

REMINGTON STANDARD OPERATING PROCEDURE (SOP)

Addendum A

Emergency Preparedness Plan – Remington College, Memphis

Introduction

Remington College strives to provide everyone who enters a Remington College Campus, or other building owned or operated by Remington College, whether they are employees, students, or visitors, with a secure and safe environment, and to provide for the efficient and safe evacuation of premises in the event of an emergency. The following Emergency Preparedness Plan is intended to address how this campus will handle emergency situations faced by the campus and for the timely notification of such emergencies.

The Campus will make available the Emergency Preparedness Plan to each new student at New Student Orientation and each new employee will receive the Emergency Preparedness Plan via the Paycom employee portal. Further, copies of this Emergency Preparedness Plan will be available to students and employees during each Emergency Safety Drill and Act of Violence/Active Shooter Discussion.

Types of Emergency Situations

The types of Emergency Situations covered by this Emergency Preparedness Plan and the procedures that will be utilized in the event of one of those Emergency Situations are addressed below. While we can plan and prescribe procedures that should be followed in the event of an Emergency Situation there may be some Emergency Situations that arise that require adjusting the prescribed procedures to better fit the situation. In those situations, the Director of Campus Administration has the leeway to make adjustments to the procedures to best address the Emergency Situation that has arisen.

- 1) Weather-Based Event – These types of events include, but are not limited to, a tornado, a hurricane, a snowstorm, or other severe violent storm. In situations when these types of storms strike without sufficient advance warning, the “*Emergency Situations In Which Evacuation Is Not Safe or Practical (Shelter in Place/Lockdown)*” procedures described below will be followed. In situations when these types of storms strike with sufficient advance warning, the “*Campus Closure for Situation with Sufficient Advance Notice*” procedures described below will be followed.
- 2) Fire and Incendiary-Based Event – These types of events occur when there is a fire on campus and may result from a simple fire or could be caused by a larger event like a wildfire or the uncontrolled combustion of flammable materials located at the campus. In these types of situations, the “*Evacuation Procedures in the Event of an Emergency*” procedures described below will be followed.
- 3) Events that pose a danger to students on or near campus – These types of events are any situation where the Director of Campus Administration makes a determination that there is a danger to students on or near the campus and could range from an act of violence at a building down the street to downed power lines near the campus. In these types of situations, the Director of Campus Administration will implement any of the Emergency

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Procedures described in this Emergency Preparedness Plan that best notify the students, employees, and visitors of the dangerous situation.

- 4) Medical Emergency – These types of situations arise when any student, employee or visitor at the campus/location requires medical attention, and the “*Medical Emergencies*” procedures described below will be followed.
- 5) Cyber Threat – A cyber threat situation occurs whenever there is anything that has the potential to cause serious harm to a computer system. A threat is something that may or may not happen but has the potential to cause serious damage. Please see the Cyber Threat Security section below for more information.
- 6) Physical Threat or Act of Violence – These types of situations include any threat or act of violence, including an unarmed or armed threat to the campus students, employees, or visitors, including, but not limited to, an unarmed individual threatening the campus, an active shooter or active shooter threat, a knife wielding individual, or a bomb threat. In these types of situations, the “*Emergency Situations Involving Physical Threats or Acts of Violence*” procedures described below will typically be followed. There may be circumstances when the procedures described below in “*Emergency Situations Involving Physical Threats or Acts of Violence*” do not properly address a Physical Threat or Act of Violence situation. In these situations, the Director of Campus Administration may choose to implement the procedures described below in the “*Evacuation Procedures in the Event of an Emergency*” or “*Emergency Situations In Which Evacuation Is Not Safe or Practical (Shelter in Place/Lockdown)*” sections.

Regroup Mass Notification System

The Regroup Mass Notification System is the emergency notification system that Remington College uses to notify its students and employees of emergency situations and weather notifications at each of its locations. This system will be used to notify all students and employees of emergency situations and weather events pursuant to the Notification of an Emergency Situation described below.

Employees will be automatically added to the notification system unless they opt out of being added to the system by sending an email notification to Human Resources with a copy to legal@remingtoncollege.edu and their Director of Campus Administration stating that they want to opt-out of the Regroup Notification System. While employees are able to opt out of receiving calls and texts to their personal cell phone, they cannot opt out of receiving communications via Remington communication platforms (i.e., they may still receive a call to their office (work) number if they have one and an email to their work email).

