# West Liberty University

Emergency Response Manual

Revised July, 2023

Not Public Safety Sensitive

### EMERGENCY RESPONSE MANUAL

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### I. MAJOR EMERGENCY GUIDELINES

### A. Purpose

The basic emergency guidelines outlined in this manual are intended to protect lives and property through effective use of University and campus community resources. Whenever an emergency affecting the campus reaches proportions that cannot be handled by routine measures, the President, or designee, may declare a state of emergency, and these contingency guidelines may be implemented.

This manual addresses two types of emergency situations:

- 1. Large-scale disorder, and
- 2. Large-scale natural/ man-made disaster

Since an emergency may occur suddenly and without warning, these guidelines are designed to be flexible in order to accommodate contingencies of various types or magnitudes.

### B. Scope

These guidelines apply to all personnel, buildings, and grounds owned and operated by West Liberty University including those peripheral areas adjoining the University.

### C. Types of Emergencies

Specific types of emergencies that may be covered by this manual:

- 1. Fire
- 2. Natural disaster
- 3. Hazardous waste spill
- 4. Explosion, downed aircraft (crash) on campus
- 5. Bomb
- 6. Civil disturbance or demonstrations
- 7. Utility failure
- 8. Violent or criminal behavior
- 9. Medical and first aid (epidemic poisoning)
- 10. Psychological crises

### D. Definitions

The President or designee serves as the overall Emergency Director during any major emergency or disaster. The following definitions of an emergency are provided as guidelines to assist building and area coordinators in determining the appropriate response:

- 1. Minor Emergency: Any incident, potential or actual, which will not seriously affect the overall functional capacity of the University. Report these immediately to Campus Police by calling 911.
- 2. Major Emergency: Any incident, potential or actual, which affects an entire building or buildings and which disrupt the overall operations of the University. Outside

emergency services probably will be required, as well as major efforts from campus support services. Major policy decisions usually will be required from the administration during times of crisis. Report such emergencies to Campus Police, by calling 911.

3. Disaster: Any event or occurrence, which has taken place and has seriously impaired or halted University operations. In some cases mass personnel casualties and severe property damage may be sustained. A coordinated effort of all campus wide resources is required to control the situation effectively. Outside emergency services will be essential. In all cases of disaster, an Emergency Command Post (see III, below) will be activated, and the appropriate support and operational plans will be executed. In addition, any incident which has the potential for adverse publicity concerning campus resources, and/or officials of the University should be promptly reported to the Campus Police by calling 911.

### E. Assumptions

This manual is predicated on a realistic approach to the problems likely to be encountered on campus during a major emergency or disaster. Hence, the following general guidelines are presumed:

- 1. An emergency or a disaster may occur at any time of the day or night, weekend or holiday, with little or no warning.
- 2. The succession of events in an emergency is not predictable, hence, published support and operations plans will serve only as checklists. They may require field modification in order to meet the requirements of the situation.
- 3. Disasters may affect residents in areas surrounding the University; therefore city, county, and federal emergency services may not be available immediately to address problems on campus. A delay in off-campus emergency services may be expected (up to 48 72 hours).
- 4. Throughout the manual specific offices and/or positions within the university are listed as responsible parties or part of the emergency response. In the event a lead/chief/senior officer is listed for the department, a designee may replace the lead/chief/senior officer in their absence or at their direction.

### F. Declaration of State of Emergency

The authority to declare a campus state of emergency rests with the President or designee as follows:

During the period of any campus major emergency (including disasters), the Campus Police department shall place into effect the procedures necessary to address the emergency, safeguard persons and property, and maintain educational facilities. Campus Police shall consult with the President or designee regarding the nature of the emergency and the propriety of declaring state of emergency.

If such declaration is made, only registered students, faculty, staff, and essential contractors shall be authorized to be on campus. Unauthorized persons will be asked to leave. Any who refuse to

leave will be deemed trespassers and treated as such by Campus Police and other law enforcement personnel. Only those faculty and staff who have emergency response duties will be allowed to enter the immediate emergency or disaster area. In the event of earthquakes, aftershocks, fires, storms, or other major disasters occurring on or about the campus, Campus Police officers and Facilities Management personnel will be dispatched to determine the extent of any damage to University property.

### II. DIRECTION AND COORDINATION

### A. Emergency Director

All emergency operations shall be directed by the President or designee and the Emergency Coordinator. In the absence of the President, an on-duty Campus Police officer shall assume operational control of the emergency until relieved and shall consult with whichever senior administrator is available.

Board of Governors Policy 27 – Order of Responsibility

- 1. President
- 2. Chief Academic Officer
- 3. Senior Student Affairs Officer
- 4. Chief Financial Officer

### B. Emergency Coordinator

The direct operational control of efforts to address a major emergency or disaster shall be the sole responsibility of the Emergency Coordinator or designee.

### III. EMERGENCY COMMAND POST

When a major emergency (or disaster) occurs or is imminent, it shall be the responsibility of Campus Police to set up and staff an Emergency Command Post. The regular department facilities in the Myers Maintenance building are also to be kept fully operational. Alternate locations for Command Post will include Myers Maintenance building, IT Offices in Main Hall, and the Ohio County Sheriff's Department satellite office on campus located in the Annex Building.

### A. Field Emergency Command Post

If the emergency involves only one building or a small part of the campus, a Campus Police vehicle is to be placed as near the emergency scene as is reasonably possible. At least one Critical Incident Response Team member is to staff the command post at all times. A small office with a desk, chairs, and a telephone may also be required near the scene.

Field Emergency Command Post equipment shall include:

- 5. Barricades, barrier tape, and signs.
- 6. Portable hand radios and cell phone.
- 7. Portable public address system.
- 8. First aid kit.

- 9. Campus telephone directory and local telephone directory including yellow pages.
- 10. Laptop computer for text alert, accessing social media, etc.

### B. General Emergency Command Post

If the emergency involves a large part of the campus, the Campus Police department office shall serve as the Command Post.

At least one Critical Incident Response Team member is to staff the Command Post at all times. A marshalling area for outside and local agency assistance shall be established by Campus Police for operations of the combined on-site emergency crews, i.e. an area that can accommodate multiple telephone, fax, and other electrical devices. Each Command Post location and alternate location will be equipped with an emergency box containing the following:

- Camera System access information
- Swipe Cards with Grand Master access for campus
- Set of Master Keys for all of campus
- Building diagrams, floor plans or blueprints for all facilities
- WLU Emergency Response Plan
- Ohio County Emergency Response Plan
- Campus Map (detailed version)
- Current Enrollment List (updated each semester)
- Emergency Phone Numbers
  - WLU Cabinet Members
  - o CIRT Team Members
  - Police Officers
  - Housing & Residence Life Professional Staff

### IV. CRITICAL INCIDENT RESPONSE TEAM

In addition to establishing an Emergency Command Post as necessary, Campus Police shall immediately begin contacting members of the Critical Incident Response Team (CIRT):

Emergency Director: President or designee

Emergency Coordinator: CIRT Chairperson or designee

Damage Control: Director of Physical Plant or designee Campus Police Department: Chief or Lead officer or designee

Student Services: Senior Student Affairs Officer or designee

Residence Life Operations: Chief Housing Officer or designee

Health Service: Director of Student Health Services or designee

Campus Safety Office: Chief Safety Officer or designee Public Information: Chief Media Relations Liaison

CIRT members should have the capability to be in constant communication with each other and with the Emergency Command Post. CIRT responsibilities are:

### A. Emergency Director: President or designee

- 1. Directs comprehensive response to the emergency.
- 2. Works with Campus Police and others in assessing the emergency and preparing the University's response.
- 3. Declares and ends, when appropriate, a state of emergency.
- 4. Notifies and conducts liaison activities with the administration, governmental agencies, media outlets, et al.

