



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

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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.](#)