Students must actively opt-in to receive notifications by going to their My Information page on the Remington College Student Portal and checking the “Yes” box next to “Enable SMS Messaging”. If students do not take this action, they will not receive notifications via the Regroup system; therefore, it is imperative that each student sign up to receive SMS messaging in the Remington College Student Portal. Students will be informed of the need to complete this step during New Student Orientation and during Emergency Safety Drills.

Questions about the Regroup Mass Notification System should be directed to the Director of Campus Administration.

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Notification of an Emergency Situation

In the event of an Emergency Situation, the Director of Campus Administration or other official, will **immediately** alert all individuals to the Emergency Situation via the following procedures:

- 1) The Director of Campus Administration or other official will activate the Fire Alarm system, if it is a Fire or Chemical situation and then will call 9-1-1 to notify local law enforcement/emergency personnel of the Emergency Situation. After activating the Fire Alarm system or if it is not a Fire or Chemical situation, the Director of Campus Administration or other official will issue a notification advising all individuals of an emergency situation on campus using the Regroup Mass Notification System advising all individuals to Evacuate; Shelter in Place/Lockdown; or Hide, Flee, or Defend themselves depending on the emergency situation. Should the emergency situation involve a Physical Threat or Act of Violence Emergency Situation, the Regroup message will only be sent via text (SMS) message and email message, do not issue the message via phone call as a recipients location may be compromised if their phone rings. Students and employees should also silence their phones during a Physical Threat or Act of Violence Emergency Situation to avoid the possibility of having their location compromised should they receive a phone call, text message, or other notification that generates a sound.
- 2) In the event that the mass notification system is not operational, the Director of Campus Administration or other official will quickly walk from room to room (or area to area) if safe to do so, and verbally announce the Emergency Situation, advising that everyone immediately Evacuate; Shelter in Place/Lockdown; or Hide, Flee, or Defend themselves depending on the Emergency Situation. If possible, the Director of Campus Administration or other designated official will obtain the assistance of other officials/employees to assist them in making the verbal emergency announcements in order to alert all individuals to the emergency as quickly as possible.
- 3) If appropriate, and if the Campus or location has any type of operational alarm system, the Director of Campus Administration or other official should utilize that system in order to alert individuals to the emergency or need to Evacuate; Shelter in Place/Lockdown; or Hide, Flee, or Defend themselves depending on the Emergency Situation.
- 4) When an employee receives notification of an Emergency Situation, the employee should also provide the notification to any Remington College visitor who is located in the same room as the employee to help ensure all individuals located on campus receive notification of an Emergency Situation as quickly as possible.
- 5) The Director of Campus Administration or other official, if it can be done safely, will then call 9-1-1 immediately in order to obtain appropriate emergency assistance, or otherwise alert emergency and/or law enforcement personnel to the emergency situation.
- 6) The Director of Campus Administration or other official may also lock down the campus if the Director of Campus Administration or other official deems the emergency situation warrants such an action. If that occurs, communication regarding the lock down will be communicated out using the above-described methods.
- 7) Once the Emergency Situation has been resolved, the Director of Campus Administration will then issue a notification advising all students and employees that the Emergency

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Situation has been resolved and normal campus operations will resume utilizing the same method used to originally communicate the existence of the Emergency Situation.

- 8) Once it is safe and practical to do so, and after the building or premises have been evacuated, the Director of Campus Administration or other official will contact the Remington College Legal Department and the Remington College Human Resources Department in order to report the Emergency Situation. Further, an incident report must be completed for each Emergency Situation and sent to legal@remingtoncollege.edu. The incident report is attached to this Policy as Addendum B and must be completely filled in with the applicable information, including but not limited to the date and time of the incident, location of the incident, and a description of the emergency situation.

Campus Closure for Situation with Sufficient Advance Notice

In certain situations, a campus may close for a situation that arises with sufficient advance notice. This will most likely occur when there is a foreseen weather event that will affect the campus/location and there is sufficient time to communicate to the students, employees, and visitors that the campus/location will be closing ahead of the Emergency Situation arising. In these situations, the following procedures should be implemented:

- 1) The Director of Campus Administration or other official will utilize all of the notification procedures set forth in the “*Notification of an Emergency Situation*” section above, and the Director of Campus Administration or other official will notify students, employees, and visitors that the campus will be closing at a specific date and time.
- 2) If foreseeable, the Director of Campus Administration may also include the expected reopening date and time in the communication regarding the campus closing. If not foreseeable, the Director of Campus Administration will communicate that it is not foreseeable when the campus will reopen but that a subsequent notification regarding when the campus will reopen will be sent utilizing the same communication method used to communicate the campus closure.