### B. Emergency Coordinator: Critical Incident Response Team Chairperson

- 1. Coordinates a comprehensive response to the emergency.
- 2. Maintains Emergency Command Post in a state of constant readiness, or designates to Critical Incident Response Team member.
- 3. Determines the type and magnitude of the emergency.
- 4. Initiates contact with the President and senior administration and begins assessment of the campus's condition.
- 5. Notifies and utilizes police and, if necessary, student aides in order to maintain safety and order.
- 6. Notifies the members of the CIRT and advises them of the nature of the emergency.
- 7. Notifies and conducts liaison activities with an appropriate outside organization such as fire, police, Office of Emergency Services, etc.
- 8. Ensures that appropriate notification is made to off-campus staff when necessary.
- 9. Oversees the preparation of a report to the President summarizing the management of the emergency.

### C. Damage Control: Director of Physical Plant

- 1. Provides equipment and personnel to perform shutdown procedures, hazardous area control, barricade set-up, damage assessment, debris clearance, emergency repairs and equipment protection.
- 2. Provides vehicles, equipment, and operators for moving personnel and supplies and assigns vehicles, if needed, to the CIRT.
- 3. Obtains the assistance of utility companies as needed.
- 4. Furnishes emergency power and lighting systems.
- 5. Surveys habitable space in case essential services must be relocated.
- 6. Provides for storage of vital records at an alternate site; coordinates with building and area coordinators for liaison and support.

### D. Campus Police Department: Chief or Lead police officer

- 1. Notifies senior administrators of emergencies.
- 2. Monitors campus emergency warning and evacuation systems
- 3. Takes steps necessary to protect life and property and to safeguard vital records (summoning external law enforcement, EMS, and fire protection personnel if needed).
- 4. Obtains assistance from the city, county, and federal government for radio monitoring and first aid as required.

- 5. Provides traffic control, access control, perimeter and internal security patrols, and fire prevention services as needed.
- 6. Provides and equips an alternate site for the Emergency Command Post if the Campus Police office in Shaw Hall is not habitable.
- 7. Maintains liaison with the Director of Physical Plant or designee for telecommunications support.

### E. Senior Student Affairs Officer

- 1. Coordinates messaging to students using TopperNet, email, etc.
- 2. Coordinates needed services through the Division of Enrollment & Student Services.
- 3. Serves as liaison to the Emergency Director and Emergency Coordinator for the Division of Enrollment & Student Services.

### F. Residence Life Operations: Executive Director Housing and Student Life

- 1. Maintains emergency operations for the residence halls.
- 2. Coordinates efforts of Housing & Student Life staff
- 3. Maintains contact with Food Service and Custodial Services operations.
- 4. Maintains liaison with Director of Physical Plant.
- 5. Maintains contact with student support services (i.e. Health Service, Counseling, Campus Ministries, etc.)

### G. Health Service: Director of Student Health Services

- 1. Maintains contact with Emergency Coordinator.
- 2. Identifies need for external health services.

### H. Campus Safety Office: Chief Safety Officer

- 1. Maintains contact with Director of Physical Plant.
- 2. Maintains contact with Director of Student Health Services.
- 3. Works with Campus Police and State Fire Marshal.

### I. Public Information: Chief Media Relations Liaison

- 1. Establishes liaison with the news media for dissemination of information as directed by the President.
- 2. Establishes liaison with local radio and TV services for public announcements.
- 3. Arranges for photographic and audiovisual services.
- 4. Advises the President or designee of all news reports concerning the extent of the emergency.
- 5. Prepares news releases for approval and releases same to media.
- 6. Compiles an "after action" report as provided in Administrative Procedure 18.
- 7. Updates the Administrative Procedure 18, Media Coordination in Emergency Situations.

### V. RESPONSIBILITIES

### A. President

The President or designee serves as Emergency Director.

### B. Administrators, Deans, and Department Heads

Every administrator, dean, and department head may appoint a specific person as Building/Facility Coordinator for activities under their control. Such persons may have the following general responsibilities prior to and during any emergency:

### 1. Emergency Preparedness

- a. Building evacuation information may be distributed to all employees with follow-up discussions and on-the-job training or explanation.
- b. Time may be allowed for training employees in emergency techniques such as fire extinguisher usage, first aid, CPR, and building evacuation procedures.

### 2. Emergency Situations

- a. Inform all employees under their direction of the emergency condition.
- b. Evaluate impact the emergency has on their activity and take appropriate action. This may include ceasing operations and initiating building evacuation.
- c. Maintain emergency telephone communications with CIRT from their own locations (or from an alternate site if necessary).

### C. Faculty and Supervisors

Each faculty member and staff supervisor may have the responsibility to:

- 1. Inform students and/or employees concerning emergency procedures, e.g. evacuation procedures for their building and/or activity.
- 2. Survey and evaluate their assigned building facility or activity and determine the impact an emergency may have on their facility. Report all safety hazards to the Director of Physical Plant. Submit work orders to reduce hazards and to minimize the risk of accidents.
- 3. Important: Advise all students, staff, and faculty to follow building evacuation procedures, e.g. reporting to a designated campus assembly area outside the building where a head count can be taken.

### VI. UNIVERSITY NOTIFICATION SYSTEM

The telephone is the primary means of emergency notification, i.e. for timely dissemination of information regarding an emergency.

### A. Campus Police Officer On-Duty:

The Campus Police department is the focal point for transmission of official emergency telephone communication to and from administrators. Each administrator, upon receiving notification of a campus emergency, is to pass the same information along to those departments/offices under their direction. The officer on duty will notify the Critical Incident Response Team chairperson. The CIRT Chairperson will initiate the notification system by calling the President and CIRT members.

Important: During an emergency, use of campus phones must be limited to emergency response matters. In the absence of phone services, the Campus Police may provide runners for emergency notification (contingent on available personnel).

### VII. ON/OFF CAMPUS SOURCES OF ASSISTANCE DURING EMERGENCIES

### A. On Campus Assistance

- 1. Campus Police may be reached at (304)336-8021 or 911 in an emergency. Uniformed Campus Police officers are on duty 24 hours a day. Campus Police has three direct cell phone numbers, one for each shift:
  - a. Day shift (7am-3pm) is (304)639-6049
  - b. Afternoon shift (3pm-11pm) is (304)639-6507
  - c. Night shift (11pm-7am) is (304)639-7030
- 2. Additionally, off-campus law enforcement help is available from
  - a. Ohio County Sheriff's Office at 911 or (304) 234-3607
  - b. WV State Police at 911 or (304) 238-1100.
- 3. Maintenance personnel are available during normal business hours at (304)336-8009. At other times, Maintenance may be reached through the Campus Police department as noted above. The following emergency services may be provided:
  - a. Utilities: Repairs to water, gas, electric, and sewage systems.
  - b. Structures: Repairs to structures and mechanical equipment therein, including heating and cooling systems.
  - c. Equipment: Portable pumps, generators, floodlights, welders, air compressors, tractors, backhoes, forklifts, etc.
  - d. Transportation: Sedans, light trucks, dumps trucks, and tractors.
- 4. Purchasing Agent: Contact CFO for purchasing as needed.
- 5. Receiving: Emergency procurement if items needed for campus support.
- 6. Emergency Shutdown Procedures:

Note: in the event of a natural disaster in which major structural damage is sustained it is advisable to turn off hazardous utilities: Electricity and natural gas are of primary concern. For specific details refer to relevant section.

