, final planning conference, controller and evaluator briefing, emergency exercise, controller and evaluator debriefing, recovery and restoration tabletop exercise, and after-action conference and lessons learned follow-up.

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21 The FEMA IS program can be accessed online via: [http://www.training.fema.gov/IS](http://www.training.fema.gov/IS).
7 Response

The facility OEP should include courses of action that will describe how occupants can most effectively respond to an active shooter situation to minimize the loss of life and teach/train on these practices. When an incident occurs, it is important to follow the OEP and any instructions given during an incident; however, often individuals will have to rely on their own judgment to decide which option will best protect lives, including their own. No single response fits all active shooter situations; however, making sure each individual knows his or her response options and empowering them to react decisively will save valuable time. Depicting scenarios and considering response options in advance will assist individuals and groups in quickly selecting their best course of action.

Understandably, this is a sensitive topic. There is no definitive best response during these scenarios, but maintaining a run, hide, fight mindset can increase the odds of surviving. It may be valuable to schedule a time for an open conversation regarding the topic at the facility. Though some individuals may find the conversation uncomfortable, they may also find it reassuring to know that as a whole their organization is thinking about how best to deal with this situation.

Regardless of training or directions given, each employee, visitor, and facility occupant will react and respond based on his or her own instincts. Some people may not be able to leave; others may refuse to leave. Some will find comfort in a group; others will face the challenges alone. It would be difficult or impossible for a facility to inform its occupants of every eventuality. Facilities should help occupants understand there is no perfect response.

Unless otherwise directed by law enforcement or other emergency personnel, the decision to stay or leave is something best determined by the individual. However, Federal facilities can help occupants better prepare, respond, and recover by discussing active shooter considerations and inviting employees to trust that they will make the best decision they can at the time, relying on their individual circumstances. During an active shooter incident, those present will rarely have all of the information they need to make a fully-informed decision about applying the run, hide, fight options.

It is not uncommon for people confronted with a threat to first deny the possible danger rather than respond. A 2005 investigation by the National Institute of Standards and Technology (NIST) into the collapse of the World Trade Center towers on September 11, 2001 found that people close to the floors impacted waited longer to start evacuating than those on unaffected floors. Similarly, during the Virginia Tech shooting, individuals on campus responded to the shooting with varying degrees of urgency. These incidents highlight this delayed response or denial.

When an active shooter event occurs, facility occupants will look for authority figures to provide guidance on what to do. They may not make a distinction between law enforcement officers and other uniformed personnel. In the Federal environment, uniformed personnel may be Federal agents or other security staff or law enforcement officers. These individuals may not be present when a shooting begins. Announcements of the incident may be made via building notification system, facility occupants, or upon hearing weapons fire. Therefore, all employees should receive training in techniques on responding to an active shooter event using the run, hide, fight model. Individuals should remain calm and try to remember the procedures they learned in
training. Agency training should explain/distinguish the procedural differences between “sheltering” for a natural disaster event versus “lockdown” for an active shooter incident.

As the situation develops, occupants need to be trained to know how to use more than one option in the run, hide, fight continuum. Individuals need to decide what action is appropriate based on their locations. The goal in all cases is to survive and protect others, but options will depend on how close individuals are to the shooter. Those present can run away from the shooter, seek a secure place where they can hide and deny the shooter access, or incapacitate the shooter in order to survive and protect others from harm. In many instances, an individual might first need to hide and then run to safety when able. While they should follow the plan and any instructions given by appropriate facility representatives during an incident, they will often have to rely on their own judgment. The mental rehearsal of scenarios and considering response options in advance will assist individuals and groups in quickly selecting their best course of action.

Staff should have an understanding of the response plan and how to lead or direct facility occupants to the nearest evacuation routes (run) and identified secure areas (hide). Train staff to overcome denial and to respond immediately. For example, train staff to recognize the sounds of danger, act, and forcefully communicate the danger and necessary action (e.g., “Gun! Get out!”). In addition, those closest to the public address or other communications system, or who are otherwise able to alert others, should communicate the danger and necessary action. Internal communications with those in the immediate situation is critical. Security officials are encouraged to use any means necessary, including information technology platforms, software, or devices (e.g., computer messaging, mobile phone applications, etc.) to disseminate information to the workforce in a dynamic environment. Repetition in training and preparedness shortens the time it takes to orient, observe, and act. Upon recognizing the danger, staff or others must alert responders as soon as it is safe to do so by contacting 911 with information that is as clear and accurate as possible.

While personal safety is the primary consideration in any emergency, helping others to safety increases the survivability for all potential victims. Rendering aid can be as simple as rallying victims to “Follow me!” or aiding non-ambulatory persons and performing immediate first aid in safer areas.

Response to an incident will involve the facility tenants (including visitors), building security officers (if applicable), and responding law enforcement (internal and/or outside agencies). The site security manager (SSM) or designated official is responsible for ensuring an active shooter response and communication plan is in place. If the SSM agency has armed security or law enforcement, they are also responsible for deploying on-site assets. The SSM should also coordinate with responding outside agencies (both law enforcement and EMS) to maximize effectiveness of any response and minimize confusion and delay.

Remember, during an active shooter incident the natural human reaction is to be startled, feel fear and anxiety, and even experience initial disbelief and denial. Those present can hear noise from alarms, gunfire, explosions, and people shouting and screaming. Training (e.g., table top exercises and drills) provides the means to regain composure, recall at least some of what has been learned, and commit to action. Training to remember the run, hide, fight mantra improves the likelihood of action.
7.1 Run

If it is safe to do so, the first course of action that should be taken is to run. When possible, individuals should exit the building through the safest route and proceed to a designated assembly location(s) or an alternate vetted site. However, given the dynamic nature of an active shooter event, exiting the building and going to an evacuation site via practiced fire drill routes may put individuals at risk or may not be possible. If doing so is not possible or puts individuals at risk, employees may need to run out of the facility or away from the area under attack and move as far away as possible until they are in a safe location. These options should be clearly conveyed to employees during facility active shooter training and/or exercises.

Despite the complexity of this situation, facility occupants and visitors at risk who can evacuate safely should do so. Recent research shows the best method to reduce loss of life in an active shooter incident is for people to immediately evacuate or be evacuated from the area where an active shooter may be located or attempting to enter.22

Staff should be trained to:

- leave personal belongings behind;
- put their hands in the air to signal that they are unarmed to law enforcement responders;
- visualize possible escape routes, including physically accessible routes for occupants, visitors, or staff with disabilities and others with access and functional needs;
- avoid escalators and elevators; and
- take others with them but not stay behind because others refuse to leave.

Call 911 when safe to do so:

Information to provide to law enforcement or dispatchers:

- Location of active shooter(s)
- Location of caller
- Number of shooters, if more than one
- If there is law enforcement on-site (if known)
- Physical description of shooter(s)
- Type and number of weapons used by shooter(s)
- Use or threat of explosives/IEDs
- If shooting is still occurring
- Number of potential victims at the scene

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Because facility occupants may scatter, they should be given directions on who they should contact in order to account for all personnel.

