



# Joint Legislative Audit Committee

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January 22, 2026—1:00 p.m.



**Lindsey A. Perry**  
Auditor General

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## **ARIZONA STATE LEGISLATURE**

### **INTERIM MEETING NOTICE** **OPEN TO THE PUBLIC**

#### **JOINT LEGISLATIVE AUDIT COMMITTEE**

**Date:** **Thursday, January 22, 2026**

**Time:** **1:00 P.M.**

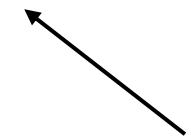
**Place:** **HHR 1**

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### **AGENDA**

1. Call to order and opening remarks
2. Presentation by Office of the Auditor General regarding JLAC-directed Arizona School Safety Special Audit—Interoperable Communication Systems, December 2025 report
  - Responses by County Sheriffs
  - Responses by Interoperability Vendors
3. Arizona State Board of Chiropractic Examiners Special Audit, January 2025 2026  
Follow-up of Report 24-115
  - Presentation by Office of the Auditor General
  - Presentation by Arizona State Board of Chiropractic Examiners
4. Adjournment



#### **Members:**

Senator Mark Finchem

Representative Matt Gress, Chair 2026

Senator Flavio Bravo

Representative Michael Carbone

Senator Timothy "Tim" Dunn

Representative Steve Montenegro, Ex-officio

Senator David C. Farnsworth

Representative Michele Peña

Senator Catherine Miranda

Representative Stephanie Stahl Hamilton

Senator Warren Petersen, Ex-officio

Representative Betty J Villegas

01/16/2026

01/21/2026

VC

RA

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## ARIZONA AUDITOR GENERAL

Lindsey A. Perry, Auditor General

Melanie M. Chesney, Deputy Auditor General

**DATE:** January 20, 2026

**TO:** Representative Matt Gress, Chairman  
Senator Mark Finchem, Co-chairman  
Members, Joint Legislative Audit Committee (JLAC)

**FROM:** Lindsey Perry, Auditor General

**SUBJECT:** JLAC-directed Arizona School Safety Special Audit—Interoperable Communication Systems, December 2025 Report 25-214

### Background

Pursuant to a December 6, 2023, JLAC resolution, we have released the second report in a series of school safety special audit reports. This second public report evaluates the School Safety Interoperability Fund (Fund), including whether expenditures of Fund monies were for statutorily authorized purposes, whether interoperable communication systems purchased with Fund monies met statutory requirements, and whether the systems were procured in accordance with applicable requirements. The report also provides information on issues we identified related to the systems' current functionality and long-term operations.

Key findings from the second school safety special audit included:

- ▶ Interoperable communication systems, such as those that offer the features specified in statute, can facilitate real-time, 2-way information sharing through voice, text, video, and other means to enhance public safety responses to school emergencies.
- ▶ Since 2019, the State has allocated approximately \$26 million through the Fund to law enforcement agencies to facilitate improved emergency communication with public schools.
- ▶ As of September 2025, 14 law enforcement agencies that were allocated Fund monies had entered into contracts totaling \$20.7 million to purchase interoperable communication systems that reportedly involved approximately 20% of public schools State-wide.
- ▶ Each of the 3 interoperable communication systems purchased by law enforcement agencies using Fund monies generally met, or were reported capable of meeting, statutory system requirements.
- ▶ Nine of 14 law enforcement agencies did not follow applicable procurement requirements or lacked some required procurement documentation, and most contracts with system vendors lacked essential protections for the purchasers, such as nonperformance

penalties and contract termination clauses, that are important for holding vendors accountable.

- ▶ Only 2 law enforcement agencies' interoperable communication systems demonstrated all 5 emergency communication functions we tested, and 4 agencies' systems did not function sufficiently for us to observe their operation.
- ▶ Unrealistic vendor representations of system performance and insufficient infrastructure, training, and system upkeep contributed to some agencies' dissatisfaction with their systems and poor functionality we observed.
- ▶ Law enforcement agencies did not plan for ongoing costs and may abandon the interoperable communication systems they purchased using Fund monies if ongoing State funding is not available, and the State-wide annual cost to continue operating these systems is likely a multimillion-dollar annual funding commitment.

We made 2 recommendations to the Legislature and 10 recommendations to law enforcement agencies that received Fund monies. As outlined in law enforcement agencies' responses, each agency agreed with the information presented on its agency page and agreed to implement all the applicable recommendations.

We were asked to present the December 2025 special audit report. Scott Swagerty, Division of School Audits Director, will provide an overview of the special audit report.

**Attachment A** includes the second school safety special audit report issued in December 2025.

### **Action required**

None. Presented for JLAC's information only.

## **Attachment A**

# **Special Audit Report**

## **Arizona School Safety—Interoperable Communication Systems**

# Special Audit

## Arizona School Safety Interoperable Communication Systems

State's \$26 million investment in interoperable communication systems, which reportedly involve about 20% of public schools State-wide, has not yielded anticipated benefits, and their continued use is in doubt because of a lack of assured funding and, in some cases, poor system functionality



# Arizona Auditor General's mission

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The Arizona Auditor General's mission is to provide independent and impartial information, impactful recommendations, and stakeholder education to improve Arizona government for its citizens. To this end, the Office conducts financial statement audits and provides certain accounting services to the State and political subdivisions, investigates possible criminal violations involving public officials and public monies, and conducts performance audits and special reviews of school districts, State agencies, and the programs they administer.

## The Joint Legislative Audit Committee

The Joint Legislative Audit Committee consists of 5 Senate members appointed by the Senate President and 5 House members appointed by the House Speaker. The Committee is responsible for overseeing the Office, including (1) overseeing all audit functions of the Legislature and State agencies, including sunset, performance, special, and financial audits; special research requests; and the preparation and introduction of legislation resulting from audit report findings; (2) requiring State agencies to comply with audit findings and recommendations; (3) receiving status reports regarding the progress of school districts to implement recommendations; and (4) scheduling hearings to review the status of State agencies and school districts.

Senator **Mark Finchem**, Chairman

Senator **Flavio Bravo**

Senator **Tim Dunn**

Senator **David C. Farnsworth**

Senator **Catherine Miranda**

Senator **Warren Petersen** (ex officio)

Representative **Matt Gress**, Co-chairman

Representative **Michael Carbone**

Representative **Michele Peña**

Representative **Stephanie Stahl-Hamilton**

Representative **Betty Villegas**

Representative **Steve Montenegro** (ex officio)

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## ARIZONA AUDITOR GENERAL

**Lindsey A. Perry**, Auditor General

**Melanie M. Chesney**, Deputy Auditor General

December 18, 2025

Members of the Arizona Legislature

The Honorable Katie Hobbs, Governor

Arizona County Boards of Supervisors

Arizona County Sheriffs

Members of the Tucson City Council

Chad Kasmar, Tucson Chief of Police

Members of the Yuma City Council

Thomas Garrity, Yuma Chief of Police

Transmitted herewith is the Auditor General's report, *Arizona School Safety—Interoperable Communication Systems*. This is the second special audit in a series of special audits related to school safety conducted in response to a December 6, 2023, resolution of the Joint Legislative Audit Committee. The audit was conducted under the authority vested in the Auditor General by Arizona Revised Statutes (A.R.S.) §41-1279.03. I am also transmitting within this report a copy of the Report Highlights to provide a quick summary for your convenience.

We worked with officials from law enforcement agencies (agencies) that were allocated monies from the School Safety Interoperability Fund (Fund) to establish school safety programs and acquire interoperable communication systems to facilitate emergency communications between law enforcement and public safety agencies and schools. To evaluate the systems agencies purchased with Fund monies, we worked with interoperable communication system vendors and observed system operations at schools and agencies. We provided updates on the results of our work throughout the course of this special audit to agency officials and vendor representatives and made changes to our report to clarify information based on their feedback. Additionally, we provided agencies with the opportunity to review applicable report sections, give feedback, and provide a formal response to any recommendations we made to their agency for publication in this report.

This special audit includes recommendations to the Legislature to consider clarifying A.R.S. §41-1733 relating to the schools eligible to participate in interoperable communication systems

Arizona School Safety—Interoperable Communication Systems

December 18, 2025

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purchased with Fund monies and the requirements such systems must meet. Additionally, it makes several recommendations to the agencies that were allocated Fund monies. As outlined in their responses, all 14 agencies agreed with our findings pertaining to their agency and agreed to implement all the associated recommendations.

I express my appreciation to the agencies, participating schools, interoperable communication system vendors, and each of their staff 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—Interoperable Communication Systems

### Special Audit

State's \$26 million investment in interoperable communication systems, which reportedly involve about 20% of public schools State-wide, has not yielded anticipated benefits, and their continued use is in doubt because of a lack of assured funding and, in some cases, poor system functionality

### Audit purpose

This audit is the second in a series of special audits related to school safety authorized by the Joint Legislative Audit Committee in December 2023. The first report, issued in December 2024, assessed emergency operations planning at schools. This report focuses on School Safety Interoperability Fund (Fund) expenditures by law enforcement agencies, including their compliance with statutory and applicable procurement requirements and whether the systems purchased with Fund monies met statutory requirements. The next report will address schools' key physical safety infrastructure and related issues and is due by December 31, 2026.

### Key takeaways

- **State has spent millions on interoperable communication systems that reportedly will connect about one-fifth of public schools to law enforcement agencies**

Since 2019, the State has allocated \$26 million through what has become the School Safety Interoperability Fund to law enforcement agencies to facilitate improved emergency communications between law enforcement agencies, public schools, and other public safety agencies. Law enforcement agencies have used Fund monies to purchase interoperable communication systems that meet or are reportedly capable of meeting requirements specified in Arizona Revised Statutes (A.R.S.) §41-1733.

Monies were spent to facilitate emergency communications between public schools and law enforcement agencies, but some nonpublic schools may also have benefited, contrary to statute.

The systems purchased are reported to involve about 20% of the State's public schools, which include traditional public schools and public charter schools. Additionally, as discussed in Chapter 1, pages 6 through 19, we found that 4 of 14 law enforcement agencies that received Fund monies also reported connecting private and/or tribal schools to the interoperable communication systems purchased with Fund monies, which was contrary to statute and may have improperly benefited these schools.

► **Interoperable communication systems can facilitate real-time 2-way communication during emergencies**

Interoperable communication systems, such as those that offer the features specified in statute, can facilitate real-time 2-way information sharing through voice, text, video, and other means to enhance public safety responses to school emergencies. For the purchase of such systems, 15 law enforcement agencies, including 13 county sheriff's offices and 2 city police departments, were allocated monies from the Fund.<sup>1</sup> As discussed in Chapter 1, pages 6 through 19, we found that each of the 3 interoperable communication systems law enforcement agencies purchased using Fund monies generally met, or reportedly met, statutory requirements.

► **Most law enforcement agencies did not follow procurement requirements, and contracts lacked essential protections**

When acquiring interoperable communication systems, 9 of 14 law enforcement agencies and their county or city procurement departments did not comply with applicable procurement requirements and/or lacked documentation required by their procurement policies and procedures, as discussed in Chapter 2, pages 20 through 28. Additionally, several agencies did not follow recommended contracting practices. As a result, many of the resulting contracts relied on vendor-supplied proposals for contract terms and did not include essential protections for the purchasers such as clearly defined performance standards, penalties for nonperformance, and contract-termination clauses. Further, agencies' contract-monitoring efforts appeared limited, as evidenced by most contracts having been paid in full despite our finding that many systems had limited functionality, and some law enforcement agencies expressed dissatisfaction with vendors' system-implementation processes.

Faulty contracting and a lack of monitoring left most agencies with few options for addressing poor vendor or system performance.

► **Only 2 law enforcement agencies' systems demonstrated all 5 emergency communication functions we tested, and 4 did not function sufficiently for us to observe their operation**

As reported in Chapter 3, pages 29 through 32, only 2 of the interoperable communication systems we tested during our observations demonstrated all key functions that law enforcement officials considered most useful during a school emergency. Moreover, 4 law enforcement agencies reported that the systems they had acquired with Fund monies were not working sufficiently to enable us to perform any observations or testing and had not increased their communication capabilities with schools.

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<sup>1</sup> Coconino County Sheriff's Office declined to spend the \$1.25 million it was allocated from the Fund, and those monies have since been reallocated to other agencies.

► **Unrealistic vendor representations of system performance and insufficient infrastructure, training, and upkeep contributed to some agencies' dissatisfaction with their systems and poor functionality**

Unrealistic vendor representations regarding system performance and implementation timelines contributed to some law enforcement agencies' dissatisfaction with the process and with their respective systems, as discussed in Chapter 4, pages 33 through 43. Specifically, connecting public safety agencies and schools to these systems has taken longer than many law enforcement agencies had anticipated, and some reported that their systems were not fully functional across participating schools and public safety agencies in their jurisdictions. Those law enforcement agencies that reported working closely with vendors during the implementation process reported a better understanding of expected timelines and greater satisfaction with system performance. Other factors that contributed to some systems' poor functionality included infrastructure limitations and insufficient system upkeep and training for users.

As of June 2025, some agencies reported that their systems were still not fully functional across participating schools and public safety agencies in their jurisdictions.

► **Law enforcement agencies did not plan for ongoing costs and may abandon systems if ongoing State funding is not available**

Some law enforcement agencies indicated that they considered the interoperable communication systems purchased with Fund monies to be supplemental to existing emergency 911 communication systems, but not essential for their operations. Several agencies, including those that were pleased with their systems and the enhanced communication capabilities they provided, reported that they did not anticipate continuing to operate their systems if State funding is not available to pay for ongoing operating costs. As discussed in Chapter 2, pages 20 through 28, we estimated that an average rural county sheriff's office would need between \$15,828 and \$382,800 annually to pay for licensing, software, and other system costs, depending on which system they had acquired with Fund monies. This indicates that the State-wide annual cost to continue operating these systems could be a multimillion-dollar annual funding commitment.

We estimated an average rural county sheriff's office would need between \$15,828 and \$382,800 annually to pay for ongoing system costs.

## Key recommendations to the Legislature

- Consider evaluating and revising, as necessary, A.R.S. §41-1733 to clarify whether nonpublic schools may participate in systems purchased with Fund monies.
- Consider evaluating and revising, as necessary, A.R.S. §41-1733 to clarify system requirements such as those relating to communication capabilities for all users, access controls, compatibility with existing equipment, and federal certification and connectivity.

## **Key recommendations to law enforcement agencies that received Fund monies**

- ▶ Comply with A.R.S. §41-1733 by establishing procedures to ensure that ongoing interoperable communication system costs, such as licensing fees, for any nonpublic schools are not paid with Fund monies and reporting all Fund expenditures for the preceding fiscal year to the Joint Legislative Budget Committee (JLBC) by November 1 each year.
- ▶ Follow applicable procurement requirements for any future expenditures of Fund monies; ensure that any contracts, addendums, or extensions that involve the use of Fund monies follow recommended practices for contracting; and establish and implement a process to monitor contracts.
- ▶ Evaluate the implementation status and functionality of their respective interoperable communication systems and work with vendors, as applicable, to resolve functional deficiencies; and establish a process for routinely testing system functions.
- ▶ Develop a detailed cost estimate for ongoing system operational costs and a plan to address ongoing interoperable communication funding needs, including actions that will be taken if the State does not provide further funding for existing interoperable communication systems, and provide the cost estimate and plan to their respective governing bodies, the Legislature, and the Governor.

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Most law enforcement agencies did not follow applicable procurement requirements nor best practices for contracting and oversight, limiting their options for addressing poor vendor performance, and most did not appear to consider ongoing system costs

- ▶ Most agencies lacked some required procurement documentation, and many relied on vendor-supplied proposals and/or lacked recommended contract provisions to ensure vendor performance
- ▶ Many agencies did not obtain pricing information to help evaluate system costs and plan for ongoing annual expenses, which we estimate could be as much as \$382,800 for an average rural county

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Interoperable communication systems can improve direct communication between schools and law enforcement agencies, but many systems purchased with Fund monies are not fully functional, limiting their utility during school emergencies

- ▶ Some agencies and schools have found that the interoperable communication systems purchased with Fund monies have provided key features for improving communication and responses during school emergencies
- ▶ System functionality varied, with some systems demonstrating most of the critical functions we tested during our site visits while others reportedly had not provided any added communication benefits

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Various factors affected interoperable communication systems' functionality and law enforcement agencies' satisfaction with their systems, and even functional systems may be discontinued as agencies did not plan for ongoing costs

- ▶ Numerous factors affected system performance and agencies' satisfaction with the implementation process, including training and system upkeep, vendor communication, and infrastructure capabilities
- ▶ Many agencies did not plan for ongoing system operational costs, and some report that if State funding is not available, they may discontinue using systems purchased with Fund monies even if they currently provide useful benefits

## CHAPTER 5: OTHER STATES' INTEROPERABLE COMMUNICATION PROGRAMS

Approaches for facilitating interoperable communication between schools and law enforcement agencies vary among states, with some focusing on panic buttons and radio communication infrastructure

- ▶ We reviewed 6 other states and their efforts to facilitate interoperable communication between schools and law enforcement agencies
- ▶ Two states mandate panic button technologies for schools and have oversight mechanisms to ensure the technologies are functional
- ▶ Two states developed infrastructure to support state-wide interoperable communication networks before providing compatible communication tools to schools

## SUMMARY OF RECOMMENDATIONS

The Arizona Auditor General makes 2 recommendations to the Legislature and 10 recommendations to law enforcement agencies that received Fund monies

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# INTRODUCTION

The Arizona Auditor General has released its second report in a series of school safety special audits authorized by the Joint Legislative Audit Committee (JLAC) in December 2023. The first report, issued in December 2024, assessed emergency operations planning at schools. This audit focused on the School Safety Interoperability Fund (Fund) and considered whether expenditures of Fund monies were for statutorily authorized purposes and whether interoperable communication systems purchased with Fund monies were procured in accordance with applicable requirements. It also assessed whether interoperable communication systems purchased with Fund monies met statutory requirements and provides information on issues we identified related to the systems' current functionality and long-term operations. The next school safety special audit will evaluate schools' key physical safety infrastructure and multimedia communication systems and is due by December 31, 2026.