### B. Disaster Resources

### **Emergency Contact**

1. Ambulance, fire, and law enforcement 911 **WWVA-AM 1170** 

2. Emergency Alert System Radio

### **Other Important Phone Numbers**

### Law Enforcement

1.	Ohio County Sheriff's Office	91	1
	West Liberty Police Department		
	West Virginia State Police – Wheeling(304)238-		

4. Bureau of Alcohol, Tobacco, & Firearms       (304)232-4170         5. Department of Environmental Protection       (304)232-1075         6. F.B.I. – Wheeling       (304)232-4464         7. F.B.I.       1-877-999-5372         8. U.S. Marshal Service – Wheeling       (304)232-2980         9. U.S. Secret Service       (304)347-5188         10. U.S. Postal Service       (304)232-4850         Miscellaneous				
<ol> <li>Ohio County Emergency Management Agency</li></ol>				
a. Chemical, Oil Spills, and Chemical/Biological Terrorism1-800-424-8802				
b. State Emergency Spill Notification				
3. American Red Cross, Ohio Valley Chapter(304)232-0711				
4. Salvation Army – Wheeling Corps				
5. West Virginia Department of Highways – Ohio County(304)238-1202				
6. West Virginia Department of Highways – Interstate(304)238-1065				
7. Family Services(304)233-2350				
<u>Health</u>				
1. Ohio County Health Department(304)234-3682; (304)233-1000 (24 hours)				
2. Wheeling Hospital(304)243-3000				
3. Ohio Valley Medical Center(304)234-0123				
Fire and Rescue				
1. Hazardous Materials Response(304)234-3695				
2. West Liberty Volunteer Fire Department(304)336-7500				
3. Wheeling Fire Department(304)234-3711				
4. West Virginia Fire Marshals (Arson Hotline)				

### C. Reporting Emergencies

## This may be posted in an appropriate location

Campus Emergency Service
 In an emergency when Campus Police cannot be reached,
 911

3. When calling, stay calm and carefully explain the problem and location to the emergency personnel. Do not hang up until told to do so.

## **Important**

After any evacuation, report to your designated assembly area. Stay there until an accurate headcount is taken. The Building/Facility Coordinator will take attendance, if feasible, and assist in accounting for all building occupants.

Building/Facility Coordinator:	
Building Location:	
Telephone:	
Building Emergency Team Members:	

### VIII. EVACUATION PROCEDURES

In an emergency contact Campus Police by dialing 911

### A. Building Evacuation

- 1. When an alarm sounds and/or upon notification by Campus Police or Building/Facility Coordinator, a building must be evacuated.
- 2. When the building evacuation alarm is activated, occupants shall leave by the nearest marked exit and alert others to do likewise.
- 3. Assist people with disabilities in exiting the building.
- 4. Once outside, proceed to a clear area that is at least 500 feet away from the affected building. Keep streets, fire lanes, hydrant areas, and walkways clear for emergency vehicles and personnel. Know where your assembly area(s) is (are).
- 5. Do not return to an evacuated building unless told to do so by a Building/Facility Coordinator, member of law enforcement, or similar authority. IMPORTANT: After any evacuation, report to your designated assembly area. Stay there until an accurate headcount is taken. The Building/Facility Coordinator will take attendance and assist in accounting for all building occupants.

### B. Campus Evacuation

- 1. Campus Police will make announcements regarding evacuation of all part of the campus.
- 2. All persons shall leave the premises immediately and relocate as directed.

### IX. SPECIFIC EMERGENCY PROCEDURES

### A. Bomb Threat

1. If you notice a suspicious object or potential bomb on campus do not handle it! Clear the area and immediately call Campus Police, 911.

- 2. Any person receiving a phone call bomb threat should ask the caller:
  - a. When is the bomb going to explode?
  - b. Where is the bomb located?
  - c. What kind of bomb is it?
  - d. What does it look like?
  - e. Why did you place the bomb?
- 3. Keep talking to the caller as long as possible and record the following:
  - a. Time of call.
  - b. Caller's gender and estimated age.
  - c. Speech pattern, accent, possible nationality, etc.
  - d. Emotional state of the caller.
  - e. Background noise.
- 4. Campus Police will contact the State Police and evacuate the building.
- 5. When the building evacuation alarm is sounded, or you are told to leave by law enforcement or similar authority, walk quickly to the nearest marked exit and ask others to do the same.
- 6. Assist people with disabilities in exiting the building! Remember that elevators are reserved for people with disabilities' use in times of emergency. Do not use elevators in case of fire. Do not panic.
- 7. Once outside, move to your designated assembly area. Keep streets, fire lanes, hydrants, and walkways clear for emergency vehicles and crews.
- 8. If requested, assist emergency crews.
- 9. Do not return to an evacuated building unless told to do so by a fire fighter, Building/Facility Coordinator, or similar authority.

  Important: After evacuation, report to your designated assembly area. Stay there until an accurate headcount is taken. A Building/Facility Coordinator will take attendance and
  - accurate headcount is taken. A Building/Facility Coordinator will take attendance and assist in accounting for all building occupants.

### B. Civil Disturbance or Demonstrations

Most campus demonstrations such as marches, meetings, picketing, and rallies will be peaceful and non-obstructive. A demonstration should not be disrupted unless one or more of the following conditions exists as a result of the demonstrations:

- 1. Interference with the normal operations of the University.
- 2. Prevention of access to office, buildings, or other University facilities.
- 3. Threat of physical harm to persons or damage to University facilities.

If any of these conditions exist, Campus Police should be notified as they will be responsible for contacting the CIRT. The following procedures should be followed:

- 1. Peaceful Non-Obstructive Demonstrations
  - a. Efforts should be made to conduct University business as normally as possible.