Planners should consider creating a threat annex for the **run, hide, fight** scenario. While developing this annex, at a minimum, consideration should be given to the following questions:

- Have primary and alternative accessible escape routes been identified?
- Have employees rehearsed the use of escape routes?
- Will escape routes provide enough distance, cover, and concealment to provide safety?
- Has a system been developed to account for all personnel when it is safe to do so?

### 7.2 Hide

If running is not a safe option, staff should be trained to hide in as safe a place as possible where the walls might be thicker and have fewer windows. Likewise, for occupants that cannot run, hiding may be the only option.

In addition, occupants should do the following:

- Lock the doors and/or barricade them with heavy furniture, if possible.
- Close and lock windows and close blinds or cover windows.
- Turn off lights.
- Silence all electronic devices.
- Remain silent.
- Look for other avenues of escape.
- Identify ad-hoc weapons.
- When safe to do so, use strategies to silently communicate with first responders, if possible (e.g., in rooms with exterior windows, make signs to silently signal law enforcement and emergency responders to indicate the status of the room’s occupants).
- Hide along the wall closest to the exit but out of view from the hallway (which would allow the best option for ambushing the shooter and for possible escape if the shooter enters or passes by the room).
- Remain in place until given an all clear by identifiable law enforcement.

Consider these additional actions:

- Identify a safe location on each floor before an incident occurs where occupants and visitors may safely barricade themselves during an event.
- Train people in how to lock down an area and secure the unit, including providing a checklist of instructions on the back of doors and by phones.
- Ensure emergency numbers are available at all phone locations.
Consider the following questions if developing a threat annex for the run, hide, fight scenario:

- Have shelter-in-place locations been identified?
- Is there a method to secure the access to these locations?
- Have employees rehearsed the movement to and positioning within these locations?
- How will communications be established with these locations?

### 7.3 Fight

If neither running nor hiding is a safe option, when confronted by the shooter individuals in immediate danger should consider trying to disrupt or incapacitate the shooter by using aggressive force and items in their environment, such as fire extinguishers, chairs, etc. Research shows there is strength in numbers, as indicated in the earlier mentioned study. The potential victims themselves have disrupted 17 of 51 separate active shooter incidents before law enforcement arrived.23

Speaking with staff about confronting a shooter may be daunting and upsetting for some individuals, but great comfort can come from the knowledge that their actions could save lives. To be clear, confronting an active shooter should never be a requirement of any non-law enforcement personnel’s job; how each individual chooses to respond if directly confronted by an active shooter is up to him or her.

Consider the following questions if developing a threat annex for the run, hide, fight scenario:

- Have discussions about when it might be appropriate to defend been addressed?
- Have discussions about available equipment to be used to assist in their defense been addressed?
- Have discussions related to the concepts of superiority of numbers, surprise, speed, and violence of action been addressed?

### 7.4 Run, Hide, Fight for Occupants with Disabilities

Any actions taken during activation of the plan must be as effective for individuals with disabilities as those actions provided for the other occupants of the facility. When developing or making changes to an occupant emergency plan, it is imperative the needs of individuals with disabilities be addressed throughout the process. Applicable laws and regulations include but are not limited to:

- The Americans with Disabilities Act of 1990;

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• The Rehabilitation Act of 1973;
• EO 12196 “Occupational Safety and Health Programs for Federal Employees” 1980; and

As discussed earlier in this section, no one should be forced to stay or leave the premises during an active shooter situation (unless otherwise directed by law enforcement or other emergency personnel). Supervisors are ultimately responsible to ensure that members of their staff or visitors with a disability are properly taken care of during all emergency incidents. Federal managers and supervisors should be trained to:

• ensure those occupants identified as requiring assistance during an evacuation or shelter-in-place (SIP) have a customized plan that includes the assistance required, the name of the person(s) volunteering to assist, accountability protocol, type of equipment required (if any), and the evacuation route from the assigned work space;
• identify any volunteer(s) willing to assist person(s) with disabilities or needing assistance; and
• ensure those occupants under their supervision with self-identified assistance needs can be accounted for during an incident.24

Additionally, notifications should be made in a variety of formats so that they are accessible to those with special needs. Proper planning and execution should consider:

• vibrating alerts for employees who are deaf or hard of hearing;
• employees who are blind;
• alternative notification measures;
• employees whose disabilities go beyond deafness or hard of hearing;
• including people with temporary disabilities;
• visitors;
• people with limited English proficiency;
• sign cards with text and picture based emergency messages/symbols; and
• involving people with disabilities in all planning.

7.5 Interacting with First Responders

Facility occupants should be aware that the first priority for responding law enforcement is to respond to the threat, engage, and neutralize the active shooter as soon as possible; all other actions are secondary. One comprehensive study found that in more than half (57 percent) of

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24 For more information, see Occupant Emergency Programs: An Interagency Security Committee Guide, March 2013.
active shooter incidents where a solo officer arrived on the scene, shooting was still underway when the officer arrived. In 75 percent of those instances, that solo officer had to confront the perpetrator to end the threat. In those cases, the officer was shot one-third of the time.25

Facility standard operating procedures (SOP) should address when transportation resources should be brought to the scene and address maintaining a transportation corridor to assist law enforcement and first responders. There should be guidance on prioritization of patients, use of treatment areas versus CCPs, and what destination hospitals may be used.

Law enforcement, firefighters, and EMS personnel (first responders) coming to a Federal facility because of a 911 call involving gunfire face a daunting task. Though the objectives remain the same—protect and save lives—the threat of an active shooter incident differs from responding to a natural disaster or many other emergencies. Emergency calls can involve actual or future threats of physical violence. Information coming in may be inaccurate and conflicting. This violence might be directed not only in or at the facility and its occupants, but also at nearby buildings off-site.

Active shooter incidents are one of the most dangerous situations facing law enforcement today. If there is active shooting, officers will assemble as a contact team, enter the facility, and proceed directly to the sounds of violence (gunshots, pleas for life, etc.). If no shouts or sounds of violence are heard, a quick and methodical search of the facility will be conducted. Should the gun shots start up, or sounds of violence be heard, the contact team will stop searching and proceed directly to this source. Facility occupants should not be alarmed if officers shout commands and push individuals to the ground for their safety. The first officers to arrive on the scene will not stop to assist with injured personnel. Rescue teams consisting of additional officers and, if authorized by facility/local law enforcement agency SOP, medical personnel will follow the first wave and will enter the facility as soon as possible.

Occupants should be trained to cooperate and not to interfere with the response of FPS or other first responders. The sooner law enforcement is able to discern the threat and react, the more lives can be saved. This is particularly true in an active shooter incident where law enforcement responds to a 911 call of shots fired. Many innocent lives are at risk in concentrated areas. This is why it is critical that facilities work with their local partners (e.g., first responders, emergency managers) to identify, prepare, prevent, and effectively respond to an active shooter incident in a coordinated fashion.

In actual emergencies, timely intelligence is critical. Staff should be trained to contact the police and share with them essential information. Law enforcement encourages all calls, and no one should assume that someone else has called. Video surveillance that is accessible to smartphones and other electronic devices must be shared with responding units as soon as practical.

