

June 25, 2007

Honorable Nancy Wieben-Stock, Presiding Judge  
Orange County Superior Court C1  
700 Civic Center Drive West  
Santa Ana, CA 92701

RE: Responses to "Orange County School Disaster Plans: A Disaster Waiting to Happen"

Dear Judge Wieben-Stock,

All Orange County School Districts have been requested to respond to the Findings and Recommendations F1 and R1 of the "Orange County School Disaster Plans: A Disaster Waiting to Happen: study conducted by the Orange County Grand Jury.

**Finding and Responses:**

**Finding #1:** The overall quality of the 28 Orange County School Districts and their individual school's emergency preparedness plans are in need of much improvement.

**Response:** Ocean View School District, over the past 18 months has worked hard to upgrade our District and Site Disaster Plans. Although we have come a long way there is always work to be done. Our Plan is updated yearly and as potential disasters are identified, we are quick to include them into our plan. Our efforts were rewarded with a Met Expectations for our District Plan and one of our school plans and Above Expectations on one of our school plans.

However, I would like to take this opportunity to comment on a couple of other aspects of the report.

First and foremost, I believe the report did a disservice to Orange County School Districts by assigning a grade to their plans without supplying the District with even a general matrix on how each plan was scored by the members reviewing plans. Therefore, for our purposes, we feel the findings were very arbitrary and leave us with no indications of where the plans failed so we can work on a plan of action to improve the plans. This is especially true for the Districts that at least Met Expectations to know what the members of the Grand Jury preserved as the areas needing improvement.

We would not expect them to provide us with detail of how and when to do the improvements. If there wasn't some sort of matrix developed prior to the review, used during the review, and distributed back to the Districts, the findings seem to be completely arbitrary.

Secondly, there is always improvement needed as new legislation, new threats, new recommendations, and new language comes out and is needed to be implemented. Development and continuing improvement to District and Site Plans is a major issue and requires a large amount of time. Meeting with City, County and State agencies, working with task forces to develop appropriate responses, trainings, etc. is hard to do if this is something that is down on an employee's priority list. While we are responsible for the safety and well-being of our students, the majority of our time and resources has to be directed towards their education, not on preparing for something that may never come. A balance needs to be maintained and sometimes financial resources force uncomfortable decisions and priorities on a District, their Board of Education and Administration.

**Recommendations and Responses:**

Orange County School Districts should make sure that they and their individual schools have a SEMS equivalent plan, and these should be submitted to the Orange County Department of Education/Superintendent of Schools for review.

**Response:**

The Ocean View School District respectfully disagrees with the recommendation made by the Orange County Grand Jury. First off the statement that Districts and their individual school have a SEMS equivalent plan is not in line with guidelines set down by the Federal Government, Homeland Security and FEMA. School Districts and their sites are to be in compliance with NIMS, the National Incident Management System, and their plans are to reflect management of a disaster accordingly. Admittedly, NIMS was based upon California's SEMS system, but SEMS is superceded by NIMS.

Secondly, Orange County encompasses a vast variety of Districts, settings and needs. Although the major components of a Disaster Plan remain the same, they will vary in the way the District interacts with surrounding communities, and the Operational Area. The same resources are not available for all Districts so the resources each need to have on hand themselves will differ.

Thirdly, to review and rate plans for all Orange County Schools every year without additional funding made available for this initiative, would only detract for the job of the Orange County Department of Education (OCDE), which is to provide assistance to District for the education of children. The programs implemented and supported by OCDE are critical to some of our neediest students including, but not limited to, Special Education, at Risk Students, and those students in the systems, whether correctional or foster, whose only stability is the educational support offered by OCDE.

Currently, OCDE does offer Districts strong support throughout the year in the development, improvement and continuing education in the area of disaster preparedness. I have found that the programs offered by OCDE are very informative and easily accessed by Districts. How a

District uses, or responds to this assistance is an issue of the individual Board of Directors and Administration. With the current financial issues confronting Orange County Schools with declining enrollment and a fairly flat budget projected over the next several years, many Districts will be faced with a major dilemma on exactly how much they can afford to put into Disaster Preparedness, and how they can justify the expense of services, equipment, supplies that may or may not be needed in the face of Union demands on salary increases, technology and other educational programs and tools.

The thought that by having the OCDE review all plans and this will improve the plans is unrealistic. To effectively manage a disaster plan, there has to be a designated person who has this as one of their major priorities in their job. Although Risk Management can be a significant cost savings to a District, it is not always seen as such. It is easier to justify hard cost savings such as on utility costs where you can show hard dollars, that the soft savings achieved by Risk Management with the decrease in liabilities.

It is and should be the responsibility of each school district to review their own District and School Disaster/Safety Plans as mandated by California Education Code Section 32281 and 32288. The Ocean View School District is committed to continue to make safety and disaster planning a priority and to provide the necessary resources as allowed within our financial resources.

Thank you for the opportunity to respond to the recommendations prepared by the 2006-2007 Orange County Grand Jury.

Sincerely,

Edward A. Sussman, Ed.D, Interim Superintendent  
Ocean View School District