## **Interoperable communication systems are designed to enhance coordination and communication capabilities during emergency events**

Interoperability technologies facilitate real-time communication and coordination between public safety agencies, including first responders and law enforcement, and other entities, such as schools. These technologies are designed to enable communication among agencies between various systems and tools that organizations may already possess, such as computer software, radios, and security cameras, even if they were purchased from different vendors or have different features and functionalities. Interoperable communication systems are intended to supplement existing 911 emergency communication services by helping to ensure first responders have the information needed to accurately assess incidents in real time, coordinate a response, and arrange for anticipated support, such as emergency medical care.

The lack of interoperable communication capabilities among first responder agencies has been cited as a factor that potentially contributed to delays or confusion during responses to various emergency incidents. For instance, according to the after-action report led by a multi-agency team including the Massachusetts Emergency Management Agency, the on-scene coordination of various emergency response teams was limited following the Boston Marathon bombing in 2013 because their radios were not programmed to communicate with one another. Similarly, according to 2 reports led by the National Police Foundation, incompatible dispatch communication systems and delayed security camera transmissions deprived first responders of critical information during an active shooter incident at Marjory Stoneman Douglas High School in Parkland, Florida. The 2018 incident resulted in 17 deaths.

## **Since 2019, State has allocated \$26 million to increase interoperable communication between law enforcement agencies and schools**

In recent years, legislation has allocated monies for the purpose of enhancing interoperable communication between law enforcement agencies, schools, and public safety agencies. In establishing what has become the Fund, the State has allocated \$26 million since 2019 to 15 law enforcement agencies—13 county sheriff's offices and 2 city police departments—to be spent on systems that facilitate communication between public safety agencies and schools.

Specifically:

- ▶ In 2019, legislation established and appropriated \$1.5 million for the Public Safety Interoperability Fund.<sup>1</sup> The legislation specified that the Arizona Department of Public Safety was responsible for administering the fund and that fund monies were to be appropriated by the Legislature for interoperable communication systems. However, the monies in this fund were not allocated or spent before additional legislation made changes to the Public Safety Interoperability Fund.
  
- ▶ In 2021, legislation was passed to rename the Public Safety Interoperability Fund as the School Safety Interoperability Fund; transfer Fund administration to the State Treasurer's Office; and establish requirements for Fund expenditures, including specific standards that any interoperable communication system purchased with Fund monies must meet. It also specified that public schools serving students in kindergarten through grade 12 (K-12 public schools) were eligible to participate in the program.<sup>2</sup>

Legislation also established 2 programs to facilitate interoperable communications and appropriated a total of \$4 million to 8 county sheriff's offices to purchase interoperable communication systems that met statutory requirements. One program appropriated \$2.5 million to 4 counties and specified that monies must be used for a school safety pilot program that facilitates communication between public safety agencies and up to 800 public schools. The other program appropriated \$1.5 million to 4 rural counties and was directed at facilitating interoperable communication among public safety agencies.<sup>3</sup> Agencies that received monies for these programs were required to report their prior years' expenditures to the JLBC each year by November 1.

## Key terms

### **Law enforcement agency (agency):**

An agency authorized by law or by a government to engage in or supervise the prevention, detection, investigation, or prosecution of any violation of criminal law. For the purposes of this report, agency or agencies refers to 1 or more county sheriff's offices and local police departments that received Fund monies.

**Public safety agency:** A public entity that provides emergency and public safety services, including, but not limited to, fire management services, emergency management disaster relief services, law enforcement, and medical services.

**Source:** Auditor General staff review of <https://www.law.cornell.edu/definitions> on 10/20/25, and of multiple states' statutes.

<sup>1</sup> Laws 2019, Ch. 272, §5, established the Public Safety Interoperability Fund consisting of monies appropriated by the Legislature. Laws 2019, Ch. 263, §151, appropriated \$1.5 million to the Public Safety Interoperability Fund.

<sup>2</sup> Laws 2021, Ch. 403, §19, amended A.R.S. §41-1733 to include requirements for a school safety pilot program.

<sup>3</sup> Laws 2021, Ch. 408, §89.

- In 2022, legislation established the School Safety Program, expanded access to Fund monies to include city or town police departments that establish school safety programs, and removed limits on the number of schools that could participate.<sup>4</sup> Additionally, the legislation appropriated \$20 million to the Fund and specified amounts ranging from \$500,000 to \$3,050,000 to be provided directly to 13 county sheriffs' offices and 2 city police departments. These agencies include the 8 that had participated in the previous interoperable communication programs. The legislation also transferred Fund administration to the Arizona Department of Administration (ADOA).<sup>5</sup> At the time these changes expanded access to Fund monies, approximately \$622,000 had been spent for interoperable technologies through the previous programs, but none of the systems purchased under those programs were fully operational.
- In 2025, legislation allocated an additional \$3,220,000 from the Fund among 9 county sheriffs' offices for fiscal year 2026.<sup>6</sup> The monies included \$1.25 million that had previously been allocated to the Coconino County Sheriff's Office but had remained unspent. Coconino County Sheriff's Office officials reported that they did not spend the monies because the Flagstaff Police Department operates the county's dispatch system and oversees the majority of area schools and may have been in a better position to evaluate and operate an interoperable communication system. However, Flagstaff Police Department officials reported they also declined Fund monies when offered because they did not have the capacity to oversee the interoperable communication system and had concerns about the ongoing system costs. Thus, the \$1.25 million that was initially allocated to the Coconino County Sheriff's Office, along with \$2 million that was transferred from the Peace Officer Training Equipment Fund, was allocated to other agencies.<sup>7</sup>

Officials from some agencies reported that they had not requested nor expected to receive additional Fund monies for fiscal year 2026. Our review did not identify any legislative discussion pertaining to the purpose for the fiscal year 2026 allocations and why additional monies were provided to some agencies and not others. Each of the agencies that received fiscal year 2026 Fund allocations were contracted with the same vendor, and the vendor reported that the monies were expected to pay for ongoing services once existing contracts expire.

## **About one-fifth of public schools State-wide reportedly participate in interoperable communication systems purchased with Fund monies**

Agencies reported approximately 20% of traditional public and charter schools participate in an interoperable communication system purchased with Fund monies. However, based on the limited functionality exhibited by many interoperable communication systems, as discussed in Chapter 3, pages 29 through 32, the percentage of schools that are connected to a fully functioning system is likely much lower than the percentage of schools that reportedly participate. Further,

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<sup>4</sup> Laws 2022, Ch. 307, §4.

<sup>5</sup> Laws 2022, Ch. 313, §5.

<sup>6</sup> Laws 2025, Ch. 233, §127.

<sup>7</sup> See Coconino County Sheriff's Office's agency page in Appendix A, page a-16, for more information.

the percentage of public schools reportedly participating in such systems varied by jurisdiction—ranging from 0% to 87%. For the number of participating schools each agency reported, see Appendix A, pages a-1 through a-72. Despite limited school participation and lack of functionality across some interoperable communication systems, schools are still able to communicate with law enforcement agencies during emergencies through other means such as 911 services. Additionally, some schools have panic alarm systems available to staff that their districts have purchased or have access to emergency radios provided by local law enforcement agencies.

## **All monies expended from the Fund were paid to 3 interoperable communication system vendors**

For this report, we reviewed all Fund expenditures, including monies spent under prior years' programs. As previously noted, 1 of the 13 county sheriff's offices was allocated Fund monies but did not spend them. As shown in Table 1, the remaining 14 agencies contracted with 3 interoperable communication system vendors—Mutualink, Motorola Solutions, and Navigate360—with 10 of 14 agencies contracting with Mutualink. The amount of Fund monies allocated to each agency, the vendors they contracted with, and areas of the State served by interoperable communication systems purchased with Fund monies are presented in Table 2 and Figure 1 on page 5. Our review found that all monies expended from the Fund have been paid to these 3 vendors for interoperable communication systems, including hardware, licensing, and training (for agency expenditure amounts, see Appendix B, pages b-1 through b-3).

**Table 1**

**The 14 agencies that spent Fund monies established contracts with 3 interoperable communication system vendors totaling \$20.7 million and had spent \$13.6 million as of September 2025**

<b>Vendor</b>	<b>Number of agencies contracted</b>	<b>Total contracted amount</b>	<b>Total expenditures as of September 2025</b>
Mutualink	10	\$12,750,000	\$12,029,104
Motorola Solutions	3 <sup>1</sup>	7,495,050	1,144,491
Navigate360	1	471,312	447,945
<b>Total</b>	<b>14</b>	<b>\$20,716,362<sup>2</sup></b>	<b>\$13,621,540</b>

<sup>1</sup> Tucson Police Department canceled its contract with Motorola Solutions in December 2024 after the vendor had started to implement its system at the police department. The system was never fully implemented. See Tucson Police Department's agency page in Appendix A, pages a-60 through a-63 for more information.

<sup>2</sup> Amount reflects the total monies encumbered through the contracts existing with vendors as of September 2025. This amount does not include possible renewal contracts that have been entered into since September 2025 as a result of fiscal year 2026 allocations to select agencies. Additionally, some agencies possessed unencumbered Fund monies at the time of our review, as the agencies' contracted amounts were for less than their total allocated Fund monies.

Source: Auditor General staff review of agency-provided documentation related to contracts and expenditures for interoperable communication systems for fiscal year 2021 through September 2025, JLBC-provided expenditure reports for interoperable communication systems for fiscal years 2021 through 2025, and auditor-conducted interviews.

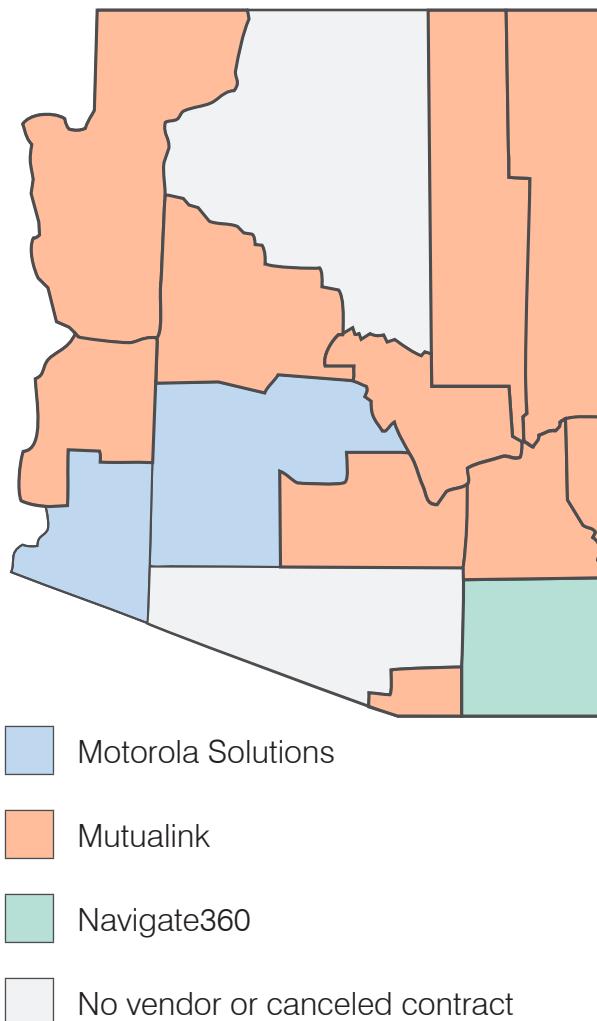
**Table 2**

**Total Fund allocations to the 14 agencies that spent Fund monies ranged between \$860,000 and \$5.15 million**

County	Agency	Vendor	Total allocations through Sept. 2025
Apache	County Sheriff's Office	<b>Mutualink</b>	\$1,275,000
Cochise	County Sheriff's Office	<b>Navigate360</b>	1,500,000
Coconino	County Sheriff's Office	N/A <sup>1</sup>	N/A <sup>1</sup>
Gila	County Sheriff's Office	<b>Mutualink</b>	1,710,540
Graham	County Sheriff's Office	<b>Mutualink</b>	1,254,930
Greenlee	County Sheriff's Office	<b>Mutualink</b>	859,338
La Paz	County Sheriff's Office	<b>Mutualink</b>	950,000
Maricopa	County Sheriff's Office	<b>Motorola Solutions</b>	5,150,000
Mohave	County Sheriff's Office	<b>Mutualink</b>	1,875,000
Navajo	County Sheriff's Office	<b>Mutualink</b>	1,940,000
Pima	Tucson Police Department <sup>2</sup>	<b>Motorola Solutions</b> (Contract canceled)	2,000,000
Pinal	County Sheriff's Office	<b>Mutualink</b>	2,455,192
Santa Cruz	County Sheriff's Office	<b>Mutualink</b>	1,100,000
Yavapai	County Sheriff's Office	<b>Mutualink</b>	2,550,000
Yuma	Yuma Police Department <sup>3</sup>	<b>Motorola Solutions</b>	1,350,000
<b>Total</b>			<b>\$25,970,000</b>

**Figure 1**

**10 of 15 counties in the State purchased Mutualink systems**



<sup>1</sup> Coconino County Sheriff's Office declined to spend the \$1,250,000 it was allocated from the Fund in fiscal year 2022, and those monies were reallocated to other agencies in fiscal year 2026.

<sup>2</sup> Tucson Police Department originally contracted with Motorola Solutions but canceled its contract in December 2024 after it determined the system would not meet schools' needs. Tucson Police Department reported during the audit that it is developing its own interoperable communications functionality that it will make available to schools throughout Pima County.

<sup>3</sup> Yuma Police Department reported that its School Safety Interoperability Fund program includes schools throughout the entire county.

Source: Auditor General staff review of Laws 2021, Ch. 403, §19; Laws 2022, Ch. 313, §5; Laws 2025, Ch. 233, §127; agency-provided documentation related to contracts and expenditures for interoperable communication systems for fiscal year 2021 through September 2025; and auditor-conducted interviews.

# CHAPTER 1: INTEROPERABLE COMMUNICATION SYSTEM REQUIREMENTS

**Law enforcement agencies generally spent Fund monies for statutorily authorized purposes, but not all statutory requirements were met, and some may have resulted in agencies spending Fund monies for systems that were not the best fit for their needs**

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## Audit question and conclusion

### Audit question

Were School Safety Interoperability Fund monies spent only for statutorily authorized purposes, and did the systems purchased meet all statutory requirements?

### Conclusion

All 14 law enforcement agencies that received and spent Fund monies used them to purchase interoperable communication systems for enhancing schools' emergency communications with public safety agencies, consistent with statute. However, 4 agencies did not limit participation in the interoperable communication systems to only eligible K-12 public schools in accordance with statute. Based on our review, a total of 7 private and tribal schools may have improperly benefited from connecting to such systems. Although we were unable to determine the amount of monies, if any, agencies spent to connect nonpublic schools, we estimate the value each participating nonpublic school may have received from the Fund to be approximately \$17,100. Additionally, not all agencies complied with the statutory requirement to annually report their Fund expenditures to the JLBC.

As of September 2025, the 14 agencies that received Fund monies had purchased 3 different interoperable communication systems. We observed demonstrations for each of the 3 systems and found that although no single system demonstrated functionality meeting all statutory requirements, all 3 vendors reported that their systems were potentially capable of meeting all system requirements. Evaluating systems' compliance with some requirements was challenging because vendors and agencies sometimes had different understandings of the same requirement. Additionally, some vendors and law enforcement officials questioned whether all requirements were critical for facilitating communication with schools during an emergency. In some cases, these statutory requirements, rather than a determination that a particular system fulfilled their needs, may have influenced which system an agency decided to purchase.

## **Fund expenditures were for interoperable communication systems, as authorized by statute, but some agencies did not restrict participation to K-12 public schools and/or did not comply with reporting requirements**

All 14 agencies that spent Fund monies used them to purchase interoperable communication systems for enhancing emergency communications with schools and public safety agencies consistent with statute, but some other statutory requirements were not met.

Specifically:

- ▶ **Agencies spent Fund monies for interoperable communication systems that they understood met statutory requirements**

As of September 2025, the State had appropriated \$26 million to the Fund and allocated these monies to law enforcement agencies throughout the State. The 14 agencies that spent Fund monies initiated contracts totaling more than \$20.7 million to purchase interoperable communication systems and, as of September 2025, had spent more than \$13.6 million toward these contracts. For detailed information about Fund allocations, contract amounts, and expenditures, see Appendix B, pages b-1 through b-3.

Law enforcement and county procurement officials reported that at the time contracts were established, they understood the interoperable communication systems they purchased met or were capable of meeting statutory requirements based on vendor representations and, in some cases, their own due diligence. For additional information about the agencies' procurement of the systems purchased with Fund monies, see Chapter 2, pages 20 through 28.

- ▶ **Not all schools that are participating in interoperable communication systems procured with Fund monies meet statutory criteria**

Although the systems purchased with Fund monies met or reportedly met statutory requirements, some nonpublic schools may have improperly benefited from the Fund monies spent on these systems, contrary to statute. Statute specifies that Fund monies are to be used only for school safety programs involving public K-12 schools and law enforcement and public safety agencies. However, during our review, 4 agencies reported that a combined total of 5 private and 2 tribal schools, which are not public schools, participate in the interoperable communication systems they purchased with Fund monies.<sup>1</sup> Because these private and tribal schools are not public schools, connecting them to systems purchased with Fund monies may have provided these schools with an improper benefit.