Evacuation Procedures in the Event of an Emergency

In the event of an Emergency Situation which requires the evacuation of any Remington College building, premises or facility, the following procedures should be implemented:

- 1) If it is safe and practical to do so, the Director of Campus Administration or other official will utilize all of the notification procedures set forth in the “*Notification of an Emergency Situation*” section above, and the Director of Campus Administration or other official will notify students, employees, and visitors that they should “**Evacuate**” the building immediately.
- 2) When appropriate and safe to do so, the Director of Campus Administration or other official will also contact 9-1-1 or otherwise immediately alert emergency personnel to the emergency situation, per the “*Notification of an Emergency Situation*” procedures set forth above.
- 3) When an alarm is sounded, or when emergency personnel or campus officials give instructions to evacuate, all students, employees and visitors should leave the

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building/premises ***immediately***. Students, employees, and visitors should walk quickly to the nearest marked exit and ask others to do the same. In an area where a “marked” exit is not immediately visible, students, employees, and visitors should leave the building via the nearest exterior door. The campus maintains fire evacuation routes posted inside each campus building that will help guide individuals to the nearest exit.

- 4) **Elevators should NOT be used** in the event of an emergency situation, unless emergency personnel give specific instructions to the contrary.
- 5) Once outside the building or off the premises, all students, employees, and visitors should ***immediately MOVE CLEAR of the building, allowing others to exit.*** Once clear of the building all students, employees, and visitors should gather in the main parking lot so that a headcount of students, employees, and visitors can take place. This will also assist in keeping everyone out of the way of emergency vehicles and personnel.
- 6) **NO ONE** should return to the evacuated building for any reason, unless specifically instructed otherwise by emergency personnel, Director of Campus Administration, or other campus official designated by the Director of Campus Administration.
- 7) While evacuating the building, all individuals should be aware of persons with disabilities who may require help evacuating in an emergency situation. Individuals should render assistance in order to aid disabled persons in evacuating ***if it is safe for the individuals to render such assistance.*** In the event that it is not safe to render assistance to a disabled person, individuals should attempt to immediately seek help from emergency personnel and/or campus officials in order to assist the disabled person.
- 8) **IF YOU ARE UNABLE TO EVACUATE** due to disability, obstruction, hazard, or for any other reason, please stay calm, and take steps to protect yourself. In such a situation, you should call 9-1-1 if possible, and tell the emergency dispatcher exactly where you are located or where you will be moving. If it is safe to do so, attempt to alert emergency personnel or others to your presence and to the situation which prevents you from evacuating.

Emergency Situations In Which Evacuation Is Not Safe or Practical (Shelter in Place/Lockdown)

In certain Emergency Situations, it may not be safe or practical to evacuate the building/premises. These situations include but are not limited to the following: a tornado or severe violent storm when such a tornado or storm strikes without sufficient advance warning, or a criminal act taking place on or near the campus/at the premises. In Emergency Situations where it may not be safe or practical to evacuate the building/premises, the following procedures should be implemented:

- 1) If it is safe and practical to do so, the Director of Campus Administration or other official will utilize ***all*** of the notification procedures set forth in the “*Notification of an Emergency Situation*” section above, and the Director of Campus Administration or other official will notify students, employees, and visitors that they should ***“seek shelter” or “lockdown the building”*** (depending on the Emergency Situation), rather than evacuate the building. If practical, the Director of Campus Administration or other official will

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provide specific instructions on locations within the campus where individuals may seek shelter.

