

Implementing a Funeral Home Emergency Action Plan

According to Occupational Safety & Health Administration (OSHA) regulations, nearly every employer – including funeral homes – must have an Emergency Action Plan (EAP). If there are fire extinguishers required or provided in the workplace, an Emergency Action Plan is required. The primary purpose of the Emergency Action Plan is to establish responsibilities for employers and employees in a workplace emergency. Whether it is a fire, natural disaster or threat of violence, the Emergency Action Plan spells out the steps that each employee should take to respond to the particular risk.

For funeral homes with 10 or more employees, OSHA regulation [29 CFR 1910.38\(b\)](#) (Means of Egress) requires the Emergency Action Plan to be in written form. Funeral homes with less than 10 employees may communicate the Emergency Action Plan orally. However, for workplace safety, a written Emergency Action Plan is always a good idea.

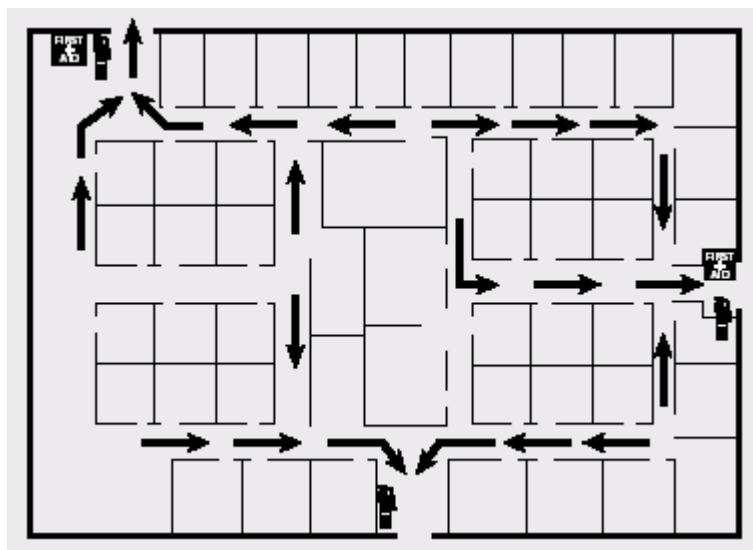
NFDA has prepared an Emergency Action Plan template for funeral homes. However, since each Emergency Action Plan must be customized to the particular funeral home building and location, the template is just the starting place. Funeral home management may use the template to build and customize the Emergency Action Plan for each of its facilities. *A downloadable, customizable EAP will be available online for members in November 2014.*

Funeral home management should take the following steps to implement an EAP.

1. Evacuation Route Plans

The funeral home needs to prepare an emergency evacuation route plan for each floor of the funeral home. Once the evacuation route plan is designed for each floor, it should be distributed to employees with copies provided for each room in the building. The evacuation route plan should be posted or placed in a prominent spot in each room. It also needs to be incorporated into the EAP.

The evacuation floor plan should show for each office and room the route to primary and secondary emergency exits. A prototype [evacuation floor plan diagram](#) from OSHA is shown below.



When designing an evacuation route plan, the funeral home should designate primary and secondary evacuation route exits for each office and room. To the extent possible, the evacuation routes and emergency exits should meet the following conditions:

- The routes should be clearly marked and well lit.
- The routes should be wide enough to accommodate the number of evacuating personnel and visitors.
- The route should be unobstructed and cleared of debris, equipment and furniture at all times.
- The route should be unlikely to expose evacuating employees and visitors to any additional hazards.
- The route should never include the use of an elevator. It is never advisable to use the elevator during a fire or similar building emergency, even in a two-story building.

Once employees are evacuated, it is critical to account for any missing employees. To allow a designated Emergency Coordinator or Area/Floor Monitor to count the employees, all employees should be instructed to evacuate to a designated assembly area. An acceptable assembly area may include parking lots, open fields, or streets which are located away from the site of the emergency and provide sufficient space to accommodate the employees. The Emergency Action Plan should direct employees to move to the assembly area and avoid congregating near doors. OSHA recommends that assembly areas be at least 200 feet away from the emergency and clear of emergency vehicle access.

2. Creating a Gun-Free Zone

In every state, an individual may lawfully carry a firearm. Some states require permits and/or training for a citizen to carry a handgun, while other states have no such restrictions. The substantial increase in concealed carry registrations indicate that more individuals than ever are armed. Given the emotions that sometimes run high at funerals, especially among dysfunctional families, funeral homes may believe that it is safer to prohibit attendees from bringing a firearm onto funeral home property.

Currently, 20 states allow a private business to post signs or notices declaring their business locations to be gun-free zones: Arizona, Arkansas, Connecticut, Illinois, Kansas, Louisiana, Michigan, Minnesota, Missouri, Nebraska, Nevada, New Mexico, North Carolina, Ohio, Oklahoma, South Carolina, Tennessee, Texas, Virginia, and Wisconsin.

If your funeral home is in one of the states listed above and you wish to exclude guns from being brought upon funeral home property, you need to review your state laws to determine where signs must be posted to prohibit guns and the design and wording of the particular signage. In some states, if the proper sign is not posted, the prohibition is not effective. Information on signage can generally be found on state attorney general's websites.

3. Good Samaritan Laws

Another state law issue that funeral homes need to consider in training staff and/or equipping the funeral home with emergency devices is the scope of the state's Good Samaritan law. Every state and the District of Columbia have a Good Samaritan law. The purpose of the Good Samaritan law is to provide immunity to persons who assist another person who is injured or in danger. Basically, the Good Samaritan law protects the volunteer from being sued for criminal or civil liability.