Each of the 4 agencies that connected nonpublic schools to their interoperable communication systems contracted with Mutualink, and because of poor contracting practices, as further described in Chapter 2, pages 20 through 28, it is unclear whether connecting private and/or tribal schools had any effect on total system contract costs for any of the 4 agencies. Specifically, Mutualink contracts we reviewed did not include

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<sup>1</sup> Apache, Navajo, Santa Cruz, and Yavapai County Sheriff's Offices reported connecting some nonpublic schools to their interoperable communication systems. See each county sheriff's office agency page in Appendix A, pages a-1 through a-72, for additional information.

detailed cost information to enable agencies to determine what it costs to connect each school to their system. Further, the Santa Cruz County Sheriff's Office's contract did not include any details, such as a list of schools, about which entities were expected to participate. Thus, it is not clear whether the number of schools connected to the system, or the inclusion of a nonpublic school, affected total contract costs. Similarly, the Yavapai County Sheriff's Office's contract proposed connecting 4 public school districts but no tribal or private schools. However, the agency was not required to pay any additional monies to the vendor when connecting a nonpublic school to the system.

Navajo and Apache County Sheriff's Offices' contracts, which are based on Mutualink's vendor proposals, specifically proposed connecting some tribal and/or private schools to the agencies' systems, contrary to statute. However, like the other 2 contracts we reviewed, the contracts lacked any detailed pricing information to determine how much these counties may have paid on behalf of the nonpublic schools connected to their interoperable communication systems. We found that the contract for the Navajo County Sheriff's Office proposed connecting 3 private and/or tribal schools, which it incorrectly described as public, and the agency reported that 3 such schools have been connected to its system. The Apache County Sheriff's Office contract proposed connecting 10 private schools and 3 tribal schools affiliated with the Bureau of Indian Education. The agency reported that 2 of the proposed schools have been connected.

Although we were unable to determine whether any of these agencies spent Fund monies directly to benefit nonpublic schools, we estimated that the value received by each connected private or tribal school was approximately \$17,100. Our estimate is based on 2025 pricing information for licensing, software, and other vendor costs that Mutualink provided to us for this audit.<sup>2</sup> Further, these agencies will likely incur ongoing licensing and system upkeep costs for any nonpublic schools that continue to participate in their systems, and these costs are not eligible to be paid from Fund monies.

Officials from agencies that allowed nonpublic schools to participate in the interoperable communication systems purchased with Fund monies indicated that there were no apparent additional system costs for adding these schools. Additionally, law enforcement agencies respond to emergencies involving all types of schools within their jurisdictions. Agency officials reported to us that they did not distinguish which schools should be permitted to have enhanced communication capabilities.

### ► **Some agencies did not submit statutorily required expenditure reports**

Additionally, not all agencies that received Fund monies complied with statutory reporting requirements. As part of our review, we collected and reviewed expenditure data from the agencies that received Fund monies and the annual expenditure reports these agencies were required to submit to the JLBC in accordance with A.R.S. §41-1733(B).<sup>3</sup> We found

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<sup>2</sup> According to the Santa Cruz County Sheriff's Office, the private school connected to its system does not have any Mutualink user licenses assigned to it. Thus we were unable to estimate the value of any benefit the school may have received from the Fund.

<sup>3</sup> A.R.S. §41-1733(B) requires that county sheriffs and local police departments that established a school safety program using Fund monies submit a report by November 1 each year to the JLBC of all expenditures made for the school safety program in the preceding fiscal year. Some expenditure reports we reviewed for fiscal year 2024 included a summary of what the expenditures were for, while others listed only the expenditure amounts with the date of payment to the system vendor.

that 4 of 14 agencies had not submitted the annual spending reports, as required.<sup>4</sup> However, there is no statutory requirement for the JLBC to take any action when agencies do not submit the required reports.

## **Systems acquired with Fund monies generally met statutory requirements or were reportedly capable of doing so, but some requirements were unclear, and others may be unnecessary**

The 3 systems agencies purchased as of September 2025 met most of the statutory requirements for interoperable communication systems purchased using Fund monies or were capable of doing so according to the vendors. A.R.S. §41-1733 specifies several capabilities that any interoperable communication system purchased using Fund monies must have, such as secure text messaging and panic alarms that provide for collaboration between schools and public safety agencies. Additionally, statute includes requirements that address issues such as data security and compatibility with other systems (see Appendix C, pages c-1 through c-4, for more information about the statutory system requirements).

However, some requirements were difficult to evaluate, and the systems we observed did not always meet every component within a requirement. For instance, some requirements were broad, calling for all users to be able to access some system features, and others were unclear about what was specifically required and/or how particular interoperability functions should be integrated with school communication systems and equipment. Additionally, despite a statutory requirement for systems to connect to existing equipment and vendors reporting that their systems were capable of doing so, fully implementing systems in some areas will require upgrading infrastructure and/or purchasing new equipment.

For the purposes of discussing whether the various systems met statutory requirements and to provide information about the various requirements, we have grouped the requirements into 4 categories. These categories include the systems' interface between schools and law enforcement agencies; compatibility with existing equipment; privacy, security, and control functions; and federal certification and connectivity.

## **Communication between schools and law enforcement during emergencies**

### **All 3 vendors met most statutory requirements related to the systems' communication capabilities or reported being capable of doing so, but 1 system did not share features with all users**

With limited exceptions, the 3 systems we reviewed were capable of performing most of the statutorily required functions related to communications between schools and law enforcement during emergencies. Specifically, statute establishes 5 requirements addressing the types of communication methods and information that an interoperable communication system must allow schools and law enforcement agencies to use and share. We observed a demonstration

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<sup>4</sup> JLBC staff confirmed during the audit that Greenlee County Sheriff's Office did not submit a report for fiscal year 2022, Apache and Gila County Sheriff's Offices did not submit a report for fiscal year 2024, and Pinal County Sheriff's Office did not submit a report for fiscal years 2022 and 2024.

of each of the 3 systems provided by the system vendor to determine whether the systems met the statutory requirements. As shown below, we observed and verified that the 3 systems we reviewed were capable of performing most of the required functions in this area.

Statutory requirement	Motorola Solutions	Mutualink	Navigate360
Identifying system users' identity, location, and operational status during an incident.	✓	✓	✓
Secure text messaging and file sharing to all users involved in an incident.	Reported capable	✗	Reported capable
Secure sharing of collaborative maps, building floor plans, and images between schools and public safety agencies.	Reported capable	✓	Reported capable
Using multiple forms of real-time communications and information collaboration, including voice and full-motion video sharing, during an incident.	✓	✓	✓
Integrating manually activated panic alarm system that, when activated, establishes direct collaboration between schools and public safety agencies.	✓	✓	✓



**System met statutory requirement** based on observations during visits to law enforcement agencies and/or schools, vendor demonstrations, and/or our review of system documentation.

Reported capable

**System reportedly met statutory requirement** based on testimonial evidence during vendor demonstrations and interviews, but we were unable to independently corroborate.



**System did not meet statutory requirement** based on observations during visits to law enforcement agencies and/or schools, vendor demonstrations, and/or our review of system documentation.

However, some elements within the requirements were not clearly defined and were sometimes interpreted differently by vendors or were considered less critical for emergency communications by law enforcement officials.

Specifically:

- ▶ **Although systems are required to identify users' operational status during incidents, statute does not define "operational status," and each vendor interpreted this requirement differently**

Each of the vendors indicated their respective systems could identify users' operational status during emergency events, as required by statute. However, based on our discussions with the 3 vendor representatives who provided system demonstrations, the requirement to identify users' operational status was unclear, and each interpreted the requirement differently. For instance, vendors defined operational status variously as the type of school incident triggered, a system user's safety status during an incident (e.g., marked "safe" or "unsafe" using the technology), or an indicator light signifying a user was logged into and directly connected to the system. We determined that each vendor met this part of the requirement because we observed each system perform the various functionalities the vendor described as their understanding of the statutory requirement.

- ▶ **Two vendors reported that their systems were capable of allowing all users involved in an incident text message and file share without requiring additional licenses, but law enforcement officials reported file sharing may not be critical**

We observed that all 3 systems provided a means for any school staff member to initiate an emergency incident using a mobile phone panic button application or a wearable panic button. However, only 2 vendors reported that with proper system configuration, all users involved in an incident could communicate directly with law enforcement agencies without the need to spend additional monies to license each user.

Specifically, Navigate360 reported that its system can be configured without additional expense to the agency to allow staff members who trigger an emergency alert to communicate with law enforcement agencies via audio, video, and/or text and to share files. Motorola Solutions reported that its system integrates with another of their applications, Citizen Input, that enables emergency dispatchers to request text messaging and file sharing from any user.

According to Mutualink, only licensed system users have the ability to text and share files with law enforcement agencies, and most school users, such as teachers, are not licensed Mutualink system users. Generally, only a small number of administrators at a school campus are licensed system users, even though all school staff may have access to Mutualink's panic button application. Thus, any unlicensed system user who triggers an emergency response using the panic button lacks the ability to text message and/or share files with law enforcement, despite being involved in the incident. Mutualink officials indicated during the audit that they believed their system met this statutory requirement because the text messaging and file sharing capability is available to all licensed system users, and a school could decide to obtain licenses for all panic button users. However, we found that licensing all users would likely result in a substantial increase to ongoing system costs and, as reported in Chapter 2, pages 20 through 28, the State currently lacks a dedicated funding source to pay ongoing costs associated with the interoperable communication systems.

We also found that during our interviews with county sheriff offices and local law enforcement agencies, some officials reported that text messaging and file sharing was not a critical function necessary for first responders during an emergency. Several officials expressed that the ability to view video footage through security cameras or cell phones was much more important during an emergency than the ability to share a file.

► **All vendors' systems demonstrated the ability to share collaborative maps and building floor plans, but only 1 demonstrated image sharing**

Each vendor's system was capable of sharing collaborative maps and building floor plans, if the schools had provided such maps to the vendor. However, only Mutualink's system demonstrated image sharing during our observations. Motorola Solutions and Navigate360 reported that their systems allowed direct image sharing, and during system demonstrations, we observed representatives from each vendor setting up an image-sharing message. However, the demonstration environment was not configured to enable us to verify that the images were successfully shared with another system user.

► **All systems demonstrated panic alarm systems that established direct collaboration between schools and law enforcement agencies**

Each of the 3 systems we reviewed directly integrated with manually activated panic alarm systems, such as a mobile phone panic button application or wearable panic button. The 3 vendors reported that their panic button systems met the requirement to establish direct collaboration by either prompting users to call 911 or by initiating an emergency incident protocol that allows authorized school users and law enforcement personnel to communicate directly using text messaging or voice chat.

## Compatibility with existing equipment

**Vendors reported their systems were capable of integrating with school access controls and connecting with existing communication assets, but requirement interpretations varied, and vendors' assertions may not reflect consideration of all existing equipment**

Each of the 3 vendors reported that their systems could connect with various systems and existing equipment, but interpretations of 1 requirement differed, and we found that vendor assurances may not have considered the availability, age, and condition of existing communication assets. As shown on page 13, statutory requirements address an interoperable communication system's ability to integrate with school access control systems and to connect with existing school and law enforcement equipment and communication systems.

Statutory requirement	Motorola Solutions	Mutualink	Navigate360
Enables integration to school access control systems to allow remote lockdown by law enforcement through the same multimedia system.	Reported capable	Reported capable	Reported capable
Is capable of being deployed to end users on existing communications assets owned by participating entities.	Reported capable	Reported capable	Reported capable



**System met statutory requirement** based on observations during visits to law enforcement agencies and/or schools, vendor demonstrations, and/or our review of system documentation.

Reported capable

**System reportedly met statutory requirement** based on testimonial evidence during vendor demonstrations and interviews, but we were unable to independently corroborate.



**System did not meet statutory requirement** based on observations during visits to law enforcement agencies and/or schools, vendor demonstrations, and/or our review of system documentation.

We found that the requirement relating to remote lockdowns by law enforcement was not interpreted consistently by law enforcement agencies and most law enforcement agencies reported that the decision to lock down a school is best left to school administrators. Additionally, the infrastructure in some areas and the communication equipment at some agencies and schools we visited was deficient or too old to allow for connectivity of existing communication assets. As further discussed in Chapter 4, pages 33 through 43, this potentially should have been known or considered by agencies and vendors.

Specifically:

- **All 3 vendors reported that their systems could integrate with school access control systems to allow for a remote lockdown by law enforcement; however, this requirement was unclear, and schools may not have the equipment to support this functionality**

Vendors and law enforcement officials we spoke with during the audit differed in how they interpreted this requirement. For instance, some interpreted the requirement to mean that law enforcement should be able to alert schools of the possible need to lock down by sending a message through the system. Most law enforcement officials we spoke with explained that putting a school in lockdown is a decision for school administrators to make and reported that they notify schools if there is an incident close by and make recommendations, but school administrators must decide what actions to take.

However, at least 4 law enforcement agencies and all 3 of the vendors explained that they understood this requirement to be a system's ability to integrate with electronic door-locking technologies to enable law enforcement agencies to remotely control school access. Law enforcement officials we spoke with were unsure whether any schools in their jurisdictions had electronic door-locking technologies, and representatives for the 3 vendors indicated that this feature is not currently functional in any of the Arizona schools that use their systems. Each vendor indicated, however, that they could work with access control manufacturers to integrate this functionality if requested by schools and law enforcement. This assertion, though, does not address whether schools have the necessary infrastructure to support law enforcement's ability to remotely operate school access controls. If not, investments in equipment such as electronic locks would be needed before law enforcement agencies could control school access through an interoperable communication system.

► **All 3 vendors reported that their systems could be deployed on schools' and agencies' existing communication assets; however, we found that this assertion likely did not consider the age and condition of existing equipment and infrastructure**

When asserting that their systems could be deployed on existing communication assets owned by schools and law enforcement agencies, it appeared that vendors had not fully considered the age and condition of existing assets and the adequacy of supporting infrastructure. Interoperability technologies are designed to connect communication systems and tools, regardless of manufacturer, and the statutory requirement appears intended to ensure that law enforcement agencies, schools, and public safety agencies would not need to change out their existing equipment to accommodate the interoperable communication systems purchased using Fund monies. However, given the variability across the State relating to school size, location, and facilities; law enforcement systems and tools; and the infrastructure needed to support interoperability, it is possible that no single interoperable communication system could reasonably be expected to fulfill this statutory requirement. As further discussed in Chapter 4, pages 33 through 43, the interoperable communication systems we observed at schools and agencies were capable of connecting to some but not all existing systems and equipment.

## Privacy, security, and control functions

**All 3 systems met or were reportedly capable of meeting statutory requirements related to privacy, security, and control functions**

Statute establishes 3 requirements that address system security, personal information protections, and schools' ability to retain control over their communication assets. As shown on page 15, each of the 3 systems met the requirements or vendors reported that their systems were capable of meeting the requirements.

Statutory requirement	Motorola Solutions	Mutualink	Navigate360
Allows each participating entity to maintain discretionary real-time control of all communications assets owned or operated by the entity.	Reported capable	✓	Reported capable
Encrypts all media communications.	✓	✓	✓
Ensures student and staff privacy.	✓	✓	✓



**System met statutory requirement** based on observations during visits to law enforcement agencies and/or schools, vendor demonstrations, and/or our review of system documentation.

**Reported capable**

**System reportedly met statutory requirement** based on testimonial evidence during vendor demonstrations and interviews, but we were unable to independently corroborate.



**System did not meet statutory requirement** based on observations during visits to law enforcement agencies and/or schools, vendor demonstrations, and/or our review of system documentation.

To make our determination, we evaluated vendor-provided technical security information against National Institute of Standards and Technology (NIST) industry standards and recommended practices for encryption and security. We found that all vendors' systems met standards for encrypting communications and maintaining privacy. Both Motorola Solutions and Navigate360 provided system documentation supporting these features to law enforcement agencies during the procurement process. However, Mutualink indicated during the audit that it did not have this type of system documentation readily available and reported that they produced it only in response to our request.

We also observed how communication assets were operated and controlled during and after system testing at agencies and schools. For instance, we observed that an agency contracted with Mutualink could access school security camera footage only once an emergency incident was triggered. After the incident ended, the agency no longer had camera system access. Although we were unable to observe this functionality at agencies contracted with Motorola Solutions and Navigate360 because the schools we visited did not have security cameras connected to the interoperable communication system, both vendors reported that their systems allowed schools to maintain discretionary control over their security camera systems.

## Federal certification and connectivity

**Only 1 system met or was reported being capable of meeting both federal certification and connectivity requirements, but most law enforcement agency officials questioned these requirements' importance for responding to emergencies**

Statute establishes 2 requirements that pertain to certification by and connectivity to federal agencies. As shown below, 1 system met or was reported being capable of meeting both requirements.

Statutory requirement	Motorola Solutions	Mutualink	Navigate360
Is certified under the United States Department of Homeland Security Safety Act as qualified anti-terrorism technology.	✗	✓	✗
Is compatible with the Federal Emergency Management Agency interoperable gateway system for disaster communications.	Reported capable	Reported capable	Reported capable



**System met statutory requirement** based on observations during visits to law enforcement agencies and/or schools, vendor demonstrations, and/or our review of system documentation.

Reported capable

**System reportedly met statutory requirement** based on testimonial evidence during vendor demonstrations and interviews, but we were unable to independently corroborate.



**System did not meet statutory requirement** based on observations during visits to law enforcement agencies and/or schools, vendor demonstrations, and/or our review of system documentation.

However, during our review, law enforcement officials and a representative from the Federal Emergency Management Agency (FEMA) questioned the applicability of these requirements to school emergency communications.

Specifically:

- ▶ **Only 1 vendor had a current certification as a qualified anti-terrorism technology, and numerous law enforcement officials questioned the certification's importance for interoperable communication between schools and law enforcement**

We found that only Mutualink's system was currently certified as a qualified anti-terrorism technology, but this requirement may pose an unnecessary limitation on the use of Fund

monies. Certification as a qualified anti-terrorism technology refers to 3 liability-protection-award levels that the U.S. Department of Homeland Security may grant to companies to limit their liability for claims arising from terrorist activities. The 3 recognition levels are: (1) developmental testing and evaluation, (2) designated, and (3) certified. The liability-protection terms and timelines vary for each level. We found that Mutualink's interoperable communication system was certified; Motorola Solutions' Rave panic button function was certified, but its interoperable communication system was not; and Navigate360's system had previously been recognized as "designated," but the credential had expired as of November 2023. When we spoke with Navigate360 and Motorola Solutions representatives in November and December 2025, they reported that each vendor has begun working with the U.S. Department of Homeland Security to obtain certification for their respective interoperable communication systems.