7.6 Roles and Responsibilities

First and subsequent arriving resources should have clearly defined tasks and roles. This should include basic activation of the active shooter event response and what initial information should be conveyed. Roles and responsibilities should be developed by a multiagency team to ensure interoperability. It should include who is responsible for and when incident command should be established.

7.7 Access and Staging

When and how law enforcement officers (LEO) establish an initial contact team should be clearly defined in any multiagency SOP. In addition, the LEOs should have a basic understanding of the desirable elements of a CCP to include security, proximity to occupants, and routes of egress. The management of active shooter events requires early insertion of medical responders into a potentially hostile environment, a philosophy contrary to that traditionally used. When, how, and under what conditions medical responders should enter the scene should be clearly defined by a multidisciplinary team, integrated into the SOP, and communicated to all. If any ongoing threat exists, law enforcement is responsible for maintaining medical responder safety. LEOs should also be responsible for determining when it is safe to evacuate occupants or if occupants should be managed in the CCP and for placing emphasis on maintaining a safe evacuation route for facility personnel.

Early identification of an active shooter event is critical to establishing an effective response. Federal facility staff engaged in security roles should receive training in agreed upon methods of notification and common terminology.

7.8 Tenant Cooperation with Law Enforcement

Tenants in a facility where an active shooting is taking place should keep the following in mind (as reinforced through training):

(a) Quickly determine what actions to take to protect life: options include run, hide, and fight. Use best judgment based on the specific circumstances of the incident.

(b) When encountering responding LEOs, remain calm and follow any and all instructions from the officers. Officers may shout commands and push individuals to the ground for his/her safety as well as their own.

When law enforcement personnel arrive at the scene, tenants should be aware of the following:

- Follow all official instructions from police;
- Remain calm, think, and resist the urge to panic;
- Immediately raise hands and spread fingers;
- Keep hands visible at all times;
- Put down any items;
• Avoid making sudden or quick movements toward officers;
• Do not point, scream, or yell;
• Do not ask for help from the officers when evacuating;
• Proceed in the direction as advised by the officers; and
• Provide all relevant information to police.

7.9 Communications/Media Messaging

The public affairs officer (PAO) is responsible for developing and releasing information about the incident to the news media, incident personnel, and other agencies and organizations, as appropriate. The public affairs officer at the affected facility should coordinate all external communications with the incident command through the joint information center (JIC). Once a JIC is established, a primary public affairs officer will be designated to coordinate all public information including that from the facility PAO.

Planning for successful crisis communications includes the following:

• Establish working relationships with local media and local law enforcement beforehand;
• Frontload agency websites with mission, key leaders, etc.;
• Have a public affairs plan (funding, backups, resources, etc.);
• To the extent possible, develop standard talking points for senior and crisis leadership to use when engaging the media;
• Get accurate information out early to avoid misinformation due to social media;
• FBI and other local law enforcement will send public affairs specialists, as requested, in an assist role;
• Include PAO in training;
• Establish main news contacts in advance; and
• Have a checklist of necessary and appropriate information to provide.

7.10 The Importance of Effective Communication in a Crisis Environment

Communication during an incident is critical. Once an active shooter event has been identified, the response should be activated using uniform and agreed upon language by responding agencies. Whenever possible, communication should be in plain language. There should be a standardized communications plan to ensure all responding agencies are able to communicate. This should include establishing a common radio frequency where practical and use of common terms to describe actions, locations, roles, etc. Planning for active shooter events should include a predetermined communication plan that should be available to all agencies that may respond to...
an active shooter event. The presence of a communication plan is of particular importance in the
airport environment given the number of local, state, and Federal agencies involved in the daily
operations of that setting. Communication plans should also include early notification of the
health care system and facilities that may be called upon to receive casualties.

Lessons learned from past incidents include the following:

- Always have multiple communications options;
- Use any communication option available;
- Do not rely on others to relay critical information;
- Do not make assumptions of who knows what;
- Do not assume others know what you know;
- Do not assume you know everything you need to know;
- Ensure all standard emergency notification is accessible in alternative formats so that all
  people have situational awareness;
- Establish a knowledgeable liaison with the first responder command post; and
- Communication can be a challenge despite best efforts of trained professionals.

Training to Communicate Effectively

Teaching managers and emergency personnel how to communicate effectively is as critical as
training staff and management in evacuation procedures. Accessible and Section 508 compliant
scenario-based training addressing a wide range of variables is strongly encouraged and should
include communication with facility staff/security and first responders.26

8 Recovery

Once the active shooter has been incapacitated or apprehended and is no longer a threat, and law
enforcement have evacuated the wounded, human resources and/or management should engage
in post-event assessments and activities in coordination with local law enforcement and
emergency personnel, including:

- accounting for all individuals at one or more designated assembly points to determine
  who, if anyone, is missing or potentially injured;
- coordinating with first responders to account for any occupants who were not evacuated;
- determining the best methods for notifying families of individuals affected by the active
  shooter, including notification of any casualties in coordination with law enforcement;

26 For more information on accessibility and Section 508 compliance, please visit the FEMA Office of Disability
Additionally, the Federal website for Section 508 compliance can be accessed at: https://www.section508.gov/.
• assessing the psychological state of individuals at the scene and referring them to health care specialists accordingly;
• employing continuity of operations plans to ensure mission essential functions are carried out; and
• determining a transition plan that includes when to resume normal operations.

It is important to note that once the active shooter is apprehended or incapacitated, the situation and the location will be an active crime scene. Nothing should be touched unless it involves tending to the wounded. Discuss the implications of the facility as a crime scene with local law enforcement officials in advance.

Facility administrators and key personnel should plan for an extended, evolving situation and the mass casualty or internal disaster plan may be activated to manage the continuing situation. This may include altering daily activities in order for law enforcement and first responders to adequately investigate and clear the scene and to rehabilitate the facility to an acceptable level for work activity.

The OEP should identify trained personnel who will provide assistance to victims and their families. This should include establishing an incident response team (including first responders) that is trained to appropriately assess victims. They will provide emergency intervention services and victim assistance beginning immediately after the incident and throughout the recovery efforts. This team will integrate with state and Federal resources when an emergency occurs.

Federal and state laws mandate the care of victims of crimes in certain circumstances. Therefore, substantial resources and processes are already in place to aid victims and their families, most notably through state agencies, the Department of Justice (DOJ), and the FBI’s Office for Victim Assistance. Prior familiarity with these resources—such as existing, dedicated toll-free numbers for victims and their families—will permit officials to immediately provide valuable information to victims, victim families, staff, and others affected by the tragedy.

8.1 Reunification

Where the immediate reunification of loved ones is not possible, providing family members with timely, accurate, and relevant information is paramount. The local or regional mass fatality plan may call for the establishment of a family assistance center (FAC) to help family members locate their loved ones and determine whether or not they are among the casualties. This center should be placed away from media view or exposure and it is recommended the families of the victims be separated from the family of the active shooter. Although the FAC should be away from the incident command, care should be taken to ensure that it is not so far away from the incident site that family members feel excluded.

