



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.