To learn more about the significance of U.S. Department of Homeland Security certifications, we spoke with representatives from the Arizona School Risk and Retention Trust (Trust), which provides insurance and risk-management services to most public school districts in the State. According to Trust officials, U.S. Department of Homeland Security certifications are not considered when they evaluate and provide coverage for school districts' cybersecurity services and systems. Some law enforcement agencies we spoke with also reported that their insurance companies do not take U.S. Department of Homeland Security certifications into account for other equipment purchases.

Additionally, some law enforcement agencies we spoke with indicated that the certification requirement posed an unnecessary limitation on their abilities to choose an interoperable communication system provider and to connect existing school systems. For instance, 1 agency researched interoperable communication systems and reported identifying a system used in another state that they thought would best meet their county's needs. However, the system they would have selected was not certified as a qualified anti-terrorism technology, so they felt compelled to contract with Mutualink instead. Officials at another agency reported that they believe they are restricted from using Fund monies to connect with some schools' existing panic button systems if the panic button systems are not also certified.

► **All 3 systems were reportedly capable of connecting to the FEMA Interoperable Gateway System for Disaster Communications (IGS), but interpretations of compatibility differed, and most law enforcement agencies questioned this requirements' importance**

Interoperable communication systems from all 3 vendors were reportedly capable of connecting with the FEMA IGS, but law enforcement agencies reported having difficulty making this determination and indicated that it was not clear how this requirement applied to school emergency communications. Mutualink developed the FEMA IGS under a federal contract with the U.S. Department of Homeland Security to securely link all emergency responders' communication systems to one another and with FEMA. Representatives from both Mutualink and FEMA reported that the IGS was designed to be compatible with a range of communication tools, and according to the Mutualink CEO, who we spoke with during the audit, any interoperable communication system could be

IGS compatible. According to the FEMA representatives, because of the proprietary nature of some IGS software and technology, other interoperable communication system vendors would need to work with Mutualink to establish IGS connectivity.

During the contracting process, some counties were aware that the Mutualink system was capable of connecting with the FEMA IGS and took steps to determine whether any non-Mutualink systems they were considering purchasing would also meet this requirement.

For example:

- Maricopa County Sheriff's Office reported reaching out to the Arizona Department of Homeland Security (DHS) for guidance prior to contracting with Motorola Solutions. According to agency officials, DHS indicated that systems listed on FEMA's authorized equipment list, which names both Mutualink and Motorola Solutions systems, would meet the IGS compatibility requirement. Additionally, agency officials reported that Motorola Solutions representatives provided additional assurances that its system follows FEMA's Common Alerting Protocol (CAP) and complies with other national interoperability standards.<sup>5</sup>
- The Yuma Police Department, which also contracted with Motorola Solutions, reported that information about IGS connectivity is not readily available on FEMA's website. Without official guidance from FEMA, Department officials indicated that they reviewed other available information related to the FEMA IGS. They reported that the U.S. Department of Homeland Security defines the FEMA IGS as a communication platform supporting interoperable communications. The Yuma Police Department reported using this definition and the Motorola Solutions system's compatibility with FEMA's CAP and Integrated Public Alert & Warning System (IPAWS) in determining whether the system it purchased met the statutory requirement to connect to the FEMA IGS.<sup>6</sup>
- Cochise County Sheriff's Office also worked to determine FEMA IGS compatibility before contracting with Navigation360. Officials reported reaching out to local and national emergency response officials about the FEMA IGS and could not get clear guidance, but through their research determined that Navigation360's compatibility with FEMA's CAP would fulfill this requirement.

In addition to the lack of clarity about what was necessary to fulfil this requirement, we found that IGS connectivity may not be necessary for effective interoperable communication between schools and law enforcement agencies. Most law enforcement agencies questioned the requirement for the systems to be compatible with the FEMA IGS and what communications with FEMA would be expected during school emergencies. Officials we spoke with shared that school emergencies are handled at the local level, and they were not aware of situations that would require local law enforcement or schools to communicate directly with FEMA. In the event of wildfires or other natural disasters that

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<sup>5</sup> FEMA's CAP is a digital format that public safety agencies can use for emergency alerts that allows for consistent messages to be disseminated simultaneously over multiple communications pathways. Public safety organizations can use CAP to exchange multimedia information including, but not limited to, photographs, maps, and streaming video.

<sup>6</sup> FEMA's IPAWS is a national system for local emergency alerts to the public through mobile phones, radio, television, and the National Oceanic and Atmospheric Administration's Weather Radio. IPAWS is used by more than 1,800 federal, state, local, tribal, and territorial authorities.

may impact schools, they explained that county- or State-level emergency management agencies would be responsible for contacting and communicating with FEMA.

We also spoke with FEMA representatives who indicated that FEMA works primarily with disaster response agencies at the State level, and the representatives indicated that they would not anticipate ever communicating directly with a school in an emergency. Further, according to FEMA's website, it has never made an emergency declaration for a school-related emergency, such as an active shooter incident.

## **Recommendations to the Legislature**

1. Consider evaluating and revising, as necessary, A.R.S. §41-1733 to clarify whether nonpublic schools, including private and tribal schools, are eligible to participate in any interoperable communication system purchased with Fund monies.
2. Consider evaluating and revising, as necessary, A.R.S. §41-1733 to clarify system requirements such as those relating to operational status and communication capabilities for all users, access controls, compatibility with existing equipment, and federal certification and connectivity.

## **Recommendations to law enforcement agencies that received Fund monies**

1. Determine the amount of Fund monies spent for the benefit of any nonpublic schools, and report this information to the Arizona Department of Administration.
2. Develop and implement procedures to ensure that ongoing interoperable communication system costs, such as licensing fees, for any nonpublic schools are not paid with Fund monies.
3. Follow the requirement set forth in A.R.S. §41-1733(B) to report all Fund expenditures for the preceding fiscal year to JLBC by November 1 each year, and, as applicable, promptly submit any required reports that were not previously submitted for prior years' expenditures.

**Most law enforcement agencies did not follow applicable procurement requirements nor best practices for contracting and oversight, limiting their options for addressing poor vendor performance, and most did not appear to consider ongoing system costs**

## Audit question and conclusion

### Audit question

Did law enforcement agencies comply with applicable procurement requirements and evaluate system costs when purchasing interoperable communication systems using Fund monies?

### Conclusion

Nine of 14 agencies that contracted for interoperable communication systems using Fund monies did not follow applicable procurement requirements and/or lacked documentation required by their respective procurement policies and procedures. The deficiencies we identified primarily related to improper sole-source procurements that lacked a required review of other potential vendor systems and a written justification for making a sole-source purchase. Further, most contracts we reviewed failed to include important terms, such as mechanisms to hold the vendors accountable, in accordance with recommended practices.

Additionally, we found that agencies with sole-source procurements lacked pricing and cost information necessary to determine whether the purchase price of their systems was reasonable and to verify the accuracy of invoices. They also did not appear to consider ongoing annual system costs when contracting for their systems, with most agencies reporting that they had not received this information from their vendor. Moreover, when we compiled our estimates of annual costs to continue operating the various systems, we found that relevant pricing information was not readily available from all vendors.

**Most agencies lacked some required procurement documentation, and many relied on vendor-supplied proposals and/or lacked recommended contract provisions to ensure vendor performance**

We found that 9 of 14 agencies that contracted for interoperable communication systems using Fund monies did not follow applicable procurement requirements and/or lacked documentation required by their respective procurement policies and procedures. For the contracts we reviewed, the law enforcement agencies that were allocated Fund monies were generally responsible for gathering relevant information about systems and vendors and submitting proposed contracts to county or city procurement staff. Once the proposed contracts were reviewed and approved, they were submitted to County boards of supervisors or city officials for final approval. Although each contract was subject to a review and approval process, most did not comply with applicable procurement requirements we reviewed, and many relied on vendor-supplied proposals as the final contract language, as shown in Table 3 on page 21.

**Table 3**

**9 of 14 agencies did not follow applicable procurement policies and procedures and/or lacked some required documentation when purchasing interoperable communication systems, and 6 used a vendor-provided proposal as their final contract**

Agency	Vendor	Procurement type	Followed applicable procurement policies and procedures?	Developed a contract independently of vendor-provided proposal?
<b>County sheriff's offices</b>				
Apache	Mutualink	Sole source	<b>No</b>	<b>No</b>
Cochise	Navigate360	Cooperative agreement	<b>No</b>	<b>Yes</b>
Gila	Mutualink	Sole source	<b>No</b>	<b>Yes</b>
Graham	Mutualink	Sole source	<b>No</b>	<b>Yes</b>
Greenlee	Mutualink	Sole source	<b>No</b>	<b>No</b>
La Paz	Mutualink	Sole source	<b>No</b>	<b>No</b>
Maricopa	Motorola Solutions	Request for proposal	<b>Yes</b>	<b>Yes</b>
Mohave	Mutualink	Sole source	<b>Yes</b>	<b>Yes</b>
Navajo	Mutualink	Sole source	<b>No</b>	<b>No</b>
Pinal	Mutualink	Sole source	<b>No</b>	<b>No</b>
Santa Cruz	Mutualink	Sole source	<b>Yes</b>	<b>Yes</b>
Yavapai	Mutualink	Proprietary	<b>No</b>	<b>No</b>
<b>Police departments</b>				
Tucson	Motorola Solutions	Request for proposal	<b>Yes</b>	<b>Yes</b>
Yuma	Motorola Solutions	Cooperative agreement	<b>Yes</b>	<b>Yes</b>

Source: Auditor General staff review of agency-provided procurement policies and procedures and contract documentation applicable to the procurement of interoperable communication systems in fiscal years 2021 through 2025.

The 5 contracts that were developed in accordance with procurement requirements included 2 sole-source procurements, 2 contracts that were developed through a request for proposal (RFP), and 1 that used a cooperative services agreement from a contract developed through 1 of the aforementioned RFPs. The Mohave County Sheriff's Office and Santa Cruz County Sheriff's Office used sole-source procurement to contract with Mutualink. The Maricopa County Sheriff's Office and Tucson Police Department both used the RFP process, and each received multiple vendor responses and evaluated proposals based on program and statutory requirements and cost. Each of these 2 agencies determined that Motorola Solutions would provide the best product based on their evaluation of submitted proposals. One of these RFP-developed Motorola Solutions contracts was also used by the Yuma Police Department under a cooperative services agreement.

Additionally, the Cochise County Sheriff's Office used a separate cooperative services agreement and generally met the procurement requirements we reviewed. However, it lacked documentation that the Cochise County Board of Supervisors had approved the agency's cooperative services membership in accordance with its procurement policies. Prior to initiating this contract with Navigate360, Cochise County took several steps to ensure that the interoperable communication system it purchased would meet the needs of schools and law enforcement. Specifically, it surveyed schools about what system functions they were interested in and conducted an evaluation of 3 vendors based on statutory requirements, functionality, and pricing.

## Procurement key terms

**Cooperative agreement:** An agreement to procure any materials, services, professional services, construction, or construction services with 1 or more public procurement offices in accordance with an already established purchasing agreement entered between agencies.

**Proprietary:** A solicitation where the purchase of a required product is restricted to a single supplier because the goods or services are only compatible with or are an integral component of products in use by the agency in which replacement is not practical. Proprietary items may be available from several vendors through competitive bidding; however, competition is restricted to this group.

**Request for proposal (RFP):** A solicitation an agency issues that outlines competitive requirements for services and invites potential vendors to submit competitive proposals for outlined projects.

**Sole source:** A solicitation where a contract may be awarded for a material, service, or construction item without competition if it is determined in writing that there is only 1 source for the required material, service, or construction item.

**Source:** Auditor General staff review of A.R.S. §41-2632(A); agency-provided policies and procedures; and the Federal Acquisition Regulation's website, retrieved 9/22/25 from <https://www.acquisition.gov/far/subpart-15.2>

## **Most agencies that used sole-source procurements initiated the procurements without determining whether any reasonable alternatives existed for obtaining interoperable communication systems that met statutory requirements**

Eight of 10 contracting agencies that used sole-source or proprietary procurements that we reviewed did not follow applicable requirements to determine and document whether any other vendor could provide qualifying interoperable communication systems before initiating contracts with Mutualink. Most of the contracting agencies also did not document their own justifications for making a sole-source purchase but instead relied on sole-source documentation provided by the vendor, Mutualink, contrary to their respective counties' procurement requirements.

Officials we spoke with at 6 of the 8 agencies indicated they believed that Mutualink had the only interoperable communication system that met the statutory requirements for using Fund monies. Staff at the remaining 2 agencies had not been with their agencies during the contracting process and were unaware of how or why former officials determined sole-source procurements were appropriate. Officials at 2 agencies reported that they performed their own informal review of statutory requirements and other vendors' systems before concluding that Mutualink's system was the only system that met all the statutory requirements. However, most agencies reported relying on discussions with State or county officials or information provided by Mutualink. For instance, 6 agencies reported that after they had been allocated Fund monies, Mutualink representatives approached their agencies directly to solicit their business and provided proposals and sole-source justification for purchasing the Mutualink system. Without independently determining and justifying their sole-source purchases, these agencies failed to ensure that their contracts were fair, competitive, and provided the best value to taxpayers.

Further, although other interoperable communication systems we reviewed during the audit met or were reportedly capable of meeting statutory requirements, officials at 1 agency reported that Mutualink representatives had recently contacted them and explained that any fiscal year 2026 Fund allocations could only be spent for Mutualink systems. As noted in the Introduction, pages 1 through 5, all fiscal year 2026 Fund allocations were directed to 9 of the agencies that had purchased interoperable communication systems with Fund monies. Each of these agencies had contracted with Mutualink.

## **Most contracts we reviewed did not incorporate recommended provisions to ensure vendor accountability and performance**

Our review of interoperable communication system contracts found that many did not include key components recommended by the National State Auditors Association (NSAA) to facilitate an efficient, effective, and accountable service procurement process.<sup>1</sup> Most of the issues we noted were associated with the 9 contracts that did not comply with their counties' applicable procurement requirements. In particular, we found that the 6 contracts that relied almost exclusively on Mutualink's vendor proposal as the final contract language provided the fewest protections for contracting agencies.

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<sup>1</sup> National State Auditors Association. (2003). *Contracting for services best practices document*. Retrieved 8/5/2025 at [https://www.nasact.org/files/News\\_and\\_Publications/White\\_Papers\\_Reports/NSAA%20Best%20Practices%20Documents/2003\\_Contracting\\_Best\\_Practices.pdf](https://www.nasact.org/files/News_and_Publications/White_Papers_Reports/NSAA%20Best%20Practices%20Documents/2003_Contracting_Best_Practices.pdf)

For example:

► **Most contracts lacked clearly defined performance standards for implementation and/or provisions for evaluating vendor performance**

Few contracts we reviewed clearly defined full system implementation and how functionality would be evaluated prior to payment. For instance, the contracts that relied on the Mutualink proposal for final contract language each call for between 2 and 5 lump sum payments of \$50,000 to \$900,000 during the contract's duration, but these payments are not linked to system performance. According to these contracts, final payment is due when final system design documentation is delivered by the vendor. The contract language states that "...final design documentation will be provided at the completion of the installation plan to reflect final implementation design..." but it is not clear what level of system performance should have been expected and how it was to be evaluated and verified before the final payment was made.

► **Some contracts lacked incentives and/or penalties linked to performance to help ensure the timely delivery of a functional system and to provide recourse for nonperformance**

Contrary to NSAA recommendations, some contracts lacked performance incentives and/or clear penalties and corrective actions for vendor nonperformance, and a dispute resolution process. Without such provisions, agencies have little recourse if the vendor does not provide expected goods and services. For instance, 3 agencies reported that their systems were not functioning, and based on our review, their only potential option for ensuring the vendor completed the work would have been to withhold final payment. However, agencies that had made their final payments lacked even this option for helping hold the vendor accountable.

► **Some contracts lacked termination provisions to enable either party to end the contract if performance is not possible or if the service no longer meets a need**

Contrary to NSAA recommendations, some contracts did not include any provisions to address when and how either party could terminate the contracts. One agency reported that it has attempted to terminate its contract with Mutualink because its interoperable communication system has not functioned as anticipated more than 3 years after it entered the contract. However, because the contract lacks recommended termination provisions, the agency was unable to end the contract as of September 2025 and is pursuing other methods to resolve the dispute with its vendor.

In contrast, another agency discovered that the schools in its area were not interested in linking to its contracted interoperable communication system provider, Motorola Solutions, and it was able to cancel its contract with the vendor. This agency contracted for services using an RFP process, and it had independently developed its own contract that included a termination clause in accordance with recommended practices.

► **Some counties did not adequately monitor interoperable communication system contracts to ensure vendor accountability and help verify charges**

Based on our review, most counties had paid vendors the full contracted amounts, but we identified instances that suggest that some agencies and/or counties did not routinely monitor contract compliance and evaluate performance before issuing payments.

For example:

- Officials at 1 agency indicated that Mutualink did not communicate regularly with them. However, we also found that the agency did not proactively enforce contract provisions requiring the vendor to provide biweekly status reports and monthly program reviews to discuss the project's status. According to agency officials we interviewed in November 2025, the agency has communicated with its vendor on only 3 occasions since March 2024. Officials reported that their most recent contact with the vendor was in November 2025 for a system test, and prior to that time, their communications with Mutualink consisted of a discussion regarding a contract extension in March 2024 and a February 2025 call from their assigned vendor representative informing them that he was leaving the company. The agency did not provide an explanation for not holding the vendor responsible for providing the contractually required biweekly reports and monthly reviews, but these communications would likely have been useful for identifying issues that were hindering system implementation and functionality. Representatives we spoke with from agencies that contracted with other vendors did not report similar communication concerns.
- We identified another case where payment was linked to a specific deliverable—an initial project plan consisting of a planned installation schedule and a targeted launch date—but it is not clear that the agency and county officials verified that the plan had been received before issuing payment. Specifically, an invoice we reviewed from Mutualink for \$250,000 included a note questioning whether the plan had been received, but there was no resolution noted before the agency approved the invoice for payment. According to an agency official, they did not receive this initial project plan and did not have an explanation for why the agency approved payment to the vendor without receiving the required deliverable.

