

Arizona School Safety Emergency Operations Planning

Special Audit

December 2024
Report 24-212



A Report to the Arizona Legislature

Lindsey A. Perry
Auditor General





The Arizona Auditor General's mission is to provide independent and impartial information and specific recommendations to improve the operations of State and local government entities. To this end, the Office provides financial audits and accounting services to the State and political subdivisions, investigates possible misuse of public monies, and conducts performance audits and special reviews of school districts, State agencies, and the programs they administer.

The Joint Legislative Audit Committee

Representative **Matt Gress**, Chair

Representative **Tim Dunn**

Representative **Nancy Gutierrez**

Representative **Alma Hernandez**

Representative **Beverly Pingerelli**

Representative **Ben Toma** (ex officio)

Senator **Sonny Borrelli**, Vice Chair

Senator **David C. Farnsworth**

Senator **Anthony Kern**

Senator **Juan Mendez**

Senator **Catherine Miranda**

Senator **Warren Petersen** (ex officio)

Audit Staff

Scott Swagerty, Director

Karl Calderon, Manager

Josh Lykins, Deputy Manager

Natalie Pfleger, Performance Audit Report Writer

Katie Peairs, Lead Visual Communications Coordinator

Liz Clark, Team Leader

Phil Gorman

John Lyle

Luke Schumaker

Anderson Wray

Contact Information

Arizona Auditor General
2910 N. 44th St., Ste. 410
Phoenix, AZ 85018-7271

(602) 553-0333

contact@azauditor.gov

www.azauditor.gov



LINDSEY A. PERRY
AUDITOR GENERAL

ARIZONA
AUDITOR GENERAL

MELANIE M. CHESNEY
DEPUTY AUDITOR GENERAL

December 9, 2024

Members of the Arizona Legislature

The Honorable Katie Hobbs, Governor

The Honorable Tom Horne, State Superintendent of Public Instruction
Arizona Department of Education

Kerry Muehlenbeck, Adjutant General
Arizona Department of Emergency and Military Affairs

Mr. Michael Crow, President of Arizona State University

Ms. Ashley Berg, Executive Director
Arizona State Board for Charter Schools

Arizona School District Superintendents

Arizona Charter School Administrators

Transmitted herewith is the Auditor General's report, *Arizona School Safety—Emergency Operations Planning*. This public report is in response to a December 6, 2023, resolution of the Joint Legislative Audit Committee and was conducted under the authority vested in the Auditor General by Arizona Revised Statutes §41-1279.03. I am also transmitting within this report a copy of the Report Highlights to provide a quick summary for your convenience.

My staff worked with officials from the Arizona Departments of Education (ADE) and Emergency and Military Affairs (DEMA), the Arizona State Board for Charter Schools (Charter Board), Arizona State University (ASU), and selected Arizona school districts and charter school operators, and provided updates on specific results of our work throughout the course of this special audit. Additionally, we provided officials from those entities the opportunity to review the applicable report sections and provide us feedback, and we made changes to clarify information in our report based on this feedback.

As outlined in its response, ADE agrees with the findings and plans to implement all the recommendations directed to it. As outlined in DEMA's response, it does not agree with the findings and will not implement 1 recommendation but will implement the other recommendations directed to it in a different manner. As outlined in the Charter Board's response, it agrees with the

applicable finding but will not implement 1 recommendation directed to it and will implement 1 recommendation in a different manner. As outlined in ASU's response, it agrees with the applicable finding but will not implement 1 recommendation directed to it and will implement 1 recommendation in a different manner. Additionally, most of the selected school districts and charter school operators indicated that our confidential findings were accurate and agreed to implement the recommendations.

My Office will follow up with ADE, DEMA, the Charter Board, and ASU in 6 months to assess their progress in implementing the recommendations. I express my appreciation to Superintendent Horne, Major General Muehlenbeck, President Crow, Executive Director Berg, the selected school districts and charter school operators, and each of their staffs for their cooperation and assistance throughout the audit.

My staff and I will be pleased to discuss or clarify items in the report.

Sincerely,

Lindsey A. Perry

Lindsey A. Perry, CPA, CFE
Auditor General

Arizona School Safety Emergency Operations Planning

None of the school emergency operations plans (EOPs) we reviewed fully met the State's EOP Minimum Standards and none of the schools we reviewed had fully implemented and tested their plans; additionally, student safety could be enhanced State-wide through efforts to provide more guidance to schools, review and update the EOP Minimum Standards, monitor compliance, and clarify the role of emergency responders

Audit purpose

This audit is the first in a series of school safety special audits and evaluates a sample of school districts' and charter schools' emergency operations plans (EOPs) to determine whether they meet minimum standards developed jointly by the Arizona Departments of Education (ADE) and Emergency and Military Affairs (DEMA). It also evaluates whether the schools have fully implemented and tested their plans and includes a review of other state and recommended practices to identify changes that could improve schools' emergency preparedness in Arizona.

Key findings

- Most school EOPs we reviewed met fewer than half of the EOP Minimum Standards we tested and some charter schools did not have EOPs, which could affect their abilities to effectively respond to safety emergencies. We found that EOP requirements need to be more clearly communicated to charter schools, and all schools could benefit from increased outreach, guidance, and training on emergency planning.
- Most schools we visited had not provided emergency procedures training to all staff, including substitute teachers; had not conducted all required safety drills; and had not posted certain safety reference materials, which could affect their preparedness to respond to emergencies.
- Some EOP Minimum Standards are too vague, may be impractical, or lack a clear purpose. A comprehensive review and update of the EOP Minimum Standards could help ensure all standards are necessary and clearly explained.
- Most other states we reviewed had monitoring processes to ensure schools comply with EOP requirements and have more clearly defined the role of law enforcement and emergency response agencies in EOP development; changes in these areas in Arizona could help improve schools' emergency preparedness.

Key recommendations

- ADE should ensure charters are aware of their responsibilities to develop school EOPs; and analyze the staffing and resources needed to initiate a compliance monitoring process and communicate the monitoring plan and authority and resource needs to the Arizona Governor and Legislature for further consideration.
- ADE and DEMa should evaluate what additional guidance is needed to help schools comply with the EOP Minimum Standards and provide necessary assistance; jointly complete a comprehensive standards review with stakeholder involvement; and work with stakeholders to clarify emergency response agencies' roles in EOP development and, if needed, seek statutory changes.
- Districts and charters should develop school EOPs that comply with the EOP Minimum Standards, and ensure school EOPs are fully implemented, tested, and reviewed annually.
- Charter sponsors should help ensure their charters meet the statutory requirement to develop school EOPs and incorporate compliance monitoring into their statutorily required review and renewal processes.



TABLE OF CONTENTS

Introduction 1

Finding 1: None of the EOPs we reviewed met all EOP Minimum Standards, increasing the risk that schools may not be fully prepared to respond to safety emergencies 7

Districts and charters are required to develop an EOP that meets EOP Minimum Standards for each school site

Most school EOPs we reviewed met fewer than half of the EOP Minimum Standards we tested, which could impact schools' ability to respond to safety emergencies

Command structure

Plan approval and receipt signatures

EOP activation

Emergency response considerations

Communication

Emergency locations and routes

Required documentation

Various factors impacted districts' and charters' abilities to develop school EOPs that met EOP Minimum Standards

Recommendations

Finding 2: None of the schools we evaluated had fully implemented and tested their EOPs, which could affect their ability to protect students in emergencies 17

EOP Minimum Standards require schools to implement and test EOPs, but none of the schools we evaluated had fully done so

Annual training

Lockdown drills

Evacuation drills

Debrief sessions

Safety reference materials posted in buildings

Safety reference materials posted in buses/vehicles

Annual EOP review



TABLE OF CONTENTS

Schools that do not implement and test their plans in accordance with the EOP Minimum Standards may increase risks to students and staff in emergencies

Recommendations

Finding 3: A comprehensive review and update of the EOP Minimum Standards could help ensure all standards are necessary, clearly explained, and understandable for schools 24

A recent update to the EOP Minimum Standards reduced ambiguity, but additional changes are needed

For some vaguely written requirements, the information in school EOPs varied or was not included at all

The purpose for some EOP Minimum Standards is unclear, others may be impractical as written, and additional guidance is needed

A comprehensive standards review is an opportunity to evaluate current standards, provide needed guidance, and identify other standards that could improve emergency preparedness

ADE's process for the recent, focused update to the EOP Minimum Standards could serve as a model for a comprehensive review

Recommendations

Finding 4: Emergency planning requirements and efforts varied among states we reviewed, and we identified changes that could help improve Arizona schools' emergency preparedness 28

All other states we reviewed require schools to have EOPs, but other state requirements, resources and support, and levels of oversight vary

Area 1: Unlike most other states we reviewed, Arizona does not have a mechanism to ensure all schools have EOPs that meet EOP Minimum Standards to better protect students

Area 2: Other states more clearly specify law enforcement and emergency response agencies' roles in emergency planning, and clarifying their roles in Arizona could increase emergency responders' involvement and improve student safety

Recommendations

Other pertinent information 37

Summary of recommendations: Auditor General makes a total of 21 recommendations to entities including districts and charters, ADE, DEMA, charter sponsors, and the Legislature 38

Appendix A: EOP Minimum Standards a-1

Appendix B: School safety summary survey results b-1

Appendix C: Scope and methodology c-1



TABLE OF CONTENTS

ADE response

Auditor General’s comments on the DEMA response

d-i

DEMA response

ASU response

Charter Board response

Figure

- | | | |
|---|--|----|
| 1 | Slightly more than half of the districts and charters in our evaluation reported involving law enforcement and emergency response agencies in school EOP development and providing EOPs to law enforcement | 33 |
|---|--|----|

Tables

- | | | |
|---|---|-----|
| 1 | School safety contributions from Arizona agencies and organizations | 2 |
| 2 | Other state EOP requirements vary compared to Arizona’s | 29 |
| 3 | Other state EOP-monitoring practices and requirements vary compared to Arizona’s | 30 |
| 4 | EOP Minimum Standards selected for review | a-2 |
| 5 | State-wide school safety survey response results tallied and grouped by district or charter and by urbanicity | b-2 |
| 6 | Combined district and charter State-wide school safety survey results tallied and grouped by the district or charter students attending | b-6 |



INTRODUCTION

The Arizona Auditor General has released the first report in a series of school safety special audit reports authorized by the Joint Legislative Audit Committee (JLAC) in December 2023. This audit report evaluates public school districts' and charter operators' (districts and charters) school emergency operations plans (EOPs) and whether they meet the *Arizona School Emergency Operations Plans EOP Minimum Requirements* (EOP Minimum Standards) jointly developed by the Arizona Department of Education (ADE) and the Arizona Department of Emergency and Military Affairs (DEMA). It also includes information about schools' efforts to implement and test their plans and identifies State-wide changes to improve schools' emergency preparedness. Due to potential safety concerns and the sensitive nature of the district- and charter-specific findings and recommendations, we will report that information separately in 2 limited-use, confidential report appendices. The remaining school safety special audits will evaluate schools' key physical safety infrastructure and multimedia data communication systems and review expenditures from the School Safety Interoperability Fund.

School safety issues across the country highlight the need for emergency planning and preparedness

Although school safety concerns are not new, the frequency and deadliness of school shootings in recent years have gained national attention and increased the public focus on school safety. *Education Week*, a national organization that provides K-12 news and information, tracks K-12 school shootings in which at least 1 person was injured or killed. According to *Education Week*, as of January 2024, there have been 211 such school shootings resulting in 134 deaths and 363 people injured since it began tracking these figures in 2018. Although Arizona districts and charters have not yet experienced school shooting tragedies on the level seen elsewhere in the country, there have been numerous incidents of weapons and other threats to schools and students. For example, in September 2024, a school in San Luis, Arizona, was locked down as police investigated reports of shots fired; in August 2024, a high school student was arrested for bringing a gun to a school campus in Phoenix; in May 2024, a gun was found in a Mesa high school student's backpack; in April 2024, an elementary school student in Phoenix was found with a gun on a school bus; and in January 2024, a school in Douglas, Arizona, activated its EOP because of a man with a knife in proximity to the campus.

Key terms

- **Emergency operations plan (EOP)**—A documented plan that provides guidance and procedures for school personnel to follow when responding to a school safety emergency. Each district and charter school site is statutorily required to have an EOP. (Arizona Revised Statute (A.R.S.) §15-341(A)(31)).
- **EOP Minimum Standards**—A set of standards developed jointly by ADE and DEMA that specify what schools' EOPs should include, and certain actions schools must take to implement and test their EOPs.

Source: Auditor General staff review of *Arizona Minimum Requirements for School Emergency Operations Plans*.

Further, Arizona schools and law enforcement have recently received a substantial number of school threats via social media. According to a situational awareness bulletin issued by the Arizona Counter Terrorism Information Center (ACTIC) in September 2024, between January 1, 2024, and September 3, 2024, it received 177 school threats. Further, between September 4, 2024, and September 24, 2024, ACTIC received more than

130 additional school threats. The significant increase in threats has posed challenges for law enforcement agencies that must investigate and determine whether the threats are credible. For example, in September 2024, approximately 40 Scottsdale police officers rushed to a Scottsdale high school after reports that a gunman had taken hostages in a bathroom. Although the threat turned out to be a hoax, responding to and investigating the threat required substantial law enforcement resources. Consequently, police departments in the State have reiterated their zero-tolerance policies for threats against schools and, in September 2024, arrested several students—some reportedly as young as 11 years old—for making school threats.

Schools must also be prepared for other types of emergencies, such as safety emergencies due to weather, fires, chemical exposure, or medical events that may threaten student safety. For example, in August 2024, students at a school in Phoenix were evacuated because of a suspected gas leak on campus. In the fall of 2023, an elementary school in Mesa reported activating its EOP because of a javelina on its campus. Comprehensive safety and emergency response planning helps prepare schools and school staff to respond quickly to emergencies and protect students from harm. EOPs provide schools with procedures for action in emergency events and reduce the opportunity for confusion or misunderstanding when emergency events occur.

Schools, along with several other entities, have responsibilities related to student safety and emergency preparedness

Although schools are primarily responsible for student safety, other agencies and organizations also have a role. For example, other federal, state, and local agencies and organizations have responsibilities related to student safety such as setting standards, providing financial and technical assistance and other support to schools, and responding to emergencies. Table 1 below provides information about the key governmental agencies and other organizations involved in student safety in Arizona and their primary responsibilities.

Table 1
School safety contributions from Arizona agencies and organizations

Agencies	School safety contributions
School districts, charter school operators, and individual school sites	<ul style="list-style-type: none"> Districts and charter school operators are statutorily responsible for developing for each school site an EOP that meets the EOP Minimum Standards (A.R.S. §15-341(A)(31)); EOP Minimum Standards require schools to implement and annually update their EOPs. Charter school operators are responsible for ensuring their charter schools comply with federal, State, and local rules, regulations, and statutes relating to health, safety, civil rights, and insurance (A.R.S. §15-183(E)(1)). Schools conduct emergency drills, staff training, and other preparedness efforts as outlined in their EOPs. Any of these entities may activate EOPs during school emergencies to help protect students.
Charter sponsors	<ul style="list-style-type: none"> Includes the State Board of Education, the State Board for Charter Schools, universities under the jurisdiction of the Arizona Board of Regents, and community college districts. Statutorily responsible for exercising general supervision over sponsored charter schools (A.R.S. §§15-182(E)(1) and 15-183(R)).

Table 1 (continued)

Agencies	School safety contributions
Arizona Department of Education (ADE)	<ul style="list-style-type: none"> Jointly responsible with DEMA for developing the State's EOP Minimum Standards (A.R.S. §15-341(A)(31)). Required to publish a list of relevant rules, regulations, and statutes to notify charter schools of their statutory responsibilities (A.R.S. §15-183(E)(1)). Oversees school safety-related teams/staff including: <ul style="list-style-type: none"> <i>The School Preparedness Team</i> (2 FTE¹, 0 vacancies)—Provides resources, outreach, and training for schools related to EOPs. <i>Arizona's School Safety Program</i>² (11 FTE, 2 vacancies)—Provides monies for school safety-related personnel, such as school resource officers (SROs), juvenile probation officers, social workers, and counselors. <i>Project AWARE</i> (Advancing Wellness and Resiliency in Education) (1.5 FTE, 0 vacancies)—Provides professional development and technical assistance on suicide prevention, understanding mental health disorders, and school and community mental health partnerships. <i>School Nursing and Health Services</i> (0.5 FTE, 1 vacancy)—Places nurses in schools in rural and underserved communities and provides training and resources for school nurses. Convened and coordinated the School Safety Task Force in 2023 to provide input on the School Safety Program. Task force recommendations included statutory changes to expand the grant program to allow it to pay for school safety officers (SSOs) and school psychologists; allow retired officers to be eligible to fill some positions covered by the grant program; and permit schools to apply for the purchase of safety technology, safety training, and infrastructure improvements.
Arizona Department of Emergency and Military Affairs (DEMA)	<ul style="list-style-type: none"> Jointly responsible with ADE for developing the State's EOP Minimum Standards (A.R.S. §15-341(A)(31)). Through its Division of Emergency Management, statutorily responsible for preparing for and coordinating emergency management activities that may be required to reduce the impact of disaster on persons or property (A.R.S. §26-305(B)).
Federal Emergency Management Agency (FEMA)	<ul style="list-style-type: none"> Provides some resources and guidance for public schools related to developing and maintaining EOPs. Hosts free, on-demand, online Incident Command System (ICS) trainings that are required by the EOP Minimum Standards for staff with designated ICS roles, such as incident commanders.

Table 1 (continued)

Agencies	School safety contributions
Local law enforcement agencies	<ul style="list-style-type: none"> • Statutorily required to coordinate with district and charter governing boards in developing EOPs for each school site. (A.R.S. §15-341(A)(31)). • Respond to school emergencies. • May provide additional school safety support by providing SROs or school safety training to school staff, such as active shooter trainings.
Emergency response agencies	<ul style="list-style-type: none"> • Statutorily required to coordinate with district and charter governing boards in developing school EOPs (A.R.S. §15-341(A)(31)). • Includes non-law enforcement emergency responders such as fire departments and hospitals. • Respond to or provide support during school emergencies. • May provide additional school safety support through EOP development, participate in emergency response drills, or provide school safety training to school staff.
Local- and/or county-level emergency management and public health agencies	<ul style="list-style-type: none"> • May provide assistance in emergencies, such as coordinating emergency response resources.
Organizations	
School Preparedness Advisory Council (SPAC)	<ul style="list-style-type: none"> • Provides input to ADE on activities and strategies related to promoting high-quality school EOPs. • Includes school representatives from various regions in Arizona, including Tribal regions, as well as professionals from nonprofits, healthcare, and emergency management. • Met 4 times in 2024.
Arizona School Risk Retention Trust, Inc. (the Trust)	<ul style="list-style-type: none"> • Membership-based organization providing insurance and risk-management services to most public school districts. • Sponsors the Arizona Regional Consortia for School Emergency Preparedness (ARCSEP) consortium meetings, which are held quarterly in each of the 6 designated regions. Consortia meetings are open to all public schools and provide presentations on emergency preparedness topics and lessons learned.

¹ There is 1 additional FTE, the School Safety Director, who is responsible for overseeing the school preparedness team, Project AWARE, and School Nursing and Health Services.

² As directed by JLAC, the Arizona Auditor General is currently conducting an audit of ADE's School Safety Program, as required by A.R.S. §§41-2958(1) and §15-154(L), with a report due by July 1, 2026.

Source: Auditor General staff review of State statute, ADE, FEMA, and the Trust websites, ADE reports, and auditor-conducted interviews.

School EOPs have been statutorily required since 2001, and although schools and other entities with school safety responsibilities have taken steps to prepare for emergencies, improvements are needed

To better ensure Arizona schools were prepared for emergencies, Laws 2000, Ch. 226, §3, required school district governing boards to develop EOPs for each school site, and ADE and DEMA to jointly establish the EOP Minimum Standards. Statute further required school EOPs to be developed in conjunction with local law enforcement and emergency response agencies.¹ Although statute does not specify that charters must develop EOPs for each of their schools, they are statutorily required to comply with all laws, rules, and regulations relating to safety, as noted in Table 1 on page 2. During the audit, ADE reported to us that it has determined that the requirement for each school site to have an EOP applies to charters.² Although ADE and DEMA were unable to provide information about the initial EOP Minimum Standards, including when they were developed and issued, and who was involved in developing them, the EOP Minimum Standards have been updated at least 4 times, with the most recent revision occurring in August 2024.^{3,4}

As previously discussed, this audit focuses on districts' and charters' efforts to develop and implement school EOPs in accordance with statutory requirements and EOP Minimum Standards. As part of our evaluation, we surveyed all districts and charters in the State regarding their emergency response and preparedness efforts, including their school EOPs (see Appendix B, pages b-1 through b-11, for additional information about the survey, including a summary of survey results). In January 2024, we also held 4 information sharing calls open to all Arizona school districts and charters to seek input and answer questions about our work related to emergency operations planning. Additionally, we met with officials from ADE, the Charter Board, the Arizona Charter Schools Association, the Arizona School Boards Association, and the Trust to obtain their perspectives on the strengths and opportunities for improvement in Arizona's school safety and emergency operations planning. Based on these efforts, we selected a sample of schools for an in-depth review of their EOPs and efforts to implement and test their EOPs.⁵ In total, for our evaluation we selected 47 schools—30 schools from 15 school districts and 17 schools from 15 charters—located in 14 counties across the State. Our evaluation found that schools were generally aware of the need for emergency preparedness, and all 47 schools we visited had taken steps to prepare for school safety emergencies. Although some schools we reviewed lacked the statutorily required EOPs, even those schools without EOPs had developed some safety procedures and reported performing some safety drills.⁶

However, our evaluation also found that additional efforts are needed to improve school safety State-wide. Specifically, despite EOPs having been required for more than 20 years, we identified widespread deficiencies in the school EOPs we reviewed, and none of the 47 school EOPs we reviewed fully met the EOP Minimum Standards. Additional outreach, training, and support relating to emergency operations planning and the EOP

¹ A.R.S. §15-341(A)(31). Prior to 2016, the statute required schools to develop their EOPs in conjunction with local law enforcement and local medical facilities.