- 2) When appropriate and safe to do so, the Director of Campus Administration or other official will contact 9-1-1 or otherwise immediately alert emergency personnel to the emergency situation, per the “*Notification of an Emergency Situation*” procedures set forth above.
- 3) When students, employees and visitors are advised to seek shelter, individuals should proceed to a safe and secure location. Depending on the nature of the emergency, a “safe and secure location” may be the basement of any building that has a basement (in the event of a tornado, for example). Alternatively, and in buildings or locations that do not have a basement, a “safe and secure location” may be an interior room with no windows or exterior doors, or in an interior hallway with no windows. If possible, individuals should vacate the higher floors of any multi-story building. Individuals should kneel, facing the wall and covering their heads in the event of broken windows and/or flying debris.
- 4) When students, employees and visitors are advised to lockdown the building, individuals should attempt to barricade themselves inside of a room or other secure area, if it is safe and practical to do so, until such time as they are advised by emergency personnel or the Director of Campus Administration (or other official) that it is safe to vacate the premises/area. The Director of Campus Administration or other official will also attempt to turn off the HVAC system, if possible and safe to do so.
- 5) Once the emergency situation/impending danger has been resolved, the Director of Campus Administration or other official will notify all occupants of the building that it is safe to vacate and will request all individuals to proceed to the nearest exit and leave the building, if it is safe for the Director of Campus Administration/official to do so. Alternatively, depending on the situation, it may be more appropriate for emergency personnel to advise occupants of the status of the situation. In such situations, emergency personnel will communicate directly with the building occupants, including students, employees, and visitors alike, as to what is required of them by the emergency personnel.

Emergency Situations Involving Physical Threats or Acts of Violence

In emergency situations involving physical threats or acts of violence, it may not be safe or practical to evacuate the building/premises. In such circumstances, the following procedures will be implemented:

- 1) Physical Threats or Acts of Violence Emergency Situations do not have a “one size fits all” solution or approach like a fire or tornado emergency situation. Each individual must be very observant, assess his or her situation and current location, and make a decision as to what to do. Once a decision is made the individual should implement that decision. In a Physical Threat or Act of Violence Emergency Situation, individuals have three options: (i) Hide, if you can find a safe location and lock down/block access to that location if possible (make sure to be very quiet, silence your cell phone; and don’t talk on the phone if at all possible); (ii) Flee, if you can; or (iii) Defend yourself if you must. The recommended course of action is to try to Hide, by finding a safe location and locking it down/blocking access to the location if possible; as this will help local law

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enforcement by not impeding their entry into a building; however, each situation is different, and individuals must evaluate and make a decision as to what to do based on their current circumstances.

- 2) If it is safe and practical to do so, the Director of Campus Administration or other official will utilize all of the notification procedures set forth in the “*Notification of an Emergency Situation*” section above, and the Director of Campus Administration or other official will notify students, employees and visitors that each of them should “Hide, Flee, or Defend themselves”, depending on their assessment of their personal situation.
- 3) When appropriate and once safe to do so, the Director of Campus Administration or other official should also contact 9-1-1 or otherwise immediately alert emergency personnel to the Emergency Situation per the “*Notification of an Emergency Situation*” procedures set forth above.
- 4) The Director of Campus Administration or other official will attempt to turn off the HVAC system, if possible and safe to do so.
- 5) Once the emergency situation/impending danger has been resolved, the Director of Campus Administration or other official will notify all occupants of the building that it is safe to vacate the premises per the “*Notification of an Emergency Situation*” procedures set forth above and should ask that all individuals proceed to the nearest exit and leave the building, if it is safe for the Director of Campus Administration/official to do so. Alternatively, depending on the situation, it may be more appropriate for emergency personnel to advise occupants of the status of the situation. In such situations, emergency personnel will communicate directly with the building occupants, including students, employees, and visitors alike, as to what is required of them by the emergency personnel.

Medical Emergencies

In the event that any medical emergency situation arises, the situation should be immediately reported to the Director of Campus Administration or other campus/location official. When a Medical Emergency arises, the following procedures will be followed:

- 1) Whenever a medical emergency situation arises, immediate action should be taken to obtain assistance from medical personnel (if required) and minimize any additional harm to the injured party. It is of primary importance that any injured party receives all appropriate medical attention as expeditiously as possible.
- 2) The first person at the scene of the emergency is to remain at the site and send someone to call 9-1-1 to request emergency assistance. The person sent to call 9-1-1 should stay on the phone with the operator to explain the nature of the injury and give directions to the location of the injured person.
- 3) Talk calmly to the injured person and assure him or her that help is on the way.
- 4) Have someone stand near the front of the building to guide the emergency personnel to the injured person, if appropriate.

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- 5) If the injured person is an employee, provide him or her with a Workers' Compensation insurance card to take with them to the health care facility where they will be treated for their injuries.
- 6) Immediately inform the Director of Campus Administration of the medical emergency situation.

