



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).