We have provided information about the procurement issues we identified to the auditors responsible for performing counties' annual financial audits.

**Many agencies did not obtain pricing information to help evaluate system costs and plan for ongoing annual expenses, which we estimate could be as much as \$382,800 for an average rural county**

In addition to the procurement and contracting deficiencies previously discussed, most agencies did not obtain detailed pricing information for components such as licenses, software, and equipment prior to initiating interoperable communication system contracts, limiting their ability to evaluate contracts and plan for expenses. Specifically, the 10 agencies that initiated sole-source or proprietary contracts with Mutualink each agreed to pay the vendor the full amount of

Fund monies they were allocated prior to fiscal year 2026, as shown in Table 4. However, they lacked pricing information to help them evaluate whether the system price was reasonable prior to signing contracts. Agencies that contracted with Motorola Solutions or Navigate360 using RFPs or cooperative contracts were more likely to have pricing information available and typically contracted for systems that cost less than their Fund allocations.

Additionally, during the implementation process, agencies without detailed pricing information could not verify whether the charges were accurate and appropriate. For instance, 1 agency reported to us that fewer schools were connected to its Mutualink system than had been estimated when the contract was signed, but the agency lacked cost information to help determine whether the amount it was contracted to pay the vendor was still appropriate. According to agency officials, they were withholding final payment to Mutualink because they had questions about the contracted amount given that not all proposed schools were connected to the interoperable communication system. Agency officials reported being unsure about whether the vendor had provided fewer licenses and/or equipment than included in the contract. Officials indicated that Mutualink did not reduce the contracted payments but sufficiently addressed their concerns such that the agency agreed to pay the full contracted amount.

#### **Table 4**

**For agencies that contracted with Mutualink, total Fund allocations were equal to total contract costs, but agencies that contracted with other vendors had monies remaining**

As of September 2025

<b>Allocated and contracted amounts for vendor systems</b>	<b>Vendors</b>		
	<b>Mutualink</b>	<b>Motorola Solutions</b>	<b>Navigate360</b>
Total Fund allocations for agencies State-wide, fiscal years 2021 through 2025	\$12,750,000	\$8,500,000	\$1,500,000
Total contracted amount as of June 30, 2025	12,750,000	7,495,050	471,312
Remaining allocations (after contracts)	<b>\$0</b>	<b>\$1,004,950</b>	<b>\$1,028,688</b>

Source: Auditor General staff review of agency-provided documentation related to contracts and expenditures for interoperable communication systems and Arizona legislation allocating Fund monies for fiscal years 2021 through 2025.

Finally, without detailed pricing information, most agencies lacked the information necessary to accurately estimate and plan for ongoing system operation costs. To estimate how much each of the 3 systems may cost an average rural county annually for ongoing licensing, software, and other vendor costs, we obtained and compiled pricing information from each of the 3 vendors. The pricing information we used for our Motorola Solutions and Navigate360 recurring cost estimates was from fiscal year 2026 detailed pricing guides and the vendors' contracts with agencies. We estimated recurring costs for Mutualink's system using information provided by the vendor that consisted of fiscal year 2025 pricing data compiled in response to our request. We applied these costs to a hypothetical law enforcement agency that we developed based on 10 rural law enforcement agencies we reviewed and the average number of public safety agencies and schools reportedly participating in each of their interoperable communication systems.<sup>2</sup> As shown in Table 5, the estimated annual costs vary substantially across the 3 systems.

## Table 5

### Estimated annual recurring costs of each interoperable communication system for an average rural Arizona county varied widely, with Mutualink's system being the most expensive

Vendor	Projected annual recurring cost
Mutualink	\$382,800 <sup>1</sup>
Motorola Solutions	\$215,291
Navigate360	\$15,828

<sup>1</sup> We requested fiscal year 2026 pricing information from each of the 3 system vendors. Motorola Solutions and Navigate360 provided pricing guides, but Mutualink was unable to do so. The Mutualink representatives we spoke with indicated that the vendor had new leadership and was restructuring its pricing and, therefore, did not have fiscal year 2026 pricing guides readily available. Additionally, 1 Mutualink representative indicated that the vendor had not set fiscal year 2026 pricing because counties had not yet been allocated Fund monies and the vendor did not know how much money each county would receive. Therefore, our annual cost estimate for Mutualink is based on fiscal year 2025 pricing estimates provided by Mutualink during the audit.

Source: Auditor General staff analysis of agency contracts for interoperable communication systems, information provided by 10 rural agencies about the number of public safety agencies and schools participating in their interoperable communication systems, and vendor-provided pricing information for fiscal years 2025 and/or 2026.

Planning for ongoing costs is important because the Fund, which provides monies for acquiring interoperable communication systems, does not have provisions to allocate monies for ongoing operational costs. Operational costs include licensing, software, and other vendor costs discussed previously, as well as other costs that cannot be paid with Fund monies, such as staffing that may be necessary to maintain the systems and interface with schools. For example, staff turnover at schools and agencies will require regular and routine efforts to timely disable unneeded accounts, ensure only authorized users have system access, and train new system users. Additionally, some interoperable communication systems rely on a variety of devices, such as personal cell phones, security cameras, and wearable panic buttons. Whenever staff turnover or equipment changes occur, agency or school staff may be needed to configure or update individual devices or work with vendors to do so.

<sup>2</sup> For our estimated annual reoccurring cost calculations, we used the average number of public safety agencies, school districts, charter networks, and schools reportedly participating in systems purchased by 10 rural law enforcement agencies and pricing information from each vendor.

Each of the 14 agencies that contracted for interoperable communication systems reported assigning staff to help implement the systems, with the costs being paid from sources other than the Fund. Of these agencies, 13 reported that staff also had other roles and responsibilities within the agency, such as chief deputy, communications director, or dispatch supervisor. Additionally, IT staff at many agencies were also needed to help implement their systems. Because these staff members already had other roles and responsibilities, they may not have been able to participate in all meetings and system tests at school sites. Rural agencies in particular reported not having enough staff to dedicate time to work with all schools during the system implementation process.

Only 1 agency—Maricopa County Sheriff's Office—had a staff member assigned and dedicated to managing system implementation. Maricopa County Sheriff's Office expects that once additional schools are connected to the system, the dedicated staff will still be needed to manage the system and work with schools to ensure the system remains functional. For example, officials said they expected that the staff member would be present for drills schools conduct to ensure the interoperable communication system is fully functional and to address any technical issues.

As discussed further in Chapter 4, pages 33 through 43, ongoing costs and the lack of assured funding may result in some agencies abandoning the systems purchased with Fund monies.

## **Recommendations to law enforcement agencies that received Fund monies**

- 4.** In conjunction with their respective vendors, as necessary, develop a detailed cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to their respective governing bodies, the Legislature, and the Governor.
- 5.** Follow their applicable procurement requirements for any future expenditures of Fund monies.
- 6.** Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables, incentives and/or penalties tied to vendor performance, and contract termination provisions; and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.
- 7.** Establish a process to monitor contracts that involve the use of Fund monies to ensure vendors comply with contract terms, including any requirements to provide regular communication or updates.

# CHAPTER 3: INTEROPERABLE COMMUNICATION SYSTEM FUNCTIONALITY

**Interoperable communication systems can improve direct communication between schools and law enforcement agencies, but many systems purchased with Fund monies are not fully functional, limiting their utility during school emergencies**

## Audit question and conclusion

### Audit question

How have interoperable communication systems contributed to school safety in Arizona, and what is the current status of the systems law enforcement agencies have purchased using Fund monies?

### Conclusion

Some interoperable communication systems have helped address school safety concerns by increasing the amount and timeliness of information available to law enforcement agencies during emergencies. However, many of the interoperable communication systems acquired using Fund monies were not fully functional at the time of our review, and 4 agencies reported that their systems were not functioning sufficiently for us to observe them. These systems likely had not provided agencies or schools with any additional communication capabilities, leaving many to continue relying on existing technologies, such as telephone calls to 911 services, to communicate during emergencies.

**Some agencies and schools have found that the interoperable communication systems purchased with Fund monies have provided key features for improving communication and responses during school emergencies**

Although we found that not all interoperable communication system functions were operational at the schools we observed, law enforcement and school officials we spoke with found some key system features to be useful for addressing school safety issues, such as:

#### ► **Access to school camera feeds**

Agencies reported that the ability to link to school security camera feeds and footage is beneficial. For example, officials with the Santa Cruz County Sheriff's Office described a recent incident involving an unauthorized person on a school campus. Through the Mutualink system, the sheriff's office was able to access the school's camera feeds in real time to direct officers to the unauthorized person's location.

### ► **Access to school maps and/or building plans**

When implementing its Navigate360 system, officials from Cochise County reported finding that some schools had outdated and/or hand drawn maps that were not easily accessible to first responders. This issue was corrected during system implementation, and officials reported that they appreciated their system's ability to ensure first responders have ready access to digitized school maps and building plans in the event of a school emergency.

### ► **Panic buttons for staff**

Staff at 3 schools we visited reported that they appreciate the Raptor panic button application that works with the Mutualink system. The panic button enables any staff member with the application on their cell phone to notify school staff and law enforcement of an emergency incident.

### ► **Connectivity to multiple law enforcement agencies**

Navajo County Sheriff's Office representatives reported that its Mutualink system enables them to easily and directly communicate with school administrators and with dispatchers through voice and text messaging. They reported that this functionality has proved useful during emergency incidents. They also reported that their system connects local police departments from all over the county, as well as other counties with the Mutualink system, so that the nearest officers can respond to any school emergency.

The administrator of a rural school we spoke with also indicated that the Mutualink system serving their school would allow them to inform multiple law enforcement agencies of an incident at the same time. This functionality may improve response times by enabling the nearest or most readily available officers to respond, even if the school was outside of their jurisdiction.

### ► **Access to the same real-time information for all first responders**

Maricopa County Sheriff's Office reported that its Motorola Solutions system provides first responders with real-time information during a school emergency incident. They reported using the system successfully 3 times at 1 school, stating that the interoperable communication system has enhanced their ability to respond to school emergencies because all first responders have the same information about the incident in real time. They reported that they appreciate the system's move away from linear communication to multimodal communication where all responders have access to the same information all at once.

## **System functionality varied, with some systems demonstrating most of the critical functions we tested during our site visits while others reportedly had not provided any added communication benefits**

We observed only 2 agencies' interoperable communication systems perform all 5 of the emergency communication functions law enforcement agencies and schools had identified as being most important during emergencies. However, some of the issues we identified were not system related but were instead specific to the individual schools included in our review and whether they had uploaded critical information such as maps. Our observations involved interoperable communication system tests at 8 agencies and 8 schools, each in a different county, to determine whether the systems could demonstrate critical emergency communication functions.<sup>1</sup> For agency-specific information about our interoperable communication system observations, see agency pages in Appendix A, pages a-1 through a-72.

As summarized below, we conducted our observations at 8 agencies and 8 schools that were reported to be connected to their respective systems and functional to determine whether the systems purchased with Fund monies enabled law enforcement and/or school staff to:

### **► Determine the emergency's location and who reported it**

During all 8 system tests we observed, the systems could be used to determine where an emergency was triggered and who triggered it, which according to law enforcement agencies can help them to respond more effectively to school emergencies. For each system test, we observed the campus address or in some cases the specific room where the test incidents were triggered. Additionally, some systems also provided the name of the person who triggered the test incident.

### **► Receive panic button alerts**

All 8 mobile panic button tests we observed notified law enforcement and other school staff of the test emergency event, but administrators at 2 rural schools were unable to communicate directly with law enforcement after triggering the panic alert. When activated, the panic alarms we observed alerted school staff and law enforcement agencies and specified the type of emergency, including but not limited to evacuations, lockdowns, and active shooter events. This information can help ensure school staff quickly initiate proper emergency procedures and provide law enforcement officers with information needed to plan and coordinate a response.

### **► View live security camera footage**

Seven of the 8 schools we observed had security camera systems, but only 4 of the tests we conducted were successful in demonstrating law enforcement's remote live access to the schools' camera systems. Law enforcement officials reported that having live security camera footage allowed dispatch staff and responding public safety officials to see, in

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<sup>1</sup> As of June 2025, 13 of the 14 agencies that received Fund monies had active contracts with interoperable communication system vendors. Tucson Police Department had received Fund monies to purchase an interoperable communication system but canceled its Motorola Solutions contract because it determined the system would not meet the needs of schools within its jurisdiction. Pinal County Sheriff's Office is seeking to cancel its contract with Mutualink due to the system not functioning to its standards.

real time, what was happening at the school to help them plan and respond appropriately. Officials from the 3 agencies whose schools were unable to share security camera footage through the interoperable communication system indicated that some security cameras were still being connected to the system and/or system updates were needed to ensure users could access video footage.

### ► **Access school maps and/or building plans**

We observed school maps and building floor plans during only 2 of 8 system tests we conducted. Law enforcement agencies reported that having access to school maps and building plans helps them to understand schools' layout before entering the building during emergencies. To be accessible to law enforcement through the interoperable communication system, maps and/or building plans must be uploaded by schools and/or system vendors so that they can be integrated with other system functions such as video sharing. Five schools had not provided school maps and/or building plans to the system vendor, although 2 had submitted maps and building plans directly to their respective law enforcement agencies. Staff at 1 agency were unable to access maps and/or building plans during our observation despite officials indicating to us after our observation that the school had interactive floor plans uploaded to the system.

### ► **Access to security cameras or other systems is limited to active emergencies**

As previously discussed, 4 schools we observed had security cameras that were connected to law enforcement through the interoperable communication system, and we found that access to these cameras was limited to emergencies, as required. To maintain student privacy, the ability to restrict access to school security camera systems is critical for compliance with federal laws.<sup>2</sup> We found that once the test emergency incident ended at the 4 schools that successfully demonstrated remote access to schools' security camera systems, law enforcement agencies no longer had camera system access.

We did not observe systems at any schools associated with 4 other agencies that had purchased systems with Fund monies because officials reported that their interoperable communication systems had either never functioned or were not fully implemented, even though these contracts were initiated more than 2 years ago.<sup>3</sup> According to officials associated with these 4 agencies, 911 service continues to be the main way that schools can notify law enforcement of an emergency and request assistance.

As recommended in Chapter 2, pages 20 through 28, and Chapter 4, pages 33 through 43, agencies should monitor vendor performance and ensure system functions are tested to ensure they are working across schools.

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<sup>2</sup> The Family Educational Rights and Privacy Act (FERPA) protects privacy of students' personally identifiable information and their education records, which may include photos or videos of a student. Although education agencies or institutions must gain consent from parents or eligible students prior to disclosing this information, student personally identifiable information and education records can be disclosed without consent in the case of a health or safety emergency.

<sup>3</sup> We also did not observe the interoperable communication system at a fifth agency, the Yuma Police Department, because the agency's contract with Motorola Solutions was signed in December 2024 and the system had not been implemented at the time of our observations.

# CHAPTER 4: FACTORS AFFECTING SYSTEM FUNCTIONALITY AND VIABILITY

**Various factors affected interoperable communication systems' functionality and law enforcement agencies' satisfaction with their systems, and even functional systems may be discontinued as agencies did not plan for ongoing costs**

## Audit question and conclusion

### Audit question

What factors contributed to interoperable communication systems' inability to demonstrate some key functions and law enforcement agencies' satisfaction with the systems purchased with Fund monies, and what considerations may impact the systems' continued use in the future?

### Conclusion

Several factors affected whether interoperable communication systems were able to consistently demonstrate all key functions during our observations and whether agencies' expectations for their systems were met. For instance, the supporting infrastructure necessary for systems purchased with Fund monies to fully function is not consistently available State-wide, and some features require users to connect with their personal devices. During our observations, system performance was affected by unreliable connectivity of security cameras at schools, staff training and cooperation at schools and agencies, and routine system updates. Additionally, in some cases, unrealistic vendor representations of quick implementation timelines with limited agency involvement contributed to agencies' dissatisfaction with their systems and/or vendors, as did limited communication and the lack of a systematic implementation process. Agencies with better-functioning systems reported being directly involved in the implementation process and working closely with system vendors.

For many agencies, the continued availability of State funding to pay for ongoing system operating costs is a critical factor for determining whether they will continue operating their interoperable communication systems once their contracts expire. We found that agencies did not plan for ongoing costs, and even those that reported receiving key benefits from their systems indicated that they are unlikely to continue using the systems if State funding is not available to pay for ongoing system operating costs.

## **Numerous factors affected system performance and agencies' satisfaction with the implementation process, including training and system upkeep, vendor communication, and infrastructure capabilities**

As previously discussed, we evaluated the functionality of interoperable communication systems purchased with Fund monies by observing demonstrations at 8 agencies and 8 connected schools. We also performed work to evaluate why another 4 systems reportedly lacked sufficient functionality to permit testing. Because Mutualink is the vendor for 10 of the 12 systems we reviewed to evaluate issues affecting functionality, much of the following discussion pertains to Mutualink systems.

### **Agencies and schools did not always ensure interoperable communication system users were trained or that their systems were updated and tested following installation**

Several interoperable communication systems we observed at schools and agencies had system user and maintenance issues that affected their ability to perform critical functions, including:

- ▶ **Some users were not fully trained on the interoperable communication systems, impacting their ability to demonstrate some key functionality**

We found some instances where staff at agencies and schools did not understand how to operate all the system's functions, so they were unable to demonstrate system capabilities. Some of these functions involved communicating with law enforcement, and the failure to use the applicable communication tools and connections properly could potentially delay emergency responders.