Emergency Safety Drills and Orientation/Training

The campus will conduct an **Emergency Safety Drill one time per calendar year**, utilizing the procedures set forth in the sections above, consisting of one evacuation or shelter in place/lockdown drill, and ***must*** conduct an **Act of Violence/Active Shooter discussion one time per calendar year**. The safety drill and discussion must be completed by November. As part of the drill and discussion, the campus must have copies of the campus' Emergency Preparedness Plan available for distribution.

- 1) The safety drills may be announced or unannounced, but will follow the "Notification", "Evacuation", and "Shelter in Place/Lockdown" procedures set forth in the preceding sections as if they were an actual emergency situation. The Act of Violence/Active Shooter discussion will be announced to all campus students, faculty, and staff at least 2 weeks prior to the discussion occurring. The Director of Campus Administration will ensure that all employees, students, and visitors vacate the building/premises during an evacuation safety drill by conducting a walk-through of the building prior to concluding the evacuation safety drill.
- 2) During each Emergency Safety Drill, the Regroup Mass Notification System will be used to communicate the Emergency Safety Drill at the time of the drill. The Director of Campus Administration will activate the system and send out the notification using the applicable Emergency Safety Drill template.
- 3) During each Shelter in Place/Lockdown Emergency Safety Drill, the HVAC units at the campus will also be shut off to test the emergency shutoff and the Campus' HVAC maintenance people will be on campus during the drills to verify that the HVAC system has shut down properly and to ensure that the HVAC system restarts properly.
- 4) Prior to and during each Act of Violence/Active Shooter Discussion, the Director of Campus Administration will explain that no drill will take place, but a discussion will be conducted on what to do in the event of an act of violence, active shooter, or active shooter threat.
 - a. During the Act of Violence/Active Shooter Discussion, the Director of Campus Administration should discuss how the Regroup Mass Notification System will be used to communicate in the event of a Physical Threat or Act of Violence Emergency Situation. The Director of Campus Administration should also show the Active Shooter Video located at <https://youtu.be/5VcSwejU2D0>; and should have an open discussion with students, faculty, and staff as to what to do in the event of an act of violence, active shooter, or active shooter threat situation.

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- 5) As part of each Emergency Safety Drill and Act of Violence/Active Shooter Discussion, the Director of Campus Administration will ensure that faculty and staff are provided training on the specific drill/discussion occurring on that day. Specifically, the faculty and staff will receive instruction on at least the following items:
 - a. How an Emergency Notification will be provided to students, employees, and visitors in the event of an Emergency Situation;
 - b. The procedures that will be followed in a given Emergency Situation; and
 - c. The expectations of individual staff and faculty during an Emergency Situation, including providing notice to visitors who are located in the same room as a staff or faculty when an Emergency Situation notification is sent out.

Cyber Threat Security

Remington College recognizes the serious nature of cyber threats and the ever-increasing number and sophistication of these threats. As such Remington College has implemented security protections and recommends employees and students take the steps outlined in this section to protect themselves and Remington College from cyber threats.

Remington College has implemented the following to protect itself from cyber threats. Remington College filters all Internet traffic through a network-based firewall which examines traffic for malware, viruses, and other agents. The datacenter access traffic is regulated by two firewalls for remote access protection and the Remington College Administrative Office has an additional firewall. All Remington College computers are protected by Microsoft antimalware agents and certain other computers and servers are protected by additional antimalware/virus agents.

While Remington College has implemented multiple levels of protection against cyber threats, cyber security also depends on individuals engaging in safe computing practices to prevent cyber threats/attacks from succeeding. As such, Remington College provides monthly emails to both employees and students with information about examples of cyber threats, threat descriptions, actions to take or avoid, and general safe computing practices. Further, Remington College sends out emails to employees when specific threats have been identified by users and/or the IT Department detailing specific actions employees must take. If determined to be necessary, Remington College will also provide additional training on safe computing practices.

Remington College also recommends that students take actions to protect their personal computing resources from cyber threats by purchasing antimalware/virus protection and following safe computing guidelines.

If any employee or student becomes aware of a cyber threat, they should immediately report the threat by emailing the Remington College IT Service Desk at service.desk@remingtoncollege.edu with a description of the cyber threat and any other information the individual believes to be pertinent to the cyber threat. The individual will then receive instruction from the Service Desk on specific actions to take.