² During an interview in July 2024, ADE reported to us that charter schools are required to have an EOP.

³ Prior to the revision issued in August 2024, ADE issued updated EOP Minimum Standards in 2006, 2013, and 2019. None of the updates have included a comprehensive review and update of all portions of the EOP Minimum Standards. ADE was unable to provide a copy of the EOP Minimum Standards that were in effect from the passage of Laws 2000, Ch. 226, through the revised standards ADE issued in 2006.

⁴ The 2019 EOP Minimum Standards, *Arizona School Emergency Operations Plan EOP Minimum Requirements*, are presented in Appendix A, pages a-4 through a-12. The 2024 EOP Minimum Standards, *Arizona Minimum Requirements for School Emergency Operations Plans*, are available on ADE's website at <https://www.azed.gov/sites/default/files/media/AZED%20Minimum%20Requirements%20-%202024%20FINAL.pdf>

⁵ For the districts and charters we selected for review that had only 1 school site, we visited the single school site. For the districts and charters we selected for review that had multiple schools, we judgmentally selected the school site(s) to visit and, for some districts and charters, visited multiple school sites.

⁶ A.R.S. §15-341(A)(31).

Minimum Standards may help districts and charters in developing and implementing school EOPs that meet the EOP Minimum Standards (See Finding 1, pages 7 through 16, for more information).

Additionally, we found that none of the schools we reviewed had fully implemented their EOPs and may not be fully prepared to respond to emergencies. For example, some schools had not adequately trained staff on emergency procedures, performed some required emergency response drills, and/or posted emergency response reference materials in required locations (See Finding 2, pages 17 through 23).

We also found that the EOP Minimum Standards could benefit from a comprehensive review of all requirements to ensure they are understandable to schools, necessary to facilitate an effective emergency response, and include clear guidance for implementation, as discussed in Finding 3, pages 24 through 27.

Further, as discussed in Finding 4, pages 28 through 36, action on a State-wide basis is needed to help ensure that all schools have comprehensive emergency plans and to clarify the role of law enforcement and emergency response agencies in the planning process. Currently, the State lacks a process for monitoring schools' EOPs to ensure they comply with EOP Minimum Standards. Additionally, although developing school EOPs in conjunction with law enforcement and emergency response agencies is statutorily required, we found that districts and charters varied widely in how they worked with these agencies, and some districts and charters had not worked with these agencies at all.⁷

Lastly, during our visits to the school sites included in our evaluation, we observed some campus security concerns, such as deteriorated or damaged fencing and broken locks, which are briefly discussed in Other Pertinent Information, page 37. We include our observations here to raise awareness of the types of safety issues that will be discussed more thoroughly in a separate school safety special audit focused on key physical safety infrastructure and multimedia data communication systems. The upcoming school safety special audit report will address whether schools' infrastructure and systems are aligned with statutory requirements, recommended standards, and other states' practices and will be issued by December 31, 2025, as directed by JLAC.

⁷ A.R.S §15.341(A)(31).



None of the EOPs we reviewed met all EOP Minimum Standards, increasing the risk that schools may not be fully prepared to respond to safety emergencies

Districts and charters are required to develop an EOP that meets EOP Minimum Standards for each school site

As discussed in the Introduction (see pages 1 through 6), Arizona districts and charters are statutorily required to develop an EOP that meets the EOP Minimum Standards for each school site in conjunction with local law enforcement and emergency response agencies.⁸ The EOP Minimum Standards include items that are required to be included in schools' EOPs, as well as several recommended items that, while not required, enhance the quality and completeness of the school EOPs.⁹ We judgmentally selected and categorized 30 standards specific to emergency planning based on their criticality in preparing schools to respond to emergencies, and evaluated the EOPs from 47 schools to determine whether they included each of the 30 elements (see Appendix A, pages a-1 through a-12, for the complete 2019 EOP Minimum Standards). We also evaluated the schools' efforts to implement and test their EOPs, and the results of that evaluation are discussed in Finding 2, pages 17 through 23.

Most school EOPs we reviewed met fewer than half of the EOP Minimum Standards we tested, which could impact schools' ability to respond to safety emergencies

The school EOPs we reviewed were missing numerous critical components that could impact schools' readiness to respond to emergency situations. For example, emergency response times may be unnecessarily delayed at schools that did not clearly specify how to activate their EOPs during emergencies. Additionally, 3 charter schools we selected for evaluation did not have a formal, written EOP. These charter schools were unaware of either the EOP Minimum Standards or the responsibility for charters to develop an EOP for each school site. Our detailed review of the school EOPs in our sample found that 26 of 44 EOPs—or nearly 60 percent—met fewer than half of the 30 standards we tested.

The 30 standards we selected for testing were grouped into 7 related categories, and the number of school EOPs we reviewed that met the standards within each category are presented below—blue denotes the total number of school EOPs that met the standard and orange indicates the total number that did not. Our analysis focuses on the 44 schools we reviewed that had an EOP and excludes the 3 schools we reviewed that did not.

⁸ A.R.S. §15-341(A)(31).

⁹ In August 2024 and during our evaluation, ADE issued updated EOP Minimum Standards that schools are required to meet by the start of the 2026-2027 school year. Our review of school EOPs was based on the 2019 EOP Minimum Standards in effect at the time of our evaluation.

Key

✓ Number of reviewed district and charter schools with EOPs that met the standard.

✗ Number of reviewed district and charter schools with EOPs that did not meet the standard.

Command structure

Most school EOPs established incident command positions, but only a few assigned staff and alternates to all required positions, increasing the risk of an ineffective or insufficient emergency response

School EOPs we evaluated often included an organizational chart outlining each of the 5 required incident command structure (ICS) positions and their responsibilities, but most did not assign staff to all required positions. A few school EOPs that partially met the command structure requirement had staff assigned to all 5 ICS positions, but did not also name alternates, as required. Additionally, we found EOPs from a few very small schools that did not designate any of the 5 required ICS positions. Establishing a clear chain of command helps identify who is in charge and helps facilitate clear lines of communication during an emergency. Further, filling all positions, where possible, can better ensure that all aspects of an emergency are managed. Additionally, because ICS is a national model, it creates common language between school officials and emergency responders.

Position responsibilities—37 of 44 EOPs specified ICS position responsibilities.

✓ 37

✗ 7

Command structure—15 of 44 EOPs included a specified ICS structure with all required elements.

✓ 15

✗ 29

Plan approval and receipt signatures

Most school EOPs lacked plan approval and receipt signatures, risking school officials, law enforcement, and emergency responders not having or being unaware of the EOP, which could be needed to facilitate an effective emergency response

Although EOP Minimum Standards require school officials to approve the EOP and recommend that law enforcement and emergency officials acknowledge receipt of it, most EOPs we evaluated lacked these signatures. Specifically, fewer than half of the EOPs we reviewed included signatures from a school principal or superintendent indicating that the plan had been approved and a second signature from a staff member at the district or charter level. Additionally, EOP Minimum Standards recommend that EOPs be provided to community support and emergency response agencies, such as public health, fire services, and law enforcement, and ADE's EOP template calls for signatures from these agencies acknowledging receipt of the EOP.¹⁰ Moreover, statute specifically directs districts and charters to develop their school EOPs in conjunction with law enforcement and other emergency response agencies.¹¹ However, most EOPs we evaluated did not include at least 1 signature from a law enforcement agency and 1 from another emergency response agency. These signatures are important to demonstrate these officials have approved or acknowledged receipt of the EOP and helps ensure agencies have a copy of the plan to facilitate their emergency response.

¹⁰ The August 2024 EOP Minimum Standards no longer recommend including signatures from community support and emergency response agencies.

¹¹ A.R.S. §15-341(A)(31).

Plan approval—20 of 44 EOPs had required approval signatures.



Staff signatures—20 of 44 EOPs were signed by district-level staff.



Responder signatures—9 of 44 EOPs included recommended signatures of at least 1 law enforcement and 1 emergency response agency.



During our evaluation, many district and charter officials reported that they did not work with law enforcement and emergency response agencies when developing the EOPs for their schools or that the schools provided the EOPs to local law enforcement or emergency response agencies, but the agencies did not sign the EOPs.

We also spoke with some law enforcement officials who work with districts and charters around the State on school safety matters. Law enforcement officials reported that they provide school safety guidance when requested, but some law enforcement agencies do not have the staff to work with all the districts and charters in their boundaries on their school site EOPs. Additionally, some law enforcement officials reported that, until recently, they were unaware of the requirement for districts and charters to develop EOPs in conjunction with law enforcement and emergency response agencies (see Finding 4, pages 28 through 36, for additional information about law enforcement and emergency responder involvement in developing EOPs). Since law enforcement and emergency response agencies are among the first to respond to school safety emergencies, it is important that they be familiar with area school EOPs and have information from the plans to help facilitate their response.

EOP activation

Most school EOPs specified who could activate the EOP and the procedures for doing so, but some lacked a sequence of activators to help ensure that emergency procedures are initiated quickly

Most school EOPs we reviewed included information about how to activate the plan, which staff were authorized to do so, and in what order. Establishing who can activate emergency protocols along with clear procedures for doing so helps to ensure a quick response to emergency incidents. However, some school EOPs did not meet this requirement because there was only 1 staff member authorized to activate the plan. Without a sequence of authorized activators, schools risk not being able to activate their EOPs timely and effectively, increasing the risk that an effective emergency response could be delayed.

Activation policy—41 of 44 EOPs included the policy or procedure for activating the plan.



Approved activators—42 of 44 EOPs specified who could activate the plan.



Activator sequence—35 of 44 EOPs included the order in which plan activators should take action.



Emergency response considerations

Procedures for assisting students who need additional help during emergencies and for managing emergency situations that occur outside the regular school day or off campus were not included in most school EOPs, potentially placing students’ safety at risk

Most school EOPs we reviewed did not meet the requirement to describe how students with access and functional needs (AFN), such as disabilities that affect mobility, or limited English language proficiency (LEP) will be assisted during an emergency. Additionally, most lacked procedures for responding to emergencies affecting before- or after-school programs and for off-campus emergencies such as field trips or school bus accidents. Instead, many school EOPs called for staff to follow existing procedures developed for emergencies that occur during the regular school day. Having specific procedures for assisting students with AFN and LEP, and for before- and after-school and off-campus emergencies, helps ensure that staff are prepared to help all students during any part of the day, whether on or off campus.

Students with AFN and LEP provisions—10 of 44 EOPs described the measures necessary to assist students with AFN or LEP.



Emergency procedures—7 of 44 EOPs included procedures for responding to before- and after-school and off-campus emergencies.



In 2023, the Arizona Legislature updated A.R.S. §15-341(A)(31) to require that school EOPs address how schools and emergency responders will communicate with and provide assistance to students with disabilities, further emphasizing the importance of the requirement to describe how students with AFN or LEP are provided for during an emergency. Some of the schools that did not meet this requirement in their EOPs indicated that they include emergency procedures in each student’s individualized education plan (IEP), which is shared with all the student’s teachers. Other schools explained that they did not have any students with AFN or LEP, so they had not included any procedures to address these needs in their EOPs. Students with disabilities or a limited ability to understand English are among the most vulnerable during an emergency because they may have limitations in understanding and responding to verbal commands. Consequently, it is critical that staff, including substitute teachers and others who may not have immediate access to students’ IEPs, have guidance for how to help them in an emergency.

Additionally, in the case of EOPs that lacked separate procedures for emergencies that occur off campus or outside the regular school day, our review found that the regular procedures often did not address situations where site-specific ICS staff and emergency resources were not available. For example, most lockdown procedures were not applicable for emergency situations that may arise during fieldtrips. Additionally, most school EOPs did not address how the lockdown procedures should change or be revised when school is not in session but when students are still under school staff’s supervision, such as during after-school programs.

Communication

Nearly all school EOPs included procedures for contacting emergency first responders and notifying staff, which is critical for ensuring a quick response, but most plans did not include detailed contact information for parents and all emergency agencies

The EOP Minimum Standards require school EOPs to include 13 elements relating to communication methods and key contacts, and nearly all the school EOPs we reviewed included procedures for calling 911 or local emergency responders and specified how the school would warn staff of an emergency. Additionally, although the EOP Minimum Standards do not provide clear guidance for what staff contact information is required, most EOPs included some staff

contact information as well as information for contacting emergency operations personnel. By including this information in their EOPs, schools can help facilitate a timely and robust emergency response.

There were several other communication standards, however, that most school EOPs in our review did not include, such as all required details for emergency response agencies, parent contact information, or all prepared statements or letters. As discussed below, some of these standards are unclear or impractical, and the expectations for what needs to be contained in the EOP have not been made clear.

Communication methods—42 of 44 EOPs addressed how the school would warn staff of an emergency and established procedures for contacting 911 or local emergency response agencies.



Emergency notifications—2 of 44 EOPs included detailed information required, which includes name, title, agency, and contact information for district/charter personnel and emergency responders to be notified.



Parent contact details—4 of 44 EOPs included a student roster with parent or guardian contact numbers.



Staff contact details—34 of 44 EOPs included faculty and staff emergency phone numbers.



Emergency personnel details—28 of 44 EOPs listed detailed information, including name, title, and telephone number for emergency operations personnel.



Prepared statements/letters—0 of 44 EOPs included all required prepared statements or letters to communicate with faculty, students, parents/guardians, and media about an emergency.



Emergency contacts—8 of 44 EOPs included all 7 required emergency contacts: general emergency (911); ambulance; poison control; police, sheriff, or state police; fire department; local hospital; and public health department.



EOP breakdown of the 7 required types of contacts:

911	Ambulance	Poison	Police	Fire	Local hospital	Public health
✓ 44	✓ 8	✓ 32	✓ 30	✓ 29	✓ 22	✓ 19

Although all school EOPs we reviewed included the emergency 911 number and many listed contact information for local emergency response agencies, they did not separately list the names, titles, agencies, and contact information for certain individual emergency responders as required. As noted in Finding 3, pages 24 through 27, the EOP Minimum Standards do not clearly describe why some of this information is required since, in most areas of the State, calling 911 is the quickest way to initiate an emergency response and ensure that appropriate responders are dispatched.

Most schools included in our evaluation also did not maintain printed rosters with parent or guardian contact numbers as part of their EOPs, but instead used their electronic student information systems to track and access this information. According to ADE’s school preparedness team, to meet the standard, school EOPs should include printed rosters with parent and guardian contact information for each student in case an emergency disrupts access to student information systems. Timely and effective communication with parents and guardians during an emergency is critical to ensure awareness of what is happening at the school, provide safe and clear guidance about reuniting with students, and alleviate anxiety, when possible. For example, during some active emergencies, schools must quickly communicate with parents and guardians if their attempts to come to campus to reunite with their students would not be safe or would hinder emergency responders’ ability to act. However, as noted in Finding 3, pages 24 through 27, maintaining printed rosters may not be practical for all schools, some of which have more than 1,000 students, and ADE and DEMA have not provided guidance for how this contact information should be maintained.

Additionally, as shown above, none of the EOPs we reviewed included all the required prepared statements or letters to communicate with parents, students, faculty, and the media during emergencies. Specifically, we found that some EOPs included prepared statements for parents and the media; however, only 1 EOP included prepared statements for faculty, and no EOPs we reviewed included prepared statements for students. Letters and statements prepared in advance can help facilitate timely communication and ease the workload for school officials during emergencies. However, as noted in Finding 3, pages 24 through 27, the purpose for some of these required letters, such as those to students and faculty, is unclear.

Emergency locations and routes

Most school EOPs we reviewed did not include detailed maps and other information necessary to facilitate successful off-site evacuations and to ensure first responders have the information they need to safely and effectively respond to on-campus emergencies

Most school EOPs we reviewed did not include information necessary for ensuring successful off-site evacuations, such as designated command posts, staging areas, evacuation routes, and assembly areas (see text box). As a result, schools may not be fully prepared for an emergency requiring them to evacuate students and staff to an alternative location. For example, 1 school we reviewed had to relocate its students off-site during an emergency and found that its relocation procedures had not addressed how students and staff were supposed to get to the relocation site. After the incident, the school created maps that identified routes to the relocation site to help facilitate safe and efficient evacuations.

Additionally, some school EOPs we reviewed contained facility maps, but only 1 school’s EOP included facility maps with the elements required by the EOP Minimum Standards. Detailed maps can be a critical resource for first responders facing a variety of emergencies to ensure they are able to respond quickly and safely. However, as noted in Finding 3, pages 24 through 27, requirements to attach detailed maps and blueprints to EOPs may not be practical for large schools with multiple and/or multistory buildings because of the number of documents to be included. Further, the EOP Minimum Standards provide no guidance for how this critical information should be communicated to emergency responders.

Key terms

- Command post**—The location where the primary functions of incident command are performed.
- Staging areas**—A temporary location for available resources in which personnel, supplies, and equipment await assignment during an incident.

Source: Auditor General staff review of 2019 ADE EOP template and FEMA’s website. Retrieved 12/4/2024 from <https://training.fema.gov/emiweb/is/icsresource/assets/glossary%20of%20related%20terms.pdf>

Command posts—16 of 44 EOPs designated primary and alternate on-site command posts and staging areas.

✓ 16

✗ 28

Evacuation routes—2 of 44 EOPs designated primary and alternate evacuation routes and assembly areas.

✓ 2

✗ 42

Relocation area—13 of 44 EOPs designated primary and alternate on-site and off-site relocation sites and addressed how students and staff would be transported

✓ 13

✗ 31

Relocation map—3 of 44 EOPs included maps of relocation areas that identified specific information such as command post and staging areas, assembly areas, parking, and services such as medical and behavioral health.

✓ 3

✗ 41

Facility map—1 of 44 EOPs included facility maps with all required components, such as the location of first aid facilities and emergency shut off valves.

✓ 1

✗ 43

Required documentation

About half of the school EOPs included student accountability release forms, which is critical for ensuring safe reunifications in an emergency, but few plans included anything to meet the master schedule requirement

Ready access to student accountability release forms that specify who is authorized to pick up a student in the event of an emergency, particularly in the case of off-site evacuations, helps ensure students are safely reunited with parents or guardians, and about half of the school EOPs we reviewed contained this information. In some cases, schools that did not have these forms in their EOPs had the information available online or filed separately in the front office, similarly to how they maintained student rosters and parent contact information. However, emergencies that require a school evacuation likely limit staff’s ability to access systems through regular means and may disrupt access completely. For example, severe weather events or natural disasters may take systems offline or result in long-term power outages. Therefore, having release forms and reunification procedures in the EOP is critical for ensuring schools can safely reunite students with their parents or guardians in emergencies where system access is limited.

The EOP Minimum Standards also require EOPs to contain a master schedule, but it is unclear what information should be included and only a few EOPs contained any scheduling information at all. As noted in Finding 3, pages 24 through 27, the EOP Minimum Standards for master schedules and some other requirements are vague, and ADE and DEMA have not clarified expectations for how this information should be incorporated into school EOPs.

Student forms—25 of 44 EOPs included required student accountability release forms.

✓ 25

✗ 19

Master schedule—8 of 44 EOPs included a master schedule.

✓ 8

✗ 36

Various factors impacted districts' and charters' abilities to develop school EOPs that met EOP Minimum Standards

We identified various reasons that districts and charters we evaluated had not developed EOPs that met EOP Minimum Standards for each of their schools. Specifically:

Some charters were unaware that an EOP is required for each school site—As noted above, our review of school EOPs identified 3 charter schools that lacked an EOP, and these charters reported that they were unaware that an EOP was required. Another 7 charters that responded to our survey, but were not selected for an in-depth review, reported that they also had not developed required EOPs for their schools (see Appendix B, pages b-1 through b-11, for the summary survey results).

Some charters may not have EOPs because the requirement for developing EOPs has not been made clear. As noted in the Introduction, pages 1 through 6, statute does not specifically state that charters operators must develop EOPs for each of their school sites, but they are required to comply with all school-related safety laws and regulations.¹² Per A.R.S. §15-183(C), charters must be sponsored by either the Arizona State Board for Charter Schools (Charter Board) or an approved entity, such as a State university or the State Board of Education. Most charters in Arizona are sponsored by the Charter Board, with Arizona State University (ASU) also sponsoring a few charters in Maricopa and Pinal Counties.

ADE is statutorily required to publish a list of relevant rules, regulations, and statutes to notify charter schools of their responsibilities, but as of November 2024, its list did not include a reference to the statutory requirement for each school site to have an EOP.¹³ Charter Board officials reported that for the past 15 years it has been their understanding that ADE considered developing school EOPs as a best practice rather than a requirement for charters. However, Charter Board officials indicated that EOPs are important and reported that the Charter Board has encouraged its charters to develop school EOPs to better prepare for emergencies. Our evaluation found that 14 of the 17 charter sites we visited had EOPs.

As noted in the Introduction, pages 1 through 6, ADE confirmed to us during the audit that it has determined that charters are required to develop school EOPs. Charter Board officials indicated that, after having conducted a recent review of its requirements and processes, the Charter Board's position is consistent with ADE's determination that the statutory requirement to develop EOPs for each school site applies to charter schools.

Staff responsible for developing EOPs were frequently unaware of specific requirements within the EOP Minimum Standards—No school EOP we reviewed fulfilled more than two-thirds of the standards, and most school EOPs met fewer than half. Districts and charters that had developed the most complete school EOPs often employed 1 or more full-time staff responsible for school-safety-related activities, but even dedicated safety staff often reported that they were either unaware of some individual requirements or they lacked an understanding of what was specifically required. For example, school safety staff at 1 district we reviewed were unaware that ICS training was required for everyone who had an ICS role. Safety staff at a charter we reviewed were unaware that school EOPs must have separate safety procedures for the regular school day and for before- and after-school events.