Having family members wait for long periods of time for information about their loved ones not only adds to their stress and frustration, but can also escalate the emotions of the entire group. Section 8.2: Psychological First Aid describes in more detail how to prepare for and handle victims’ emotional and psychological needs. When families are reunited, it is critical that there are child release processes in place where minors might be involved (e.g., childcare or
discharged patients) to ensure that no child is released to an unauthorized person, even if that person is well-meaning.27

Essential steps to help establish trust and provide family members with a sense of control can be accomplished by identifying a safe location separate from distractions and/or media and the general public, but close enough to allow family members to feel connected in proximity to their children/loved ones; scheduling periodic updates even if no additional information is available; being prepared to speak with family members about what to expect when reunited with their loved ones; and ensuring effective communication with those who have language barriers or need other accommodations, such as sign language interpreters for deaf or hard of hearing family members.

When reunification is not possible because an individual is missing, injured, or killed, how and when this information is provided to families is critical. Before an emergency, the planning team must determine how, when, and by whom loved ones will be informed if their loved one is missing or has been injured or killed, keeping in mind that law enforcement typically takes the lead on death notifications related to criminal activity. This will ensure that families and loved ones receive accurate and timely information in a compassionate way.

While law enforcement and medical examiner procedures must be followed, families should receive accurate information as soon as possible. In cases where an individual has been killed, describe the importance of processing the scene for forensic, investigative purposes and to ensure accurate identification of victims. It is best to avoid making promises that cannot be kept with regard to timing of identification and release of victims’ remains. Training personnel immediately available to talk to loved ones about death and injury can ensure the notification is provided to family members with clarity and compassion. Crisis responders should be on hand to immediately assist family members.

The OEP should include pre-identified points of contact to work with and support family members (e.g., Federal victim assistance personnel counselors, police officers). These points of contact should be connected to families as early in the process as possible, including while an individual is still missing but before any victims have been positively identified. After an incident, it is critical to confirm that each family is getting the support it needs, including over the long term.

The OEP should consider printed and age-appropriate resources to help families recognize and seek help with regard to a variety of reactions that they or their loved ones can experience during and after an emergency. It is critical that families and loved ones are supported as they both grieve their loss and support their surviving family members.

The OEP also should explicitly address how impacted families will be supported if they prefer not to engage with the media. This includes strategies for keeping the media separate from

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27 A useful resource regarding this topic is the Post-Disaster Reunification of Children: A Nationwide Approach, published by FEMA, the American Red Cross, the Department of Health and Human Services, and the National Center for Missing and Exploited Children. It can be accessed at: http://www.fema.gov/media-library-data/1384376663394-ee4f41b4269de14faff40390e4e2f2d3/Post+Disaster+Reunification+of+Children+-+A+Nationwide+Approach.pdf.
families and staff while the emergency is ongoing and support for families that may experience unwanted media attention at their homes.

8.2 Psychological First Aid

An important aspect of recovery is to treat the emotional side effects of violence and stress. Psychological first aid (PFA) is an evidence-informed, modular approach used by mental health and disaster response workers to help individuals of all ages in the immediate aftermath of disaster and terrorism. PFA is designed to reduce the initial distress caused by traumatic events and to foster short- and long-term adaptive functioning and coping.

PFA does not assume that all survivors will develop mental health problems or long-term difficulties in recovery. Instead, it is based on an understanding that disaster survivors and others affected by such events will experience a broad range of early reactions (e.g., physical, psychological, behavioral, spiritual). Some of these reactions may cause enough distress to interfere with adaptive coping, and recovery may be helped by support from compassionate and caring disaster responders.

PFA is designed for delivery by mental health and other disaster response workers who provide early assistance to affected children, families, and adults as part of an organized disaster response effort. These providers may be embedded in a variety of response units, including first responder teams, the incident command structure, primary and emergency health care, incident crisis response teams, faith-based organizations, community emergency response teams, Medical Reserve Corps, the Citizen Corps, the Department of Defense Disaster Mental Health Response teams, and other disaster relief organizations.

Basic objectives of PFA:

- Establish a human connection in a non-intrusive, compassionate manner.
- Enhance immediate and ongoing safety and provide physical and emotional comfort.
- Calm and orient emotionally overwhelmed or distraught survivors.
- Help survivors specifically discuss what their immediate needs and concerns are and gather additional information as appropriate; offer practical assistance and information to help survivors address their immediate needs and concerns.
- Connect survivors as soon as possible to social support networks, including family members, friends, and neighbors.
- Support adaptive coping, acknowledge coping efforts and strengths, and empower survivors; encourage adults, children, and families to take an active role in their recovery.
- Provide information that may help survivors cope effectively with the psychological impact of disasters.
- When appropriate, link the survivor to another member of a disaster response team or to local recovery systems, mental health services, public sector services, and organizations.

  - PFA is designed for delivery in diverse settings. Mental health and other disaster response workers may be called upon to provide PFA in the following:
- General population shelters;
- Shelters for those with disabilities and others with access/functional needs;
- Field hospitals and medical triage areas;
- Acute care facilities (e.g., emergency departments);
- Staging areas or respite centers for first responders or relief workers;
- Emergency operations centers;
- Crisis hotlines or phone banks;
- Mobile dining facilities;
- Disaster assistance service centers;
- Family reception and assistance centers;
- Homes;
- Businesses; and
- Other community settings.28

8.3 Training on Psychological First Aid

PFA training can be provided in person or online. The online version29 is broadly used and is a six-hour interactive course that puts the participant in the role of a provider in a post-disaster scene. This professionally narrated course is for individuals new to disaster responses who want to learn the core goals of PFA, as well as for seasoned practitioners who want a review. It features innovative activities, video demonstrations, and mentor tips from the Nation’s trauma experts and survivors. PFA online also offers a learning community where participants can share experiences using PFA in the field, receive guidance during times of disaster, and obtain additional resources and training.

The Psychological First Aid: Field Operations Guide30 provides information for adults, families, first responders, disaster relief workers, crisis counselors, and volunteers to help survivors immediately in the aftermath of a traumatic event. The guide describes key steps for providing PFA, including how to approach someone in need, how to talk to them, how to help stabilize someone, and how to gather information. Appendices include resources about service delivery sites and settings, provider care, and worksheets and handouts.

28 The content for this section was taken from Psychological First Aid Field Operations Guide, which is available at http://www.nctsn.org/sites/default/files/pfa/english/1-psyfirstaid_final_complete_manual.pdf.
29 For more information, visit http://learn.nctsn.org/.
30 For more information, visit http://www.nctsn.org/content/psychological-first-aid.
Following disasters or emergencies, the PFA Mobile application can assist responders who provide PFA to adults, families, and children. Materials in PFA Mobile are adapted from the *Psychological First Aid: Field Operations Guide (2nd Edition).*

The application allows responders to:

- read summaries of the eight core PFA actions;
- match PFA interventions to specific stress reactions of survivors;
- get mentor tips for applying PFA in the field;
- self-assess to determine their own readiness to conduct PFA; and
- assess and track survivors’ needs to simplify data collection and referrals.