For example, during 1 observation, the school staff member who activated the panic button as part of the test incident declined to connect to 911 when prompted to communicate with dispatchers. We observed that the 911 operator sent a message to a different staff member who was listed as an authorized system user after the 911 call was declined. However, this was a manual process and took more time than it would have if the school staff member had correctly used the application.

Similarly, we were unable to complete our observation of another agency's system because agency staff had not been trained to operate it. Although school staff demonstrated knowledge of the system's functions and communication tools, agency staff did not know how to use the system to receive the school's communications through the system.

- ▶ **Some agencies and/or schools had not installed required system software updates, which impaired functionality during our tests**

We found that some agencies and/or schools using Mutualink systems had not installed system software updates, some of which must be done manually and are necessary for some interoperable communication system functions to remain operational and secure. For example, at 1 agency, we were unable to observe the live video feed on 1 dispatch console, although video feeds were available on other consoles. The agency staff member appeared surprised that it was not working and reported that the live feed did not load because software had not been updated on the dispatch console we observed during our

tests. Another agency reported that their dispatch consoles do not receive any advance alerts from the system when software updates are required, and the system stops working if it is not regularly updated. This could potentially result in law enforcement agencies being unable to access critical information during emergencies.

Similarly, at another school, we were only able to observe the interoperable communication system on an administrator's cell phone because the school district's IT department had not approved and installed the necessary software update for the desktop version of the system software. Although a staff member erroneously reported that the system was still operational without the latest available update, when we tested the system, we found that it would not work on district computers without the update.

The agencies contracted with Navigate360 and Motorola Solutions did not report any issues with system updates. According to representatives from both Navigate360 and Motorola Solutions, system updates are automatic and do not need to be manually installed.

► **Authorized system users were not consistently updated following staffing changes, which prevented current school administrators from using the system**

We identified 2 rural schools that had experienced recent staff turnover, and it appeared that current administrators had not been fully added to their Mutualink interoperable communication systems as authorized users. Each administrator had a panic button application, but only authorized users can use the Mutualink system to communicate directly with law enforcement personnel, as noted in Chapter 1, pages 6 through 19. Administrators at these schools could not log into the system to see who triggered the test emergency event nor to directly communicate with law enforcement through the system during our tests.

According to Mutualink, schools that are connected to its system can provide new staff with limited panic button functionality and can reassign system licenses without involving the vendor. However, Mutualink must perform additional steps to enable licensed system users to receive alerts when emergencies are triggered at their schools. If an emergency is triggered before an administrator is set up to receive emergency alerts, the administrators must be manually invited by another authorized user to participate in the emergency event, and once invited, the administrator could directly communicate with law enforcement. Navigate360 and Motorola Solutions systems allow administrative users at schools and agencies to add or remove users as needed without the vendors' involvement, reducing the potential for delays.

Although a Mutualink representative reported reaching out to schools at least once each year to obtain their updated authorized user lists, some schools we visited had staff changes during the year, which may have caused their administrators to be unable to access the system. If a school does not reassign licenses to new administrators or send updated authorized user information to the vendor, users are not added to the system, increasing the risk that a key school staff member may be unable to use the interoperable communication systems effectively during emergencies. Additionally, by not promptly removing system users when they no longer need access, agencies and/or schools increase the risk for false panic alerts and unauthorized access to camera feeds and other sensitive information during emergencies.

► **System functions were not regularly tested, which may have helped to more timely identify and correct functionality issues we encountered during our observations**

We found that some schools and agencies did not routinely test their interoperable communication systems to ensure they could be used to communicate during emergencies. As a result, agencies and schools were frequently unaware that their systems may not function because of issues we identified, such as untrained staff, uninstalled software updates, and outdated user credentials. Routine system testing may have helped agencies and schools to proactively address the issues we identified and could better ensure that they are able to rely on their interoperable communication systems during emergencies.

**Agencies' expectations for system implementation and their involvement in the process appeared to affect their satisfaction with the systems they purchased and system functionality**

Agencies that were substantially involved in working with schools and public safety agencies to implement their interoperable communication systems reported greater satisfaction with the process and better-functioning systems than agencies that reported expectations that vendors would provide turnkey systems.

Specifically:

► **Agencies that were actively involved with system implementation and worked closely with vendors and schools experienced greater success**

We found that agencies with better-functioning systems were more likely to be actively involved in the implementation process and to work closely with their respective vendors. For example, 1 agency whose system demonstrated nearly all critical functions during our observation reported working cooperatively with Mutualink, other local law enforcement agencies, and schools to establish interoperable connectivity. The agency estimated that the implementation workload was split proportionally between its staff and the vendor, with each contributing to the implementation process. Although agency officials expressed concerns that implementation took longer than expected, they also indicated that the system's features had contributed to improved communication between law enforcement agencies and schools. Officials also indicated that Mutualink staff were responsive and worked to address issues that arose during system implementation.

Similarly, 3 other agencies—each contracted with a different vendor—also reported taking active roles during the system implementation process. According to agency officials, their respective systems had performed critical functions during real emergency incidents and/or tests. These agencies reported taking steps such as meeting regularly with vendors, working with vendors to ensure public safety agencies and schools were added to the system, and ensuring training and system tests were conducted.

- **Agencies that reported expecting “turnkey” systems that required little agency involvement for implementation were more likely to be dissatisfied with the process and/or the system**

The Mutualink vendor proposal, which was the basis for several contracts, indicates that the contracting agency will receive a “turnkey” system that meets all statutory requirements. However, the contracts also call for agencies to make technical support staff available to facilitate equipment and network configurations and provide reasonable assistance. These expectations do not clearly state roles and responsibilities, such as whether technical support extends to schools, and 1 agency reported that they have become more involved in the implementation process than they expected.

Based on the “turnkey” language, officials at 1 agency we reviewed reported expecting that the system would be installed relatively quickly, with the vendor reaching out and working with all local law enforcement agencies and schools. Since schools are under the jurisdiction of various local law enforcement agencies, officials at the contracting agency reported that they had expected to provide basic support to local law enforcement agencies but did not expect to be directly involved with schools. However, agency officials reported that Mutualink had not reached out to other local law enforcement agencies, and the vendor failed to resolve connectivity issues at their agency during the implementation process. Officials further reported that Mutualink representatives had referred to their county as “beta testers” for a system that they had been led to believe was already tested and successfully operating elsewhere.

Another agency with a similar contract also reported understanding that Mutualink would reach out to schools, but outreach became the agency’s responsibility instead. Officials reported feeling uncomfortable trying to “sell” the system to schools. Additionally, their contract called for a kickoff workshop with stakeholders, and officials said they had expected that all public safety agencies that wanted to participate in the program would meet with Mutualink representatives in person and as a group. Instead, the officials indicated that Mutualink coordinated the implementation with each agency separately and mostly via email, which officials thought inhibited communication. According to officials, the unclear expectations for the process led to the schools being frustrated with the agency and the agency being frustrated with the vendor.

### **System implementation was sometimes inconsistent and poorly planned, resulting in connectivity issues**

System implementation was not consistently planned and systematic at every agency, potentially leading to delays and connectivity issues. For instance, officials at 1 agency, which is seeking to end its Mutualink contract, reported that system implementation was not systematic, and the vendor attempted to connect schools before ensuring that the system was working for law enforcement. The officials explained that their system was supposed to be installed and implemented in 2 phases—the first phase to connect law enforcement agencies to the interoperable communication system and the second phase to connect schools to the same system. However, officials reported that the vendor did not follow this plan. Officials indicated that instead, the vendor installed equipment at schools before connecting law enforcement agencies to the interoperable communication system, which resulted in schools being connected to the

system while law enforcement agencies were not. According to the agency, it contracted for its interoperable communication system in 2022, but as of June 2025, it still does not connect to all area law enforcement agencies and schools.

In contrast, another agency with a more successful system implementation dedicated staff to the process and concentrated its efforts on establishing connections with a limited number of schools. This agency ensured that the interoperable communication system it purchased was connected to key systems, such as 911 dispatch, and then focused its efforts on connecting with schools that were not within other law enforcement jurisdictions and did not already have interoperable law enforcement communication capabilities. Similarly, another agency worked closely with its vendor to install equipment at schools and conduct training before moving on to system installation and training at local law enforcement agencies. Once these steps were completed, it worked cooperatively with the vendor to test panic button alarm functions at every school and law enforcement agency to ensure the system was functioning correctly. Agency officials reported that, at the time of our review, the agency's interoperable communication system had been connected to systems and equipment at all but 2 of the participating schools in their county.<sup>1</sup>

### **Unrealistic vendor representations of system performance and implementation timelines potentially led to unexpected expenses and delays**

Agency expectations for system capabilities and timelines may have been based on unrealistic or inaccurate vendor materials and representations.

For example:

- ▶ **Vendors represented that their systems were capable of connecting with existing equipment, but we found some equipment or infrastructure was too old or outdated and some was incompatible**

As previously discussed in Chapter 1, pages 6 through 19, vendors reported that their systems were capable of connecting with existing equipment and systems, but they may not have considered the complexities of fulfilling this requirement across hundreds of schools and numerous law enforcement agencies. According to the National Center for Educational Statistics, as of fiscal year 2024, Arizona has approximately 2,150 district and charter schools that could potentially be connected to interoperable communication systems purchased using Fund monies.<sup>2</sup> When communication equipment such as security cameras, panic alarms, and radios is available at these schools, they are likely to vary in age, condition, and manufacturer, making it difficult to ensure connectivity for all schools' existing equipment. Further, connectivity for all existing equipment owned by law enforcement agencies may also be unrealistic. We found, for example, that even the State-wide network for public safety radio communications does not enable all agencies and jurisdictions to communicate with each other.

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<sup>1</sup> One school opted out of the county's interoperable communication system after 1 year, and 1 school was still in the implementation phase as of October 2025.

<sup>2</sup> National Center for Education Statistics. (n.d.). *Common core of data, Public elementary/secondary school universe survey, 2022-23 v.1a, 2023-24 v.1a*. U.S. Department of Education. Retrieved 11/20/25 from <https://nces.ed.gov/ccd/elsi/>

Some specific examples we identified where interoperable communication systems could not connect to existing equipment without additional investments or upgrades include:

- Officials at 14 agencies reported concerns about limited cellular and internet service reliability in their areas, which is essential for enabling 2-way communication with schools via interoperable communication systems. One rural agency reported switching to a different cellular service provider that was willing to install additional communication towers and boosters to improve coverage.
- Another agency reported that it had to purchase new radios because its existing radios would not connect to the Mutualink interoperable communication system it purchased. Given the statutory requirement to connect to existing equipment and a similar contract provision, it is not clear whether Mutualink should have provided compatible equipment at no cost since its system could not be connected to the existing radio equipment. The agency reported that it agreed to pay Mutualink's \$27,000 equipment upgrade fee to acquire new equipment that was compatible with the system.
- We also observed 2 schools that had newer security camera systems that Mutualink had been unable to connect to law enforcement through the interoperable communication system. The manufacturer of 1 school's camera system would not permit it to be connected to an outside entity to share images. Another school's camera system could not be connected to law enforcement even after individually reconfiguring each camera. Officials at this school reported that IT staff had spent hundreds of hours on this issue and stopped pursuing system integration out of frustration.

► **Implementation timelines may not have been accurately represented and have not been met**

Officials from some of the agencies we reviewed reported that Mutualink's representations about timelines for system implementation were inaccurate. For example, officials at 1 agency reported that they thought approximately 6 area schools would be connected to its system within a year, but it was 18 months from the signing of the contract until the first school was fully connected. Officials at another agency reported being under the impression that all schools in their jurisdiction would be connected within 6 months, but it has been approximately 2 years since the contract was signed, and not all schools are connected.

We reviewed the sales materials available on Mutualink's website and other representations it had made about the timelines for implementing its system. According to Mutualink's sales materials, its interoperable communication system should be fully operational within 6 to 8 weeks. Further, in October 2019, Mutualink representatives reported to the legislative Joint Ad Hoc Committee on Statewide Emergency Communications that the technology itself could be installed and deployed at a school in 4 to 5 hours.<sup>3</sup> However, as previously discussed, contracts for some Mutualink systems

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<sup>3</sup> The Joint Ad Hoc Committee on Statewide Emergency Communications was created to examine emerging technologies that have produced positive outcomes in the areas of emergency and crisis communications, investigate solutions for shared data across multiple agencies and departments, and gather input from professionals in law enforcement, emergency management, border security, homeland security, and the Governor's office. The committee, which comprised 3 State senators and 3 State representatives, met 5 times between September 2019 and January 2020 and heard presentations from Arizona public safety agencies, data connectivity vendors, and interoperable communication vendors, including Mutualink and Motorola Solutions.

were initiated more than 2 years ago, and the systems were still not fully operational at the time of our review. The implementation delays suggest that the vendor may not have fully considered the challenges of connecting law enforcement agencies with multiple schools. For more information about how long implementation has taken at each agency we reviewed, see each agency's page in Appendix A, pages a-1 through a-72.

Agencies that purchased systems from Motorola Solutions and Navigate360 also reported that connecting public safety agencies and schools to the system had been a lengthy process, but the timelines had been explained, and they had expected the process to take time. For example, 1 agency reported that it took approximately 10 months for the first school to get its Motorola Solutions interoperable communication system connected and implemented. However, based on discussions with the vendor and schools, the agency reported that they had understood that the implementation process would be completed in phases with the first phase taking at least a year. Another agency reported that full implementation of its Navigate360 system for all schools that opted into the program has taken more than 3 years. Officials did not indicate any dissatisfaction with the process and reported that they are kept informed of any setbacks or technical difficulties through their weekly meetings with the vendor. They also reported that their system was implemented in phases to ensure all systems were functioning at the school sites and public safety agencies.

**Some agencies reported that a lack of vendor communication and involvement has affected system implementation, but we also found that some agencies had not proactively sought vendor support**

Some agencies reported experiencing challenges contacting vendors—particularly Mutualink, which has most of the contracts in the State—and receiving the support necessary to resolve issues with their systems' functionality. For instance, 1 of the agencies that reported concerns about Mutualink's responsiveness indicated that poor communication and support contributed to 1 school district being unable to connect to the agency's system and deciding not to participate.

Based on our discussions with agencies, some of the communication issues they reported may be related to staff turnover at Mutualink. When many of the agencies in the State signed contracts with Mutualink in 2022, the vendor had 3 representatives assigned to sell and implement interoperable communication systems across Arizona. However, according to agencies we spoke with, these vendor representatives were either reassigned or left Mutualink before their systems were implemented. Some agencies reported working with as many as 3 different representatives during the system implementation process, and at least 1 agency indicated that Mutualink did not consistently inform them of how to contact their new representatives. Officials at another agency reported that each time a new representative was assigned to their agency, they felt like they had to restart the entire implementation process. Officials at another agency reported that they would not hear from Mutualink for months, and once they did, it was from a new representative.

However, we also found that these criticisms of Mutualink were not universal, and some agencies reported being satisfied with Mutualink's responsiveness and communication. Additionally, as previously discussed in Chapter 2, pages 20 through 28, at least 1 agency that reported communication difficulties did not appear to have proactively initiated communication nor enforced contract terms requiring regular updates from the vendor, which likely contributed to the

problems they reported. Agencies that contracted with Motorola Solutions or Navigate360 did not report issues with vendor responsiveness, communication, or staff turnover.

### **Most contracts did not include provisions to hold vendors accountable, leaving little recourse for ensuring systems are fully implemented**

As detailed in Chapter 2, pages 20 through 28, most agencies failed to develop contracts that complied with procurement requirements and recommended contracting practices, leaving them little recourse to address issues related to vendor or system performance. Many of the agencies that reported system implementation difficulties or nonfunctioning systems did not include provisions in their contracts to hold vendors accountable for providing functioning systems or for terminating contracts. Without such contract provisions, these agencies may have limited options for ensuring systems meet their expectations and little recourse if the systems are still not functional after all payments have been made. If the agencies had included contract provisions to hold the vendors accountable and regularly monitored vendor performance, they may have been able to take steps, such as withholding payments, to ensure compliance with contract terms.

### **Full system functionality depends on underlying infrastructure, which may not be sufficient in some areas to support all interoperability features, and on the willingness of school employees to connect using their personal devices**

Some areas of the State lack the infrastructure necessary to fully support interoperable technologies with broad capabilities, such as those outlined in State law governing the Fund. The interoperable communication systems we reviewed during the audit frequently depended on reliable communication infrastructure such as internet connectivity, cellular communication towers and coverage, and 911 emergency call centers and dispatch capabilities. For example, sharing live video footage requires high-speed internet access and reliable internet connections. Law enforcement officers reported that this and other system functions were highly desirable and could help them more effectively respond to a variety of emergencies. However, representatives from law enforcement agencies throughout the State indicated that some rural areas within their counties had limited internet availability and/or cellular communication coverage. Further, we found that even in urban areas, variations in cellular and internet signal strength or coverage could adversely affect system functionality.

We also found that some interoperable communication system functions, such as mobile panic buttons, rely on applications downloaded to users' personal cell phones or other devices, and staff's willingness to use such applications on their personal devices may further affect how effectively the systems operate.

For example:

- ▶ To send an emergency alert to law enforcement agencies, some systems require a panic button user to have a smart phone or device capable of supporting the application and data or Wi-Fi services available. School districts reported that they expect panic button functions to be available to all staff, including teachers, custodians, and school bus drivers. However, officials reported that some staff were reluctant to install the application on their personal devices. Other schools reported that not all staff members had a smart phone, which is required for the panic button application they were using to function. Although some schools we observed had purchased tablets for each classroom and

installed the mobile panic button application on it, we also observed that staff were not logged into the application on the tablets to ensure the application was readily available if an emergency occurred.