Staff at districts and charters that did not employ specialized safety personnel and those that reported relying on ADE for awareness and assistance were even less likely to be aware of the EOP Minimum Standards and how to comply with them. According to some districts and charters, assistance from ADE has not always been readily available and outreach has been limited. For example, officials from 1 district indicated that no one from ADE had reached out to help them locate and understand the EOP Minimum Standards, and they had relied on other resources, such as other schools' EOP templates, to help with their emergency planning. Several administrators from other districts and charters we spoke with also did not know where to find the EOP Minimum Standards or other resources to help direct their emergency planning efforts.

¹² A.R.S. §§15-341(A)(31) and 15-183(E)(1).

¹³ A.R.S. §15-183(E)(1).

Although ADE's past outreach efforts generally did not include charters and were likely insufficient to keep districts and charters informed about emergency planning expectations, ADE has increased its safety outreach efforts in the past 2 years. For instance, in June 2024, ADE surveyed districts and charters to gather feedback for its 2024 update of the EOP Minimum Standards. ADE also conducted an event readiness forum in June 2023 to discuss active shooter scenarios and responses that involved participants from more than 130 districts, charters, emergency response agencies, and other stakeholders. Additionally, ADE indicated that at the end of 2023, staff began communicating more with charter school associations, and in fiscal year 2024, staff attended and made presentations at quarterly regional safety consortia meetings operated by the Trust and open to all schools.¹⁴

ADE and DEMA have not developed or provided training specific to the EOP Minimum Standards, although ADE offers other safety-related trainings and resources—ADE has provided schools with some resources to help them in developing EOPs, such as templates, resource guides, and trainings. However, ADE and DEMA have not developed or provided training for districts and charters specific to the EOP Minimum Standards and how to meet them, which may have helped more districts and charters to develop school EOPs that comply with the EOP Minimum Standards.

Additionally, according to some district and charter officials we spoke with, some of the trainings the EOP Minimum Standards require are not designed to address their needs and they do not always find the content relevant. Specifically, district and charter officials expressed concerns about the FEMA-developed ICS trainings, which EOP Minimum Standards mandates for school emergency response personnel. For example, officials from 2 rural schools reported that some of the FEMA-developed ICS trainings only focused on urban environments and were not directly applicable to rural settings. Further, other district and charter officials, including 1 former law enforcement official who led school safety efforts at a large urban school district, reported that the FEMA-developed ICS trainings included content that was irrelevant to schools because it used specialized law enforcement/first responder terminology that was not easily understandable to school staff.

Although ADE and DEMA have not yet developed EOP Minimum Standards training, ADE has recently begun working to improve the accessibility and relevance of its other training offerings. For example, ADE's school preparedness team has begun offering a variety of trainings that are available in multiple locations across the State, as webinars, or as on-demand video presentations. Additionally, in its August 2024 EOP Minimum Standards update, ADE now only requires each school's incident commanders to take the FEMA-provided ICS introductory course that many schools found challenging and not fully relevant. Staff in other ICS positions may select from a series of other courses geared more toward schools and their safety concerns.

Some EOP requirements lack clarity, including law enforcement and emergency response agencies' roles in working with districts and charters to develop school EOPs—As previously discussed, in August 2024, ADE issued revised EOP Minimum Standards, but additional improvements are needed. The updated EOP Minimum Standards now include only required elements, no longer listing both required and recommended elements that may have caused confusion. However, as noted above and in Finding 3, pages 24 through 27, some of the requirements continue to be unclear, and different guidance may be appropriate for larger versus smaller schools and urban versus rural school districts. Additionally, although statute requires districts and charters to develop school EOPs in conjunction with local law enforcement and emergency response agencies, neither statute nor the EOP Minimum Standards clearly describes what these agencies' roles should be.¹⁵ See Finding 4, pages 28 through 36, for more information about the need to clarify the role of law enforcement and emergency response agencies in EOP development.

No State-wide entity currently monitors and enforces the requirement for schools to have EOPs that meet the EOP Minimum Standards—Although districts and charters are statutorily required to develop school EOPs in accordance with EOP Minimum Standards, none of the entities in the State with school safety responsibilities is currently ensuring districts and charters comply with this requirement.¹⁶ ADE and DEMA were jointly responsible for developing the EOP Minimum Standards, but officials from both entities reported to us that they do not

¹⁴ The Trust is a private organization that provides insurance and risk-management services to its members.

¹⁵ A.R.S. §15-341(A)(31).

¹⁶ A.R.S. §15-341(A)(31).

monitor whether schools have EOPs that meet the standards. Additionally, as previously discussed, charter sponsors are responsible for general supervision over their sponsored charter schools, but neither of the 2 charter sponsors for the charters we reviewed had processes to monitor compliance with the EOP Minimum Standards.¹⁷ Without an entity consistently monitoring districts and charters to ensure their school EOPs comply with EOP Minimum Standards requirements, districts and charters may not prioritize EOP development and maintenance or may not receive critical feedback about deficiencies in their schools' EOPs that could impact their emergency preparedness and response (see Finding 4, pages 28 through 36, for more information).

Districts and charters reported that staffing resources, turnover, and a focus on other responsibilities also hindered school safety planning efforts—Finally, districts and charters we evaluated indicated that staffing and other responsibilities impacted their ability to create comprehensive and compliant school EOPs. For example, officials from districts and charters with small schools expressed that it can be difficult to fill the 5 ICS positions the EOP Minimum Standards require, and especially to name alternates, given the limited staff available to do so. At 1 school we reviewed, the 5 required ICS positions were divided between 2 staff members because there were not enough staff working at the school to fulfill all required positions. Additionally, small districts and charters typically lacked dedicated school safety staff, and staff with various other responsibilities, such as the school principal, were responsible for school emergency operations planning. Some district and charter administrators also reported that they had not dedicated time and attention to their school EOPs because they were focused on other responsibilities related to school operations.

Additionally, some district and charter officials we spoke with also reported that turnover among staff responsible for emergency preparedness affected their ability to develop and implement school EOPs. For example, 1 district we reviewed had a new superintendent, who also acted as the principal for the district's only school, in each of fiscal years 2023, 2024, and 2025. The school's EOP was created in fiscal year 2023, but the superintendent who joined the district in fiscal year 2024 was not aware of all the school's emergency procedures. Teachers we spoke with, however, were aware of the emergency procedures within the school's EOP. Another administrator at a different school we spoke with had overseen the school's EOP development in fiscal year 2024 but was leaving at the end of the school year and was not confident that the newly established EOP and emergency response procedures would be carried forward.

Recommendations

1. Districts and charters should develop school EOPs for each school site that comply with statutory requirements and EOP Minimum Standards.

ADE should:

2. Review federal, State, and local rules, regulations, and statutes relating to school safety and publish an updated list of rules, regulations, and statutes relevant to charter schools, including the requirement to develop an EOP for each school site, as required by A.R.S. §15-183(E)(1).
3. Develop and implement a process to regularly update its list of federal, State, and local rules, regulations, and statutes that charter schools must follow and to inform charter schools of their listed responsibilities.

ADE and DEMA should:

4. Taking into consideration differences in size and location, evaluate whether districts and charters require additional outreach, guidance, or training related to developing school EOPs and the EOP Minimum Standards and if so, coordinate to develop and offer necessary and easily accessible training and guidance to districts and charters.

ADE response: As outlined in its [response](#), ADE agrees with the finding and recommendations and will implement the recommendations.

DEMA response: As outlined in its [response](#), DEMA does not agree with the finding and will not implement the recommendation.

¹⁷ A.R.S. §§15-182(E)(1) and 15-183(R).



None of the schools we evaluated had fully implemented and tested their EOPs, which could affect their ability to protect students in emergencies

EOP Minimum Standards require schools to implement and test EOPs, but none of the schools we evaluated had fully done so

The EOP Minimum Standards include 7 elements related to how schools should implement and test their EOPs, which are in addition to the 30 EOP standards discussed in Finding 1, pages 7 through 16. For example, the testing and implementation standards include requirements for training staff; conducting emergency response drills, such as evacuation and lockdown drills; and posting emergency response reference materials in classrooms and on school buses. However, none of 47 schools we evaluated had fully met the EOP Minimum Standards relating to training, drills, and posted safety reference materials.

The 7 implementation standards and the number of schools that met them are presented below—blue denotes the total number of schools we reviewed that met the standard, and orange indicates the total number that did not. Our analysis focuses on all 47 schools selected for evaluation since all have a responsibility to conduct drills and other emergency preparedness activities regardless of whether they have a formal EOP. See the details below.

Key



Number of reviewed district and charter schools with EOPs that met the standard.



Number of reviewed district and charter schools with EOPs that did not meet the standard.

Annual training

Most schools provided emergency response training to full-time teachers but did not meet the requirement to train all staff, including substitute teachers, potentially limiting their ability to effectively respond to emergencies

Although full-time teachers at most schools received emergency response training, this required training was not provided to all staff—including substitute teachers—at many of the schools we evaluated. Required training includes notifying staff of who is in charge during emergencies at the school and how to contact that person, as well as how to send and receive communications during emergencies. Training must also include a review of warning signals, evacuation routes, assembly areas, and emergency response procedures. By not ensuring all staff receive training, schools increase the risk that substitute teachers or others will not know how to activate the EOP or what to do in emergency situations.

Annual training—26 of 47 sites provided annual training on emergency response procedures to all staff.

✓ 26

X 21

In addition to determining whether schools provided required trainings, we also interviewed school staff to understand their perspective on the adequacy of their schools’ safety and emergency response trainings and found:

- **Substitute teachers reported needing additional training**—EOP Minimum Standards require emergency response training for all staff, including substitute teachers, but substitute teachers at some schools reported not receiving training and lacked an understanding of the school’s EOP and emergency response procedures. Our evaluation found that 45 of 47 schools trained full-time teachers. However, of the 37 schools in our evaluation that utilized substitute teachers, only 16 provided them with EOP and/or emergency response trainings. According to the Arizona School Personnel Administrators Association (ASPAA), its September 2024 survey of 139 school districts and charters found that more than 2,200 teaching positions remained vacant or were filled by long-term substitute teachers a few weeks into the school year. Because of districts’ and charters’ reliance on substitute teachers in classrooms, it is critical that they receive the training they need to act in emergencies.

The schools we evaluated that provided training generally did so at the start of the school year and offered classroom-style lecture-based courses in areas relevant to school safety. School officials reported that training substitute teachers is more challenging because substitute teachers are typically not present when these safety trainings are conducted. Also, some districts and charters reported hiring substitute teachers through contract agencies and thought the contract agency had provided safety training. However, training provided by an outside agency is not likely to include information specific to the school site, such as emergency evacuation routes and communication procedures. Because the EOP Minimum Standards require training for all staff, districts and charters could better fulfill this requirement by developing trainings, such as video-based or other on-demand classes, for substitute teachers or staff who miss the annual training session. Such training could help ensure that all staff have the information they need to effectively respond in an emergency.

- **Staff were less sure about how to act in a lockdown than in an evacuation**—Our interviews found that staff at 35 of 47 schools we evaluated were aware of and reported being comfortable with procedures for conducting safe and effective evacuation drills, such as fire drills. However, staff were less confident and knowledgeable when describing their schools’ lockdown procedures. At 25 of 47 schools we evaluated, staff we interviewed were not able to accurately describe their responsibilities during a lockdown. Some of the items teachers were unsure about included how to communicate with administrators during a lockdown, how to use tools the schools included in their EOP such as color-coded cards and the various colors’ meanings, and how to account for all students during a lockdown event. Insufficient training can potentially impact student safety if staff are unable to react quickly to an emergency or do not understand what they need to do in various emergency situations.

Lockdown drills

Nearly all the schools we reviewed could not demonstrate that they had conducted all required lockdown-type drills, potentially impacting staff and students’ readiness and ability to follow safety procedures in an emergency

The EOP Minimum Standards require each school to annually conduct at least 4 lockdown-type drills—3 lockdowns and 1 shelter-in-place—including 1 while students are outside the classroom, but only 4 of 47 schools we reviewed could provide support that they met this standard during the 2023-24 school year. Another 14 schools documented performing 2 lockdown drills, with 4 of these schools performing at least 1 drill while students were out of the classroom. At the time of our evaluation, the EOP Minimum Standards did not require schools to document the drills conducted throughout the year. Failing to perform required lockdown drills increases the risk that students or staff do not know how to act in emergency situations and may increase risk to students and staff during emergencies.

Lockdown drills—4 of 47 sites conducted the required number of lockdown and shelter-in-place drills.

✓ 4

✗ 43

The EOP Minimum Standards have required a combined total of 4 lockdown and shelter-in-place drills since 2013, but staff we spoke with at several schools were unaware of the standard and believed that only 2 lockdown-type drills were required. The confusion may be related to the fact that the school EOPs we reviewed generally did not specify the number of lockdown and other drills required, so staff lacked readily available guidance to ensure they met the current requirements. Additionally, ADE’s EOP template to help districts and charters develop their school EOPs does not state the required number of drills. As noted in Finding 1, pages 7 through 16, increased outreach and training focused specifically on the EOP Minimum Standards, such as the required number and type of drills and how to meet the requirements, could better facilitate compliance at schools and ensure they are better prepared for safety emergencies.

School lockdown procedures generally involve locking classroom doors, closing windows and shutting window coverings, and moving to a specified location in the classroom while remaining quiet and still. Without practicing the behaviors and skills expected during lockdowns, schools increase the risk that students may not follow procedures due to panic or stress or that staff may not be aware of students who have adverse reactions during lockdown drill events, potentially increasing safety risks during emergencies.

Key terms

- **Lockdown**—School buildings and grounds are secured during incidents that pose an immediate threat of violence in or around the school. Instruction stops, and staff and students follow specific safety procedures. EOP Minimum Standards require 3 lockdown drills per year.
- **Shelter-in-place**—Also referred to as “soft lockdown,” these drills require occupants to remain indoors, perhaps for an extended period, because it is safer inside the building/room than outside. Generally, in-classroom activities may continue during shelter-in-place events. EOP Minimum Standards require 1 shelter-in-place drill per year.

Source: Auditor General staff review of *Arizona Minimum Requirements for School Emergency Operations Plans*.

Evacuation drills

About half of the schools did not conduct and document all required evacuation drills, which could affect whether students and staff can safely exit classrooms and buildings in an emergency

Schools we evaluated were aware of the need to conduct evacuation drills, such as fire drills, and all reported conducting at least 1 of these drills during the school year. However, most schools did not meet the EOP Minimum Standards requirement to conduct and document evacuation drills in accordance with the State Fire Marshal’s mandated schedule, which requires 1 evacuation drill per month.¹⁸ For schools that are in session from August to May each year, the schedule requires at least 10 evacuations over the course of the school year.

Key term

- **Evacuation**—Move students, staff, and other on-campus individuals away from hazards that affect the safety of the campus.

Source: Auditor General staff review of *Arizona Minimum Requirements for School Emergency Operations Plans*.

Only 23 schools maintained the required drill documentation and had performed the required monthly evacuation drills. Another 22 schools maintained drill documentation but had not performed all required evacuation drills, and 2 schools did not have drill documentation to support that they had conducted any evacuation drills.

¹⁸ The Office of the State Fire Marshal, within the Arizona Department of Forestry and Fire Management, adopted the 2018 International Fire Code (IFC), which requires schools to conduct monthly fire and evacuation drills.

Evacuation drills—23 of 47 sites conducted required number of evacuation drills.



Officials from some schools we evaluated indicated that completing monthly evacuation drills can be challenging for schools because of school breaks. For example, 1 administrator reported that school calendars in their district typically include breaks of up to 2 weeks in the fall, winter and spring, which reduces the number of days available to conduct drills during the affected months. However, performing required evacuation drills helps to ensure students and staff know how to respond in emergency situations to quickly evacuate a school.

Debrief sessions

Most schools reported debriefing after drills to identify improvements that could better protect students during emergencies, but few documented the results of these sessions which could be helpful for ensuring needed changes are made

Although 40 of 47 schools we reviewed reported conducting debriefs after drills, only 12 schools documented debriefing sessions for all the drills they conducted. Debriefing after drills is an important tool for identifying deficiencies in emergency procedures and, by documenting the corrective actions needed, schools can help ensure they are better prepared for future emergencies.

Drill debrief sessions—12 of 47 sites conducted and documented debrief sessions after every drill.



Schools that did not consistently conduct debriefing sessions or document the results may not have done so because, prior to August 2024, the EOP Minimum Standards listed this as a best practice rather than as a requirement. One school, for example, indicated that it informally holds discussions following drills but does not complete any formal documentation unless the school activates its EOP for actual emergency events. Another school indicated that if nothing went wrong during a drill, it did not conduct a debriefing session. The updated EOP Minimum Standards issued by ADE in August 2024 now require schools to debrief after all drills and to document the results of those debriefing sessions along with any necessary changes to the EOP or safety procedures to address deficiencies.

Safety reference materials posted in buildings

Few schools posted all required safety reference materials in every classroom and assembly area, increasing the risk that students and staff may lack critical guidance in emergency situations

Although many schools had developed safety reference materials outlining common procedures for evacuations, lockdowns, and other emergencies, 40 of 47 schools we visited did not have these materials visibly posted in all classrooms and assembly areas, as required. Posted materials are an important component of school safety because they can help refresh staffs' knowledge of procedures or guide untrained staff or students through the steps to take in emergencies.

Safety reference materials posted in buildings—7 of 47 sites posted safety materials in all required areas.



Several schools we observed had safety reference materials posted in some, but not all, classrooms or some, but not all, assembly areas such as gymnasiums or lunchrooms. Other schools had reference materials available to classroom teachers and staff but did not post them where they were visible and accessible to students. Specifically, 13 of the schools that did not post safety reference materials had emergency binders or booklets available in classrooms for staff to reference. However, these emergency binders or booklets were not always easily accessible to students and, in some cases, staff had to search to find them when we requested them while observing the classrooms. For the classrooms where staff had to search to locate the emergency binders, staff were generally able to find the binder within 1 to 2 minutes. However, in a few cases, staff were not able to locate the emergency binder.

Some schools we visited in May 2024 reported that they had already collected safety reference materials from classrooms in preparation for updating posters or binders for the next school year. However, school was still in session, and students and staff were present in classrooms at the time of our visits, suggesting that posted safety materials continued to be necessary in case of an emergency. Additionally, staff at 1 charter school reported that materials had previously been posted but had been placed on doors that opened to the outside. The materials were readily damaged by the wind or lost and had not been replaced.

Safety reference materials posted in buses/vehicles

None of the schools posted safety reference materials in their buses/vehicles, but making these materials available to drivers and transportation staff could help them better respond to a variety of emergency scenarios

Of the 47 schools we observed, 35 provided student transportation services and none of these schools met the EOP Minimum Standard requiring safety reference materials to be posted in vehicles used to transport students. Although these schools generally reported that they followed safety standards included in Arizona Department of Public Safety’s (DPS) *Minimum Standards for School Buses and School Bus Drivers*, posting EOP safety materials in vehicles and making drivers familiar with their contents could ensure they or others on the school bus have access to information needed to address a variety of emergency scenarios. The DPS standards require bus drivers to be trained to drive safely and respond to emergencies, including vehicle accidents and situations that may require bus evacuations. Because there are separate student transportation safety and emergency response requirements that are overseen and enforced by DPS, schools indicated that they were unaware of the need to also post safety reference materials from their EOPs.

Safety reference materials posted in buses/vehicles—0 of 35 sites posted safety materials in transportation vehicles.

X 0 of 35

Recent news reports of emergencies on student transportation vehicles, although not related to schools we evaluated as part of this audit, reinforce the importance of posting safety reference materials to provide additional guidance to school bus drivers and other staff. For example, incidents included weapons found on a bus, a suspected student drug overdose on a bus, and multiple assaults on school bus drivers. Additionally, a school bus was targeted in a road rage incident that resulted in the outraged driver following the school bus and making threats for more than 40 miles while the school bus driver skipped stops and kept students aboard the school bus.

Annual EOP review

Most districts and charters do not conduct required annual reviews of their school EOPs, which could result in staff relying on outdated information and procedures and increases the risk of an inefficient or ineffective emergency response

Although the EOP Minimum Standards require districts and charters to complete and document reviews of their school EOPs every year, only 11 of the 44 schools we evaluated that had an EOP met this requirement. Several other schools reported reviewing plans periodically or on an “as needed” basis rather than annually, but did not document their reviews, as required. However, conducting and documenting annual reviews helps ensure EOP procedures are up-to-date and the EOP can be activated quickly.

Annual EOP review—11 of 44 sites conducted and documented annual review of EOP.



As part of the annual review process, the EOP Minimum Standards require stakeholders to be made aware of any necessary revisions, including any changes to the EOP or emergency procedures based on plan weaknesses identified during drill debriefings. Additionally, annual reviews help ensure that key information, such as emergency contacts and the ICS, is current. Without these updates, staff may not respond to emergencies appropriately or may not have the correct information needed to activate the EOP.

Annual reviews are also an opportunity to check whether the EOP complies with the EOP Minimum Standards. However, as discussed above, the confusion at many schools regarding the required number of lockdown drills indicates that district and charter reviews of school EOPs may not be comprehensive or include a check of the plan against the EOP Minimum Standards. For instance, 1 school reported that although portions of its EOP have been updated, the plan has not undergone a comprehensive review and revision since 2013.

Schools that do not implement and test their plans in accordance with the EOP Minimum Standards may increase risks to students and staff in emergencies

Drills are an opportunity for staff and students to ensure they understand emergency procedures and practice their response, and debriefing sessions help identify needed improvements with emergency response procedures and staff training. For example, during a drill, 1 school we visited reported that they discovered that students and staff on its playground could not hear the emergency announcements, such as an announcement to initiate a lockdown. As a result of the drill, the school installed flashing emergency lights to alert staff and students on the playground to a safety emergency. Identifying these issues through drills and debriefing sessions prior to a true emergency increases student safety by helping schools to identify deficiencies and take actions to correct them. Drills are also important for ensuring staff and students know how to respond to different emergency situations.