- b. If demonstrators are asked to leave but refuse to leave by regular facility closing time:
  - (i) Arrangements will be made by Campus Police to monitor the situation during non-business hours, or
  - (ii) Determination will be made by CIRT to treat the violation of regular closing hours as a disruptive demonstration.
- 2. Non-Violent, Disruptive Demonstrations (Students)
  - a. In the event that a demonstration blocks access to facilities or interferes with the operation of the University:
    - (i) Demonstrators will be asked by the Senior Student Affairs Officer to terminate the disruptive activity.
    - (ii) CIRT members and SGA members may be enlisted by the Senior Student Affairs Officer to try to persuade the demonstrators to desist.
    - (iii) If the demonstrators persist in the disruptive activity, they will be notified that failure to discontinue the specified action within a specified length of time may result in disciplinary action including suspension, expulsion, or possible intervention by civil authorities. Except in extreme emergencies, the President will be consulted before such disciplinary actions are taken.
    - (iv) Efforts should be made to secure positive identification of demonstrators in disciplinary violation to facilitate later testimony, including photographs and video.
    - (v) Campus Police and the CIRT shall consult with the President, so he/she may decide whether to seek injunctive relief or otherwise request intervention by civil authorities.
    - (vi) If the President decides to seek the intervention of civil authorities, the demonstrators should be so informed. Campus Police will be responsible for notifying demonstrators that their arrest is imminent.
- 3. Violent Disruptive Demonstrations (students and/or non-students)
  If a violent demonstration occurs (personal injury or property damage occurs or appears imminent), Campus Police, the President, and CIRT shall be notified, so a response can be formulated as prescribed above.
  - a. During Normal Business Hours
    - (i) In coordination with the Senior Student Affairs Officer, Campus Police will contact the departments affected.
    - (ii) The President will decide whether intervention by civil authorities is needed (per paragraph B above).
  - b. After Business Hours
    - (i) Campus Police shall be notified immediately of the disturbance.
    - (ii) Campus Police will investigate the disruption and notify the Senior Student Affairs Officer.

- (iii) The Senior Student Affairs Officer will:
  - (\*) Report the circumstances to the President and the CIRT.
  - (\*) Notify the Chief Media Relations Liaison, so a photographic/video record of events may be made.
  - (\*) The President shall decide whether additional law enforcement assistance should be summoned.

NOTE: Campus Police retains the responsibility for unilaterally summoning external law-enforcement without counsel from others if circumstances dictate.

SAMPLE A Directive to Terminate Demonstration Immediately (with Campus Police present)

### (Identify self by name and position)

This assembly is disrupting the operations of the University. Participants are subject to arrest for disorderly conduct, disturbing the peace, and other violations of West Virginia law. You have previously been called upon to disperse and terminate this demonstration. Accordingly, you are directed to terminate this demonstration. If you have not done so within 15 minutes, you will be arrested. Students, you may be subject to disciplinary action as a result of this behavior.

SAMPLE B Directive to Terminate Demonstration Immediately (with Campus Police and OCSO deputies present)

### (Identify self by name and position)

You have previously been directed to terminate this demonstration, and you have been told the consequences of your failure to do so. Each student participating in this unlawful demonstration may be subject to disciplinary action. Campus Police and deputies from the Ohio County Sheriff's Office are here to place you under arrest.

### C. Earthquake

- 1. During an earthquake, remain calm and quickly follow the steps outlined below.
- 2. If indoors, seek refuge in a doorway or under a desk or table. Stay away from glass windows, shelves, and heavy equipment.
- 3. If outdoors, move away from buildings, utility poles, and other structures. Caution: Always avoid power or utility lines as they may be energized.
- 4. If in an automobile, stop in the safest place available, preferably away from power lines and trees. Stop as quickly as safety permits but stay in the vehicle for the shelter it offers.

- 5. After the initial shock, evaluate the situation and, if emergency help is needed, call 911. Protect yourself at all times and be prepared for after-shocks.
- 6. Damaged facilities should be reported to Campus Police and Maintenance. Note: Gas leaks and power failures create special hazards. Please refer to the section on Utility Failures.
- 7. If necessary, activate the building alarm.
  - Caution: If the building alarm does not operate, make sure you have alerted Campus Police.
- 8. When the building evacuation alarm is sounded, or when you are told to leave by law enforcement or similar authority, walk to the nearest marked exit and ask others to do the same.
- 9. Assist people with disabilities in exiting the building!
  Remember that elevators are reserved for people with disabilities' use in times of
  - emergency.

    Do not use elevators in case of fire. Do not panic.
- 10. Once outside, move to your designated assembly area. Keep streets, fire lanes, hydrants, and walkways clear for emergency vehicles and crews.
- 11. If requested, assist emergency crews.
- 12. An Emergency Command Post may be set up near the emergency site. Keep clear of the Command Post unless you have emergency response duties.
- 13. Do not return to an evacuated building unless told to do so by a fire fighter, Building/Facility Coordinator, or similar authority.

  Important: After evacuation, report to your designated assembly area. Stay the
  - Important: After evacuation, report to your designated assembly area. Stay there until an accurate headcount has been taken. A Building/Facility Coordinator will take attendance and assist in accounting for all building occupants.

### D. Elevator Failure

If you are trapped in an elevator use the emergency phone to notify Campus Police (304)336-8021. If the elevator does not have an emergency phone, turn on the emergency alarm (located on the front panel) which will signal for help.

### E. Explosion, aircraft down (crash) on campus

In the event a mishap occurs such as an explosion or a downed aircraft (crash) on campus, take the following action:

- 1. Immediately take cover under tables, desks, and other objects which will give protection against falling glass and debris.
- 2. After the effects of the explosion and/or fire have subsided, call 911 for emergency response from Fire Department and Police. Give your name and describe the location and nature of the emergency.

- If necessary activate the building alarm.
   Caution: If the building alarm does not operate, make sure you have alerted Campus Police.
- 4. When the building evacuation alarm is sounded, or when you are told to leave by law enforcement or similar authority, walk quickly to the nearest marked exit and ask others to do the same.
- 5. Assist people with disabilities in exiting the building!
- 6. Once outside, move to your designated assembly area. Keep streets and walkways clear for emergency vehicles and crews. Know where your assembly area(s) is(are).
- 7. If requested, assist emergency crews.
- 8. An Emergency Command Post may be set up near the emergency site. Keep clear of the Command Post unless you have emergency response duties.
- 9. Do not return to an evacuated building unless told to do so by a fire fighter, Building/Facility Coordinator, or similar authority. Important - After evacuation, report to your designated assembly area. Stay there until an accurate headcount is taken. A Building/Facility Coordinator will take attendance and assist in accounting for all building occupants.

### F. Fire

In all cases of fire, the West Liberty Volunteer Fire Department must be notified immediately: Dial 9-911

- 1. Know the location of fire extinguishers, fire exits, and alarm systems in your area and know how to use them. Training and information are available through Health & Chief Safety Officer.
- 2. Always call 911 to alert the fire department. In case of minor fire that appears controllable, discharge fire extinguisher toward the base of the flames. In large fires that do not appear controllable, contact the fire department and Campus Police. Then evacuate all rooms, closing all doors to confine the fire and reduce oxygen. Do not lock doors!
- If necessary, activate the building alarm.
   Caution: If the building alarm does not operate, make sure you have alerted Campus Police.
- 4. In large fires that do not appear controllable, contact the fire department and Campus Police. Then evacuate all rooms, closing all doors to confine the fire and reduce oxygen. Do not lock doors!
- 5. When the building evacuation alarm is sounded, or when you are told to leave by law enforcement or similar authority, walk quickly to the nearest marked exit and ask others to do the same.

- 6. Assist people with disabilities in exiting the building! Do not use the elevators during a fire. Smoke is the greatest danger in a fire, so stay near the floor where the air will be less toxic.
- 7. Once outside, move to your designated assembly area. Keep streets, fire lanes, hydrants, and walkways clear for emergency vehicles and crews.
- 8. When the fire department arrives on campus to respond to a residence hall fire, Campus Police shall grant them access to the building and the RA control room where all the keys are kept. The police and the lead officer from the fire department shall assign keys as needed and log who has the keys. When the call is completed, the same two officers shall check all the keys back in and sign the log sheet. This will allow the fire department all access necessary while limiting and documenting the distribution of keys.
- 9. If requested, assist emergency crews.
- 10. An Emergency Command Post may be set up near the emergency site. Keep clear of the Command Post unless you have emergency response duties.
- 11. Do not return to an evacuated building unless told to do so by a fire fighter, Building/Facility Coordinator, or similar authority.

