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10 Common Mistakes in Your Emergency Action Plan (From NFMT)

By [Sarah Kloepple](#)

At the NFMT 2019 conference in Baltimore, 911 Consulting president and former police commissioner Bo Mitchell walks attendees through the common gaps in your emergency planning and how to fill them.

Bo Mitchell, [911 Consulting](#) founder and president and a retired Connecticut police commissioner, has seen more than 500 emergency action plans from various organizations over the last 17 years he's been consulting. Only *one*, he says, was OSHA-compliant.

That's just 0.2 percent of plans in compliance with OSHA.

At [NFMT 2019](#), the facilities management education and training conference in Baltimore, Mitchell spoke to a crowded conference room about the laws and regulations that apply to your emergency planning and how to fill the common gaps most emergency action plans have.

"You don't get to pick and choose your emergencies," Bo Mitchell says. "The emergencies pick you."

"Often, when I go in and ask for an [emergency action plan](#), I get a disaster business continuity plan with a tornado thrown in, or it's all about data," Mitchell says.

He adds that most emergency action plans he sees:

- Are not called an emergency action plan
- Do not cover all hazards
- Do not include annual training
- Do not cover all employees
- Are not OSHA-compliant

Why Laws and Regulations Matter in Emergency Planning

According to the Department of Justice, the workplace is 18 times more likely to experience violence than a fire.

[Active shooters](#) are obviously a fear on people's minds—from recent tragedies in Parkland, FL, where 17 high school students and teachers were killed; to Annapolis, MD, where five employees of *The Capital Gazette* were killed.

After studying incidents such as these, the FBI has concluded that most last about four to five minutes. Mitchell says that means the police and fire department are not the first responders—you are. "You have a duty of care to keep everyone safe on your premises," he says.

That means your emergency planning should not solely focus on fire and weather.

"You don't get to pick and choose your emergencies," Mitchell says. "The emergencies pick you."

The Supreme Court of the United States has ruled twice that an organization's CEO is the responsible party—civilly, personally and criminally—as far as the planning and enforcement of federal regulations regarding workplace safety. These rulings also cover directors and senior operations personnel.

BUILDINGS Checklist

How to Handle ADA Complaints



Ignoring the situation could set you up for a lawsuit.

Protect yourself. Follow these tips for a compassionate, thorough response that could make all the difference. [Get your checklist here >>](#)

Filling the 10 Common Gaps in Your Emergency Action Plan

Mitchell recalls one of his clients he'd been working with for five years, a CEO of a company located in a high-rise building, who received a letter from OSHA.

It said that the agency had received a complaint about the company's lack of an emergency action plan and [training](#). The letter then asked for a copy of the emergency action plan and training records from the last three years. "We piled everything into a box and sent it to the agency, and we never heard from them again," Mitchell says. He adds it's likely most people could not survive that compliance audit today.

[Related: [The Importance of Scheduling Emergency Drills](#)]

Do you have an emergency action plan? Have you trained your employees? That's what OSHA might ask of you one day. "It's just that simple," Mitchell says.

BUILDINGS Podcast

Better Plans for Emergency Evacuations



[podcast]

Do your occupants know how to evacuate your building during an emergency? Where will they go once they leave?

Mariah Obiedzinski, BUILDINGS' director of content services, chats with editor-in-chief Janelle Penny about what belongs in an evacuation plan. [Listen here >>](#)

To prepare, he recommends referencing [NFPA 1600](#), "the bible" when it comes to writing an emergency action plan. As you do this, Mitchell says to be cognizant of these 10 common gaps:

1. Have an emergency action plan that **covers all hazards**, a list of which can be found in *NFPA 1600*.
2. **Include coverage of special needs persons**, such as people who are pregnant, people temporarily on crutches, contractors or visitors on site who might be unfamiliar with the facility, etc.
3. By law, you need a **head count system**.
4. **Train people hands-on**. On-screen training can supplement, but it can't substitute.

5. Appoint an emergency team that's large enough. One team member for every five employees is the standard.

6. Establish a **chain of command**. If the highest-ranking member isn't there, who's in charge?

7. Set up **sources of communication**. Cell phone signals will likely be down, so don't rely on them. Use two-way radios.

8. By law, you must also have an **evacuation map**.

9. Do not plagiarize another plan, because it might not work for your employees or facility, or it might be out of date.

10. Do not rely on landlords to create an emergency action plan. Mitchell says to remember that you are the first responders, not them.

[Read also: [Emergency Management Planning](#)]

By filling these common gaps in your emergency action plan, it means the brand of your company is protected and liabilities are covered. Most importantly, you're keeping the people in your facility safe and building their awareness of and preparedness for a dangerous, possibly life-threatening situation. And Mitchell says that is a priceless return on investment.

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