Additionally, some schools that have activated their EOPs for actual threats reported that they experienced issues that would not have been apparent during drills, which makes debriefing sessions after emergencies critical to ensuring EOPs are updated to address any problems. Schools we evaluated activated their EOPs for various reasons, including gun threats on campus, armed persons near campus, and potential gas leaks. After activating their EOPs for actual threats, these schools sometimes identified previously unknown safety issues or concerns. For example, 1 district found that roadblocks implemented by law enforcement during an emergency at a school prevented the district’s superintendent, who served as the incident commander, from accessing the school site. Consequently, the district updated its emergency response procedures to name an incident commander at every school site so someone located at the school could manage the emergency response. This same district also reported that improved communication with parents was needed throughout an emergency response to ensure, for example, that parents do not congregate in areas that could put them in danger or inhibit emergency responders’ ability to act.

Recommendations

Districts and charters should:

5. Regularly conduct training for all staff, including substitute teachers, on their EOP and emergency procedures in accordance with the EOP Minimum Standards.
6. Develop and implement procedures to track training attendance and ensure all staff receive EOP and emergency procedures training.
7. Conduct lockdown and evacuation drills in accordance with the EOP Minimum Standards.
8. Hold debrief sessions after each drill in accordance with the EOP Minimum Standards and after each EOP activation.
9. Develop and implement procedures to document the results of each drill and debrief session and ensure issues identified are corrected.
10. Develop safety reference materials and post these materials in classrooms, assembly areas, and transportation vehicles in accordance with the EOP Minimum Standards and ensure staff are familiar with their contents.
11. Develop and implement procedures to regularly review school sites and transportation vehicles to ensure that required materials are posted and visible and staff are familiar with their contents.
12. Develop and implement procedures to annually review and evaluate their EOP(s), including steps to document the review and provide stakeholders with any revisions, in accordance with the EOP Minimum Standards.



A comprehensive review and update of the EOP Minimum Standards could help ensure all standards are necessary, clearly explained, and understandable for schools

A recent update to the EOP Minimum Standards reduced ambiguity, but additional changes are needed

In August 2024, ADE issued an update to the EOP Minimum Standards that provides some additional guidance to schools and more clearly states what is required. ADE spearheaded this effort, with DEMA reviewing the proposed changes before ADE issued the revisions. The revised EOP Minimum Standards provide additional guidance relating to emergency response procedures and ICS requirements, and include new requirements for conducting and documenting drill debriefing sessions. Additionally, based on feedback from districts, charters, and other stakeholders, the August 2024 updated EOP Minimum Standards no longer contain any items labeled as “best practice” or for consideration. The updated standards clarified that all items listed in the EOP Minimum Standards are now required, and a school EOP must contain all the components to meet the EOP Minimum Standards.

Although the recent revision reduced some ambiguity in the EOP Minimum Standards, the prior lack of clear requirements, coupled with a lack of outreach and training as discussed in Finding 1, pages 7 through 16, likely impacted Arizona districts’ and charters’ abilities to develop school EOPs that fully met the EOP Minimum Standards. Additionally, the updated EOP Minimum Standards released in August 2024 still contain some requirements that may not be clearly understandable, necessary for facilitating an emergency response, or practical for schools of various sizes to implement. In some cases schools could also benefit from more guidance for what should be included in their EOPs to meet the intent of the standard. Some of the issues we identified are highlighted below and point to the need for ADE and DEMA to perform a comprehensive review of all EOP Minimum Standards. Additionally, a comprehensive review provides an opportunity to evaluate whether there are additional standards that have been shown to improve emergency preparedness and should be considered.

For some vaguely written requirements, the information in school EOPs varied or was not included at all

Our review identified some EOP Minimum Standards requirements that were vague or lacked specificity, making them difficult to incorporate into school EOPs and to evaluate. For example, EOP Minimum Standards require EOPs to contain master schedules but do not provide clear guidance to districts and charters about what information a master schedule should include. Because the standard is vague, during our evaluation, we credited schools with meeting the requirement if they included anything in their EOPs relating to schedules. Although all 47 schools we reviewed had scheduling information that they used as part of their day-to-day operations, only 8 schools included something in their EOP to meet this requirement. Similarly, school EOPs are required to include staff contact information, but the EOP Minimum Standards do not provide information or guidance to districts and charters about which staff should be listed and what contact information is required.

Because the standard is unclear, we considered the staff contact information standard met if the EOP included any staff contact information.

The purpose for some EOP Minimum Standards is unclear, others may be impractical as written, and additional guidance is needed

The EOP Minimum Standards include requirements that are unclear and may not be necessary to facilitate an effective emergency response, and others do not clearly communicate ADE and DEMA's expectations for the information that should be included in school EOPs. Further, many school safety staff we spoke with, including officials with backgrounds in law enforcement and emergency response, reported that some standards are impractical or need clarification. A comprehensive review could evaluate all of the standards and address issues, such as those discussed below, that may affect districts' and charters' ability to develop EOPs that meet EOP Minimum Standards.

When schools should use required template letters to communicate with students and faculty is unclear—As noted in Finding 1, pages 7 through 16, none of the school EOPs we reviewed included required letters about emergencies for communicating with students after school emergencies, and only 1 included a faculty letter. Because schools communicate with students and staff on a daily basis through announcements or other means, the purpose for requiring EOPs to include template letters about emergencies that the school could send to students or staff is unclear. Some districts and charters we spoke with indicated that these types of communications are not handled at the school level, and they believed template letters were unnecessary for site-level EOPs. Additionally, ADE's templates do not include any samples of these letters to students or faculty to help schools understand what the letters are expected to address and when they would be needed. The lack of template examples also suggests that ADE may not consider these letters essential EOP components.

Requirements for including individual first responders' contact information may be redundant or require clarification—The EOP Minimum Standards require school EOPs to include contact information for 7 different first response and public health agencies and to separately list detailed contact information for individuals within some of these agencies, which may be unnecessary. For example, the EOP Minimum Standards require contact information to separately list the 911 emergency number, phone numbers for local law enforcement and fire departments, and contact information including specific names, titles, and agency information for individuals within these departments. Obtaining and maintaining up-to-date contact information for individual first responders may be difficult for districts and charters, and only 2 of the school EOPs we evaluated included this type of detailed information. Further, detailed contact information for individual first responders does not appear to be useful for initiating an emergency response, and the EOP Minimum Standards do not provide any guidance for when or how this information should be used.

Expectations for incorporating parent and guardian contacts into school EOPs is unclear—The EOP Minimum Standards do not clearly communicate ADE and DEMA's expectations for how school EOPs should incorporate information such as parent and guardian contacts. As noted in Finding 1, pages 7 through 16, most EOPs we evaluated did not include or reference the location of student rosters with parent and guardian contact information. However, for day-to-day operations, schools generally have this type of contact information readily available and are familiar with using it, which may be a reason that it was not specifically included in most school EOPs we reviewed. Even though most EOPs we evaluated did not include or reference student rosters with contact information in their plans, 10 of the schools we reviewed maintained printed rosters with emergency contact information separately from their EOPs—usually in their front offices. Of those 10 schools, 6 maintained both printed and electronic contact information. Additionally, 18 schools—5 of which had more than 1,000 students—relied solely on electronic contact information from their student information systems; mass communication applications such as School Messenger; or emergency response applications such as Raptor.

During the audit, ADE expressed concerns about schools being unable to access electronic data if an emergency occurred that disrupted power or internet access, such as a power outage during a storm.

However, routinely printing rosters, especially at large schools, is likely impractical and puts sensitive personal data at risk. Further, ADE has not clarified its expectations for where and how contact information should be maintained, nor has it worked with schools to determine whether there are acceptable alternatives to printing the information.

Detailed map requirements may not be practical for all schools, and there is no guidance for sharing the information with emergency responders—Additionally, as noted in Finding 1, pages 7 through 16, only 1 of the EOPs we evaluated included facility maps with all the elements required by the EOP Minimum Standards. Although detailed maps could be essential for emergency responders in certain scenarios, including these maps in the EOP itself could be difficult for large schools with multiple and/or multistory buildings because of the number of documents to be included. In addition, all of the required elements may not be applicable to all schools. Schools may also want to limit access to this type of information that could potentially expose sensitive information about school facilities. Instead, some schools opted to maintain maps separately from their EOPs, and some larger schools reported having digital maps, which they indicated are easier to use and more readily sharable with emergency responders. Currently, the EOP Minimum Standards do not provide any guidance for how maps and blueprints should be communicated to first responders to facilitate their responses to emergencies.

A comprehensive standards review is an opportunity to evaluate current standards, provide needed guidance, and identify other standards that could improve emergency preparedness

By reviewing all standards and determining whether they should continue to be required in the EOP Minimum Standards, ADE and DEMA could ensure students are protected while potentially reducing the time necessary for schools to develop and maintain EOPs. Further, ADE and DEMA could help improve compliance with the EOP Minimum Standards by incorporating those requirements determined to be essential into its EOP template and providing additional guidance and outreach to districts and charters, as noted in Finding 1, pages 7 through 16. For instance, a thorough review could help determine what additional guidance may be necessary for schools to effectively implement the emergency planning requirements, including whether different guidance may be appropriate for schools of different types, sizes, or locations.

Additionally, a comprehensive review would provide an opportunity for ADE and DEMA to review safety standards from other states to determine whether there are elements that have been shown to enhance student safety and should be added to Arizona's EOP Minimum Standards. For example, some other states have basic school EOP requirements along with additional modules that may be applicable to either the district/charter or school level. These additional modules address planning for such things as cyber breaches, disaster recovery, and continuity of operations to ensure schools can continue operating during and after an emergency. Some other states also have requirements relating to prevention, such as procedures for addressing behavioral threats and potentially suicidal students.

ADE's process for the recent, focused update to the EOP Minimum Standards could serve as a model for a comprehensive review

A review process involving stakeholders and safety experts, like the one ADE used to produce the 2024 EOP Minimum Standards update, could help ADE and DEMA address many of the requirements that appeared to be challenging for the districts and charters in our evaluation. For the recent update, ADE's staff established a working group with broad stakeholder representation, surveyed schools, and met with experts and focus groups. Stakeholders included representatives from districts and charters located in urban and rural areas around the State and staff from agencies and interest groups such as the Arizona Coalition for Healthcare Emergency Response, Arizona Center for Disability Law, and the Arizona School Administrators, Inc. Similarly, a comprehensive review of all the EOP Minimum Standards should involve stakeholders, such as districts, charters, the School Preparedness Advisory Council (SPAC), and law enforcement and emergency response agencies to provide feedback and obtain agreement and buy-in.

Recommendations

ADE and DEMA should:

13. Jointly complete a comprehensive review of the current EOP Minimum Standards to identify standards that should be modified, clarified, or added, and update the EOP Minimum Standards to make necessary changes. This review should include:
 - a. Seeking input from relevant stakeholders, such as districts, charters, charter sponsors, SPAC, and law enforcement;
 - b. Reviewing relevant safety research and practices from other states and information contained in this report; and
 - c. Considering whether different guidance may be appropriate for schools of different sizes, types, and locations, such as urban and rural schools.
14. Jointly develop and implement procedures to regularly review and update the EOP Minimum Standards, and specify the roles and responsibilities each department will have in the process.

ADE response: As outlined in its [response](#), ADE agrees with the finding and will implement the recommendations.

DEMA response: As outlined in its [response](#), DEMA does not agree with the finding, but will implement the recommendations in a different manner.



Emergency planning requirements and efforts varied among states we reviewed, and we identified changes that could help improve Arizona schools' emergency preparedness

All other states we reviewed require schools to have EOPs, but other state requirements, resources and support, and levels of oversight vary

As part of our review, we contacted 5 states, including 3 neighboring states and 2 other states with standalone school safety entities, to learn more about their school safety emergency planning requirements and efforts. The states we reviewed were California, Colorado, New Mexico, Ohio, and Texas. Additionally, we reviewed school safety and emergency planning recommended practices from various sources, including the U.S. Department of Justice, U.S. Department of Homeland Security, U.S. Secret Service, Federal School Safety Clearinghouse, and Education Commission of the States (see Appendix C, pages c-1 through c-2, for information about the specific sources we reviewed). We found that, like Arizona and consistent with the recommended practices we reviewed, each of the states we reviewed require schools to have EOPs that meet standards developed for their respective states.

However, we also found important differences between Arizona and the other states we reviewed. While all the other states we reviewed had developed minimum standards for schools' EOPs, there were variations in the ways the standards were developed and monitored and in the level of emergency responder involvement in EOP development. For example, each of the other states we reviewed generally took a more active role than Arizona in ensuring that schools comply with emergency planning requirements. Additionally, some of the other states we reviewed devote substantially more resources to school safety planning and oversight than Arizona. Table 2, page 29, shows an overview of Arizona as it compares to the other states we reviewed in areas related to schools' emergency operations planning.

Table 2
Other state EOP requirements vary compared to Arizona’s

Requirements	Arizona	California	Colorado	New Mexico	Ohio	Texas
Is each district and charter school statutorily required to have an EOP?	Yes	Yes	Yes	Yes	Yes	Yes
Is state-level EOP monitoring required by statute?	No	Yes	No	Yes	Yes	Yes
Are local law enforcement agencies required to be involved in EOP development?	Yes	Yes	No	No	Yes	Yes
Are other emergency response agencies required to be involved in EOP development?	Yes	Yes	No	No	Yes	Yes

Source: Auditor General staff review of state statute, school safety procedures and guidance documentation, and interviews with the state agencies and organizations in Arizona, California, Colorado, New Mexico, Ohio, and Texas.

Although practices varied among the other states we reviewed, we identified some State-wide changes that may help improve schools’ emergency preparedness in 2 primary areas.

Area 1: Unlike most other states we reviewed, Arizona does not have a mechanism to ensure all schools have EOPs that meet EOP Minimum Standards to better protect students

Other states we reviewed appeared to have more robust processes than Arizona for ensuring that schools comply with emergency preparedness and planning requirements. As shown in Table 3, page 30, 4 of 5 states we reviewed have statutes specifically requiring an entity to monitor compliance with EOP requirements and conduct regular EOP reviews. Additionally, although we did not identify a specific statute in Colorado requiring emergency planning monitoring, Colorado, unlike Arizona, requires all schools applying for school safety grants to submit their EOPs as part of their grant applications.

Table 3

Other state EOP-monitoring practices and requirements vary compared to Arizona's

Practices	Arizona	California	Colorado	New Mexico	Ohio	Texas
Is EOP monitoring required by statute?	No	Yes, CA Education Code Section 32288	No requirement identified	Yes, NM Administrative Code 6.12.6.8(D)(7)	Yes, OH Revised Code Section 5502.262(C)(1)	Yes, TX Education Code Section 37.2071
School safety organization overseeing EOPs	Arizona Department of Education	Each school district and County Office of Education	Colorado Department of Public Safety	New Mexico Public Education Department	Ohio Department of Public Safety	Texas State University
Required EOP monitoring practices by school safety organization	None. ADE will review EOPs at the request of a district or charter.	Annually review EOP and notify California Department of Education of any non-compliant EOPs.	None. EOPs are reviewed as part of school safety grant applications.	Triennial EOP reviews of each school's EOP.	Triennial EOP reviews of each school's EOP.	Annual reviews of the EOP basic plan section and selected other sections.
Staff dedicated to EOP monitoring ¹	None	Unknown	None	1.5	6	12
Number of district and charter schools ²	1,934	11,278	1,903	900	5,600 ³	1,271 districts, charter operators, and community colleges ⁴

¹ Staffing levels are approximate figures reported to us by staff we interviewed in the respective states.

² Number of district and charter schools for California, Colorado, New Mexico, and Ohio and number of school districts, charter operators, and community colleges for Texas are approximate figures reported to us by the staff we interviewed in the respective states and documentation from state agencies.

³ Ohio Revised Code Section 5502.262(B)(1) requires emergency operation plans for each district and charter school building.

⁴ The Texas School Safety Center reported that it reviews EOPs at the district level, not school site level, for district and charter schools as well as community colleges, which are also required to have an EOP. Staff at the Texas School Safety Center reported that Texas has more than 9,000 schools.

Source: Auditor General staff review of state statute, school safety procedures and guidance documentation, and interviews with the state agencies and organizations in Arizona, California, Colorado, New Mexico, Ohio, and Texas.

EOP compliance monitoring is required by law in some states, but Arizona statutes do not explicitly authorize or establish such a process, and no State-wide entity currently monitors schools' EOPs—As noted in Table 3, page 30, Arizona statutes do not require EOP compliance monitoring, and there is currently no formal process for ensuring that all schools have an EOP that meets EOP Minimum Standards. However, some limited efforts have been made to encourage EOP development and provide reviews. For instance, the Charter Board's contract with its sponsored charters informs them of their statutory responsibility to follow all federal, state, and local laws, rules, and regulations relating to health, safety, civil rights, and insurance, as specified in A.R.S. §15-183(E)(1). In addition, the Charter Board and ASU each require their charter holders to undergo a statutorily required compliance review every 5 years and a charter renewal process every 15 to 20 years.¹⁹ The Charter Board indicated that it does not currently require charters to submit any EOP information for review. ASU reported that although it may review schools' EOPs as part of overall charter monitoring efforts, it does not have a process to ensure that the EOPs meet EOP Minimum Standards.

ADE reported that it will review school EOPs on a limited basis for districts and charters that request a review. However, few districts and charters have requested such a review, and as of September 2024, ADE staff reported having reviewed only 10 school EOPs since July 2023. ADE also reported that it requires applicants for school safety grants to attest that they have a school EOP that meets EOP Minimum Standards. However, we identified 1 district and 1 charter that received school safety grant monies from ADE but reported to us in our school safety survey that their school did not have an EOP. Beyond these measures, ADE reported that it lacks compliance-monitoring authority and that its 2-person school preparedness team does not have the capacity to review and evaluate all school EOPs for compliance with the EOP Minimum Standards. Similarly, as indicated in its response to this report, DEMA indicates that it lacks statutory authority to monitor school EOPs to ensure they meet EOP Minimum Standards, and that ADE has this responsibility (see DEMA response, explanation for recommendation 4). As of November 2024, Arizona has 528 charter schools and 1,406 district schools that are statutorily required to have an EOP.²⁰ Depending on the process used, monitoring all public schools for compliance and working individually with those schools needing additional assistance would likely require more staff.

Some other states have developed robust monitoring processes and devote substantially more resources to school safety than Arizona—We found that some other states have established more comprehensive compliance-monitoring processes and devote significant resources to overall school safety. For example, the Texas Safety Center, under Texas State University, requires districts and charters to annually submit the basic EOP section required for all schools along with selected additional EOP sections that address specific concerns, such as cyber security. Texas Safety Center staff evaluate the EOPs for compliance with statutory requirements, and any deficiencies identified must be addressed within 90 days. The Texas School Safety Center, which is also responsible for providing technical assistance, trainings, and conducting school safety research, has over 90 full-time employees and an annual budget of over \$16 million.

Similarly, the Ohio Department of Public Safety's Safety Center conducts triennial reviews of all school EOPs. Each school site submits its EOP electronically every 3 years, and Ohio Safety Center staff evaluate compliance with requirements and work directly with the schools to correct any deficiencies. The Ohio Safety Center also provides technical assistance and trainings, crisis response, and grants oversight, and has 53 full-time employees and an annual budget over \$9 million dollars. The Ohio Safety Center reported that it employs 5 EOP reviewers and 1 school compliance and safety manager specifically to support EOP development and review, and spends an estimated \$800,000 annually in salaries and benefits costs for these positions. Additionally, the Ohio Safety Center created its own electronic EOP repository, with an estimated one-time cost of \$540,000, to support its monitoring activities.

The lack of a State-wide process to monitor and enforce compliance with the EOP Minimum Standards increases the risk that schools may not be fully prepared for emergencies and limits the information needed to guide outreach and training efforts—Establishing a more robust State-wide EOP compliance-monitoring process will likely require additional resources, but without

¹⁹ A.R.S. §§15-183(I)(3), 15-183(I)(1), and 15-183(J).

²⁰ A.R.S. §15-341(A)(31).

such a process, schools may not be fully prepared to act in emergencies. Additionally, information gathered from EOP monitoring efforts would likely provide ADE and DEMA with information needed to update the EOP Minimum Standards, develop additional guidance and training, and help ensure compliance with requirements. Establishing an EOP compliance-monitoring process would help ensure schools were better prepared to respond to safety emergencies by:

- **Enabling ADE and DEMA to identify schools without EOPs or those that are not meeting the EOP Minimum Standards to provide targeted support**—As noted in Finding 1, pages 7 through 16, none of the schools we reviewed had an EOP that met all the standards we tested. Additionally, some school staff we interviewed were unaware of specific requirements within the EOP Minimum Standards or lacked an understanding of some standards we tested. Regular and ongoing monitoring and oversight processes would help ensure that districts and charters are aware of requirements for developing school EOPs and receive necessary assistance to do so.
- **Providing ADE and DEMA with critical information about the types of guidance and training necessary to meet districts' and charters' needs**—As reported in Finding 1, pages 7 through 16, there are several elements within the EOP Minimum Standards that districts and charters have not incorporated into their school EOPs, and in some cases, this is because the districts and charters have not fully understood the requirements. Regular and ongoing monitoring could identify the standards that districts and charters are having the most difficulty incorporating into their school EOPs and guide training development and course offerings.
- **Helping ADE and DEMA to identify standards that may need to be updated, revised, or added to ensure that the requirements remain relevant, practical, and effective**—Regular and ongoing monitoring likely would have helped ADE and DEMA to identify the standards discussed in Finding 1, pages 7 through 16, that all or nearly all school EOPs failed to meet. Additionally, as discussed in Finding 3, pages 24 through 27, compliance monitoring can help identify requirements that may need to be reexamined, clarified, or added.

Arizona's processes for monitoring and enforcing compliance with transportation safety requirements could serve as a model for EOP monitoring and enforcement—Arizona has developed a compliance-monitoring model for transportation safety and spends substantial time and resources to help ensure students are transported safely to and from school. The system for ensuring school bus safety for district and charter school students includes an advisory council of stakeholders that helps create the State's *Minimum Standards for School Buses and School Bus Drivers* and requires compliance monitoring and standards enforcement. DPS enforces requirements by inspecting school buses, tracking school bus driver certifications, receiving complaints from stakeholders and findings from our Office, and regularly communicating safety standards and updates to districts and charters. To meet these responsibilities, DPS employs 10 staff who spend some or all of their time on these activities with annual salaries costing an estimated \$580,000 to \$760,000.²¹ The transportation safety program could potentially serve as a model for a similar effort to monitor and ensure districts and charters comply with school EOP requirements and may help improve schools' emergency preparedness.