Note: if you become trapped in a building during a fire and a window is available, wave an article of clothing (shirt, coat, etc.) outside the window as a marker for rescue crews. If there is no window, stay near the floor where the air will be less toxic. Shout at regular intervals to alert emergency crews of your location. Do not panic!

Important: After evacuation, report to your designated assembly area. Stay there until an accurate headcount is taken. A Building/Facility Coordinator will take attendance and assist in accounting for all building occupants.

### G. Gas Leak

Cease all operations. Do not switch on lights or any electrical equipment. Do not smoke or use a lighter or matches. Remember, electrical arcing or any ignition source can trigger an explosion! Notify 911. Vacate the area.

### H. Hazardous Waste Spill

- 1. Any spill of a chemical or hazardous waste should be reported immediately to Campus Police, (304)336-8021.
- 2. When reporting, be specific about the nature of the involved material and the exact location. Campus Police will contact the necessary specialized authorities and medical personnel.
- 3. A Building/Facility Coordinator should evacuate the affected area and seal it off to prevent further contamination of other areas until the arrival of Campus Police.

- 4. Anyone who may be contaminated by the spill is to avoid contact with others as much as possible, remain in the vicinity, and give their name to Campus Police. First aid and cleanup by specialized authorities should be started as soon as possible.
- If necessary, activate the building alarm.
   Caution: If the building alarm does not operate, make sure you have alerted Campus Police.
- 6. When the building evacuation alarm is sounded, or you are told to leave by law enforcement or similar authority, walk to the nearest marked exit and alert others to do the same.
- 7. Assist people with disabilities in exiting the building!
  Remember that elevators are reserved for people with disabilities' use in times of emergency. Do not use elevators in case of fire. Do not panic. Once outside, move to your designated assembly area. Keep streets, fire lanes, hydrants, and walkways clear for emergency vehicles and crews.
- 8. If requested, assist emergency crews.
- 9. An Emergency Command Post may be set up near the emergency site. Keep clear of the Command Post unless you have emergency response duties.
- 10. Do not return to an evacuated building unless told to do so by a fire fighter, Building/Facility Coordinator, or similar authority. Important: After evacuation, report to your designated assembly area. Stay there until an accurate headcount is taken. A Building/Facility Coordinator will take attendance and assist in accounting for all building occupants.

### I. Medical Emergency

In case of serious injury or illness, call Campus Police if you need assistance, by calling 911.

- 1. Give your name and describe the nature and severity of the medical problem and the campus location of the victim.
- 2. In case of minor injury or illness provide first aid care.\* Use only sterile first aid materials.
- 3. In case of serious injury or illness, Red Cross trained personnel\* should quickly perform the following steps:
  - a. Keep the victim still and comfortable. Do not move the victim.
  - b. Ask the victim, "Are you okay?" and "What is wrong?"
  - c. Check breathing and give artificial respiration if necessary.
  - d. Control serious bleeding by direct pressure on the wound.
  - e. Continue to assist the victim until help arrives.
  - f. Look for emergency medical I.D., question witness(es), and give all information to the paramedics.
  - g. For Pandemic Procedures see Addendum B, attached.

<sup>\*</sup>Only Red Cross trained personnel should provide first aid treatment.

### J. Psychological Crisis

A psychological crisis exists when an individual is threatening harm to himself/herself or to others or is out of touch with reality due to severe drug reactions or a psychotic break. A psychotic break may be manifested by hallucinations or uncontrollable behavior. If you observe concern behavior, please contact the Behavioral Intervention Team.

If a psychological crisis occurs:

- 1. Never try to handle on your own a situation you feel is dangerous.
- 2. Notify Campus Police of the situation by calling 911.
- 3. Campus Police may involve other student support personnel such as the Executive Director of Housing and Student Life, Counselor, etc. or their designees.

In extreme emergencies, contact the Campus Police and West Liberty Volunteer Fire Department (Emergency Squad) at 911.

### K. Plumbing Failure/Flooding

- 1. Initial report should be made to Physical Plant during business hours at (304)336-8009.
- 2. After hours reports can be made to housing staff for residential facility or to Campus Police for any facility or location. Campus Police or Housing Staff will contact on call Physical Plant staff. Cease using electrical equipment and vacate the area.
- 3. Contact maintenance staff to shut off water and for repair work. (Initial Reporter/Campus Police/Housing Staff)
- 4. CIRT Team will be convened (Campus Police/Housing Staff/Maintenance contact CIRT Chair)
- 5. Contact Health Department regarding boil orders. (Chief Safety Officer)
- 6. Move temporary drinking water to Dining Services locations in case of boil order. (Physical Plant)
- 7. Determine need for changes to classroom usage. (Physical Plant and Chief Academic Officer)
- 8. Determine need for changes to dining service facilities. (Physical Plant and Dining Services)
- 9. Identify any needs for alternate housing locations and make available. (Physical Plant and Housing)
- 10. Physical Plant will maintain inventory of drinking water. (Physical Plant)
- 11. Contact Media Relations regarding communication to campus. (via CIRT Team)
- 12. During any time when there is no water on campus, a fire watch walk will be completed in any campus building with a sprinkler system where there may be people in the building during the outage. Residence Life staff will complete the fire watch in residential facilities and Campus Police will complete the fire watch in academic and administrative buildings. (Safety, Police, Residence Life, Physical Plant)
- 13. When water is restored, check plumbing locations: i.e., toilet function in residential facilities, water tanks in Arnett with College of Science animals, etc. (Physical Plant)
- 14. When water is restored, send notification to campus, including information on boil order as needed. (Chief Safety Officer, Physical Plant, Media Relations)

### L. Steam Line Failure

- 1. Initial report should be made to Physical Plant during business hours at (304)336-8009.
- 2. After hours reports can be made to Campus Police for any facility or location. Campus Police will contact on call Physical Plant staff.

### M. Utility Failure

- 1. Initial report should be made to Physical Plant during business hours at (304)336-8009.
- 2. After hours reports can be made to housing staff for residential facility or to Campus Police for any facility or location. Campus Police or Housing Staff will contact on call Physical Plant staff.
- 3. If there is an immediate danger to safety of occupants, pull an alarm for evacuation.
  - a. Caution: If the building alarm does not operate, make sure you have alerted Campus Police.
  - b. All building evacuations will occur when an alarm sounds continuously and/or when an emergency exists.
  - c. Assist people with disabilities in exiting the building! Remember that the elevators are reserved for people with disabilities' use in times of emergency. Do not use elevators in case of a fire.
  - d. Once outside, move to your designated assembly area. Keep the walkways, fire lanes, and hydrants clear for emergency crews.
  - e. If requested, assist emergency crews.
  - f. An Emergency Command Post may be set up near the emergency site. Keep clear of the Command Post unless you have emergency response duties.
  - g. Do not return to an evacuated building unless told to do so by a firefighter, Building/Facility Coordinator, or similar authority.
- 4. Contact utility provider. (Physical Plant, Housing, Campus Police)
- 5. CIRT Team will be convened (Campus Police/Housing Staff/Maintenance contact CIRT Chair)
- 6. Determine need for changes to classroom usage, delay of classes, or cancellation of classes. (Physical Plant and Chief Academic Officer)
- 7. Determine need for changes to dining service facilities. (Physical Plant and Dining Services)
- 8. Identify any needs for alternate housing locations and make available. (Physical Plant and Housing)
- 9. Contact Media Relations regarding communication to campus. (via CIRT Team)
- 10. Check facilities and equipment on generator power.
  - a. Lighting
  - b. Heating/Cooling
  - c. IT Temperature controls
  - d. Card Access Systems

Additional Information and Procedures for Electrical/Light Failure:

At present, campus building lighting may not provide sufficient illumination in corridors and stairs for safe exiting. It is therefore advisable to have a flashlight and portable radios available for emergencies. Contact Campus Police at (304)336-8021.