8.4 Managing the Responses to Victims and Families

Victim and family support is a critical component to ensuring a successful overall response to a critical incident. It is important to ensure the response is coordinated through each phase including the immediate response, transition process, and post-crisis support in a way that integrates into the investigative and operational response. There are predictable challenges and practical solutions in mass casualty events. Coordination with local resources is critical to ensure a smooth provision of services throughout the longevity of the case. The quality of the overall operational response to a mass casualty will, in large part, be judged by the response to victims and families, and should be based upon trust, cooperation, and respect shown to victims, families, and eye witnesses. Response planning should always track and adjust to meet the needs of the victim/family and the dynamics of the situation. Some considerations include (but are not limited to):

- information sharing;
- victim identification;
- family response management teams;
- communications plans; and
- resource coordination.

For more information, please see Appendix A: Victim and Family Support Considerations.

9 Resources/Templates

The list below contains links to useful active shooter websites, with a brief description for each:

1. FBI Active Shooter Statistics 2000-2013:
   http://www.fbi.gov/news/stories/2014/september/fbi-releases-study-on-active-shooter-

31 For more information, visit http://www.netsn.org/content/pfa-mobile.
2. FBI Active Shooter public site:
   
   [Link to FBI Active Shooter public site](http://www.fbi.gov/about-us/cirg/active-shooter-and-mass-casualty-incidents)

   
   [Link to FEMA Active Shooter Training](http://training.fema.gov/EMIWeb/IS/courseOverview.aspx?code=IS-907)

4. FEMA Guide for Developing High Quality Emergency Operations Plans for Houses of Worship:
   

5. FEMA Guide for Developing High Quality School Emergency Operations Plan:
   

   

### 9.1 ISC Documents Referencing Active Shooter

   

   
   [Link to ISC Occupant Emergency Programs Guide](http://www.dhs.gov/publication/isc-occupant-emergency-programs-guide)

### 9.2 Other Government Resources

1. Air Force Be Ready Active Shooter:
   
   [Link to Air Force Be Ready Active Shooter](http://www.beready.af.mil/disasters&emergencies/activeshooter.asp)

2. DHS Active Shooter Video:
   
   [Link to DHS Active Shooter Video](http://www.dhs.gov/video/options-consideration-active-shooter-training-video)

3. DHS Active Shooter Preparedness website:
   
   [Link to DHS Active Shooter Preparedness website](http://www.dhs.gov/active-shooter-preparedness)

4. DHS Office for Bombing Prevention counter-IED training courses and information:
   
   [Link to DHS Office for Bombing Prevention counter-IED training courses](http://www.dhs.gov/bombing-prevention-counter-ied-training-courses)

5. DOJ/FBI/NTSB – Mass Fatality Incident Family Assistance Operations: Recommended Strategies for Local and State Agencies:
   

6. DOJ Traumatic Incident Management:
   
   [Link to DOJ Traumatic Incident Management](http://www.justice.gov/jmd/hr/hrorder/chpt7-2.htm)


### 9.3 HIPAA and FERPA Resource Cards for Printing

HIPAA and FERPA reference cards with Privacy Rule information can be found at: http://www.fbi.gov/about-us/cirg/active-shooter-and-mass-casualty-incidents or readers of this document may use the images pasted below to print them directly without the link (see next page).
Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule: A Guide for Law Enforcement

What is the HIPAA Privacy Rule?

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule provides federal privacy protections for individually identifiable health information, called protected health information or PHI, held by most health care providers and health plans and their business associates. The HIPAA Privacy Rule sets out how and with whom PHI may be shared. The Privacy Rule also gives individuals certain rights regarding their health information, such as the rights to access or request corrections to their information.

Who must comply with the HIPAA Privacy Rule?

HIPAA applies to health plans, health care clearinghouses, and those health care providers that conduct certain health care transactions electronically (e.g., billing a health plan). These are known as covered entities. Hospitals, and most clinics, physicians and other health care practitioners are HIPAA covered entities. In addition, HIPAA protects PHI held by business associates, such as billing services and others, hired by covered entities to perform services or functions that involve access to PHI.

Who is not required to comply with the HIPAA Privacy Rule?

Many entities that may have health information are not subject to the HIPAA Privacy Rule, including:

- employers,
- most state and local police or other law enforcement agencies,
- many state agencies like child protective services, and
- most schools and school districts.

While schools and school districts maintain student health records, these records are in most cases protected by the Family Educational Rights and Privacy Act (FERPA) and not HIPAA. HIPAA may apply, however, to patient records at a university hospital or to the health records of non-students at a university health clinic.

Under what circumstances may a HIPAA covered entity disclose PHI to law enforcement?

A HIPAA covered entity may disclose PHI to law enforcement with the individual's signed HIPAA authorization.

A HIPAA covered entity also may disclose PHI to law enforcement without the individual's signed HIPAA authorization in certain incidents, including:

- To report PHI to a law enforcement official reasonably able to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public.
- To report PHI that the covered entity in good faith believes is evidence of a crime that occurred on the premises of the covered entity.
- To alert law enforcement to the death of an individual, when there is a suspicion that death resulted from criminal conduct.
- When responding to an off-site medical emergency, as necessary to alert law enforcement to criminal activity.
- To report PHI to law enforcement when required by law to do so (such as reporting gunshots or stab wounds).

- To comply with a court order or court-ordered warrant, a subpoena or summons issued by a judicial officer, or an administrative request from a law enforcement official (the administrative request must include a written statement that the information requested is relevant and material, specific and limited in scope, and de-identified information cannot be used).

- To respond to a request for PHI for purposes of identifying or locating a suspect, fugitive, material witness or missing person, but the information must be limited to basic demographic and health information about the person.

- To respond to a request for PHI about an adult victim of a crime when the victim agrees (or in limited circumstances if the individual is unable to agree). Child abuse or neglect may be reported, without a parent's agreement, to any law enforcement official authorized by law to receive such reports.

For More Information

This is a summary of the relevant provisions and does not include all requirements that are found in the HIPAA Privacy Rule. For complete information, please visit the U.S. Department of Health and Human Service’s Office for Civil Rights HIPAA web site at http://www.hhs.gov/ocr/privacy.
Family Educational Rights and Privacy Act
A Guide for First Responders and Law Enforcement

What is FERPA?
The Family Educational Rights and Privacy Act (FERPA) is a federal law that protects the privacy of student education records. The law applies to all educational institutions and agencies (termed “schools” below) that receive funds under any U.S. Department of Education program. FERPA gives parents certain rights with respect to their children’s education records. These rights transfer to the student when he or she reaches the age of 18 or attends a postsecondary institution. Students to whom the rights have transferred are “eligible students.”

FERPA protects the rights of parents or eligible students to:
- inspect and review education records;
- seek to amend education records;
- consent to the disclosure of information from education records, except as specified by law.

What information can schools provide to law enforcement?

Generally, schools may disclose personally identifiable information (PII) from students’ education records to outside parties, including local law enforcement, only if the parent or the eligible student has provided prior written consent. “Education records” are defined as those records that are directly related to a student and maintained by a school or a party acting for the school, and include student records such as transcripts, disciplinary records, immunization records, and other similar records.

However, there are exceptions to the definition of “education records.” One of these exceptions is for school “law enforcement unit (LEU) records.” These records are defined as records that are (1) created by a LEU; (2) created for a law enforcement purpose; and (3) maintained by the LEU. These records are not protected under FERPA and can be disclosed according to school policy or as required by law. Education records that are in the possession of the LEU do not lose their status as education records and must continue to be protected under FERPA.