Area 2: Other states more clearly specify law enforcement and emergency response agencies' roles in emergency planning, and clarifying their roles in Arizona could increase emergency responders' involvement and improve student safety

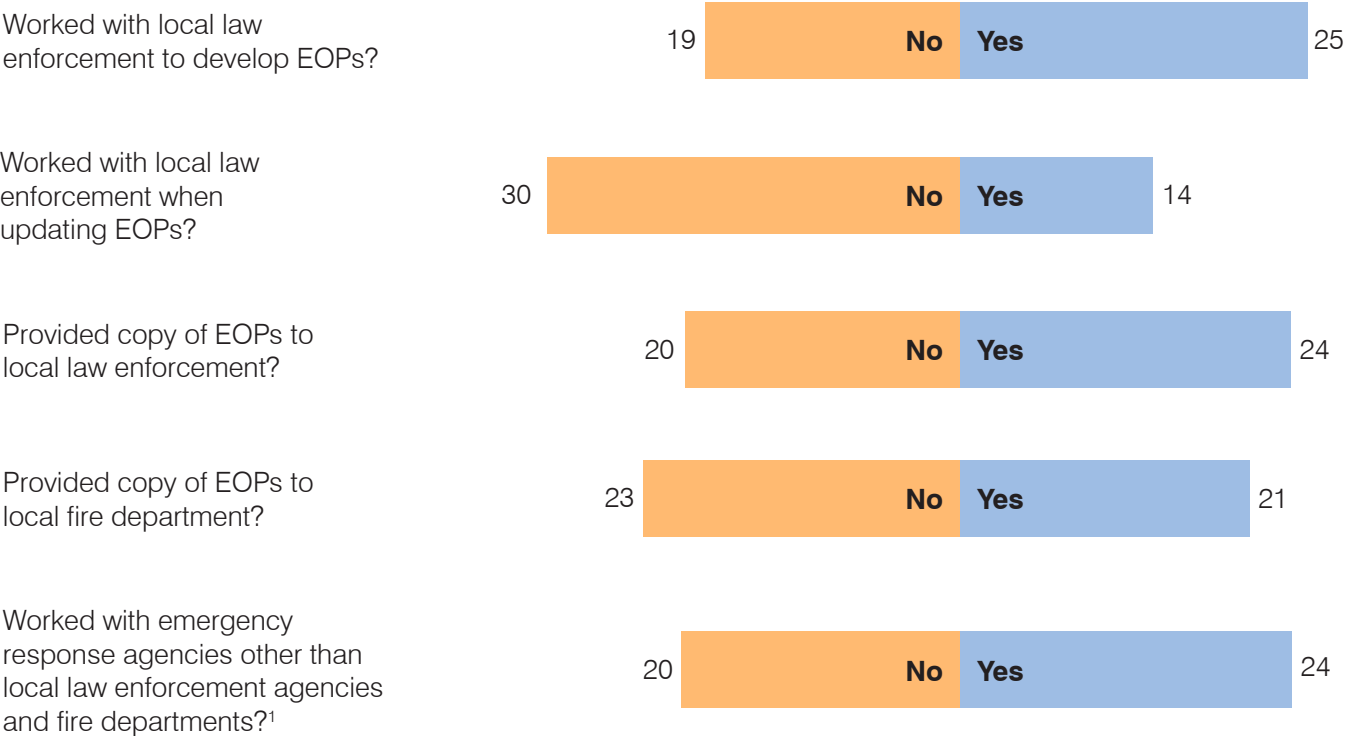
As previously discussed, despite statute requiring school EOPs to be developed in conjunction with local law enforcement agencies and emergency response agencies, neither statute nor ADE or DEMA has made these

²¹ The salary cost does not include employment related expenses such as costs for benefits and taxes, or other operating costs such as office space and equipment associated with DPS' transportation oversight activities.

agencies' role in EOP development clear.²² ADE and DEMA indicated that they believe law enforcement and other emergency response agencies should be involved in developing EOPs. However, neither department has provided specific guidance or recommendations to schools about how these agencies might be involved and neither has worked with law enforcement and emergency response agency stakeholders to discuss and formalize their role in school EOP development.

Emergency response agencies in some other states we reviewed have specific responsibilities and are more involved in EOP planning and training—Similar to Arizona, other states that we reviewed require law enforcement and/or emergency response agencies to be involved with school EOPs, but have more specific requirements, some of which are outlined in statute. For example, law enforcement participation in EOP development is statutorily mandated in California, Ohio, and Texas, and statutes specify which agencies should be involved. Texas law requires EOPs to contain measures for ensuring coordination with emergency response agencies, including law enforcement. Additionally, Ohio requires specific emergency response agencies to sign EOPs certifying that they have had the opportunity to provide feedback. Moreover, Ohio and Colorado have school safety divisions within their departments of public safety that employ local officers and professionals who consult with schools and provide training on safety-related issues.

Figure 1
Slightly more than half of the districts and charters in our evaluation reported involving law enforcement and emergency response agencies in school EOP development and providing EOPs to law enforcement



¹ Other emergency response agencies included entities such as hospitals, emergency mangement agencies, and the American Red Cross.
Source: Auditor General staff analysis of interviews with and information provided by officials from each of the districts and charters included in our evaluation.

²² A.R.S. §15-341(A)(31).

Arizona emergency responders' involvement in developing schools' EOPs has been limited

Districts and charters we reviewed reported experiencing challenges in understanding how they should coordinate with law enforcement and emergency responders, and many reported not involving these agencies when developing their EOPs. As shown in Figure 1, page 33, law enforcement and emergency response agencies' involvement varied, with just over half of the districts and charters in our evaluation reporting that they worked with these agencies when developing school EOPs.

Districts and charters reported contacting law enforcement and emergency response agencies for assistance, but responses from these agencies were mixed

Although many districts and charters we evaluated did not involve law enforcement and emergency response agencies when developing their school EOPs, nearly all of them reported making some efforts to reach out to these agencies for help with emergency preparedness. For example, 1 charter reported working with the Red Cross to conduct CPR training at its school, and another reported working with the Fire Marshal to identify ways to improve fire safety on campus. Additionally, 1 urban district reported working with its local fire department to ensure fire fighters had the maps they needed to respond effectively. However, not all efforts to work with emergency response agencies were successful. For instance, 1 district reported that it shared its school EOPs with the local fire department and its county emergency management agency, but both refused to sign that they had received the documents.

When discussing their efforts to involve or work with emergency response agencies, most districts and charters we spoke with focused on law enforcement. Their experiences with law enforcement agencies also varied, with some districts and charters reporting that they did not always receive a response or assistance. Whether law enforcement was involved in developing school EOPs depended mainly on an individual district's or charter's relationship with local departments, its location, and whether it had assigned school resource officers (SROs) on campus.

According to the district and charter officials from the schools we reviewed, those with strong relationships with local law enforcement agencies, even if they did not have school SROs assigned to their campuses, had increased law enforcement involvement and support in their emergency planning process. Additionally, schools we reviewed with SROs reported that these officers were able to act as liaisons with law enforcement agencies, which helped facilitate a collaborative relationship and improve school safety preparedness. For example, SROs we spoke with reported that they were likely to be made aware of issues in the community, such as armed individuals and police situations near schools but not on school grounds, that could put students at risk and could help ensure that schools take appropriate action in these situations. The schools also reported that SROs often participate in emergency response drills and provide feedback to improve school safety.

In comparison, some districts and charters without law enforcement involvement in their school EOPs reported that they had approached law enforcement agencies but were told that the agency lacked staffing or resources to assist with planning or that a school was not within the law enforcement agency's jurisdiction. For example, officials at 1 school we reviewed reported that although they are located near a police department, they are outside the department's jurisdiction and must rely on the county sheriff's office for assistance. Other schools we reviewed were in rural areas, including some on reservation lands, and reported not having local police or fire personnel who could readily provide planning help or even reasonable response times for school emergencies.

Clarifying local law enforcement and emergency responders' roles in the EOP process and ensuring these agencies receive copies of school EOPs could enhance emergency preparedness and student safety

Currently, statute does not provide any clear expectations for local law enforcement and other emergency response agencies' role in working with districts and charters to develop school EOPs. Further, as noted in Finding 1, pages 7 through 16, some law enforcement officials we interviewed during the audit only recently became aware of their responsibility to work with districts and charters to develop school EOPs. Additionally, the EOP Minimum Standards have not provided guidance for how districts and charters should involve local law enforcement and emergency response agencies in developing their EOPs.

Coordinating with law enforcement and emergency responders during the emergency planning process can provide critical insight to schools and better prepare those agencies to respond if an emergency occurs. For example, law enforcement officers conducted a safety review at 1 school we reviewed and noticed that because of the building's open structure and lack of interior walls, students would be safer scattering during certain threat scenarios that might otherwise call for a lockdown response. With the advice of law enforcement, this school does not conduct standard lockdown drills. Instead, students and staff scatter and regroup at reunification points outside the building.

Clarifying the roles of law enforcement and emergency response agencies in school EOP development could better ensure that all districts and charters receive input and assistance from emergency responders. ADE and DEMA should convene and work with relevant stakeholders, including law enforcement, emergency response agencies, districts and charters, to determine and communicate their various roles and responsibilities for EOP development and seek statutory clarification if needed. As part of this process, districts and charters should be provided with guidance for working with law enforcement and emergency response agencies, such as how to request assistance and what resources are available.

Additionally, the State lacks a clear process for schools to submit their EOPs, or at least critical components such as evacuation routes, building layouts, and key contact information, to law enforcement and emergency response agencies. Although submitting plan information to these agencies is not required under the EOP Minimum Standards, ADE officials reported that it is critical for these agencies to have information from the EOPs in the event of school emergencies. During our evaluation, some schools indicated that they had emailed their plans to law enforcement and other emergency response agencies; others indicated they did not provide the plans to law enforcement or other agencies at all. By working with law enforcement and other emergency response agencies to identify information that is critical for an effective response and establishing timeframes and methods for schools to share the information, ADE and DEMA could ensure first responders are better prepared to respond to emergencies and protect students.

Recommendations

ADE should:

15. Conduct a staffing and cost analysis to determine resources needed to develop and implement a process to regularly monitor compliance by all districts and charters with the EOP Minimum Standards and communicate the resource needs identified and monitoring plan to the Governor and Legislature.

ADE and DEMA should:

16. Convene and work with relevant stakeholders, including representatives from law enforcement and emergency response agencies and district and charter governing boards, to:
 - a. Clarify law enforcement and emergency response agencies' roles in helping to develop and maintain school EOPs.
 - b. Identify EOP information that is critical for an effective emergency response and develop and implement a process for schools to follow to annually submit this information to relevant law enforcement and emergency response agencies.
17. If necessary, work with the Legislature to seek any statutory changes that may be needed to help ensure law enforcement and emergency response agencies fulfill their roles related to school EOPs.
18. Upon completing its work with stakeholders, communicate to local law enforcement, emergency response agencies, districts, and charters the roles and responsibilities each entity has for developing and maintaining school EOPs.

Charter sponsors should:

19. Develop and implement processes to help ensure charters meet the statutory requirement to develop an EOP for each school site that meets EOP Minimum Standards in conjunction with local law enforcement and emergency response agencies.
20. Incorporate charter school EOP compliance monitoring into the statutorily required review and renewal processes and, for any State-wide monitoring process that may be developed, coordinate with the responsible agency or agencies.

The Legislature should:

21. Upon receiving ADE's staffing and cost analysis, and the plan for monitoring compliance with the EOP Minimum Standards, consider revising statute to grant specific statutory authority to ADE to oversee and monitor districts' and charters' compliance with the EOP Minimum Standards.

ADE response: As outlined in its [response](#), ADE agrees with the finding and will implement the recommendations.

DEMA response: As outlined in its [response](#), DEMA does not agree with the finding, but will implement the recommendations in a different manner.

ASU response: As outlined in its [response](#), ASU agrees with the finding and will not implement 1 recommendation, but will implement 1 recommendation in a different manner.

Charter Board response: As outlined in its [response](#), the Charter Board agrees with the finding and will not implement 1 recommendation, but will implement 1 recommendation in a different manner.



OTHER PERTINENT INFORMATION

Additional work is necessary to help ensure schools' physical safety infrastructure and security measures are intact and operating as intended

As part of this audit and our evaluation of schools' EOPs and their implementation efforts, we visited 47 school campuses and became familiar with some of their physical safety and security measures. Although these measures are not the focus of this report, we are including some of our observations here to raise awareness of potential security issues and to encourage schools to begin evaluating and addressing any deficiencies they may have. Our observations noted concerns in the areas discussed below:

- **Authorized visitor access procedures were not always present or effective**—We observed that nearly all schools we visited had established some security measures to prevent unauthorized access to areas where students would be present, such as requiring visitors to check in at the central office. However, a few schools either lacked procedures for limiting access or their processes were ineffective, and we were able to access campuses without checking in.
- **Some physical barriers had deteriorated or were rendered ineffective**—Many schools we visited had constructed physical barriers, such as fencing, to help prevent unauthorized access to campus, but the infrastructure at some schools had deteriorated. For example, we observed deficiencies such as broken windows, missing sections of fencing, and broken gates or locks that allowed unmonitored and unrestricted access to campus. At other schools, these physical barriers had been bypassed by students or others who left gates or doors unlocked or propped open. For example, school officials at 1 school we visited indicated that students propped gates open or waited at certain gates with easy access to the street to collect food deliveries from companies such as Uber Eats.
- **Some schools did not restrict access to maintenance areas or track master keys**—Other safety concerns we noticed included unmonitored maintenance areas with power tools and chemicals that were accessible to students. Additionally, at some campuses, there was not a complete accounting for all master keys, which can be used to gain access to all campus buildings.

These observations will be used to help guide a separate school safety special audit that will more comprehensively evaluate a sample of schools' key physical safety infrastructure and multimedia data communications systems, as directed by JLAC. The upcoming school safety special audit report will address whether the infrastructure and systems are aligned with statutory requirements, recommended standards, and other states' practices and will be issued by December 31, 2025.



SUMMARY OF RECOMMENDATIONS

Auditor General makes a total of 21 recommendations to entities including districts and charters, ADE, DEMA, charter sponsors, and the Legislature

Districts and charters should:

1. Develop school EOPs for each school site that comply with statutory and the EOP Minimum Standards (see Finding 1, pages 7 through 16, for more information).
2. Regularly conduct training for all staff, including substitute teachers, on their EOP and emergency procedures in accordance with the EOP Minimum Standards (see Finding 2, pages 17 through 23, for more information).
3. Develop and implement procedures to track training attendance and ensure all staff receive EOP and emergency procedures training (see Finding 2, pages 17 through 23, for more information).
4. Conduct lockdown and evacuation drills in accordance with the EOP Minimum Standards (see Finding 2, pages 17 through 23, for more information).
5. Hold debrief sessions after each drill in accordance with the EOP Minimum Standards and after each EOP activation (see Finding 2, pages 17 through 23, for more information).
6. Develop and implement procedures to document the results of each drill and debrief session and ensure issues identified are corrected (see Finding 2, pages 17 through 23, for more information).
7. Develop safety reference materials and post these materials in classrooms, assembly areas, and transportation vehicles in accordance with the EOP Minimum Standards and ensure staff are familiar with their contents (see Finding 2, pages 17 through 23, for more information).
8. Develop and implement procedures to regularly review school sites and transportation vehicles to ensure that required materials are posted and visible and staff are familiar with their contents (see Finding 2, pages 17 through 23, for more information).
9. Develop and implement procedures to annually review and evaluate their EOP(s), including steps to document the review and provide stakeholders with any revisions, in accordance with the EOP Minimum Standards (see Finding 2, pages 17 through 23, for more information).

ADE should:

1. Review federal, State, and local rules, regulations, and statutes relating to school safety and publish an updated list of rules, regulations, and statutes relevant to charter schools, including the requirement to develop an EOP for each school site, as required by A.R.S. §15-183(E)(1) (see Finding 1, pages 7 through 16, for more information).
2. Develop and implement a process to regularly update its list of federal, State, and local rules, regulations, and statutes that charter schools must follow and to inform charter schools of their listed responsibilities (see Finding 1, pages 7 through 16, for more information).

3. Conduct a staffing and cost analysis to determine resources needed to develop and implement a process to regularly monitor compliance by all districts and charters with the EOP Minimum Standards and communicate the resource needs identified and monitoring plan to the Governor and Legislature (see Finding 4, pages 28 through 36, for more information).

ADE and DEMA should:

1. Taking into consideration differences in size and location, evaluate whether districts and charters require additional outreach, guidance, or training related to developing school EOPs and the EOP Minimum Standards and if so, coordinate to develop and offer necessary and easily accessible training and guidance to districts and charters (see Finding 1, pages 7 through 16, for more information).
2. Jointly complete a comprehensive review of the current EOP Minimum Standards to identify standards that should be modified, clarified, or added, and update the EOP Minimum Standards to make necessary changes. This review should include:
 - a. Seeking input from relevant stakeholders, such as districts, charters, charter sponsors, SPAC, and law enforcement;
 - b. Reviewing relevant safety research and practices from other states and information contained in this report; and
 - c. Considering whether different guidance may be appropriate for schools of different sizes, types, and locations, such as urban and rural schools (see Finding 3, pages 24 through 27, for more information).
3. Jointly develop and implement procedures to regularly review and update the EOP Minimum Standards, and specify the roles and responsibilities each department will have in the process (see Finding 3, pages 24 through 27, for more information).
4. Convene and work with relevant stakeholders, including representatives from law enforcement and emergency response agencies and district and charter governing boards, to:
 - a. Clarify law enforcement and emergency response agencies' roles in helping to develop and maintain school EOPs.
 - b. Identify EOP information that is critical for an effective emergency response and develop and implement a process for schools to follow to annually submit this information to relevant law enforcement and emergency response agencies (see Finding 4, pages 28 through 36, for more information).
5. If necessary, work with the Legislature to seek any statutory changes that may be needed to help ensure law enforcement and emergency response agencies fulfill their roles related to school EOPs (see Finding 4, pages 28 through 36, for more information).
6. Upon completing its work with stakeholders, communicate to local law enforcement, emergency response agencies, districts, and charters the roles and responsibilities each entity has for developing and maintaining school EOPs (see Finding 4, pages 28 through 36, for more information).

Charter sponsors should:

1. Develop and implement processes to help ensure charters meet the statutory requirement to develop an EOP for each school site that meets EOP Minimum Standards in conjunction with local law enforcement and emergency response agencies (see Finding 4, pages 28 through 36, for more information).

2. Incorporate charter school EOP compliance monitoring into the statutorily required review and renewal processes and, for any State-wide monitoring process that may be developed, coordinate with the responsible agency or agencies (see Finding 4, pages 28 through 36, for more information).

The Legislature should:

1. Upon receiving ADE's staffing and cost analysis, and the plan for monitoring compliance with the EOP Minimum Standards, consider revising statute to grant specific statutory authority to ADE to oversee and monitor districts' and charters' compliance with the EOP Minimum Standards (see Finding 4, pages 28 through 36, for more information).



EOP Minimum Standards

This appendix contains the EOP Minimum Standards used in our evaluation of school EOPs and our review of schools' efforts to implement and test their EOPs. Our analysis is based on the 2019 version of the EOP Minimum Standards since districts and charters would have used these standards to create the EOPs they provided to us for our review, and the 2019 standards were current when we began the audit. For our review, we judgmentally selected 30 Minimum Standards items that should be included in a school site EOP and grouped them into 7 categories (see Finding 1, pages 7 through 16). We also selected an additional 7 standards related to schools' implementation and testing of their EOPs (see Finding 2, pages 17 through 23). The categories we identified, and their related requirements, are presented below in Table 4, page a-2 through a-3. The appendix also includes the complete 2019 EOP Minimum Standards, which are presented in full on pages a-4 through a-12.

Some of the items included in the 2019 EOP Minimum Standards are labeled as a "best practice" or for consideration but are not clearly required. We included some of these items, such as providing a copy of the EOP to emergency response agencies and debriefing after drills, in our review because of their potential impact on student safety or their importance for emergency preparedness. In August 2024—during the audit—ADE issued updated EOP Minimum Standards. Among other changes, the updated version removed language labeling some EOP items as a "best practice" or for consideration. The update clarified that all items that are listed in the EOP Minimum Standards are required and a school EOP must contain all the components to be in compliance with the Minimum Standards.