### N. Ventilation Problem

If smoke odors come from the ventilation system, notify Campus Police by calling 911, and cease all operations, and vacate the area.

### O. Violent or Criminal Behavior

- 1. Everyone is expected to assist in making the campus a safe place by being alert to suspicious situations and criminal behavior and promptly reporting same.
- 2. If you are a victim or a witness to any violent/criminal offense, avoid risks!
- 3. Promptly notify Campus Police by calling 911 as soon as possible and report the incident, including the following:
  - a. Nature of the incident.
  - b. Location of the incident.
  - c. Description of person(s) involved.
  - d. Description of property involved.
- 4. Assist Campus Police and other law enforcement when they arrive by answering questions and asking others to cooperate.
- 5. Should gunfire or discharged explosives threaten the campus, you should evacuate immediately if possible. For further information on violent intruder procedure, review Addendum C for the ALICE Training protocol.

### What to do if taken hostage:

- a. Be patient. Time is on your side. Avoid drastic action.
- b. The initial 45 minutes are the most dangerous. Be alert. Don't antagonize the captor.
- c. Don't speak unless spoken to and then only when necessary. Maintain eye contact with the captor at all times, if possible, but do not stare.
- d. Try to rest. Comply with instructions as best you can.
- e. Be observant. You may be released, or you may escape; the personal safety of others may depend on your memory.
- f. Be prepared to answer the police on the phone. If medications, first aid, or restroom privileges are needed by anyone, say so.

### ADDENDUM A

### Administrative Procedure 18 – Media Coordination in Emergency Situations

### Introduction

The President is the official spokesperson for West Liberty University. He/she may designate other individuals such as the Chief Media Relations Liaison or senior administrators to serve in this capacity.

### **Emergency or Crisis Situation**

The Emergency Response Manual prescribes criteria used to identify emergency or crisis (terms used interchangeably) situations. Campus violence, explosions, chemical spills, an active shooter, hostage-taking, fires, extreme and/or sudden weather events are examples of emergency situations.

The term "crisis" often refers to the period immediately following a situation which has generated interest from the local, state, and/or national media.

### I. Purpose

This procedure describes the role of the Media Relations office in collecting and conveying information to the public during or immediately following a crisis or emergency situation.

### II. Situation

- A. Each emergency or crisis will require a unique public information response. The extent of the response will depend on the nature of the situation.
- B. Media Relations contacts include the print and broadcast media as well as social media. The function exists to maintain the flow of accurate information from the University to the public and to public officials.

### III. Operations

### A. General

 To ensure that the University's public information response to an emergency is quick, accurate, sensitive, and responsible, Media Relations will coordinate communications with all media. The director will be available until the emergency situation abates, working extended hours as needed. In consultation with the CIRT, the director may designate an office or other space for the media's use. 2. If the President is unavailable, the hierarchy prescribed in Board of Governors Policy 27 (Order of Responsibility) will determine which administrator has ultimate authority for media management decisions.

### **B.** Phases of Response

### 1. Immediate

- a. The President or designee will determine when an official statement should be prepared and released to the media. He/she also will consult with the CIRT and develop answers to specific questions that may be asked by the media. The official statement should ease public concerns and yet help contain the flow of information.
- b. The spokesperson will brief administrators and staff who may be assigned to answer media questions. In the event of a national-scale event, each individual will be assigned a national TV network and/or print publication (CBS, NBC, ABC, CNN, Fox News, Associated Press). These administrators and staff may not release any information other than the official statement. Only the President or other spokesperson may offer additional information.
- c. The telephone line (304)336-8400 will be designated as a crisis hot line with recorded messages offering information on the situation. This number will be made available to the media and the public at the beginning of a crisis. Recorded messages will be updated. Email and the webpage also will be used for campus-wide advisories. Additional information will be posted on the WLU Facebook and Twitter accounts.
- d. The spokesperson will gather basic information (type of emergency/disaster; time of event; actions taken, areas, and number of people involved; fatalities, injuries, and extent of damage) and prepare an official news release. Staff members will be kept apprised of breaking news, but they should not answer any media questions. Only the University President or designated spokesperson should answer questions, or be the source of answers to questions.
- e. The spokesperson will verify all sources of information.
- f. The spokesperson will clear any press release with the President before releasing it to the media.
- g. In cases involving employee or student injuries or deaths, the spokesperson will notify families before that information is released to the public.
- h. The spokesperson will coordinate the release of information with local hospitals and disaster agencies, providing as prompt, accurate, and complete information as possible.

### 2. Ongoing Period

In a crisis, the Chief Media Relations Liaison will (as applicable)

- a. Provide basic information about an emergency or threatened emergency to the public and campus community via the news media.
- b. Keep the public, media, and community informed of the situation and provide advice on what they should not do to prevent further damage or loss of life, panic, or interference with emergency response efforts.
- c. Keep the public, media, and community informed of where to seek temporary housing, food, relief, etc.
- d. Instruct the public on how to obtain further advice or information.

### 3. Recovery Period

Media Relations will issue media updates as long as necessary. After the crisis has passed, the director will participate in a meeting with the CIRT to review all actions taken and "lessons learned." The director will compile an "after action" report for the President and the Emergency Coordinator.

### IV. Assignment of Responsibilities

### A. Responsibilities

- 1. The Chief Media Relations Liaison will prepare official statements for social, print and broadcast media.
- 2. The Chief Media Relations Liaison will be responsible for organizing press conferences. The director will present the conference. The President and/or other administrators may make announcements concerning the emergency and the University's response to it.
  - a. Site: Small conferences (expecting up to the 8 media outlets): Board Room in Shaw Hall (provides easiest access to off-campus media). Large conferences (more than 8 outlets): R. Emmett Boyle Conference Room at ASRC. Other alternatives: Main Hall conference room, Elbin Library conference room, Fine Arts F111, or Arnett 202.
  - b. Parking: A Campus Police officer should be posted at the main entrance to campus, directing media to press conference site. Time permitting, media advisories can be sent that direct media representatives to designated parking areas.

c. Access: For sensitivity/ safety reasons, media representatives should be escorted by a designated University representative to any location other than the press conference site.

### **B.** Media Relations

- 1. Interviews: Before any University employee submits to an interview, he/she should be briefed on the "official statement" and advised as to potential questions/answers. Media Relations must be notified in advance of any interview.
- 2. General conduct: Interaction with the media should always be honest, courteous, and otherwise professional to encourage the media's confidence in and respect for University personnel. Any staff, faculty or student with questions should call, email or text media relations.