- ▶ Cellphone or computer-dependent applications may require users to take additional steps to initiate an emergency response as compared to calling 911 services directly. For example, to activate a panic alarm and initiate an emergency response, Motorola Solutions and Navigate360's systems require users to log into an application on their phone and press a panic button, which notifies law enforcement officers and participating public safety agencies of the emergency. However, to communicate with emergency dispatchers, users must select the option to call 911 services after pressing the panic button on their devices. Similarly, Mutualink users also must log into an application on their phones and press a panic button to initiate an emergency response. The system then automatically connects selected administrative users directly to 911 dispatchers. Other users, however, would need to separately call 911 if they needed to speak with dispatchers.

As previously discussed, training for some users has been limited, which may affect their abilities to perform all the necessary steps in an emergency situation. Instead, users may be conditioned to call 911 directly rather than use the applications.

### **Many agencies did not plan for ongoing system operational costs, and some report that if State funding is not available, they may discontinue using systems purchased with Fund monies even if they currently provide useful benefits**

Some county sheriff's offices reported that they may consider abandoning their interoperable communication systems that were purchased with Fund monies if the ongoing system maintenance and operations costs shift to their agencies and/or counties. As discussed in Chapter 2, pages 20 through 28, when agencies contracted for their interoperable communication systems, pricing information was limited. Many agencies did not plan for or consider ongoing system operational costs, and most also lacked information to help them determine what it would cost to continue operating and maintaining their systems beyond the initial purchase price. However, our cost analysis estimated that an average rural county could expect to pay between approximately \$15,828 to \$382,800 annually for licensing, software, and other vendor costs depending on the interoperable communication system they purchased.

Two agencies reported that they saw little value in continuing to pay for their current interoperable communication system because it has not been functional at their agency, and 1 agency indicated that they view the system as supplemental rather than critical for their operations. These agencies indicated that 911 services are still the main way that they expect schools to communicate with law enforcement agencies and other first responders. Further, even agencies where key functions are working indicate that they may stop using their systems if State funding is no longer available. One agency, for example, indicated that its system had improved communication and coordination with multiple law enforcement agencies in northern Arizona. However, officials indicated that they do not expect that their agency will be able to pay for the system's ongoing operating costs without continued State funding. Additionally, representatives from another agency that is still in the process of implementing its interoperable communication

system reported that if State funding were unavailable and they continued operating their system, they would consider passing some costs along to participating schools.

As previously discussed, 9 agencies were allocated Fund monies for fiscal year 2026, but the intent for how the monies should be spent and why only some agencies received allocations was not clear. However, it appears that ADOA, acting as Fund administrator pursuant to statute, has initiated efforts to exercise some oversight over these recent allocations. Beginning in October 2025, ADOA requested each agency that received fiscal year 2026 Fund allocations to sign an agreement specifying certain conditions they agree to abide by to receive their Fund allocations. The agreement specifies that the agency will provide ongoing technical support, maintenance, and upgrades to ensure their interoperable communication system remains in compliance with applicable laws and regulations. Officials at 1 agency we spoke with indicated that they were uncertain about what this specific provision commits their agency to provide since they lack the technical expertise to perform these functions. Additionally, they were unsure of how their fiscal year 2026 allocation may be spent if they were to sign the agreement. They also reported that they had not been required in prior years to sign such an agreement before receiving their allocated Fund monies. According to ADOA, the Treasurer's Office rather than ADOA distributed Fund monies in past years, but ADOA will not release fiscal year 2026 Fund allocations unless an agency returns a signed agreement.<sup>4</sup>

## **Recommendations to law enforcement agencies that received Fund monies**

- 8.** Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
- 9.** Evaluate the implementation status and functionality of their respective interoperable communication systems and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
- 10.** Make a plan to address their respective interoperable communication systems' ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to their respective governing bodies, the Legislature, and the Governor.

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<sup>4</sup> We met in November 2025 with each of the 9 agencies that were allocated Fund monies for fiscal year 2026 and at the time of our meetings, only the Apache County Sheriff's Office reported having signed the agreement.

# CHAPTER 5: OTHER STATES' INTEROPERABLE COMMUNICATION PROGRAMS

## Approaches for facilitating interoperable communication between schools and law enforcement agencies vary among states, with some focusing on panic buttons and radio communication infrastructure

### Audit question and conclusion

#### Audit question

What are recommended practices for facilitating interoperable communication between schools and public law enforcement agencies, and how have Arizona and other states addressed this need?

#### Conclusion

We found that improving communication between schools and law enforcement agencies is considered crucial for protecting students and staff during emergencies, and the states we reviewed have taken various approaches to facilitating these types of communications. We reviewed interoperability programs in Arizona and 6 selected states—California, Colorado, Florida, New Mexico, Ohio, and Texas. Arizona requires the multifunctional interoperable communication systems it funds to be capable of connecting a variety of modern communication tools and equipment. Other states we reviewed also set requirements and provide funding to facilitate interoperable communication. However, many of these programs are limited in scope in that they require and/or encourage all public schools to adopt communication technologies such as panic alarms or 2-way radios. To ensure that schools can successfully communicate with law enforcement agencies, some other states have also taken steps to develop supporting state-wide infrastructure, establish equipment specifications or state-wide contracts, and verify system and equipment functionality.

### We reviewed 6 other states and their efforts to facilitate interoperable communication between schools and law enforcement agencies

We identified recommended practices that prioritize enabling schools to communicate immediately and directly with law enforcement agencies using interoperable video, voice, and other communication methods during emergencies. We also found that states have taken various approaches to facilitating interoperable communication between schools and law enforcement agencies. Our review considered school emergency communication practices, requirements, and funding efforts in Arizona and across 6 states. The other states we reviewed included neighboring Colorado, New Mexico, and California; Ohio, which has a standalone school safety entity; and Texas and Florida, which each have laws requiring schools to have panic buttons that directly connect with public safety agencies.

Five of these states have initiated programs specifically to fund emergency communication technologies, and some have mandated the use of specific communication tools. However, Arizona's statutory requirements for interoperable communication systems, which are detailed in Chapter 1, pages 6 through 19, were the most extensive of the state emergency communication requirements we reviewed, and most of the other states we reviewed took a more focused approach to any technologies they either mandated or encouraged schools to adopt.

## **Two states mandate panic button technologies for schools and have oversight mechanisms to ensure the technologies are functional**

Interoperable communication systems in Arizona are required to connect with school panic button technologies, and we found that Florida and Texas also have specific panic button requirements.<sup>1</sup> These states have laws requiring all schools to implement silent panic buttons that are either accessible by all school personnel or in every classroom to instantly notify first responders of an emergency. The requirement, generally referred to as Alyssa's Law, is part of a national effort to mandate panic button technologies in schools that directly notify first responders during an emergency. As of September 2025, it has been adopted into law in 7 states and has been introduced in 20 others, including Arizona.<sup>2</sup>

Panic button technologies can be cell phone applications, making them readily available to most school staff and limiting the need for schools to purchase specialized equipment. However, such applications are reliant on supporting cellular infrastructure, and some staff may resist installing the application on their personal devices. We found schools in Florida and Texas are responsible for coordinating with local law enforcement agencies to implement required panic button technologies, and both states provide funding and have oversight mechanisms in place to help ensure the systems function.

Specifically:

► **Florida has state contracts for panic button technologies, offers the technology to schools for free, and requires confirmation that it works as intended**

To fund and facilitate its panic button program, the Florida legislature allocates \$6.4 million annually to the state's Department of Education, which is responsible for maintaining state contracts for panic button technologies. One of Florida's vendors provides a panic button system that relies on Bluetooth technology rather than cellular or Wi-Fi networks to notify other school staff of an incident, which minimizes some potential infrastructure issues. This vendor and others also offer panic buttons that are available as wearable devices so there is no need for staff to download an application to their personal cell phones or other devices.

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<sup>1</sup> Panic buttons send an alert to law enforcement agencies but are not considered interoperable unless they also allow for 2-way communication.

<sup>2</sup> We reviewed all 50 states and determined a state had passed or introduced Alyssa's Law legislation if it included the following language: requires each school site to have at least 1 panic response button, and panic response button can be any type of mobile, wearable, or interoperable technology equipment, application, or system, but it must directly connect with local law enforcement in the event of an emergency. For our calculations of the 7 states that adopted or the 20 states that introduced Alyssa's Law legislation as of September 2025, we did not include legislation that either "encouraged" or required schools to "consider" implementing panic button technology. The 7 states we determined passed Alyssa's Law legislation are Florida, Georgia, New Jersey, North Carolina, Oklahoma, Texas, and Utah.

Florida schools can receive panic button technologies from the state-contracted vendors at no charge, or they may use other funding to purchase from an outside vendor. If schools select state-funded panic button technologies, Florida requires 911 centers to certify that the panic buttons are functional before paying the vendor.

► **Texas provides funding for panic button technologies and performs comprehensive school safety audits to evaluate compliance with safety requirements and identify potential risks**

Between 2022 and 2024, Texas allocated more than \$17 million for grants to help schools comply with its requirement to implement panic button technologies and make them accessible in all classrooms. Although schools are responsible for working with local law enforcement agencies to connect their panic buttons, Texas exercises oversight to verify this and other school safety requirements are met. Statute requires schools to conduct biannual maintenance checks to ensure all panic alert systems function properly. Additionally, every 3 years, all traditional public and charter schools must conduct a safety and security audit and submit the results to the Texas School Safety Center. These audits assess schools' emergency planning efforts and compliance with specific safety requirements, such as drills and functional communication between the schools and law enforcement agencies, to identify potential safety risks. Schools are required to share the results of these audits with their school boards to help facilitate improvements.

Finally, the state separately requires school vulnerability and security assessments of areas that coincide with the areas of the required audits, including facility-access controls, emergency operations procedures, and school safety requirements. Each school district undergoes such an assessment at least once every 4 years, and the Texas Education Agency, which oversees the assessments, requires corrective action for any deficiencies identified.

## **Two states developed infrastructure to support state-wide interoperable communication networks before providing compatible communication tools to schools**

As previously discussed in Chapter 4, pages 33 through 43, interoperable technologies may not function without robust supporting infrastructure, such as internet and cellular networks, which are not consistently available across Arizona. Our review of other states found that some have taken steps to address infrastructure issues by developing state-wide interoperable communication networks. Specifically, Ohio and Colorado have focused on developing robust infrastructure capable of supporting state-wide interoperable radio communications.

Traditional radio communication networks have historically resulted in fragmented communications, including in Arizona. According to the September 2024 *Arizona Statewide Communication Interoperability Plan*, one-quarter to one-half of public safety radios in the State are not programmed for interoperability and consistency. Our contracted school safety expert also indicated that dead zones, or areas where radios do not work, can also be a substantial issue if supporting infrastructure is limited. Other considerations related to using radios to communicate school safety emergencies, according to our contracted expert, include keeping

radios charged and secure, training staff, and ensuring responding officers are prepared to communicate using school's radio channels.

To ensure their state-wide interoperable radio infrastructure systems remain viable and effective over time, both Ohio and Colorado have modernized technologies, added capacity, and improved radio coverage and service. In addition, the tower infrastructure that supports Ohio's interoperable radio system also helps extend cellular communication and internet service availability to underserved areas of the state. By the mid- to late 2010s, each of these states began enabling schools to communicate with public safety agencies using their state-wide radio networks.

Specifically:

► **Ohio makes specially designed radios available at minimal cost to schools and also provides funding for a range of school safety needs**

Schools can obtain state-issued radios that feature emergency alert buttons and can be connected directly to responding agencies during an emergency via the state's Multi-Agency Radio Communication System (MARCS). In addition to any required maintenance and repair costs, schools pay a state-subsidized monthly subscription cost of \$5 per radio.<sup>3</sup> Additionally, although we did not identify a state funding program in Ohio exclusively for multimedia interoperability technologies in schools, Ohio has allocated more than \$285 million for school safety programs since fiscal year 2021. These monies can be spent for a variety of school safety purposes depending on the needs of a particular school.<sup>4</sup> For example, monies can be used to purchase other interoperability technologies that are compatible with local law enforcement systems, or for purposes such as safety upgrades to buildings or equipment, school resource officer trainings, or school staff safety trainings.

► **Colorado has a program open to schools that is focused on improving state-wide radio coverage and other interoperable communication efforts**

Schools in Colorado can purchase radios that are compatible with its state-wide radio communication system that serves public safety agencies. Using the radios, school users can speak directly with first responders during an emergency. Colorado allocates \$5 million annually to provide grants for technology such as radios and other interoperable technologies that allows for 2-way communication between schools and public safety agencies.<sup>5</sup> When evaluating grant applications, the state considers the planned uses of the monies, compatibility with existing infrastructure, the school's efforts to collaborate with local law enforcement and other agencies, and whether the school's interoperable program appears sustainable.

<sup>3</sup> As of fiscal year 2023, the unsubsidized cost per radio was \$25 per month.

<sup>4</sup> Arizona has 2 school safety funding mechanisms—the School Safety Interoperability Fund, which is restricted to purchasing systems that meet specific requirements, and the School Safety Program established within the Arizona Department of Education to provide grants to help schools pay for safety personnel, such as school resource officers and counselors. Beginning in fiscal year 2026, monies from the School Safety Program may also be available for school safety technologies, training, or infrastructure upgrades if certain requirements are met.

<sup>5</sup> The Colorado School Access for Emergency Response Program allows fund monies to be used for school radios and other communication devices that allow for 2-way communication to improve interoperability. The program does not specify what communication devices can be purchased using fund monies.

Ensuring schools can communicate with public safety agencies using radios is not the state's sole focus for interoperable school communications, but this effort helps ensure that every school has access to direct, 2-way emergency communication tools. In total, since fiscal year 2021, Colorado has dedicated \$30 million specifically for school interoperable communications and over \$24 million for school safety grants that could be spent for various purposes, including improving interoperable communication.

For more information about the other states we reviewed, including funding they provide specifically for emergency school communications and related spending requirements, as well as other monies they make available to address various school safety needs that may include, but are not limited to, emergency communication, see Appendix D, pages d-1 through d-8.

# SUMMARY OF RECOMMENDATIONS

## The Arizona Auditor General makes 2 recommendations to the Legislature and 10 recommendations to law enforcement agencies that received Fund monies

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Click on a finding, recommendation, or its page number to the right to go directly to that finding or recommendation in the report.

### Recommendations to the Legislature

#### CHAPTER 1

1. Consider evaluating and revising, as necessary, A.R.S. §41-1733 to clarify whether nonpublic schools, including private and tribal schools, are eligible to participate in any interoperable communication system purchased with Fund monies. **19**
2. Consider evaluating and revising, as necessary, A.R.S. §41-1733 to clarify system requirements such as those relating to operational status and communication capabilities for all users, access controls, compatibility with existing equipment, and federal certification and connectivity. **19**

### Recommendations to the law enforcement agencies that received Fund monies

#### CHAPTER 1

1. Determine the amount of Fund monies spent for the benefit of any nonpublic schools, and report this information to the Arizona Department of Administration. **19**
2. Develop and implement procedures to ensure that ongoing interoperable communication system costs, such as licensing fees, for any nonpublic schools are not paid with Fund monies. **19**
3. Follow the requirement set forth in A.R.S. §41-1733(B) to report all Fund expenditures for the preceding fiscal year to JLBC by November 1 each year, and, as applicable, promptly submit any required reports that were not previously submitted for prior years' expenditures. **19**

## CHAPTER 2

20

4. In conjunction with their respective vendors, as necessary, develop a detailed cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to their respective governing bodies, the Legislature, and the Governor. 28
5. Follow their applicable procurement requirements for any future expenditures of Fund monies. 28
6. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables, incentives and/or penalties tied to vendor performance, and contract termination provisions; and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable. 28
7. Establish a process to monitor contracts that involve the use of Fund monies to ensure vendors comply with contract terms, including any requirements to provide regular communication or updates. 28

## CHAPTER 4

33

8. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions. 43
9. Evaluate the implementation status and functionality of their respective interoperable communication systems and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed. 43
10. Make a plan to address their respective interoperable communication systems' ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to their respective governing bodies, the Legislature, and the Governor. 43

### Law enforcement agency pages

This appendix contains detailed information from our review of each of the 15 law enforcement agencies that were allocated and/or spent monies from the Fund to establish a school safety program in accordance with A.R.S. §41-1733. These agencies included 13 county sheriff's offices and 2 municipal police departments. One agency, the Coconino County Sheriff's Office, did not spend any of the Fund monies allocated to it, but we report other applicable information we obtained. The pages for the remaining agencies include the results of our expenditure analysis, including whether Fund monies were spent for statutorily authorized purposes and whether the agency complied with applicable procurement requirements when contracting for an interoperable communication system. Also included are timelines for system purchases and implementation, any plans related to continued system operations, and general county demographic data.

Where applicable, these appendix pages include recommendations for agencies to address any areas we identified for improvement. They also provide an opportunity for agencies to indicate whether they agree with the information presented on their pages and whether they plan to implement any recommendations.

Users can refer to the following guide to understand how the pages are presented and what the information means as it relates to interoperable communication systems.

#### General county information

The pages for each law enforcement agency we reviewed include demographic information about the county where it is located.<sup>1</sup> Key terms used in this section are described below.

##### General county information key terms

**Population:** The estimated population of all county residents retrieved from the Arizona Office of Economic Opportunity for July 1, 2024.

**School age population (projection for July 2024):** The estimated population of all county residents between ages 5 to 17 retrieved from the Arizona Office of Economic Opportunity on July 1, 2024.

**Number of K-12 public schools:** The number of traditional public and charter schools serving students in kindergarten through grade 12 in the county based on our analysis of fiscal year 2024 data from the National Center for Education Statistic's (NCES), which is the most recent fiscal year data available. The number of schools reported excludes online schools and nonpublic schools, specifically private schools, tribal schools, and preschools.

<sup>1</sup> Demographic information representing the entire county is included for the 2 municipal police departments reviewed. Police department officials stated that their school safety programs are available to all schools in their respective counties.