Table 4
EOP Minimum Standards selected for review

Standard	EOP Minimum Standards reference
Command structure	
Specify an ICS structure with all required elements	Section 2 (e) a and b
Specify ICS position responsibilities	Section 2 (f) a
Plan approval and receipt signatures	
Superintendent or principal approval signatures	Section 2 (a) b
District-level approval signature	Section 2 (a) c
Acknowledgement that law enforcement and emergency response agencies received the plan (recommended)	Section 2 (a) d
EOP activation	
Policy or procedure for activating the plan	Section 2 (c) a
Identify plan activators	Section 2 (c) b
Order of plan activators	Section 2 (c) c
Emergency response considerations	
Measures to assist students with AFN or LEP	Section 2 (e) h
Procedures for responding to before- and after-school and off-campus emergencies	Section 2 (e) j
Communication	
Procedures for warning staff and contacting 911 or local emergency response agencies	Section 2 (c) d
Detailed contact information for district/charter personnel and emergency responders	Section 2 (e) d
Student roster with parent or guardian contact numbers	Section 2 (f) b
Faculty and staff emergency phone numbers	Section 2 (f) d
Detailed emergency operations personnel contact information	Section 2 (f) h
Prepared statements or letters to communicate with faculty, students, parents and the media	Section 2 (f) i
Required emergency contacts—911; ambulance; poison control; police, sheriff, or state police; fire department; local hospital; public health department	Section 2 (f) e

Table 4 continued

Standard	EOP Minimum Standards reference
Emergency locations and routes	
Designated primary and alternate on-site command posts and staging areas	Section 2 (e) c
Designated primary and alternative evacuation routes and assembly areas	Section 2 (e) f
Designed primary and alternate on-site and off-site relocation sites, including transportation plans	Section 2 (e) g
Detailed relocation maps	Section 2 (f) f
Detailed facility maps	Section 2 (f) g
Required documentation	
Master schedule	Section 2 (f) c
Student accountability release forms	Section 2 (f) j
Requirements related to EOP implementation and testing	
Annual emergency response procedures training for all staff	Section 3 (c)
Conduct 3 lockdown and 1 shelter-in-place drills	Section 3 (e) 1 and 2
Conduct and document evacuation drills in accordance with the State Fire Marshal's mandated schedule	Section 3 (e) 3
Conduct and document debriefing sessions after drills (best practice)	Section 3 (f)
Posted safety reference materials in classrooms and assembly areas	Section 2 (e) i
Post safety reference materials in student transportation vehicles	Section 2 (e) i
Conduct and document annual EOP review	Section 3 (a)



ARIZONA SCHOOL EMERGENCY OPERATIONS PLANS (EOP)

EOP MINIMUM REQUIREMENTS Arizona Revised Statutes (ARS) 15-341 (A) (31)

INTRODUCTION

Arizona Revised Statutes (ARS) 15-341 (A) (31) requires each school site to have an emergency operations plan (EOP) that meets the minimum state requirements. The Arizona Department of Education (ADE) and the Arizona Department of Emergency and Military Affairs, Division of Emergency Management (AZDEMA) are responsible for developing the minimum standards for school emergency operations plans in Arizona.



Specific language: (ARS) 15-341 (A) (31) *In conjunction with local law enforcement agencies and emergency response agencies, develop an emergency operation plan for each school in the school district in accordance with minimum standards developed jointly by the department of education and the division of emergency management within the department of emergency and military affairs.*

This document provides the components that may be included in a school's emergency operations plan. The standards are not a systemic guide for completing a comprehensive operations plan, but rather what may be included in your plan.

The following two national resource documents provide a national framework with the most current information applicable for developing and maintaining emergency operations plans.

- *Comprehensive Preparedness Guide (CPG) 101*
- *Guide for Developing High-Quality School Emergency Operations Plans*

Contributors of the two documents included:

- *The Federal Emergency Management Agency (FEMA)*
- *U.S. Department of Education*
- *U.S. Department of Health and Human Services*
- *U.S. Department of Homeland Security*
- *U.S. Department of Justice*
- *Federal Bureau of Investigation*

A variety of resources that include guides, training materials and technical assistance are available to schools relative to the process of revising or developing a comprehensive emergency operations plan that meets the individual needs of the school. ADE, AZDEMA, Arizona Department of Health Services (AZDHS), and the Arizona Department of Public Safety (AZDPS) recognizes a national 6-step process of plan development, as outlined in the two aforementioned national resource documents.

Figure 1 depicts the six steps in the planning process. Each step in the planning process, Schools should consider the impact of their decisions on ongoing activities such as training and exercises, as well as on equipment and resources.



Figure 1: Steps in the Planning Process

Arizona Department of Education
April 2019



ARIZONA SCHOOL EMERGENCY OPERATIONS PLANS (EOP)

EOP MINIMUM REQUIREMENTS Arizona Revised Statutes (ARS) 15-341 (A) (31)

Information and resources for developing and strengthening emergency operations plans, as well as locating course offerings of the Multi-Hazard Emergency Planning for Schools course, may be found on the Arizona Department of Education website: <http://www.ade.gov/shs/sep>

ADE website materials include, but are not limited to:

- ☐ 2019 Emergency Operations Plan Template
- ☐ Local, State and Tribal planning assistance directory
- ☐ Comprehensive Preparedness Guide (CPG 101)
- ☐ Guide for Developing High-Quality School Emergency Operations Plans
- ☐ EOP guidance for Access and Functional Needs (AFN) and non-English speaking students
- ☐ Training opportunities
- ☐ All hazards planning prevention/mitigation, preparedness, response, and recovery information and resources
- ☐ Information and resources informative for parents

More school resources may be found at:

Arizona Department of Emergency and Military Affairs, Division of Emergency Management
<https://dema.az.gov/emergency-management/preparedness/training>

Arizona Department of Health Services <https://www.azdhs.gov/director/index.php#county-health-departments>

Arizona Department of Public Safety <https://www.azdps.gov>

Readiness for Emergency Management for Schools Technical Assistance Center <https://www.rems.ed.gov>

Federal Emergency Management Agency, National Emergency Training Center (NETC) www.training.fema.gov

TABLE OF CONTENTS:

MINIMUM REQUIREMENTS

1. **INCIDENT COMMAND SYSTEM**
2. **EMERGENCY OPERATIONS PLAN (EOP)**
 - Introduction
 - Purpose
 - EOP Activation and Communication
 - Situation Overview
 - Direction, Control and Coordination
 - Emergency Operations Plan
 - Attachments
3. **PLAN MAINTENANCE, AND TRAINING, AND EXERCISE**



ARIZONA SCHOOL EMERGENCY OPERATIONS PLANS (EOP)

EOP MINIMUM REQUIREMENTS Arizona Revised Statutes (ARS) 15-341 (A) (31)

MINIMUM REQUIREMENT SECTIONS 1- 2- 3

SECTION 1 - INCIDENT COMMAND SYSTEM (ICS)

- The ICS shall be used to manage emergencies that occur on school properties.
- The school district governing board and/or superintendent shall develop a procedure or policy that ICS will be used to manage school emergencies.
- ICS training is required for each individual who is assigned a function within the school or district ICS organizational structure.

ICS – Is a Component of the National Incident Management System (NIMS)

The National Incident Management System (NIMS) is a systematic, proactive approach to guide all levels of government, nongovernmental organizations (NGOs), and the private sector to work together to prevent, protect against, mitigate, respond to, and recover from the effects of incidents. NIMS provides a consistent foundation for all incidents, ranging from daily occurrences to incidents requiring a coordinated local, state, tribal or federal response.

NIMS is organized into three major components:

- Resource Management*
- Command and Coordination – Including the Incident Command System*
- Communications and Information Management*

GUIDANCE NIMS AND ICS

At a minimum district/school employees identified to fill a role within the ICS structure must successfully pass the following Federal Emergency Management Agency (FEMA) Independent Study (IS) course:

IS 100.c, Introduction to ICS

It is recommended District personnel who fill a role within the ICS structure and desire additional training complete the following:

IS 200, Basic ICS
IS 700, NIMS

IS courses may be taken on line at:
www.training.fema.gov/IS/crslist.aspx



ARIZONA SCHOOL EMERGENCY OPERATIONS PLANS (EOP)

EOP MINIMUM REQUIREMENTS Arizona Revised Statutes (ARS) 15-341 (A) (31)

SECTION 2 - EMERGENCY OPERATIONS PLAN (EOP)

EOP REQUIRED SECTIONS:

- Introduction
- Purpose
- EOP Activation Authority and Communication
- Situation Overview
- Direction, Control and Coordination
- Emergency Operations Plan
- Attachments

a. Introduction:

- a. Table of contents
- b. Approval statement with dated signature of superintendent and/or principal
- c. District level signature page with superintendent or district designee signature
- d. *Consider providing applicable plan information to your local community support agencies such as public health, law enforcement, fire services and emergency management.*

b. Purpose:

- a. State the purpose and/or procedures of the emergency operations plan and the scope for which it applies.

c. EOP Activation Authority and Communication

- a. List the school or districts policy and/or procedure for activation of the EOP.
- b. Identify the title of those approved to activate the EOP.
- c. List the order of succession by title.
- d. List communication methods for warning staff of an emergency and policy and procedure for emergency notification to 911, or local emergency response agencies.

GUIDANCE

INTRODUCTION, PURPOSE, ACTIVATION AUTHORITY & COMMUNICATION

Introduction: It is recommended, although not required that each site emergency operations plan follow the format of the April 2019 ADE Emergency Operations Plan Template.

- a. See Table of Contents section in ADE EOP Template for example.
- b. Approval descriptive information (ADE EOP Template , page 6)
- c. District level signature page "Community Partners Signature" indicate receipt of a copy of the district/ school EOP (ADE EOP Template page 7)

Purpose: (ADE EOP Template Page 8)

EOP Activation Authority and Communication (ADE EOP Template page 14, with additional Communications information on pages 24-25)



ARIZONA SCHOOL EMERGENCY OPERATIONS PLANS (EOP)

EOP MINIMUM REQUIREMENTS Arizona Revised Statutes (ARS) 15-341 (A) (31)

d. Situation Overview:

- a. State the number of students and employees normally present on campus, and any scheduled daily differences in population, such as before and after school programs to include clubs and athletics
- b. Identify the number of access and functional (AFN) students, limited-English proficient students and staff per building
- c. Consider collaboration with your local community support agencies (public health, law enforcement fire services and emergency management) as you complete a hazard analysis of your school grounds and buildings, as well as the surrounding community, including natural and human related hazards.

e. Direction, Control and Coordination

- a. Create an Incident Command System (ICS) organizational chart for your site, which will include a chain of command and alternates to implement and carry out the plan.
- b. At a minimum include the following:
 1. Incident Commander
 2. Public Information Officer
 3. Safety Officer
 4. Liaison Officer
 5. Operations Section
- c. Designate primary and alternate on-site command posts and staging areas
- d. Identify persons to be notified during an emergency. List their agency, name, title, and contact information
- e. Utilize plain language for commands that alert staff and students to emergency responses. Code words shall not be used.

Responses may include:

 1. Evacuation (On-site, Off-site, Reverse)
 2. Lockdown
 3. Shelter-In-Place
- f. Designate primary and alternate evacuation routes and assembly areas.

GUIDANCE

SITUATION OVERVIEW,
DIRECTION, CONTROL &
COMMUNICATION

Situation Overview: (ADE EOP Template, page 9)

ADE EOP Template Section I, pages 9-10 provides guidance to assist in the development of the Situation Overview items a, b, c.

Direction, Control and Coordination: (ADE EOP Template page 19)

- a. Examples of ICS charts (ADE EOP Template, page 20)
- b. Each ICS position shall have a minimum of two (2) persons who are most qualified with the organization to fill that position, one primary, and one alternate. Each person shall have training in their assigned positions. ICS job responsibilities and descriptions can be reviewed in the ADE EOP Template, pages 19-24
- c. ICS assignments and staging areas may be found in the ADE EOP Template, Appendix A, pages 12-13



ARIZONA SCHOOL EMERGENCY OPERATIONS PLANS (EOP)

EOP MINIMUM REQUIREMENTS Arizona Revised Statutes (ARS) 15-341 (A) (31)

Direction, Control and Coordination *continued*

- g. Designate primary and alternate on-site and off-site relocation areas, other necessary response, or recovery sites, and how students/staff would be moved or transported
- h. Describe how access and functional needs (AFN), limited or non-English proficient students and staff will be provided for.
- i. To assist students and staff, provide classroom guides for quick reference. Post guides in each classroom, indoor assembly area and school transportation vehicle.
- j. Develop procedures for off campus emergencies (field trips, bus accidents, etc.) and response procedures for before and after school programs.
- k. Develop and train staff, to include substitute teachers, and parent/guardian on parent-guardian/student reunification

GUIDANCE con't. DIRECTION, CONTROL & COMMUNICATION

d. This would include district level personnel as well as first responders and public safety agency personnel. The school site should make no more than two (2) calls, those being to the 911 center and district office.

e. Lockdown – Terminology may vary regionally (e.g. use of Hard Lockdown or Soft Lockdown to differentiate the type of lockdown).

g. Other necessary sites may include medical triage, mental/behavioral health, etc.

h. AFN planning forms and limited-English speaking picture cards may be found on the ADE website.

i. Courses of actions in the classroom guide should align with School EOP.

j. State who is in charge during an off-campus emergency. Inform parent/guardian how to find information at the district/school level if an accident or incident occurs during a field trip.

k. See ADE Template Section II Functional Annexes, pages 11-14. Specific policies and procedures must be in place to dictate the release of students to parents/guardians.



ARIZONA SCHOOL EMERGENCY OPERATIONS PLANS (EOP)

EOP MINIMUM REQUIREMENTS Arizona Revised Statutes (ARS) 15-341 (A) (31)

f. Emergency Operations Plan Attachments:

- a. ICS structure and ICS position responsibilities
- b. Student roster with parent/legal guardian phone numbers
- c. Master schedule
- d. Faculty/staff with emergency phone numbers
- e. Community emergency phone numbers
 - 1) General Emergency Number – 911
 - 2) Ambulance
 - 3) Poison Control Center
 - 4) Police Department/Sheriff/State Police
 - 5) Fire Department
 - 6) Local Hospital
 - 7) Public Health Department
- f. Map(s) of relocation site(s) to include the identification of assembly areas, staging areas, request/release gates, medical and mental/behavioral health services, command post, and parent/guardian parking
- g. Site plan or blueprint of the facility and floor plan(s) of the building(s) showing location of emergency utility shut-off valve locations, heat plants, boilers, generators, flammable liquid storage, other hazardous materials, fire-fighting equipment placement, Automatic External Defibrillators (AEDs), Stop the Bleed Kit, first aid facilities, and property and building assess points.
- h. List with the names, title, address, telephone numbers and organizational responsibilities for emergency operations personnel
- i. Sample statements/letters for use in notifying faculty, students, parents/guardians, and media about an emergency
- j. Student accountability/release forms

GUIDANCE EMERGENCY OPERATIONS PLAN ATTACHMENTS

Emergency Operations Plan Attachments:

d. Recommended to conduct test of these contacts at least annually

e. Add emergency phone numbers that serve your community

g. Note location and distribution of site plan or blueprint.

i. Sample statements, letters are included in Appendix A of ADE EOP Template

j. Sample Student accountability/release forms are included in the ADE EOP Template, Appendix A



ARIZONA SCHOOL EMERGENCY OPERATIONS PLANS (EOP)

EOP MINIMUM REQUIREMENTS Arizona Revised Statutes (ARS) 15-341 (A) (31)

SECTION 3. PLAN MAINTENANCE, & TRAINING, & EXERCISE

- a. Conduct an annual review of the EOP and EOP attachments. Additionally, update plan as needed when lessons learned were identified after an emergency response, training, or exercise event.
- b. Collaborate with local emergency management, fire, law enforcement and public health agencies as needed when addressing hazard, threat, or risk assessments, plan development or revision, training, and exercises.
- c. Conduct annual training of all staff, to include substitute teachers, on warning/response signals, evacuation routes, assembly areas, emergency procedures, and chain of command (Incident Command System)
- d. Annually review and provide training of your Incident Command System for those with assigned responsibilities.
- e. Annually practice as identified below each of the listed emergency response drills with students and staff:
 1. Lockdown – three (3) per school year. One (1) of which shall occur when students are outside the classroom.
 2. Shelter-in-Place – One (1) per school year
 3. Evacuation – Follow evacuation drill requirements provided by the fire marshal for your jurisdiction
 4. Although not required, districts should consider conducting one (1) parent/guardian student reunification drill each school year.
- f. Best practice is to complete a debriefing after each drill to identify strengths and weaknesses in your plan. The plan should be updated based upon recommendations from the debriefing.
- g. Complete and document the annual review and evaluation of plan and provide stakeholders with revisions.

GUIDANCE

PLAN MAINTENANCE,
TRAINING & EXERCISE

Plan Maintenance, Training & Exercise (ADE EOP Template, pages 26-27):

Prior to the beginning of the school year consider a 10-20 minute awareness training on the topic of ICS for staff that has not been assigned a role in the ICS structure. This is in addition to more in-depth training for the ICS personnel.

It is appropriate and time efficient to conduct drills consecutively, such as shelter in place followed by evacuation.

Any plan weakness identified during drills or debriefing sessions should be addressed at that time. Modify plan accordingly.

It is not recommended that copies of the entire plan be provided to non-district employees or non-public safety personnel.



School safety summary survey results

This appendix contains summary information from a survey we administered to 230 school districts and 221 charter operators in Arizona related to their school safety and emergency preparedness efforts.^{23, 24} The survey included questions about safety and emergency operations planning, practices, funding, and infrastructure, and was conducted in February and March 2024. In total, 214 school districts and 199 charter operators responded to the survey. Tables 5 and 6, pages b-2 through b-11, present summary information based on the survey responses we received.

The summary information provided is based on information self-reported by school districts and charter operators, and the responses have not been validated for accuracy. The survey responses were not used to derive conclusions relating to the adequacy of school EOPs or to evaluate other school safety issues. However, survey responses were 1 of the factors we considered when selecting our sample of districts and charters for an in-depth evaluation of their EOPs and implementation and testing efforts.

²³ The total number of school districts and charter operators and the summary survey results presented in Tables 5 and 6 exclude districts and charters that did not provide instruction to students at physical school sites and are therefore not required to have an EOP, such as school districts that only transport students to school and charter operators that offered only online instruction.

²⁴ To present summary survey results that are comparable between school districts and charter schools, and to account for charters that operated multiple schools, we grouped charter schools into charter operator networks based on various factors such as shared governing boards and/or central administrative staffing and resources, charter schools located on the same physical campuses, and shared charter school websites. Based on this analysis, we identified and sent the school safety survey to 221 charter operators that collectively operated 528 charter schools in the State as of November 2024.

Table 5

State-wide school safety survey response results tallied and grouped by district or charter and by urbanicity (data collected in February and March 2024)

	Districts	Charters	Urban	Rural
Districts and charters by students attending				
Very Small (fewer than 200 students attending)	63	83	73	73
Small (200 to 499 students attending)	28	55	45	38
Medium-small (500 to 1,199 students attending)	27	31	34	24
Medium (1,200 to 1,999 students attending)	18	14	15	17
Medium-large (2,000 to 5,999 students attending)	41	10	31	20
Large (6,000 to 14,999 students attending)	25	5	27	3
Very Large (15,000 or more students attending)	12	1	13	0
Total number of school districts and charter networks	214	199	238	175

Emergency operations plan (EOP) utilization				
Emergency incident that required EOP activation	57%	27%	38%	49%
EOP reviewed annually	65%	63%	69%	57%
Responders who did not have an EOP	4%	4%	4%	5%

School safety funding				
Received grants or other monies for school safety	55%	23%	36%	44%

School safety grant sources				
School Safety Grant	39%	14%	26%	29%
Elementary and Secondary School Emergency Relief Grant	3%	2%	3%	2%
County Grant	3%	0%	0%	3%
Community Oriented Policing Services Grant	3%	0%	1%	2%

Table 5 continued

	Districts	Charters	Urban	Rural
School safety personnel				
Have personnel with specific responsibilities for school safety and emergency planning	83%	80%	83%	80%
School safety management team structure				
District/Charter-level and school-level safety management teams	49%	39%	50%	36%
District/Charter-level safety management team only	17%	6%	8%	17%
School-level safety management team only	7%	15%	10%	12%
One person who oversees school safety management	6%	15%	10%	10%
Other	3%	4%	4%	4%
Did not have a school safety management team or person	1%	1%	1%	1%
Provided a copy of EOP to:				
Faculty and staff	70%	77%	78%	67%
Governing board members	63%	68%	68%	62%
Local law enforcement agency	66%	33%	45%	57%
Local fire department	50%	22%	30%	45%
Arizona Department of Education	9%	10%	11%	8%
Parents/legal guardians	8%	22%	18%	10%

Table 5 continued

	Districts	Charters	Urban	Rural
Collaboration with external entities				
State agencies	54%	45%	53%	45%
Local law enforcement agency	91%	68%	75%	86%
Local EMS/public health agency	74%	29%	41%	67%
Local fire department	78%	49%	56%	75%
None	3%	14%	11%	5%
Site vulnerability assessment and behavioral threat assessments				
Policy to perform regular site vulnerability assessments	41%	38%	41%	38%
Perform regular behavioral threat assessments	66%	46%	58%	54%
Number of site vulnerability assessments performed in the last 3 years				
0	33%	42%	37%	38%
1 to 3	59%	55%	57%	56%
Over 4	8%	3%	6%	6%
Emergency response drills				
Perform number of required evacuation drills	62%	60%	65%	55%
Perform number of required lockdown drills	36%	34%	37%	32%
Document drills performed	88%	93%	93%	88%
Hold drill debriefs	88%	88%	89%	87%

Table 5 continued

	Districts	Charters	Urban	Rural
Incident Command System (ICS) members required to take FEMA ICS training(s)				
Annually	3%	5%	5%	3%
Every 2 years	3%	2%	2%	3%
Once, when assigned to the ICS	44%	25%	35%	36%
Not required	48%	67%	58%	56%
Did not respond	2%	1%	0%	2%
EOP training				
Train staff on EOP	79%	87%	86%	79%
School safety practices utilization				
Control access to school buildings	91%	93%	94%	89%
Electronic notification system to notify parents in an emergency	74%	64%	69%	70%
Panic buttons or silent alarms	43%	28%	36%	36%
Anonymous threat reporting system	38%	25%	36%	26%
Require students to carry badges or picture IDs.	29%	15%	29%	13%
School safety infrastructure and equipment utilization				
Security cameras	89%	83%	88%	83%
Two-way radios	83%	71%	77%	77%
Lockdown kits	50%	38%	45%	42%
Stop the Bleed kits	43%	24%	29%	39%
Interoperable communication systems to communicate with local law enforcement	44%	15%	15%	51%
Ballistic glass or film	22%	7%	18%	11%
Emergency evacuation chairs	15%	7%	12%	10%
Metal detectors	11%	5%	6%	11%

Table 5 continued

	Districts	Charters	Urban	Rural
School safety software utilization				
Mutualink	25%	7%	4%	33%
Raptor	21%	8%	7%	26%
Informacast	8%	2%	5%	5%
Navigate 360	6%	2%	3%	6%
Verkada	3%	0%	0%	3%

Source: Auditor General staff analysis and summary of 214 district and 199 charter responses to our State-wide school safety survey administered in February and March 2024, unaudited.