# ADDENDUM B WEST LIBERTY UNIVERSITY Student Health Service

### **Response to Pandemic Event**

### **Policy**

In case of a pandemic event, the Student Health Services (SHS) facilities and staff will work in the best interest and health of the WLU students in accordance with the College Emergency Response Plan.

### Action Plan Level One - Preplanning to confirmed cases of human-to-human transmission

**Staff Education and Preparedness** 

- CIRT team to meet.
- Maintain ongoing communication with the Ohio County Health Department, the American College Health Association, and Wheeling Hospital.
- Benchmark activities of other student health services.
- Staff participation in webcast and seminars related to diagnosis and treatment of current pandemic.
- Staff planning and rehearsal of disaster planning including participation in college drills.
- Schedule and frequency to be determined by evolution of infectious organism.
- Recommendation of vaccination of all staff if available.
  - Designated and emergency personnel fitted for N95 respiratory protection and inserviced on use.
  - o Annual refit and review of use.
  - o Have PPE available specific to transmission of infectious agent.

### Clinical Issues

- Identify supply sources for PPE, medications including Tamiflu, antibiotics, etc.
- Maintain a stock supply of necessary equipment and meds based on projected estimates of prevalence rates.
- Coordinate a plan with EMS and local Emergency Department for patient transport
- Utilize the SHS as an infirmary until patient(s) can be transported to the Emergency Department.

### Communication

- External:
  - Provide information to campus community through Chief Media Relations
     Liaison on status of infectious disease and travel advice via e-mail and post to
     SHS website with links to CDC and WHO.
  - Provide training for relevant groups.
     Develop a communication implementation plan for Levels 2 and 3.
  - o Revise SHS signage.

# Action Plan Level Two – Suspected/confirmed cases in surrounding area (in addition to Level One)

### Staff Education and Preparedness

- CIRT team to meet.
- Initiate prophylaxis of contacts as deemed appropriate.
- Initiate prophylaxis of key personnel as deemed appropriate.
- Review of use PPE.

### Clinical Issues

- Order additional PPE, medications including Tamiflu, antibiotics, etc.
- Contact the OCHD for updates or pertinent information from the CDC.
- Institute plan for patient transport to hospitals.
- Prepare infirmary as a holding area until patients can be transported to the Emergency Department.
- Isolate and monitor suspected cases in accordance with the OCHD based on characteristics of the disease.
- Identify contacts of suspected cases and isolate in accordance with the OCHD.
- Coordinate with WFF the cleaning and waste management protocol.

### Communication

### • External:

- Provide information to campus community through the Chief Media Relations Liaison on status of infectious disease and travel advice via e-mail and post to SHS website with links to CDC and WHO.
- Poster campaign on self-care and directions for reporting cases in self and others and how to get medical care.
- Provide updates on status of pandemic for relevant groups.
   Dedicated phone line for individuals with signs/symptoms of illness.
- o FAQs, general information for parents, community on voicemail queue.
- o Place signage for call number to information and assistance outside SHS.

### • Internal:

- Regular updates to Medical Director, Senior Student Affairs Officer, and the OCHD regarding numbers of patients seen, number in isolation, number being prophylaxed, supply issues, requests for information from media, communication issues.
- o Communicate with parents of suspected cases.

### Action Plan Level Three - Confirmed cases on campus (in addition to Level Two)

- CIRT to meet to discuss possible campus closure
- Maintain contact with the OCHD/CDC
- Support for Quarantine of Exposed as deemed necessary
  - Liberty Oaks, Boyd ground floor apartments, Grocery Delivery, Environmental Waste Clean-up

### ADDENDUM C ALICE Training Protocol

The ALICE method is focused on empowering students, faculty and staff alike to make decisions on how to respond in a violent intruder situation. Preparation is the first step in maximizing survivability and minimizing casualties.

### A. Alert

- a. You will typically be alerted by sights or sounds in your area.
- b. Official notification will be sent using official Toppernet Alert System (texts, emails), website and WLU social media venues.

### B. Lockdown

- a. If you are unable to evacuate, barricade in a safe space quickly. Utilize furniture and personal belongings to barricade doors and block windows in doors.
- b. Spread out within the room, do not huddle in a small space.
- c. Dial 911 when it is safe to do so.

### C. Inform

- a. Gather information through 911 dispatcher you are on the line with, as well as through official notification systems of the University, listed in the Alert section.
- b. Continue to feed information to emergency response through the 911 dispatcher.

### D. Counter

- a. If all other options have been exhausted or failed, and you are now facing a violent intruder, follow these steps:
  - i. Distract the intruder with noise and movement
    - 1. Throw objects at the intruder (these do not have to be heavy objects, the more you can throw at him/her, the more distracting.)
    - 2. Yell, scream, and make noise to further distract the intruder.
  - ii. Evacuate if possible, during these distractions
  - iii. If evacuation is not possible, while distracting, utilize the "swarm" method and counter the intruder. Multiple persons working to take down the intruder, first isolating the arm with the weapon, and then the remaining arm and legs.
  - iv. Once intruder is down, continue to restrain appendages and head.
  - v. Remove gun from the room by dropping in a trash can and carrying the trash can out of the building. This prevents the intruder from being able to get back the gun. Do not hold the gun on the intruder! If the intruder gets free from the restraint, they may remove gun from your possession, or police may enter the room and assume you are the shooter.

### E. Evacuate

- a. If you can get out of the area, do so quickly!
- b. Do not utilize cars to evacuate the campus, this can cause a traffic jam and prevent emergency responders from getting to victims.
- c. Utilize windows and doors to get out of buildings.
- d. Help wounded or disable persons to evacuate.
- e. The University will notify campus members of rally points and reunification points when it is safe to do so.

**Authority:** BOG Policy 60: Information Technology Governance

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**Revision History:** 

President's Signature: On File

SECTION 1: Purpose and Scope

1.1 The purpose of this Policy is to provide a process to report suspected thefts involving

University Data ("Data"), and Data breaches or exposures (including Unauthorized Access, Use, or disclosure), ("Breach Incident") to appropriate individuals; and to outline the response to a confirmed Breach Incident based on the type of Data involved.

1.2 This Policy applies to all computer systems, network devices, and any additional systems and outputs containing or transmitting Data.

**SECTION 2: Policy** 

- 2.1 Reporting Suspected Breach Incident. Any individual who suspects that a Breach Incident has occurred must immediately provide a description of what occurred via email to <a href="mailto:privacyofficer@westliberty.edu">privacyofficer@westliberty.edu</a> or by calling 304-336-8495. This email address and phone number is monitored by WLU's Privacy Officer who will investigate all reported Breach Incidents to confirm if a Breach Incident has occurred, the Privacy Officer will follow the appropriate procedure depending on the class of Data involved.
- 2.1.1 If the Breach Incident is a suspected theft, WLU's Campus Police shall be notified by the Privacy Officer. They will determine whether a local law enforcement agency should be contacted based on the location and details of the incident. If a local law enforcement agency is contacted, the name of the agency and the report number should be provided to WLU via the methods of contact outlined above.
- 2.1.2 Failure to report a suspected Breach Incident is a violation of this Policy.
- 2.2 Confirmed Breach Incident. As soon as a Breach Incident containing Data is identified, the process of removing all access to that resource will begin as soon as possible. If the information is available on a site outside of WLU, that site will be contacted to have the information removed as soon as possible.
- 2.2.1 The Chief Information Officer will be notified of the Breach Incident and will inform the Chief Media Relations Liaison as soon as possible. The WLU IT Department (IT) will analyze the Breach Incident to determine the root cause, work with the appropriate parties to remediate the root cause and examine any involved systems to ensure the integrity of all Data within those systems.