The problem with Good Samaritan laws is that they vary widely from state-to-state. Some states limit the immunity only to physicians or individuals who have received training and are operating within their certified expertise. Other states extend the immunity to any volunteer who steps forward as long as they are operating in good faith. It is important for the funeral home to know exactly the protections afforded by its state in advising its employees how to assist someone suffering an illness or emergency.

State law is also important in deciding what type of emergency equipment to provide. For example, some funeral homes have purchased an automatic external defibrillator (AED) in case an attendee suffers sudden cardiac arrest. These devices, which cost approximately \$2,000, can be used by lay persons with little or no training. The American Heart Association estimates that 20,000 lives could be saved annually by prompt use of AEDs.

When AEDs first became commercially available in the late 90s, some states passed laws which provide immunity to users, but that require training and/or registration of the devices. More recent state laws have deleted the training and registration requirements as the devices have become so sophisticated that they can be easily used by untrained personnel. If a funeral home is deciding to purchase an AED, it should first understand the requirements of its state law so that it can take advantage of any immunity provisions provided by the law.

4. Emergency Action Plan

Funeral homes that have an Emergency Action Plan in place may want to use the template developed by NFDA to help ensure that their Emergency Action Plan is complete (sample follows). *A downloadable, customizable EAP will be available online for members in November 2014.*

If a funeral home does not have an Emergency Action Plan, it may use the template to develop its own plan. It will need to assign personnel to serve as emergency coordinators, alternate emergency coordinators, and area/floor monitors. It will also need to fill in emergency contact information for first responders as well as employees.

Beyond simply providing contact information, funeral home management also needs to closely assess each possible threat to the funeral home. An Emergency Action Plan must be specific both to the layout of the building and also the surrounding environment.

5. Alarm System

OSHA requires that any Emergency Action Plan include an [alarm system](#) to alert the employees when an emergency is occurring and to signal the need to evacuate. OSHA recommends that the alarms be distinctive and recognizable by all employees as a signal to evacuate the work area or, if it has employees with specific emergency responsibilities, to perform those responsibilities. In order to be effective, alarms must be able to be heard, seen or otherwise perceived by everyone in the workplace. Therefore, a different alarm system may be needed if an employee suffers from a disability.

6. Employee Training

An Emergency Action Plan will be of little use unless employees know about the plan and have been trained on what actions to take in case of an emergency. All employees should know the types of potential emergencies, reporting procedures, alarm systems, and evacuation plans. In addition, for those employees who are trained in first aid procedures, CPR, or the proper use of an automated external defibrillator, they should understand what their roles are in a given emergency.

OSHA recommends that general training for employees should address all of the following areas:

- Individual roles and responsibilities
- Threats, hazards and protective actions
- Notification, warning and communication procedures
- Means for locating family members in an emergency
- Emergency response procedures
- Evacuation, shelter and accountability procedures
- Location and use of common emergency equipment
- Emergency shutdown procedures.

Whenever a new employee is hired, it is necessary to review the Emergency Action Plan with the new employee. Also, if new emergency equipment is added or if renovation is made to the facility, the funeral home should revise and update its Emergency Action Plan to reflect those changes. Any change in the Emergency Action Plan must be reviewed with all employees.

7. Fire and Other Evacuation Drills

A key component of any Emergency Action Plan is the safe evacuation of employees from the funeral home, especially in the case of fire. To accomplish this task, the funeral home must implement emergency evacuation drills. The purpose of emergency egress and relocation drills is to educate the employee in the fire safety features of the building, the primary and alternate evacuation routes, the responsibilities for assisting visitors, and the location(s) of the designated assembly area(s). While speed is important in any evacuation drill, the orderly process is much more crucial.

Since visitors to a funeral home are in the building to attend visitations or funeral services, it would not be appropriate to conduct an evacuation drill when outsiders are present. In such cases, the emergency evacuation drills are to be limited to regular employees who can, however, be thoroughly educated in the proper procedures and must be trained to properly direct visitors in the funeral home in case of an emergency evacuation.

According to the [*Life Safety Code*](#) published by the National Fire Protection Association, the primary objective of a fire drill is orderly evacuation. The following points should be part of any effective fire or other evacuation drill:

- The employees will recognize the evacuation alarm.
- On receiving the evacuation alarm, the employees will take appropriate actions, including notification of supervisors and first responders.
- The employees will immediately begin the evacuation process using routes set forth in the Emergency Action Plan. The safe and orderly evacuation of visitors to the funeral home must be each employees' top priority.

- The employees will be alert to any visitor who is experiencing difficulty in evacuating and provide necessary assistance.
- The employees will use alternative evacuation routes if the primary routes are determined to be unsafe.
- The employees will report to the designated assembly area at the designated place.

In formulating fire drills, the funeral home management should consult with state and local laws to see if there are any particular requirements that apply to funeral homes. Some state and local jurisdictions develop their own fire prevention regulations which may specify the frequency of fire drills.

While funeral homes are not going to conduct evacuation drills during visitations or funeral ceremonies, employee drills should include the action that will be taken if visitors are in the funeral home for small or large gatherings. This will be a critical component of training for employees. Each employee working a visitation or a funeral ceremony must know the primary and secondary evacuation routes out of the gathering areas and to the designated assembly areas.