Table 6

Combined district and charter State-wide school safety survey results tallied and grouped by number of students attending (data collected in February and March 2024)

	Very Small (<200)	Small (200-499)	Medium-Small (500-1,199)	Medium (1,200-1,999)	Medium-Large (2,000-5,999)	Large (6,000-14,999)	Very Large (> 14,999)
EOP utilization							
Emergency incident that required EOP activation	22%	30%	40%	63%	76%	83%	85%
EOP reviewed annually	52%	58%	67%	72%	86%	77%	92%
Responders who did not have an EOP	9%	2%	2%	3%	0%	0%	0%
School Safety Funding							
Received grants or other monies for school safety	19%	34%	43%	44%	69%	70%	92%
School safety grant sources							
School Safety Grant	10%	19%	28%	38%	55%	47%	85%

Table 6 continued

	Very Small (<200)	Small (200-499)	Medium-Small (500-1,199)	Medium (1,200-1,999)	Medium-Large (2,000-5,999)	Large (6,000-14,999)	Very Large (> 14,999)
Elementary and Secondary School Emergency Relief Grant	1%	2%	3%	0%	6%	0%	15%
County Grant	1%	1%	2%	0%	4%	0%	0%
Community Oriented Policing Services Grant	0%	0%	5%	0%	2%	7%	0%
School safety personnel							
Have personnel with specific responsibilities for school safety and emergency planning	74%	83%	91%	78%	84%	87%	100%
School safety management team structure							
District/Charter-level and school-level safety management teams	30%	36%	50%	53%	57%	77%	84%
District/Charter-level safety management team only	9%	17%	17%	6%	11%	10%	8%
School-level safety management team only	14%	11%	15%	3%	8%	0%	0%
One person who oversees school safety management	16%	16%	2%	10%	6%	0%	0%
Other	4%	3%	5%	3%	2%	0%	8%
Did not have a school safety management team or person	1%	0%	2%	3%	0%	0%	0%

Table 6 continued

	Very Small (<200)	Small (200-499)	Medium-Small (500-1,199)	Medium (1,200-1,999)	Medium-Large (2,000-5,999)	Large (6,000-14,999)	Very Large (> 14,999)
Provided a copy of EOP							
Faculty and staff	69%	76%	72%	72%	69%	87%	92%
Governing board members	64%	72%	69%	56%	59%	73%	54%
Local law enforcement agency	34%	42%	64%	59%	57%	77%	100%
Local fire department	31%	34%	33%	50%	37%	57%	54%
Arizona Department of Education	8%	10%	9%	6%	14%	10%	23%
Parents/legal guardians	16%	19%	19%	9%	12%	3%	0%
Collaboration with external entities							
State agencies	36%	48%	45%	53%	65%	77%	100%
Local law enforcement agency	66%	76%	84%	84%	98%	100%	100%
Local EMS/public health agency	44%	42%	43%	69%	76%	80%	54%
Local fire department	53%	64%	67%	59%	76%	87%	85%
None	13%	10%	2%	16%	2%	0%	0%
Site vulnerability assessments and behavioral threat assessments							
Policy to perform regular site vulnerability assessments	33%	43%	45%	34%	35%	43%	85%
Perform regular behavioral threat assessments	42%	47%	55%	56%	82%	90%	100%

Table 6 continued

	Very Small (<200)	Small (200-499)	Medium-Small (500-1,199)	Medium (1,200-1,999)	Medium-Large (2,000-5,999)	Large (6,000-14,999)	Very Large (> 14,999)
Number of site vulnerability assessments performed in the last 3 years							
0	45%	31%	36%	34%	39%	27%	15%
1 to 3	51%	65%	57%	66%	55%	63%	46%
Over 4	4%	4%	7%	0%	6%	10%	39%
Emergency response drills							
Perform number of required evacuation drills	48%	52%	74%	75%	76%	70%	92%
Perform number of required lockdown drills	21%	35%	29%	53%	47%	53%	85%
Document drills performed	87%	89%	91%	91%	98%	97%	100%
Hold drill debriefs	82%	92%	93%	84%	88%	100%	100%
Incident Command System (ICS) members required to take FEMA ICS training(s)							
Annually	3%	6%	3%	6%	8%	0%	0%
Every 2 years	2%	5%	2%	6%	0%	3%	0%
Once, when assigned to the ICS	28%	29%	31%	31%	47%	57%	85%
Not required	66%	57%	64%	57%	45%	40%	15%
Did not respond	1%	3%	0%	0%	0%	0%	0%
Train staff on EOP	75%	90%	93%	78%	75%	97%	85%

Table 6 continued

	Very Small (<200)	Small (200-499)	Medium-Small (500-1,199)	Medium (1,200-1,999)	Medium-Large (2,000-5,999)	Large (6,000-14,999)	Very Large (>14,999)
School safety practices utilization							
Control access to school buildings	88%	90%	93%	94%	94%	100%	100%
Electronic notification system to notify parents in an emergency	60%	65%	72%	81%	76%	83%	100%
Panic buttons or silent alarms	27%	29%	38%	38%	51%	57%	54%
Anonymous threat reporting system	18%	27%	36%	19%	43%	70%	100%
Require students to carry badges or picture IDs	8%	6%	26%	28%	41%	70%	77%
School safety infrastructure and equipment utilization							
Security cameras	72%	90%	95%	97%	94%	97%	100%
Two-way radios	62%	76%	81%	84%	96%	100%	92%
Lockdown kits	33%	37%	52%	53%	45%	73%	77%
Stop the Bleed kits	18%	40%	36%	38%	41%	57%	62%
Interoperable communication systems to communicate with local law enforcement	28%	27%	34%	41%	35%	23%	23%
Ballistic glass or film	5%	7%	21%	16%	27%	37%	46%
Emergency evacuation chairs	4%	7%	12%	19%	14%	20%	62%
Metal detectors	6%	1%	7%	22%	8%	17%	23%

Table 6 continued

	Very Small (<200)	Small (200-499)	Medium-Small (500-1,199)	Medium (1,200-1,999)	Medium-Large (2,000-5,999)	Large (6,000-14,999)	Very Large (> 14,999)
School safety software utilization							
Mutualink	16%	19%	10%	25%	24%	7%	0%
Raptor	12%	16%	10%	19%	25%	17%	8%
Informacast	0%	1%	9%	6%	10%	17%	15%
Navigate 360	5%	1%	9%	0%	4%	3%	0%
Verkada	1%	0%	2%	3%	4%	3%	0%

Source: Auditor General staff analysis and summary of 214 district and 199 charter responses to our State-wide school safety survey administered in February and March 2024, unaudited.



Scope and methodology

The Arizona Auditor General has conducted this special audit of emergency operations planning in Arizona pursuant to a December 6, 2023, resolution of JLAC.

We used various methods to address the audit's objectives, including reviewing applicable federal and State statutes and rules, Arizona school districts' and charter schools' policies and procedures, and information from websites of various entities with responsibility for school safety and/or emergency response including ADE, DEMA, DPS, the Office of the State Fire Marshal, and charter sponsors. We also conducted interviews with staff from these entities to gain an understanding of their responsibilities and current practices related to school emergency operations planning. In addition, we used the following specific methods to meet the audit objectives:

- To gain an understanding of school districts' and charter schools' safety and emergency preparedness efforts Statewide, we administered a survey to 230 school districts and 221 charter operators in the State regarding their safety and emergency preparedness efforts.^{25,26} We received survey responses from 214 of 230 school districts and 199 of 221 charter operators. Districts and charters that operated multiple schools were only required to submit a single response representing their safety procedures and emergency operations planning efforts.
- To determine whether schools' EOPs met the EOP Minimum Standards, we judgmentally selected a sample of 15 districts and 15 charters for our evaluation based on various factors including information contained in their school safety survey responses, input from school safety stakeholders, and our review of local and State-wide news reports. Districts and charters that did not respond to the school safety survey were more likely to be selected for our in-depth review. From these 15 districts and 15 charters, we judgmentally selected 47 school sites to ensure schools of various types, sizes, and locations were represented in our evaluation. For each school we selected, we reviewed whether their EOP met 30 standards related to EOP content. We judgmentally selected these 30 standards from the 2019 EOP Minimum Standards, which were current and in effect during the audit, based on their criticality in preparing schools for safety emergencies. As part of this evaluation, we also interviewed district and charter staff, including administrators and safety professionals, and spoke with local law enforcement officials.
- To evaluate whether the 47 schools we visited had implemented, tested, and reviewed their EOPs as required, we evaluated compliance with an additional 7 judgmentally selected standards important for ensuring staff are prepared to act during emergencies. We visited each of the 47 schools to observe campus facilities, interview staff, and review documentation to help evaluate schools' efforts to train staff, post safety reference materials, conduct drills and debrief sessions, and review their EOPs. During our

²⁵ The total number of school districts and charter operators excluded districts and charters that did not provide instruction to students at physical school sites and are therefore not required to have an EOP, such as school districts that only transport students to school and charter operators that offered only online instruction.

²⁶ To present summary survey results that are comparable between school districts and charter schools, and to account for charters that operated multiple schools, we grouped charter schools into charter operator networks based on various factors such as shared governing boards and/or central administrative staffing and resources, charter schools located on the same physical campuses, and shared charter school websites. Based on this analysis, we identified and sent the school safety survey to 221 charter operators that collectively operated 528 charter schools in the State as of November 2024.

visits, we also toured the campuses to gain an understanding of each school's safety environment and identify critical weaknesses or vulnerabilities in the school's physical security. As directed by JLAC, we will conduct a special audit of schools' key physical safety infrastructure and multimedia data communication systems and issue an audit report by December 31, 2025.

- To evaluate how Arizona's emergency operations planning and response practices compared to other state practices, we judgmentally selected 5 states—California, Colorado, New Mexico, Ohio, and Texas—and reviewed applicable school safety information. These states were selected either because of their geographic proximity to Arizona or because they have developed standalone entities dedicated to school safety. For each of the selected states, we reviewed statutes and rules relating to school safety and planning, interviewed officials from agencies with school safety-related responsibilities, and reviewed information and documents they provided.
- To evaluate how Arizona's emergency operations planning and response practices compared to school emergency response recommended practices, we reviewed recommended practices for school safety and emergency operations planning from various sources. Sources included the U.S. Department of Justice, U.S. Department of Homeland Security, U.S. Secret Service, Federal School Safety Clearinghouse, Education Commission of the States, and 8 other states—including the 5 named above that were selected for our evaluation.²⁷
- To obtain information for the Introduction, we reviewed statutes, rules, and websites for the various entities involved in school emergency operations planning and emergency response, including ADE, charter sponsors, DEMA, FEMA, local law enforcement agencies, emergency response agencies, and the Trust—a membership-based organization providing insurance and risk-management services to most Arizona school districts. We also conducted interviews with officials from these entities. Additionally, we reviewed local and State-wide news reports related to school safety incidents.

As authorized by JLAC's December 6, 2023, resolution directing us to conduct this work, we excluded certain district- and charter-specific findings and recommendations from this public report because of its sensitive nature and the potential public safety and security concerns that could result from its widespread distribution. We will report that information separately in 2 confidential, limited-use report appendices, pursuant to JLAC's resolution.

We selected our audit samples to provide sufficient evidence to support our findings, conclusions, and recommendations. Unless otherwise noted, the results of our testing using these samples were not intended to be projected to the entire population.

We express our appreciation to the district and charter administrators and staff and entity officials for their cooperation and assistance throughout the audit.

²⁷ We reviewed school safety and emergency operations planning recommended practices from the following sources: Hutchison, J. (2023). *Assess Your School's Safety Plan*. National Association of Elementary School Principals (NAESP). Retrieved 11/14/2024 from <https://www.naesp.org/resource/assess-your-schools-safety-plan/>; Education Commission of the States. (2022). *50-State comparison-K-12 school safety 2022: School safety plans*. Retrieved 11/14/2024 from <https://reports.ecs.org/comparisons/k-12-school-safety-2022-05>; Weeter, C. (2022). *School Safety and Resiliency Act*. Kentucky Department of Education. Retrieved 11/15/2024 from <https://education.ky.gov/school/sdfs/Pages/School-Safety-and-Resiliency-Act-%28Senate-Bill%2C-2019%29.aspx>; R.L. Nichols & Associates. (2021). *An overview of comprehensive safety audits for schools*. Retrieved 11/14/2024 from <https://campussafetyconference.com/wp-content/uploads/2021/11/Nichols-Hot-Topic-Handout-Safety-Audits-for-Schools-v.2.pdf>; Office of Justice Programs (OJP). (2020). *A Comprehensive School Safety Framework: Report to the Committees on Appropriations*. U.S. Department of Justice; Office of the Washington State Auditor. (2019). *Opportunities to Improve School Safety Planning*. Retrieved 11/13/2024 from <https://sao.wa.gov/reports-data/audit-reports/opportunities-improve-school-safety-planning>; U.S. Department of Homeland Security & U.S. Secret Service. (2018). *Enhancing school safety: Using a threat assessment model*. Retrieved 11/12/2024 from https://www.secretservice.gov/sites/default/files/reports/2020-10/USSS_NTAC_Enhancing_School_Safety_Guide.pdf; Planty, M., Banks, D., Cutbush, S., & Sherwood, J. (2018). *School Tip Line Toolkit: A Blueprint for Implementation and Sustainability*. Research Triangle Park, NC: RTI International; Federal School Safety Clearinghouse. (n.d.). *Foundational Elements of School Safety*. Retrieved 11/15/2024 from <https://www.schoolsafety.gov/foundational-elements-school-safety>; and *Minnesota School Safety Center—Threat Assessment*. (n.d.). Retrieved from <https://dps.mn.gov/divisions/hsem/mn-school-safety-center/Pages/prevention-threats.aspx>.

ADE RESPONSE



ARIZONA DEPARTMENT OF
EDUCATION

December 4, 2024

Lindsey A. Perry, Auditor General
Arizona Auditor General
2910 N. 44th Street, Ste. 410
Phoenix, AZ 85018

Dear Auditor General Perry,

Thank you for allowing our respective staffs to work together to reach consensus on the findings of the school safety special audit. After careful review of the revised recommendations, I am happy to report that the Arizona Department of Education (ADE) agrees to all audit findings that are specific to ADE. The final analysis has been completed by my office and the revised written responses have been provided in a separate document as requested.

My staff and I are grateful for the opportunity to collaborate with your team on ways to enhance safety in Arizona schools.

Sincerely,

A handwritten signature in blue ink that reads "Tom Horne".

Tom Horne
Superintendent of Public Instruction

Arizona Department of Education

1535 West Jefferson Street • Phoenix Arizona 85007 • (602) 542-5460 • Tom.Horne@azed.gov • www.azed.gov

Finding 1: None of the EOPs we evaluated fully met all the EOP Minimum Standards, increasing the risk that schools may not be fully prepared to respond to safety emergencies

ADE Response: The finding of the Auditor General is [agreed to](#).

Recommendation 2: ADE should review federal, State, and local rules, regulations, and statutes relating to school safety and publish an updated list of rules, regulations, and statutes relevant to charter schools, including the requirement to develop an EOP for each school site, as required by A.R.S. §15-183(E)(1).

ADE Response: The audit recommendation [will be implemented](#).

Recommendation 3: ADE should develop and implement a process to regularly update its list of federal, State, and local rules, regulations, and statutes that charter schools must follow and to inform charter schools of their listed responsibilities.

ADE Response: The audit recommendation [will be implemented](#).

Recommendation 4: ADE and DEMA should, taking into consideration differences in size and location, evaluate whether districts and charters require additional outreach, guidance, or training related to developing school EOPs and the EOP Minimum Standards and if so, coordinate to develop and offer necessary and easily accessible training and guidance to districts and charters.

ADE Response: The audit recommendation [will be implemented](#).

Response explanation: [While we agree with the recommendation, the extent of the training and guidance provided will be contingent upon the staffing level of the School Preparedness section.](#)

Finding 3: A comprehensive review and update of the EOP Minimum Standards could help ensure all requirements are necessary, clearly explained, and understandable for schools

ADE Response: The finding of the Auditor General is [agreed to](#).

Recommendation 11: ADE and DEMA should jointly complete a comprehensive review of the current EOP Minimum Standards to identify standards that should be modified, clarified, or added, and update the EOP Minimum Standards to make necessary changes. This review should include:

- a. Seeking input from relevant stakeholders, such as districts, charters, charter sponsors, SPAC, and law enforcement;
- b. Reviewing relevant safety research and practices from other states and information contained in this report; and
- c. Considering whether different guidance may be appropriate for schools of different sizes, types, and locations, such as urban and rural schools.

ADE Response: The audit recommendation **will be implemented.**

Recommendation 12: ADE and DEMA should jointly develop and implement procedures to regularly review and update the EOP Minimum Standards and specify the roles and responsibilities each department will have in the process.

ADE Response: The audit recommendation **will be implemented.**

Finding 4: Emergency planning requirements and efforts varied among states we reviewed, and we identified changes that could help improve Arizona schools' emergency preparedness

ADE Response: The finding of the Auditor General is **agreed to.**

Recommendation 13: ADE should conduct a staffing and cost analysis to determine resources needed to develop and implement a process to regularly monitor compliance by all districts and charters with the EOP Minimum Standards and communicate the resource needs identified and monitoring plan to the Governor and Legislature.

ADE Response: The audit recommendation **will be implemented.**

Recommendation 14: ADE and DEMA should convene and work with relevant stakeholders, including representatives from law enforcement and emergency response agencies and school district and charter school governing boards, to:

- a. Clarify law enforcement and emergency response agencies' roles in helping schools to develop and maintain school EOPs.
- b. Identify EOP information that is critical for an effective emergency response and develop and implement a process for schools to follow to annually submit this information to relevant law enforcement and emergency response agencies.

ADE Response: The audit recommendation **will be implemented.**

Recommendation 15: If necessary, ADE and DEMA should work with the Legislature to seek any statutory changes that may be needed to help ensure law enforcement and emergency response agencies fulfill their roles related to school EOPs.

ADE Response: The audit recommendation [will be implemented.](#)

Recommendation 16: ADE and DEMA should, upon completing its work with stakeholders, communicate to local law enforcement, emergency response agencies, districts, and charters the roles and responsibilities each entity has for developing and maintaining school EOPs.

ADE Response: The audit recommendation [will be implemented.](#)



AUDITOR GENERAL'S COMMENTS ON THE DEMA RESPONSE

The Joint Legislative Audit Committee requires all agencies to respond to whether they agree with our findings and plan to implement the recommendations. However, DEMA has included certain statements in its response that misrepresent our work, mislead the reader, and deflect attention from the deficiencies we identified in meeting its responsibilities related to school emergency operations planning. To provide clarity and perspective, we are commenting on DEMA's response to our special audit.

1. Throughout its response, DEMA asserts that because it did not have the opportunity to review the unredacted report, it did not agree with the report's findings.

Consistent with our standard practice, we provided DEMA with a confidential draft report for its review before the report's public issuance. Due to the many entities involved in this special audit, we redacted certain portions of the draft report that were unrelated to DEMA and its responsibilities. Our redactions to the report did not change the message or context of the information directed to DEMA, and we provided all of the information DEMA needed to understand the recommendations directed to it in the confidential draft report it received. Three other entities to whom we made recommendations in the report—ADE, the Charter Board, and ASU—similarly received redacted draft reports and did not express a lack of understanding of our findings or the recommendations directed to them.

2. Throughout its response, DEMA's explanations misrepresent our findings and recommendations.

DEMA's explanation in response to Finding 1, recommendation 4, indicates "DEMA distinguishes between 'developing EOP minimum standards' from 'developing school EOPs.' A.R.S. §15-341(A)(31) requires that DEMA and ADE jointly develop EOP minimum standards but does *not* require DEMA to develop EOPs for every school in every district or charter" [emphasis in original]. Despite DEMA's assertions, our report did not recommend that DEMA develop EOPs for every school or state that DEMA was required to do so. Rather, as noted in Finding 3, pages 24 through 27, we found that some schools did not know they were required to develop an EOP that meets the EOP Minimum Standards, lacked guidance on how to implement the standards, and did not have access to training specific to the standards. Based on these findings, we recommended ADE and DEMA evaluate whether additional outreach, guidance, and training would help schools to better plan for safety emergencies. With joint responsibility for developing the EOP Minimum Standards, ADE and DEMA are best positioned to provide these resources to schools to ensure the standards they jointly developed are clear, correctly interpreted, and effectively implemented.

Similarly, in explaining its disagreement with Finding 3, DEMA indicates, "In this instance, DEMA notes that its role per A.R.S. §15-341(A)(31) is limited to *jointly* develop [the] EOP Minimum Standards with ADE and emphasizes that DEMA does not have the statutory authority to do this without ADE's participation" [emphasis in original]. Our report repeatedly makes clear that ADE and DEMA share joint responsibility for developing the EOP Minimum Standards, and our recommendations clearly indicate that the comprehensive review and update of the EOP Minimum Standards should be a joint effort between ADE and DEMA (see Finding 3, pages 24 through 27).

Finally, DEMA indicates that it already met with ADE to review and update the EOP Minimum Standards in July 2024 (see DEMA's response, explanation for recommendation 11) and asserts that ADE informed it that the updated standards would be published in 2025 (see DEMA's response, explanation for Finding 1). Despite

having reviewed an unredacted confidential draft of Finding 3 of this report prior to its public issuance, DEMA appears to be unaware that ADE had already issued the updated EOP Minimum Standards in August 2024 and our review of these updated standards found that additional improvements are needed (see Finding 3, pages 24 through 27, for more information).

DEMA RESPONSE



Katie Hobbs
GOVERNOR

STATE OF ARIZONA
DEPARTMENT OF EMERGENCY AND MILITARY AFFAIRS

5636 East McDowell Road
Phoenix, Arizona 85008-3495
(602) 267-2700 DSN: 853-2700



Major General Kerry L. Muehlenbeck
THE ADJUTANT GENERAL

December 5, 2024

Lindsey Perry, CPA, CFE
Auditor General
2910 N. 44th Street, Suite 410
Phoenix, Arizona 85018-7571

RE: *Auditor General's report, Arizona Department of Insurance and Financial Institutions -
Performance audit and sunset review*

Dear Ms. Perry:

The Arizona Department of Emergency and Military Affairs (DEMA) has reviewed the Auditor General's revised report in a series of school safety special audits assessing traditional public school districts' and charter operators' (districts and charters) school emergency operations plans and whether they meet the Emergency Operations Plans Minimum Standards jointly developed by the Arizona Department of Education (ADE) and DEMA. Attached please find DEMA's final responses to the revised report's recommendations.