2.2.2 Failure to report an actual Breach Incident is a violation of this Policy.

**SECTION 3: Response Team** 

3.1 Breach Incident Response Team. The Privacy Officer will chair a Response Team to handle the Breach Incident. The Response Team will include members from: IT, the Chief Media Relations Liaison, the Office of the General Counsel, the affected unit, or department that uses the involved system or output or whose Data may have been breached or exposed, and additional departments based on the Data type involved and as deemed necessary by the Privacy Officer.

3.1.1 This team will provide information regarding how the Breach Incident occurred, the types of Data involved, the WLU Data Classification, any protective measures

around the involved Data (such as encryption), and the number of internal/external individuals and/or organizations impacted. The Chief Media Relations Liaison will handle all communications about the Breach Incident. IT will work with the appropriate parties to remediate the root cause of the breach or exposure.

3.2 For any Breach Incident involving information listed below, a representative from the listed areas will be included on the Response Team:

Financial information, including but not limited to credit card numbers, bank account numbers, investment information, grant information, and budget information – Chief Financial Officer, Controller, Director of Financial Aid

Information about individual employees, including but not limited to social security numbers – Human Resources

Student financial information - Chief Financial Officer, Controller, Senior Student Affairs Officer

Student information protected by FERPA – Senior Student Affairs Officer, Registrar, Chief Academic Officer

Student health information - Senior Student Affairs Officer, Director of Student Health Services

Student information not listed above – Senior Student Affairs Officer, Marketing, Communication Services

Research data - Chief Academic Officer

PII concerning faculty - Chief Academic Officer, Chief Human Resources Officer

PII concerning donors or unreleased information about gifts received – Director of Advancement

Payroll information – Chief Financial Officer, Controller

- 3.3 The Response Team should consider the following when responding to a Breach Incident.
- 3.3.1 The following materials may need to be developed to handle the Breach Incident including: Web pages, Notification letters, Press releases, Q&A for media, Q&A for other potential responders (Law Enforcement for example).
- 3.3.2 Alert university leadership teams (President, Cabinet, Information Technology, Deans) so they understand what is being done to address the Breach Incident and are apprised of status. The order and frequency of updates to these groups will be determined by the Privacy Officer.
- 3.3.3 All available information about the Breach Incident, including both information that has been confirmed and information that is suspected, will be provided to the Response Team. As new information is discovered, it will be provided to the Response Team as quickly as possible.
- 3.3.4 Daily conference calls to checkpoint progress and obstacles are tremendously helpful in keeping things moving and sharing information.
- 3.3.5 Size and severity (likelihood of fraud) of the incident may warrant different actions, i.e., whether credit monitoring is affordable and/or appropriate.
- 3.3.6 Track the amount of time that has passed between the Breach Incident, discovery of the Breach Incident, and notification of affected individuals. While none of these steps are necessarily long, each one of them adds to the number of days to notification.
- 3.3.7 If contracts need to be negotiated to provide services to the affected individuals, those negotiations should begin immediately. Check to see if previously negotiated contracts can be applied to the situation (especially for credit monitoring).
- 3.3.8 Depending on the number of individuals impacted, it can take some time to assemble mailing address information for large groups. Begin pulling this data immediately. A percentage of the initial mailings will be returned as undeliverable so the number of deliveries to attempt and methods to pull additional delivery information should be identified.

### SECTION 4: Policy Adherence:

- 4.1 Any employee who violates this Policy will be subject to appropriate disciplinary action.
- 4.2 Any student who violates this Policy will be subject to appropriate disciplinary action in accordance with the Student Code of Conduct.
- 4.3 Any individual affiliated with the University who violates this Policy will be subject to appropriate corrective action, including, but not limited to, termination of the individual's relationship with the University.
- 4.4 The University's Chief Information Officer and/or the Privacy Officer will coordinate with appropriate University entities on the implementation and enforcement of this Policy.

4.5 Responsibility for interpretation of this Policy rests with the President and Chief Information Officer and/or the Privacy Officer.

### **SECTION 5: Definitions**

- 5.1 "Data Breach" means the unauthorized access and acquisition of unencrypted and unredacted computerized data or physical records that compromise the security or confidentiality of personal information maintained by West Liberty University.
- 5.2 "Unauthorized Access" means a person gains logical or physical access without permission to a University network, system, application, data, or other resource.
- 5.3 "Unauthorized Use" means when Data is used by someone who does not have permission to use the Data and/or in a way that interferes with an individual's privacy either under the relevant privacy law or in breach of the WLU Acceptable Use Policy.
- 5.4 "University Data" means data created, received, maintained, or transmitted by or on behalf of the University through the course of its academic, administrative, research, or outreach activities. Examples of University Data include, but are not limited to:
  - 5.4.1 Personally Identifiable Information (PII). Data that specifically identifies an individual, including, but not limited to: Social Security number, driver's license number, credit card numbers, bank account information, employee performance or salary information, student grades, disciplinary information, account passwords, or Protected Health Information (PHI).
  - 5.4.1.1 Protected Health Information (PHI): Data as defined by the Health Insurance Portability and Accountability Act of 1996 (HIPAA). PHI under the US law is any information about health status, provision of health care, or payment for health care that is created or collected by a Covered Entity (or a third-party associate) that can be linked to a specific individual.
  - 5.4.2 Education Records: Data as defined by the Family Educational Rights and Privacy Act of 1974 (FERPA). FERPA governs access to educational information and records by potential employers, publicly funded educational institutions, and foreign governments.
  - 5.4.3 Customer Information: Data as defined by the Gramm-Leach-Bliley Act (GLB Act, GLBA or the Financial Modernization Act of 1999), requiring financial institutions to explain how they share and protect their customers'; private information.
  - 5.4.4 Card Holder Data: Data as defined by the Payment Card Industry Data Security Standard (PCI DSS). PCI DSS is an information security standard that tells organization's how to handle branded credit cards from the major card schemes.
  - 5.4.5 University Sensitive Data. Sensitive Data based on departmental/internal standard operating procedures including, but not limited to, budgetary, departmental, or University planning information, intellectual property, system credentials, personnel records, unpublished

grant proposals/research data, and non-public financial, procurement, health/safety, audit, insurance, and claims information.

5.5 "WLU Data Classification" means the classification of Data based on its level of sensitivity and the impact to the University should that Data be disclosed, altered, or destroyed without authorization. To define how much protection different types of Data require, WLU has adopted a three-tier classification system:

Level 1: Confidential information governed by state or federal privacy regulations and data protected by confidentiality agreements, including but not limited to, FERPA, HIPAA, GLBA, PCI, confidentiality agreements, non-disclosure agreements, and Attorney Privileged Data.

Level 2: University Sensitive Data that must be protected for ethical or privacy reasons.

Level 3: General information that may be sensitive in nature, such as a person's title, email address, or other published information that exists in the public domain.