FERPA permits the non-consensual disclosure of PII from “education records” for health and safety emergencies and judicial orders.

Discussed below are some relevant exceptions to FERPA’s general consent rule that permit the non-consensual disclosure of PII from education records to law enforcement agencies:

Schools may non-consensually disclose designated “directory information” to law enforcement agencies.

This is permitted if the school has provided notice to parents and eligible students of PII from student education records that the school has designated as directory information and if the parents and eligible students have not opted out of directory information disclosures. Directory information is information from an education record that would not generally be considered harmful or an invasion of privacy if disclosed and may include items such as name, address, telephone listing, and participation in sports.

Schools may non-consensually disclose PII from education records in connection with a health or safety emergency. When an articulable and significant threat exists—anything from an active shooter to a hazardous weather event to a chemical spill—school officials are permitted to disclose PII from education records to appropriate parties, such as law enforcement, in order to protect the health and safety of students or other individuals. Schools are allowed to share this information only during the period of the emergency, and they have to meet certain recordkeeping requirements.

Schools may non-consensually disclose PII from education records in order to comply with a judicial order or a lawfully issued subpoena. Prior notification to parents and students is generally required, though there are some exceptions for law enforcement subpoenas where the court or issuing agency has ordered that the existence or contents of the subpoena or the information furnished in response to the subpoena not be disclosed.

Questions about FERPA?
Email the U.S. Department of Education’s Family Policy Compliance Office with questions about FERPA at FERPA.Customer@ed.gov. You may also contact your legal counsel for advice.
### 9.4 DHS Active Shooter Pocket Cards for Printing

DHS Active Shooter Pocket Cards information can be found at: [http://www.dhs.gov/publication/active-shooter-pocket-card](http://www.dhs.gov/publication/active-shooter-pocket-card) or readers of this document may use the images pasted below to print them directly without the link (see below).

<table>
<thead>
<tr>
<th>COPING WITH AN ACTIVE SHOOTER SITUATION</th>
<th>PROFILE OF AN ACTIVE SHOOTER</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Be aware of your environment and any possible dangers</td>
<td>An active shooter is an individual actively engaged in killing or attempting to kill people in a confined and populated area, typically through the use of firearms.</td>
</tr>
<tr>
<td>• Take note of the two nearest exits in any facility you visit</td>
<td></td>
</tr>
<tr>
<td>• If you are in an office, stay there and secure the door</td>
<td></td>
</tr>
<tr>
<td>• Attempt to take the active shooter down as a last resort</td>
<td></td>
</tr>
</tbody>
</table>

Contact your building management or human resources department for more information and training on active shooter response in your workplace.

<table>
<thead>
<tr>
<th>CALL 911 WHEN IT IS SAFE TO DO SO</th>
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</thead>
</table>

<table>
<thead>
<tr>
<th>HOW TO RESPOND WHEN AN ACTIVE SHOOTER IS IN YOUR VICINITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Run</td>
</tr>
<tr>
<td>• Have an escape route and plan in mind</td>
</tr>
<tr>
<td>• Leave your belongings behind</td>
</tr>
<tr>
<td>• Keep your hands visible</td>
</tr>
<tr>
<td>2. Hide</td>
</tr>
<tr>
<td>• Hide in an area out of the shooter’s view</td>
</tr>
<tr>
<td>• Block entry to your hiding place and lock the doors</td>
</tr>
<tr>
<td>• Silence your cell phone and/or pager</td>
</tr>
<tr>
<td>3. Fight</td>
</tr>
<tr>
<td>• As a last resort and only when your life is in imminent danger</td>
</tr>
<tr>
<td>• Attempt to incapacitate the shooter</td>
</tr>
<tr>
<td>• Act with physical aggression and throw items at the active shooter</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CALL 911 WHEN IT IS SAFE TO DO SO</th>
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<table>
<thead>
<tr>
<th>HOW TO RESPOND WHEN LAW ENFORCEMENT ARRIVES</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Remain calm and follow instructions</td>
</tr>
<tr>
<td>• Put down any items in your hands (i.e., bags, jackets)</td>
</tr>
<tr>
<td>• Raise hands and spread fingers</td>
</tr>
<tr>
<td>• Keep hands visible at all times</td>
</tr>
<tr>
<td>• Avoid quick movements toward officers such as holding on to them for safety</td>
</tr>
<tr>
<td>• Avoid pointing, screaming or yelling</td>
</tr>
<tr>
<td>• Do not stop to ask officers for help or direction when evacuating</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Location of the active shooter</td>
</tr>
<tr>
<td>• Number of shooters</td>
</tr>
<tr>
<td>• Physical description of shooters</td>
</tr>
<tr>
<td>• Number and type of weapons held by shooters</td>
</tr>
<tr>
<td>• Number of potential victims at the location</td>
</tr>
</tbody>
</table>
9.5 Non-Federal Government Resources

The Federal Government does not officially endorse the organizations below or their products. These materials have been provided here for educational purposes only.

1. Texas State University Advanced Law Enforcement Rapid Response Training: http://www.alerrt.org
3. Tactical Emergency Casualty Care website: http://www.c-tecc.org/
6. Active Response Training: http://www.activeresponsetraining.net/