DEMA's staff appreciates the opportunity to respond and looks forward to continue supporting ADE's efforts to improve school safety.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Muehlenbeck".

KERRY L. MUEHLENBECK

Major General, AZ ANG
The Adjutant General

Finding 1: None of the EOPs we reviewed met all EOP Minimum Standards requirements, increasing the risk that schools may not be fully prepared to respond to safety emergencies

DEMA Response: The finding of the Auditor General is not agreed to.

Response explanation: DEMA has not had the opportunity to review the entire unredacted report, nor did DEMA have the opportunity to review any of the EOPs the Auditor General reviewed to reach this conclusion. Additionally, per A.R.S. § 15-341(A)(31) DEMA has a *joint* responsibility with ADE to *develop* minimum standards for EOPs, but not specifically develop or review the EOPs themselves. DEMA and ADE did jointly review and update EOP minimum standards in July 2024. ADE has notified DEMA that those updated EOP minimum standards are expected to be published in 2025.

A.R.S. § 15-341(A)(31) directly tasks the local school districts with developing EOPs in conjunction with their local law enforcement and emergency response agencies and in accordance with the EOP minimum standards. DEMA stands ready to provide technical assistance to local districts and charters on how to meet EOP minimum standards if requested and in conjunction with the cooperation of their local county emergency management office and county school administrators.

Recommendation 4: ADE and DEMA should, taking into consideration differences in size and location, evaluate whether districts and charters require additional outreach, guidance, or training related to developing school EOPs and the EOP Minimum Standards and if so, coordinate to develop and offer necessary and easily accessible training and guidance to districts and charters.

DEMA Response: The audit recommendation will not be implemented.

Response explanation: DEMA distinguishes “developing EOP minimum standards” from “developing school EOPs.” A.R.S. § 15-341(A)(31) requires that DEMA and ADE jointly develop EOP minimum standards but does *not* require DEMA to develop EOPs for every school in every district or charter. Industry practice is to develop generalized planning standards which set a minimum threshold that allow each school district the flexibility to tailor their EOP to their unique circumstances or particularized needs. The current EOP minimum standards (jointly developed and updated by DEMA and ADE) state that the standards are “not a systematic guide for completing a comprehensive operations plan, but rather what must be included in [the school’s] plan.”

The State Board of Education is vested with the authority to “exercise general supervision over and regulate the conduct of the public school system and adopt any rules and policies it deems necessary to accomplish this purpose,” as well as “aid in the enforcement of laws relating to schools.” (A.R.S. §§ 15-203(A)(1) and (11)). The State Board and ADE are empowered to carry out those responsibilities – DEMA is not vested with any such authority. Thus, the State Board and ADE – not DEMA – may exercise its supervisory and administrative powers over local districts and charters (“public school system”) to ensure each develops an EOP that complies with the EOP minimum standards jointly developed by ADE and DEMA. In so doing, DEMA presumes that per A.R.S. §§ 15-203(A)(1) and (11), the State Board may instruct local districts and charters to obtain adequate training and guidance.

Although DEMA does not develop particularized curricula or trainings, DEMA’s Training Branch routinely facilitates and coordinates emergency management-related trainings

for a number of agencies and political jurisdictions around the state when solicited by those responsible parties. DEMA's Training Branch website publishes a current catalog of all available trainings and courses. Political subdivisions, including ADE and local school districts, may and do identify and request access to specific trainings and courses..

DEMA has coordinated with ADE to support any required trainings ADE seeks to provide to or require of the school districts. Many of the trainings and courses identified in the EOP minimum standards are independent study courses, requiring no facilitation by DEMA. It is DEMA's position that performing and delivering additional outreach, guidance, and other training opportunities to schools related to emergency planning and preparedness is the primary responsibility of ADE and local emergency management agencies. A.R.S. §§ 26-308(B) directs that "[e]ach county and incorporated city and town of the state shall establish and provide for emergency management within its jurisdiction in accordance with state emergency plans and programs." As the primary agency responsible for enforcing standards with school districts, DEMA contends that it is ADE's responsibility to inform districts of statutory requirements to adopt EOPs meeting the minimum standards. DEMA understands that ADE has full-time school safety and preparedness planners that can support this purpose and has an opportunity to communicate any additional resource needs to further effect this recommendation through their Audit response process.

Finding 3: A comprehensive review and update of the EOP Minimum Standards could help ensure all requirements are necessary, clearly explained, and understandable for schools

DEMA Response: The finding of the Auditor General is not agreed to.

Response explanation: Because DEMA has not been provided the full unredacted report, the origin and purpose of this finding is unclear. Without additional clarifying information, DEMA takes no position on this finding, and therefore cannot agree with this finding at this time. In general, however, as a best practice DEMA already advises local agencies and stakeholders to conduct an annual review and update and a five-year comprehensive review and update of EOPs (or in response to any new or evolving threat). Those annual and five-year reviews and updates can ensure that agencies and stakeholders are tailoring their EOPs to nationalized, evidence-based minimum standards.

In this instance, DEMA notes that its role per A.R.S. § 15-341(A)(31) is limited to *jointly* develop those EOP minimum standards with ADE and emphasizes that DEMA does not have the statutory authority to do this without ADE's participation – DEMA has no authority to develop these standards independently. DEMA recently met with ADE (July 2024) to jointly review and update the EOP minimum standards, which to DEMA's knowledge have not yet been published publicly.

Recommendation 11: ADE and DEMA should jointly complete a comprehensive review of the current EOP Minimum Standards to identify standards that should be modified, clarified, or added, and update the EOP Minimum Standards to make necessary changes. This review should include:

- a. seeking input from relevant stakeholders, such as districts, charters, charter sponsors, SPAC, and law enforcement;
- b. reviewing relevant safety research and practices from other states and information contained in this report; and

- c. considering whether different guidance may be appropriate for schools of different sizes, types, and locations, such as urban and rural schools.

DEMA Response: The audit recommendation **will be implemented in a different manner.**

Response explanation: To date, ADE has not notified DEMA that the EOP minimum standards jointly reviewed and updated in July 2024 have been published. The July 2024 review included input from a variety of relevant stakeholders and groups representing specific communities of practice. A comprehensive review of those six-month old unpublished standards is premature. DEMA did commit to an annual and five-year review of the standards with ADE once published.

Recommendation 12: ADE and DEMA should jointly develop and implement procedures to regularly review and update the EOP Minimum Standards and specify the roles and responsibilities each department will have in the process.

DEMA Response: The audit recommendation **will be implemented in a different manner.**

Response explanation: DEMA has already met with ADE to review and update current EOP minimum standards (July 2024). DEMA and ADE have agreed on their respective roles and responsibilities with DEMA's primary responsibility being to provide feedback and subject matter expertise while ADE provides school-specific expertise and exercises their statutory responsibility to communicate and enforce requirements with school districts. DEMA has committed to reconvene for joint review of these standards both annually and every five years, or sooner should conditions warrant.

Finding 4: Emergency planning requirements and efforts varied among states we reviewed, and we identified changes that could help improve Arizona schools' emergency preparedness.

DEMA Response: The finding of the Auditor General is **not agreed to.**

Response explanation: DEMA has not been provided the full unredacted report, and the requirements and changes identified in this finding are unclear. Without additional clarifying information DEMA takes no position on this finding, and therefore cannot agree with this finding at this time, but notes that its role per A.R.S. § 15-341(A)(31) is limited to *jointly* develop those EOP minimum standards with ADE. This role should not be conflated with the school districts' responsibility to develop EOPs. DEMA maintains that that responsibility, per A.R.S. § 15-341(A)(31), remains at the *local* level and with the cooperation of *local* law enforcement and emergency response agencies.

Recommendation 14: ADE and DEMA should convene and work with relevant stakeholders, including representatives from law enforcement and emergency response agencies and district and charter governing boards, to:

- a. Clarify law enforcement and emergency response agencies' roles in helping schools to develop and maintain school EOPs.

- b. Identify EOP information that is critical for an effective emergency response, and develop and implement a process for schools to follow to annually submit this information to relevant law enforcement and emergency response agencies.

DEMA Response: The audit recommendation [will be implemented in a different manner.](#)

Response explanation: This recommendation addresses the EOP planning process, not developing generalized standards. DEMA stands ready to provide technical assistance to local districts and charters on how to meet EOP minimum standards if requested, in conjunction with the cooperation of local county emergency management offices and county school administrators. ADE has full-time school safety and preparedness planners to convene and work with stakeholders to clarify roles. DEMA's statutory role is limited to assisting ADE by jointly developing EOP minimum standards and supporting jurisdictional emergency management agencies efforts in community planning for emergencies or disasters. As the agency responsible for governing the activities of school districts, ADE should direct school districts to convene such relevant stakeholders to assist in identifying roles and responsibilities and key information relevant to the schools planning efforts.

Recommendation 15: If necessary, work with the Legislature to seek any statutory changes that may be needed to help ensure law enforcement and emergency response agencies fulfill their roles related to school EOPs.

DEMA Response: The audit recommendation [will be implemented in a different manner.](#)

Response explanation: DEMA does not fully understand this recommendation and would be better able to respond to it once the full unredacted report is published. As a matter of first impression, DEMA does not currently see a need for *additional* legislative actions to ensure law enforcement and emergency response agencies fulfill their roles relating to school EOPs.

Recommendation 16: Upon completing its work with stakeholders, communicate to local law enforcement, emergency response agencies, districts, and charters the roles and responsibilities each entity has for developing and maintaining school EOPs.

DEMA Response: The audit recommendation [will be implemented in a different manner.](#)

Response explanation: DEMA will support this effort by facilitating access to emergency management expertise familiar with the school EOP minimum standards. Although this collaboration ensures all stakeholders are equipped to fulfill their roles in supporting school EOPs, consistent with statutory responsibilities, this recommendation addresses responsibilities that are the unique statutory responsibility of ADE. DEMA's role should be limited to assisting ADE by jointly developing EOP minimum standards and supporting jurisdictional emergency management agencies' efforts in community planning for emergencies or disasters. As the agency responsible for governing the activities of school districts, ADE should be the lead agency for communicating school planning efforts. As agreed upon in the collaborative ADE and DEMA EOP minimum standards review process, ADE remains the primary point of contact for school EOP planning information.

ASU RESPONSE



November 25, 2024

Lindsey Perry, CPA, CFE, Arizona Auditor General
Office of the Auditor General
2910 North 44th Street, Suite 410
Phoenix, Arizona 85018-7271

Re: Auditor General's Special Audit Report—School Safety and Emergency Response Practices

Dear Auditor General Perry,

Please find the Arizona State University (ASU) response to the Auditor General's Special Audit Report—School Safety and Emergency Response Practices. We appreciate the opportunity to respond to the Auditor General's recommendations regarding Emergency Operations Plans (EOPs) for charter schools. Ensuring student and staff safety is a top priority, and we fully support the development of consistent processes to enhance EOP compliance. While ASU does not have the capacity to independently monitor adherence to EOP Minimum Standards, we strongly advocate for a centralized, specialized agency to oversee this critical function.

In line with the recommendations, ASU has committed to updating its Performance Framework to ensure alignment with statutory requirements and best practices. Our response underscores a collaborative approach that leverages expertise and ensures equitable oversight across public schools, fostering safe and secure learning environments for all.

Sincerely,

A handwritten signature in black ink, appearing to read "JRund", written in a cursive, flowing style.

James Rund
Senior Vice President
Educational Outreach and Student Services
Arizona State University

OFFICE OF EDUCATIONAL OUTREACH AND STUDENT SERVICES

300 East University Drive, Suite 210
Tempe, AZ 85287-6705
(480) 965-2200

Finding # 4

ASU Response: The finding of the Auditor General is agreed to.

Response explanation:

Recommendation 17: Develop and implement processes to ensure charters meet the statutory requirement to develop an EOP for each school site that meets EOP Minimum Standards in conjunction with local law enforcement and emergency response agencies.

ASU Response: The recommendation of the Auditor General will not be implemented.

Response Explanation: ASU supports the establishment of a formalized process to ensure all schools, including charter and district schools, develop and maintain Emergency Operations Plans (EOPs) that meet the Minimum Standards. To achieve this, we recommend that a dedicated school safety organization be tasked with overseeing the development of these standards, monitoring practices, and ensuring compliance. This organization should collaborate with local law enforcement and emergency response agencies to align EOPs with statutory requirements and best practices.

ASU does not have the expertise or capacity to monitor whether schools meet EOP Minimum Standards. However, we fully endorse the creation of a consistent process under the leadership of a specialized entity with the requisite expertise. This approach would ensure equitable and effective implementation of EOPs across charter and district schools, thereby enhancing safety for all students and staff.

Recommendation 18: Incorporate charter school EOP compliance monitoring into the statutorily required review and renewal process and, for any state-wide monitoring process that may be developed, coordinate with the responsible agency or agencies.

ASU Response: The audit recommendation will be implemented in a different manner.

Explanation: ASU supports integrating Emergency Operations Plan (EOP) compliance monitoring into the statutorily required review and renewal process in coordination with a dedicated agency or agencies responsible for state-wide monitoring. ASU has adopted a comprehensive Performance Framework (framework) to annually evaluate the academic, financial, and operational performance of each ASU-authorized charter school. As part of this process, Section 5 of the Annual Performance Evaluation outlines clear expectations for operational performance, including compliance with health, safety, and facilities requirements.

ASU staff annually conduct a compliance check to ensure charter operators adhere to contractual and statutory obligations. Safety indicators, as outlined in Section 5(b) of the Performance Framework, include the requirement to maintain up-to-date emergency response plans (EOPs) compliant with the National Incident Management System (NIMS). Supporting

documentation is collected to substantiate compliance. If any operational noncompliance issues are identified, the charter operator must address them as part of its Five-Year Review.

In response to this recommendation, ASU will update Section 5(b) of the framework to clarify that EOPs must also meet the Minimum Requirements established by the Arizona Department of Education (ADE) and the Arizona Department of Emergency Military Affairs (DEMA) pursuant to ARS 15-341(A)(31).

While ASU supports consistent oversight of EOP compliance across charter and district schools, we recommend that this function be coordinated with a dedicated agency with expertise in monitoring and enforcing EOP standards. Requiring one agency to oversee all monitoring ensures consistent standards, avoids duplication of efforts, and leverages specialized expertise, whereas independent monitoring by each authorizer could result in variability and inefficiencies.

CHAPTER BOARD RESPONSE



Arizona State Board for Charter Schools

Physical Address: 1700 West Washington Street, Ste. 304 Phoenix, AZ 85007

Mailing Address: P.O. Box 18328 Phoenix, AZ 85009

Email Address: charterschoolboard@asbcs.az.gov

Phone Number: (602) 364-3080

December 3, 2024

Lindsey Perry, CPA, CFE, Arizona Auditor General
Office of the Auditor General
2910 North 44th Street, Suite 410
Phoenix, Arizona 85018-7271

Re: Auditor General's Special Audit Report—School Safety and Emergency Response Practices

Dear Auditor General Perry,

Thank you for the opportunity to respond to the recent special audit conducted by your office. Please find below the Arizona State Board for Charter Schools' (Charter Board) response to the Auditor General's Special Audit Report on School Safety and Emergency Response Practices.

Many charter schools are small, with fewer than 100 students and have limited resources, leading to unique challenges. Staff often take on multiple roles, making it difficult to ensure adequate resources and training. Given these constraints, we fully support any recommendations to provide additional resources, support, and funding to improve emergency preparedness.

The Charter Board is deeply committed to the safety and well-being of all students. School safety remains our utmost priority, and we recognize that this requires continuous attention, resources, and improvement.

Thank you for your partnership in ensuring that all schools in Arizona provide safe and secure learning environments for students.

Sincerely,

A handwritten signature in black ink, appearing to read "Ashley Berg".

Ashley Berg
Executive Director
Arizona State Board for Charter Schools

Finding 4: Emergency planning requirements and efforts varied among states we reviewed, and we identified changes that could help improve Arizona schools' emergency preparedness

Charter Board Response: The finding of the Auditor General is [agreed to](#).

Response explanation:

The Arizona State Board for Charter Schools ("Charter Board") agrees with the Auditor General's findings regarding the variation in emergency planning requirements and efforts among states, as well as the fact that there are opportunities for improving Arizona schools' emergency preparedness. The safety of students is our top priority, and we want Arizona families to know that charter schools are committed to keeping their students safe.

Historically, charter schools were not explicitly required to have Emergency Operations Plans ("EOP") and guidance did not require charters to have EOPs, though it has always been communicated as a best practice. We believe that most charter schools have taken steps to develop and implement plans, placing student safety at the forefront of their operations.

In recent years, the Charter Board has significantly strengthened its oversight and accountability of charter schools, with a growing emphasis on safety measures. We recognize the critical role of providing charter schools with the appropriate guidance and resources, and we are dedicated to collaborating with other agencies to ensure charter schools have the most current and comprehensive information on emergency planning requirements.

We welcome the opportunity to further improve Arizona's schools' preparedness and are committed to working alongside other partners and charter schools to meet all necessary standards for emergency planning. We will continue to support charter schools in safeguarding the well-being of students and ensuring a safe learning environment across the state.

Recommendation 17: Charter sponsors should develop and implement processes to ensure charters meet the statutory requirement to develop an EOP for each school site that meets EOP Minimum Standards in conjunction with local law enforcement and emergency response agencies.

Charter Board Response: The audit recommendation [will not be implemented](#).

Response explanation:

The Arizona State Board for Charter Schools ("Charter Board") recognizes and fully acknowledges the importance of ensuring charter schools meet the statutory requirement to develop an Emergency Operations Plan ("EOP") for each school site. We concur with the need to ensure each school site has an EOP and will implement processes in a manner that aligns

with the Charter Board's resources and expertise (See Recommendation 18 for more information on implementation of this review).

While the Charter Board recognizes the importance of verifying that charter schools have an EOP in place, the Charter Board does not have the resources or subject matter expertise to monitor and enforce compliance with the minimum standards for these plans.

The Charter Board believes it is appropriate for a state-centralized review process to be established to monitor whether EOPs meet the required minimum standards. This process would ensure that both charter and district schools are held to the same standards of review and oversight. Furthermore, it would assign the responsibility of evaluating whether EOPs substantively meet the Minimum Standards to the appropriate agency—one with the necessary resources and expertise to effectively monitor compliance.

Currently, certain programmatic monitoring of charter schools is conducted by other state agencies, such as the Arizona Department of Education. When compliance issues are identified, the Charter Board is notified by the relevant agency. The Charter Board then holds charter holders accountable by marking their Operational Dashboards under the Board's Operational Performance Framework, requiring the charter to come into compliance, and taking disciplinary action as needed. Similarly, the Charter Board would follow this procedure in collaboration with the agency overseeing the state-centralized reviews of EOPs, holding charter schools accountable based on the findings.

The Charter Board will work closely with the entity overseeing the state-centralized monitoring process to ensure clear guidance, effective communication, and transparency regarding expectations for EOPs. Our goal is to ensure that all charter schools are fully informed about and compliant with the requirements for emergency operations planning. Additionally, we will take appropriate action based on any findings presented to our office.

Recommendation 18: Charter sponsors should incorporate charter school EOP compliance monitoring into the statutorily required review and renewal processes and, for any State-wide monitoring process that may be developed, coordinate with the responsible agency or agencies.

Charter Board Response: The audit recommendation [will be implemented in a different manner.](#)

Response explanation:

In addition to what was mentioned in response to Recommendation 16, the Charter Board supports integrating EOP monitoring into review and renewal processes in coordination with the entity overseeing a state-centralized review process.

During its reviews, Charter Board staff already monitor schools for various safety requirements. This includes reviews of Occupancy Documentation (Certificates of Occupancy and Fire Marshal Reports), Fingerprint Clearance Cards, Employee Disciplinary Action, and reviewing

safety related complaints filed with our office. During on-site reviews, Board staff also walks buildings and observes student movement on campus and flags related safety concerns.

The Charter Board has an Operational Performance Framework to annually evaluate the compliance requirements of the charters and schools under its authority. Measure 2.c, which addresses whether a charter holder is “maintaining a safe environment consistent with state and local requirements,” will be updated to include a specific metric regarding the development of an EOP for each school site.

Charter Board staff has updated its review processes, including first and second year reviews, statutorily required five year interval reviews, renewal reviews, pop-in visits, and specialized accountability visits to include verifying whether a school can demonstrate that it has developed an EOP. Guidance sites for charter schools related to these processes, and checklists to assist in preparation for these processes have already been updated, and Board staff has begun adding the check for an EOP to its on-site visits. However, we would defer the monitoring of specific requirements and implementation of the EOP to an agency overseeing a state-centralized review process or one with the appropriate staffing and expertise to conduct that review.

Additionally, the Board’s Operational Performance Framework and associated guidance specify that the Board may use evidence from third-party reviewers to assess whether a charter holder is in compliance with applicable state and federal laws, as well as the terms of its charter contract. If, in the future, another agency notifies the Charter Board that a charter school in our portfolio is out of compliance with school safety requirements (e.g., implementation of their EOP), Charter Board staff would incorporate both our own findings and the findings from the outside agency into our compliance expectations. After technical assistance is provided and if at a later date an issue of compliance is identified, the charter holder’s dashboard would be updated to reflect these findings, triggering the need for corrective action to address any compliance issues, in line with our standard processes and practices.

This approach aligns with the Charter Board’s established practices for monitoring compliance in areas such as special education services, grant compliance, and other areas where the Arizona Department of Education conducts the monitoring and possesses the necessary staffing and expertise.

Further, Charter Board staff will add the requirement that all charter school sites have an EOP to any future compliance guidance documentation published on its website and distributed to its charter holders annually.