9.6 Foreign Resources

# List of Abbreviations/Acronyms/Initializations

<table>
<thead>
<tr>
<th>TERM</th>
<th>DEFINITION</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADA</td>
<td>Americans with Disabilities Act</td>
</tr>
<tr>
<td>ALERRT</td>
<td>Advanced Law Enforcement Rapid Response Training</td>
</tr>
<tr>
<td>ASO</td>
<td>Armed Security Officer</td>
</tr>
<tr>
<td>ASTITP</td>
<td>Active Shooter Threat Instructor Training Program</td>
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<tr>
<td>ASTTP</td>
<td>Active Shooter Threat Training Program</td>
</tr>
<tr>
<td>BAU</td>
<td>Behavioral Analysis Unit</td>
</tr>
<tr>
<td>CCP</td>
<td>Casualty Collection Point</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>COOP</td>
<td>Continuity of Operations</td>
</tr>
<tr>
<td>DEA</td>
<td>Drug Enforcement Agency</td>
</tr>
<tr>
<td>DHS</td>
<td>Department of Homeland Security</td>
</tr>
<tr>
<td>DOJ</td>
<td>Department of Justice</td>
</tr>
<tr>
<td>EAP</td>
<td>Employee Assistance Program</td>
</tr>
<tr>
<td>EEO</td>
<td>Equal Employment Opportunity</td>
</tr>
<tr>
<td>EMS</td>
<td>Emergency Medical Services</td>
</tr>
<tr>
<td>EO</td>
<td>Executive Order</td>
</tr>
<tr>
<td>FAC</td>
<td>Family Assistance Center</td>
</tr>
<tr>
<td>FBI</td>
<td>Federal Bureau of Investigation</td>
</tr>
<tr>
<td>FEMA</td>
<td>Federal Emergency Management Agency</td>
</tr>
<tr>
<td>FERPA</td>
<td>Family Educational Rights and Privacy Act</td>
</tr>
<tr>
<td>FLETC</td>
<td>Federal Law Enforcement Training Center</td>
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<tr>
<td>FOUO</td>
<td>For Official Use Only</td>
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<tr>
<td>FPS</td>
<td>Federal Protective Service</td>
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<td>FSP</td>
<td>Facility Security Plan</td>
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<td>HIPAA</td>
<td>Health Insurance Portability and Accountability Act</td>
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<tr>
<td>IARD</td>
<td>Immediate Action Rapid Deployment</td>
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<tr>
<td>ICS</td>
<td>Incident Command System</td>
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<td>IED</td>
<td>Improvised Explosive Device</td>
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<td>IFAK</td>
<td>Individual First Aid Kit</td>
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<td>IRS</td>
<td>Internal Revenue Service</td>
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<td>IS</td>
<td>Independent Study</td>
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<td>ISC</td>
<td>Interagency Security Committee</td>
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<td>JIC</td>
<td>Joint Information Center</td>
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<tr>
<td>LEFRTP</td>
<td>Law Enforcement First Responder Training Program</td>
</tr>
<tr>
<td>Acronym</td>
<td>Description</td>
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<tr>
<td>LEO</td>
<td>Law Enforcement Officer</td>
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<tr>
<td>MRI</td>
<td>Magnetic Resonance Imaging</td>
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<td>NCAVC</td>
<td>National Center for the Analysis of Violent Crime</td>
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<td>NGO</td>
<td>Non-governmental Organization</td>
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<tr>
<td>NIMS</td>
<td>National Incident Management System</td>
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<td>NIST</td>
<td>National Institute of Standards and Technology</td>
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<tr>
<td>OEO</td>
<td>Occupant Emergency Organization</td>
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<td>OEP</td>
<td>Occupant Emergency Program or Plan</td>
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<td>OSH</td>
<td>Occupational Health and Safety</td>
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<tr>
<td>PAO</td>
<td>Public Affairs Officer</td>
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<tr>
<td>PFA</td>
<td>Psychological First Aid</td>
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<tr>
<td>PPD</td>
<td>Presidential Policy Directive</td>
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<tr>
<td>SALT</td>
<td>Sort-Assess-Lifesaving Interventions-Treatment/Transport</td>
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<tr>
<td>SIP</td>
<td>Shelter-In-Place</td>
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<tr>
<td>SOP</td>
<td>Standard Operating Procedure</td>
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<tr>
<td>SSM</td>
<td>Site Security Manager</td>
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<tr>
<td>START</td>
<td>Simple Triage and Rapid Treatment</td>
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<tr>
<td>TAT</td>
<td>Threat Assessment Team</td>
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<tr>
<td>USCG</td>
<td>United States Coast Guard</td>
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<tr>
<td>USMS</td>
<td>United States Marshals Service</td>
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<tr>
<td>USSS</td>
<td>United States Secret Service</td>
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# Glossary of Terms

<table>
<thead>
<tr>
<th>TERM</th>
<th>DEFINITION</th>
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<tr>
<td>Active Shooter/Active Threat</td>
<td>An individual or individuals actively engaged in killing or attempting to kill people in a confined and/or populated area. In most cases, firearms are the weapon of choice during mass casualty incidents but any weapon (such as a knife, etc.) can be utilized to harm innocent individuals and typically there is no pattern or method to the selection of victims.</td>
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<tr>
<td>Contact Team</td>
<td>A group of law enforcement officers who assemble and proceed directly to the sounds of violence with the goal of making contact with the perpetrator(s).</td>
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<td>Designated Officials</td>
<td>Those individuals responsible for a facility’s OEO and OEP. This includes staffing, training, developing, maintaining, and implementation of the OEO and OEP.</td>
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<td>Employee Assistance Program</td>
<td>Federally required program which provides short-term counseling and referral services to employees at no cost.</td>
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<td>Family Assistance Center</td>
<td>An area where families may gather to ascertain information about loved ones after a mass casualty emergency.</td>
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<tr>
<td>Federal Facilities</td>
<td>Government leased and owned facilities in the United States (inclusive of its territories) occupied by Federal employees for nonmilitary activities.</td>
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<tr>
<td>Mitigation</td>
<td>The capabilities necessary to eliminate or reduce the loss of life and property damage by lessening the impact of an event or emergency. Mitigation also means reducing the likelihood that threats and hazards will happen.</td>
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<td>Occupant Emergency Plan</td>
<td>Preparedness documents which cover a spectrum of emergency situations ranging from essential services interruptions, communicated threats, incidents posing a risk of injury or significant property damage, hazardous conditions, and incidents posing an immediate threat to life or property, including active shooter attacks.</td>
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<tr>
<td>Preparedness</td>
<td>PPD-8 characterizes preparedness using five mission areas: Prevention, Protection, Mitigation, Response, and Recovery.</td>
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<tr>
<td>Prevention</td>
<td>The capabilities necessary to avoid, deter, or stop an imminent threat. Prevention is the action agencies take to keep a threatened or actual incident from occurring.</td>
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<tr>
<td>Protection</td>
<td>The capabilities to secure facilities against acts of terrorism and man-made or natural disasters. Protection focuses on ongoing actions that protect employees, visitors, networks, and property from a threat or hazard.</td>
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<tr>
<td>Psychological First Aid</td>
<td>An evidence-informed, modular approach used by mental health and disaster response workers to help individuals of all ages in the immediate aftermath of disaster and terrorism.</td>
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<tr>
<td>Public Affairs Officer</td>
<td>Responsible for developing and releasing information about an incident to the news media, incident personnel, and other agencies and organizations, as appropriate.</td>
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<tr>
<td>Recovery</td>
<td>The capabilities necessary to assist facilities affected by an event or emergency in restoring the work environment as soon as possible.</td>
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<tr>
<td>Response</td>
<td>The capabilities necessary to stabilize an emergency once it has already happened, restore and establish a safe and secure environment, save lives and prevent the destruction of property, and facilitate the transition to recovery.</td>
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<tr>
<td>Threat Assessment Team</td>
<td>Responsible for addressing threats, confronting violent behavior, and assisting in assessing potential for violence.</td>
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</table>
Interagency Security Committee Participants

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Appendix A: Victim and Family Support Considerations

There are several elements of a successful response. They include the right plan, the right people, and the right focus. The first element is ensuring the right people are involved. These responders will manage and coordinate as well as deliver services. Responders should have an understanding of the issues and needs, and the ability to access and apply resources. Appropriate support to victims and families should be provided by experienced front-line providers. Not all law enforcement agencies have internal victim assistance personnel and resources and knowing what community resources and partners are available to assist will help in the absence of a victim assistance program. Having the right plan is also part of a successful response. The victim assistance response should be integrated into incident planning/response, and informed by experience and best practices. It is crucial that the relevant players are integrated into this plan. Develop a plan that can be adapted and scalable based on the incident response. Exercises can serve as a way to modify and improve the response plan. The last element of a successful response is having the right focus. Prioritizing addressing victim needs in a timely, compassionate, and professional manner is key. Remembering why responders do this work is imperative. The focus starts from the top down. It is important to identify a point of contact or a manager to oversee the lead agency’s response and to plan and to coordinate with other partners. A successful response plan has investigative and operational benefits. Victims and families tend to be more cooperative when an agency proactively provides them with support and resources. It also assists with identifying, locating, communicating with additional victim/witnesses. The plan also ensures a continuous flow of information to and from the victims.

While each incident will have unique factors, there are predictable response elements in all incidents. Victims need accurate and timely information and the availability of a support system. Preparation and planning can make the difference in meeting these challenges. The role of law enforcement will intersect with victims/families around certain issues including information collection and provision including briefings, interviews, and investigative updates. Victim identification is another intersection between victims/families and law enforcement. This includes ante mortem data collection and missing person reporting in addition to the development of a victim list. In addition, death notification is a major interaction between the family members and law enforcement, as well as the management of personal effects, both evidentiary and non-evidentiary.

Identifying victims is one of the predictable challenges. The legal definition of a victim tends to be more inclusive than exclusive. An incident can result in injured, missing/deceased, walking wounded, and eyewitnesses who may be identified as victims. Closed populations include a set group of impacted individuals such as an airline manifest. Victim identification and notification is less problematic when there is a closed population of victims. In a closed population, victims are known and can be accounted for. In an open population, there are unknown number of victims, missing persons lists, and identification of whole or fragmented human remains. If a death notification is to be delivered to the next of kin, using an effective model can assist with reducing the stress of the individual notifying the family as well as the next of kin. The victim identification process is likely to be drawn out with open populations and when victim remains are disfigured, severely damaged, or fragmented. Victim populations tend to be diverse, which
necessitates planning for multi-cultural issues, language barriers, foreign citizens, injured victims and other special populations with unique needs.

There are practical solutions for identifying victims. Law enforcement generally has the legal responsibility to identify victims. This process starts at the scene. It is imperative to manage expectations. Carefully describing the importance of processing the scene for forensic, and investigative purposes, and to ensure accurate identification of victims is critical. There may be a need to inform families if the loved ones’ remains are significantly disfigured. Eventually, the number of victim remains will begin to align with the number of families who have not located their loved ones. This has to be addressed, sooner rather than later. “Provisional” notification can be made by telling these families what is known at that point in time about the number of deceased victims, what needs to be done to identify victims, and how long the process is estimated to take. It is best to avoid making promises that cannot be kept with regard to timing of identification and release of victims’ remains. Working collaboratively with the medical examiner to determine the most accurate and efficient victim identification process can be of great value. Ante-mortem interviews with families to collect identifying information should be conducted with a professionally trained victim support person present. When possible, avoid showing photographs to families for identification purposes. Ensure the relevant jurisdictions are clear on who will be doing the death notifications (Medical Examiner vs. Law Enforcement). Death notification should be done in teams (Law Enforcement and victim services provider) using a model. How these issues and death notification are handled has a major impact on families, as well as their relationship to officials and their perception of responding agencies.

Management of victim/family response is another predictable challenge. The National Transportation Safety Board estimates that an average of eight to twelve family members for each missing victim will respond to the incident location or city. Family structures may be very complex and may include parents, step-parents, and estranged family members. There will be family members who are unable to travel to the site but who still deserve information and support. Different victim populations (missing/deceased/hospitalized) may require different resources and services. Victims and families will begin asking about personal belongings. For the families of the deceased these items assume special significance as they are among the last things their loved ones touched and help maintain a physical connection when it is needed most.

There are quite a few practical solutions to manage the victim/family response. A strong, cohesive management team can ensure that the victim response goes smoothly, coordinates and maximizes resources, and keeps senior officials informed. The team should consist of a representative from each responsible agency that is identified prior to an active shooter incident. Victim/Family Assistance Centers have been established in response to many events. FAC models generally are intended to support families of the missing/deceased in the immediate aftermath until all the victims have been recovered and identified. FACs may need to remain open through the period of funerals/burials. Considerations should be made for victims who are unable to travel, such as using phone conference bridges and websites. FBI Victim Specialists are located around the country and may be called upon to personally assist with notifications and other support to out of town family members. The plan should include all types of victims and multiple delivery points. Some victim needs are the same – information, emergency assistance, support – but some needs will be distinctly different (families of deceased vs. families of hospitalized injured). The needs of victims and the responsibilities for addressing these needs evolve along a continuum to include:
• the immediate aftermath;
• identifying victims and providing initial information and support;
• transition to services that help stabilize victims and families; and
• long-term provision of information and support associated with protracted investigations and potential prosecutions.

Other considerations include various victim populations specifically, children, persons with disabilities, elderly, non-English speaking victims. If the shooter killed members of his/her own family, there needs to be a separate process for working with surviving family members. A compassionate and supportive approach may enhance their cooperation.

Communication is another predictable challenge. Communication is the key to an effective response. Communicating with victims, families, responders and service providers is paramount for a successful outcome. A massive number of inbound calls from family, friends, and the public may incapacitate the emergency operations center. Victims have a primary need for information from an official source, as soon as it becomes available, and before the media receives it. There are practical solutions to work through communication issues. First, determine, in advance, one hotline number that will be issued to receive calls from families, friends and the public. Second, identify how the hotline will be staffed. A DOJ-funded, professional crisis call center may be a potential asset for local agencies. Ensure that the command post is coordinating and communicating with the lead victim assistance agency to provide critical victim information to victims and families. Deliver accurate information to families. Avoid speculation. It is acceptable to explain why complete or specific information cannot be provided at a given point in time, especially if it means taking the time necessary to ensure a thorough and accurate identification, autopsy, and criminal investigation. Respect victims’ need to know the truth, even painful facts, and ensure that information is provided in a sensitive and supportive manner. Share victim information as appropriate while protecting victim privacy. The Family Assistance Center is usually the best place to deliver briefings as it provides privacy and support. The FAC ensures families remain at a centralized location. When identifying a media staging area, consider a location some distance from the FAC to avoid unintended interactions between media and families. When transitioning after the incident, ensure a formal structure for ongoing communication with victims and families to relay ongoing investigative findings and other information, as appropriate. To assist with interagency collaboration, Law Enforcement Online is a helpful tool to use when discussing victim issues within your agency or with other law enforcement agencies and responders.

Resource coordination is yet another predictable challenge. Many “helpers” and donations will show up at scenes and places where victims/families gather. Most will not be needed or helpful, especially when families are in acute crisis and having difficulty absorbing information and making decisions. Victim needs are basic. They include information, support, practical assistance, and privacy from media and well-meaning but unhelpful people. During the immediate aftermath of the incident, victims and families are less interested in the criminal charges and prosecutions. Acute distress is a common and normal reaction to sudden, violent trauma and loss but it does not necessitate mental health counseling, especially in the immediate aftermath. Most people cope over time but some will benefit from counseling at a later point.
A successful overall response to a critical incident includes a plan to respond to victims and families of the event. A coordinated response is critical in order to respond to the predictable challenges and practical solutions. Local resources ensure a seamless transition in the aftermath. A community’s response to an active shooter event is largely dependent on the support provided to victims and their family members.