## General county information key terms (continued)

**Number of students enrolled at K-12 public schools:** The number of kindergarten through grade 12 students enrolled at traditional public and charter schools in the county based on our analysis of fiscal year 2024 NCES data, which is the most recent fiscal year data available. Total enrollment reported does not include students attending online schools and nonpublic schools, specifically private schools, tribal schools, and preschools.

Source: Auditor General staff review of the Arizona Office of Economic Opportunity estimated population data for all counties in Arizona for July 1, 2024 (retrieved 10/30/25 from <https://oeo.az.gov/population/projections>) and fiscal year 2024 NCES data for Arizona (retrieved 11/20/25 from <https://nces.ed.gov/ccd/elsi/>).

## Overview of School Safety Interoperability Fund monies

This section includes our review of each participating agency's total Fund allocations, interoperable communication system contracted amounts, and expenditures between January 2021 and September 2025. We also address whether expenditures were for authorized purposes and reported to the JLBC in accordance with A.R.S. §41-1733(B). Monies that were allocated to agencies under the School Safety Pilot Program or the Rural County Interoperability Communication Program—2 interoperable communication programs established in 2021—are reported on participating agency pages as pilot program allocations. A key term used in this section is described below.

### Overview of School Safety Interoperability Fund monies key term

**Spent monies only for authorized purposes:** Our determination considered whether agencies expended Fund monies for interoperable communication systems to enhance emergency communication between schools and public safety agencies, and whether these systems were used for the benefit of K-12 public schools, consistent with A.R.S. §41-1733. To make our determination, we reviewed statute, evaluated interoperable communication system capabilities, and considered the schools each agency reported were participating in the interoperable communication system purchased with Fund monies.

Source: Auditor General staff review of agency-provided documentation of interoperable communication system participants, fiscal year 2024 NCES data for Arizona (retrieved 11/20/25 from <https://nces.ed.gov/ccd/elsi/>), and A.R.S. §41-1733.

## Interoperable communication system information

This section includes information about the interoperable communication system each agency purchased with Fund monies, including the contracted system vendor, the number of participating K-12 public schools and public safety agencies, and the number of students enrolled in participating K-12 public schools. It also indicates whether the system performed key functions during our observations and whether it has been utilized during a real emergency event. Key terms used in this section are described on page a-3.

## Interoperable communication system key terms

**Reported number of public safety agencies participating:** The agency's reported number of other public safety agencies, such as local police departments, participating in the interoperable communication system the agency purchased with Fund monies.

**Reported number of K-12 public schools participating:** The agency's reported number of traditional K-12 public and charter schools participating in the interoperable communication system it purchased with Fund monies. Online schools and nonpublic schools, specifically private schools, tribal schools, and preschools are not included in this total.

**Reported number of students enrolled at participating schools:** The number of students enrolled in kindergarten through grade 12 at traditional public and charter schools that are reported as participating in an agency's interoperable communication system purchased with Fund monies. The total is based on the schools each agency reported as participating in its interoperable communication system and our analysis of NCES fiscal year 2024 enrollment data, which is the most recent data available. Students enrolled in online schools or at nonpublic schools, specifically private schools, tribal schools, and preschools are excluded from the total.

Source: Auditor General staff review of agency-provided documentation of interoperable communication system participants and fiscal year 2024 NCES data for Arizona (retrieved 11/20/25 from <https://nces.ed.gov/ccd/elsi/>).

## System procurement

This section specifies which agencies were involved in procuring interoperable communication systems using Fund monies and which procurement method was used. This section also includes our determination of whether agencies' procurement processes followed their own city or county's required procurement policies and procedures. Key terms used in this section are described below.

### System procurement key terms

**Cooperative agreement:** An agreement to procure any materials, services, professional services, construction, or construction services with 1 or more public procurement offices in accordance with an already established purchasing agreement entered between agencies.

**Proprietary:** A solicitation where the purchase of a required product is restricted to a single supplier because the goods or services are only compatible with or are an integral component of products in use by the agency in which replacement is not practical. Proprietary items may be available from several vendors through competitive bidding; however, competition is restricted to this group.

**Request for proposal (RFP):** A solicitation an agency issues that outlines competitive requirements for services and invites potential vendors to submit competitive proposals for outlined projects.

## System procurement key terms (continued)

**Sole source:** A solicitation where a contract may be awarded for a material, service, or construction item without competition if it is determined in writing that there is only 1 source for the required material, service, or construction item.

Source: Auditor General staff review of A.R.S. §41-2632(A), agency-provided policies and procedures, Federal Acquisition Regulation's website (Retrieved 9/22/25 from <https://www.acquisition.gov/far/subpart-15.2>), and A.R.S. §41-2536.

## Contracting best practices

This section includes our determination of whether participating agencies' contracts included detailed pricing information and key components recommended by the National State Auditors Association to facilitate an efficient, effective, and accountable service procurement process.

## Interoperable communication system functionality

This section includes information about our interoperable communication system observations conducted in the spring of 2025. We specifically focused on 5 key emergency communication functions from the requirements specified in A.R.S. §41-1733 A(3) because these functions were found to be the most useful for addressing school safety issues according to law enforcement and school officials we spoke with. To make our determination, we observed system functions at each agency that reported having a functional interoperable communication system and at a participating school in their jurisdiction. If an interoperable communication system was not fully functional during our observations, we include the agency's explanation for deficiencies we identified.

## Implementation delays

This section includes information agencies reported concerning delays in its interoperable communication system implementation.

## Timeline of system implementation

This section includes a timeline of milestones for system purchases and implementation, including when agencies received their initial Fund allocations, established contracts, and made payments to vendors.

## Future plans

This section includes information about agencies' plans related to ongoing interoperable communication system operations.

## Recommendations to agencies

This section includes the recommendations we made to agencies that received and expended Fund monies.

# Apache County Sheriff's Office

## Apache County general information (fiscal year 2024)



Population	67,700
School age population (projection for July 2024)	12,487
Number of K-12 public schools	40
Number of students enrolled at K-12 public schools	9,519

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$1,275,000</b>
Pilot program allocation	\$0
School Safety Interoperability Fund allocation through fiscal year 2025	\$1,000,000
Fiscal year 2026 allocation	\$275,000
Total interoperable communication system contracted amount	\$1,000,000
Total expenditures	\$1,014,000 <sup>1</sup>
Allocation amount remaining	\$261,000
Submitted all required annual expenditure reports to JLBC?	<b>No</b>
<b>Spent monies only for authorized purposes?</b>	<b>No</b>

The agency reported 1 tribal and 1 private school were connected to its system. However, statute authorizes Fund monies to be spent only for K-12 public schools, which does not include tribal or private schools. We were unable to determine the amount of Fund monies, if any, the agency spent to benefit the tribal and private schools due to the agency's lack of specific vendor pricing documentation. However, we estimated that the value each of these schools received from the Fund by participating in the system was approximately \$17,100.

<sup>1</sup> Officials from the Apache County finance department reported paying an additional \$14,000 to the State of Arizona for a use-tax payment but could not explain why the use-tax payment was necessary nor the sources of the monies used for the payment.

## Interoperable communication system information

Interoperable communication system vendor selected	Mutualink
Reported number of public safety agencies participating	9
Reported number of K-12 public schools participating	22 <sup>1</sup>
Number of students enrolled at participating K-12 public schools	5,363
Interoperable communication system utilized during real emergency event?	N/A <sup>2</sup>

<sup>1</sup> In addition to 22 public schools, agency officials reported that 1 nonpublic tribal school and 1 private school were connected to its interoperable communication system.

<sup>2</sup> The agency reported the system was not functional as of June 2025.

## System procurement

The Apache County sheriff's office, finance department, attorney's office, and board of supervisors were involved in the procurement process for the interoperable communication system.

Procurement method	Sole source
Followed applicable procurement policies and procedures?	No

## Contracting best practices

Created a contract outside of vendor proposal?	No
Contract included standards/provisions for evaluating vendor performance?	No
Contract included incentives and/or penalties linked to performance?	No
Contract included termination provisions for either/both parties?	No
Contracts contained detailed pricing information?	No

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	No
Could the agency receive panic button alerts?	No
Could the agency view live security camera footage?	No
Could the agency access school maps and/or building plans?	No
Was access to systems limited to active emergencies?	No

We were unable to observe the system in use during the audit because the agency reported it was not functional. The agency reported it could still communicate with schools during emergency incidents using other communication technologies, such as traditional 911 service.

## Implementation delays

Agency officials reported delays in system implementation were due to County and vendor staff turnover, outdated communication infrastructure, and a lack of training from the vendor on system functionality.

## Timeline of system implementation

2022	
<b>November</b>	Allocated \$1,000,000 in Fund monies.
<b>December</b>	Signed \$1,000,000 contract with Mutualink.
↓	
2023	
<b>January</b>	Paid Mutualink \$250,000.
<b>March</b>	Paid Mutualink \$250,000.
<b>December</b>	Paid Mutualink \$250,000.
↓	
2024	
<b>May</b>	Paid the State of Arizona a \$14,000 use-tax payment for the Mutualink system. The County could not provide information about the source of monies it used for this use-tax payment.
↓	
2025	
<b>March</b>	We were unable to observe the system because the agency indicated it was not functional.
<b>June</b>	Made final \$250,000 payment to Mutualink.

## Future plans

The agency's contract with Mutualink expired in June 2025, and at that time, the agency reported that the system was not functional. According to agency officials, the agency will extend its contract with Mutualink and is continuing its efforts to make its system operational by updating its communication infrastructure and working with the vendor to schedule training for its staff. Additionally, if Fund monies are no longer available, the continued use of the system depends on if the agency can fund and maintain the operational status of the technology. Further, if and when the system becomes operational, agency officials stated that they would like to extend the system to additional schools in the County.

## Recommendations to the Apache County Sheriff's Office

1. Determine the amount of Fund monies spent for the benefit of any nonpublic schools, and report this information to the Arizona Department of Administration.
2. Develop and implement procedures to ensure that ongoing interoperable communication system costs, such as licensing fees, for any nonpublic schools are not paid with Fund monies.
3. Follow the requirement set forth in A.R.S. §41-1733(B) to report all Fund expenditures for the preceding fiscal year to JLBC by November 1 each year, and, as applicable, promptly submit any required reports that were not previously submitted for prior years' expenditures.
4. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its board of supervisors, the Legislature, and the Governor.
5. Follow its applicable procurement requirements for any future expenditures of Fund monies.
6. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables, incentives and/or penalties tied to vendor performance, and contract termination provisions; and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.
7. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.
8. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.

9. Evaluate the implementation status and functionality of its interoperable communication system and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
10. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its board of supervisors, the Legislature, and the Governor.

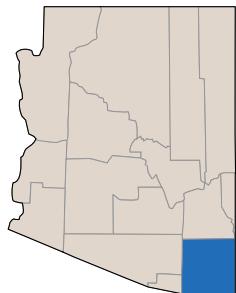
## Apache County Sheriff's Office's response

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

**Response explanation:** The agency wants to clarify that including tribal schools was a deliberate and principled decision made when accepting the grant. The Sheriff's approval to pursue the grant depended on making sure schools serving Apache County residents, including those on the Navajo Nation, were not left out of emergency communication and safety plans. This approach was grounded in the principles of public safety needs and regional interoperability considerations. The agency recognizes the need to improve documentation and reporting on such participation and remains dedicated to fully complying with all applicable laws.

# Cochise County Sheriff's Office

## Cochise County general information (fiscal year 2024)



Population	127,800
School age population (projection for July 2024)	20,134
Number of K-12 public schools	69
Number of students enrolled at K-12 public schools	18,452

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$1,500,000</b>
Pilot program allocation	\$0
School Safety Interoperability Fund allocation through fiscal year 2025	\$1,500,000
Fiscal year 2026 allocation	\$0
Total interoperable communication system contracted amount <sup>1</sup>	\$471,312
Total expenditures	\$447,945
Allocation amount remaining	\$1,052,055
Submitted all required annual expenditure reports to JLBC?	<b>Yes</b>
Spent monies only for authorized purposes?	<b>Yes</b>

<sup>1</sup> The cooperative agreement contract the agency used to purchase its interoperable communication system did not include a total price for the system, stating that prices would be outlined in order forms the vendor provided. We calculated the total contracted amount based on system implementation costs obtained from the order forms and subscription costs from pricing lists for the 3-year contract term.

## Interoperable communication system information

Interoperable communication system vendor selected	Navigate360
Reported number of public safety agencies participating	8
Reported number of K-12 public schools participating	60
Number of students enrolled at participating K-12 public schools	18,382
Interoperable communication system utilized during real emergency event?	Yes

## System procurement

The Cochise County sheriff's office, office of the school superintendent, treasurer's office, procurement department, and board of supervisors were involved in the procurement process for the interoperable communication system.

Procurement method	Cooperative agreement
Followed applicable procurement policies and procedures?	No

## Contracting best practices

Created a contract outside of vendor proposal?	Yes
Contract included standards/provisions for evaluating vendor performance?	No
Contract included incentives and/or penalties linked to performance?	Yes
Contract included termination provisions for either/both parties?	Yes
Contracts contained detailed pricing information?	No

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	Yes
Could the agency receive panic button alerts?	Yes
Could the agency view live security camera footage?	No
Could the agency access school maps and/or building plans?	No
Was access to systems limited to active emergencies?	Yes

At the time of our observation, security cameras at the school site we visited were not connected to the interoperable communication system, and the agency staff we observed during the system test were unable to view the school's site maps in the system. The agency reported that it is continuing to work with its participating schools and the vendor to connect security cameras and will ensure that interactive maps and floor plans are accessible to county law enforcement agencies through the system.

## Implementation delays

Agency officials with the County School Superintendent and County Sheriff's Office did not report any implementation delays.

## Timeline of system implementation

2022	
<b>December</b>	Allocated \$1,500,000 in Fund monies.
↓	
2023	
<b>July</b>	Signed \$471,312 contract with Navigate360. <sup>1</sup>
<b>August</b>	Paid Navigate360 \$292,027.
↓	
2024	
<b>March</b>	Agency reported first school successfully connected to its interoperable communication system.
<b>April</b>	Paid Navigate360 \$66,275.
<b>September</b>	Made final \$89,643 payment to Navigate360.
↓	
2025	
<b>April</b>	We conducted our system observation.

<sup>1</sup> The cooperative agreement contract the agency used to purchase its interoperable communication system did not include a total price for the system, stating that prices would be outlined in order forms the vendor provided. We calculated the total contracted amount based on system implementation costs obtained from the order forms and subscription costs from pricing lists for the 3-year contract term.

## Future plans

The agency's contract with Navigate360 expires in July 2026. If Fund monies are no longer available, officials from the Cochise County School Superintendent's Office reported they will work with the Cochise County Sheriff's Office to operate the system using other funding sources.

## Recommendations to the Cochise County Sheriff's Office

1. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its board of supervisors, the Legislature, and the Governor.
2. Follow its applicable procurement requirements for any future expenditures of Fund monies.
3. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables; and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.
4. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.
5. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
6. Evaluate the implementation status and functionality of its interoperable communication system and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
7. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its board of supervisors, the Legislature, and the Governor.

## Cochise County Sheriff's Office's response

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

### **Response explanation:**

#### **Response to Finding:**

##### **Interoperability Communication System Functionality**

##### **Live Security Camera Footage**

The Cochise County Sheriff's Office acknowledges that live security camera footage has not been integrated into the current interoperability communication system. At this time, the existing

infrastructure cannot reliably support continuous live video feeds without significantly impacting the performance of other critical communication channels.

In prioritizing emergency response functionality, the Sheriff's Office has determined that live camera feeds are a lower priority compared to maintaining clear, uninterrupted communication among first responders. To ensure situational awareness, the system currently provides virtual maps and detailed floor plans through the EMS platform, which supply sufficient information to guide emergency personnel during incidents.

### **Access to School Maps and Building Floor Plans**

As part of the Navigate360 contract, which includes 911Cellular integration, all public and charter schools in Cochise County were electronically mapped during the 2023–2024 school year. Interactive floor plans were created for every building on each campus, down to the individual room level.

These maps are fully integrated into the 911Cellular dashboard within the PSAP (Public Safety Answering Point) view and are automatically transmitted to responding law enforcement and EMS personnel via a secure link. This ensures that first responders have immediate access to accurate, detailed campus layouts during emergencies.

While the interactive maps were not displayed during the audit observation, they are available and accessible to 911 dispatch and law enforcement through the 911Cellular platform. This functionality remains active and operational for emergency response purposes.

### **Future Plans**

The integration of the Navigate360 Emergency Management Suite with the 911Cellular integration has strengthened communication and preparedness strategies between law enforcement agencies and county school districts. Consistent emergency response technology across all schools allows law enforcement to plan and respond more effectively, while standardized 911 protocols and best practices provide a unified framework for school safety.

Looking ahead, remaining funds will be directed toward enhancing law enforcement active shooter training, piloting automated door locking systems in select schools, and continuing to evaluate the effectiveness of Navigate360 throughout the 2026–2027 school year. With the system now live in all 60 schools, at least one additional year will be needed to ensure the platform fully meets the needs of the Sheriff's Office, 911 dispatch, local law enforcement, and school districts.

## **PROCUREMENT**

### **Followed Applicable Procurement Policies and Procedures (Cooperative Purchasing)**

The contract with Navigate360 was presented to the Board Supervisors without the BuyBoard Cooperative Contract being included as part of the approval process.

Moving forward, all parties involved will work together to ensure that all procedures are followed in the correct order and that all documents that need Board of Supervisor approval will be submitted for Board approval and signature.

### **Contract Included Standards/Provisions for Evaluating Vendor Performance**

The County used a national cooperative contract with BuyBoard and accepted a order form from Navigate360.

Moving forward the departments (Sheriff and School) will work early in the process with Procurement to ensure provisions for evaluating vendor performance and provisions are included and determined in all executed contracts.

### **Contracts Contained Detailed Pricing Information**

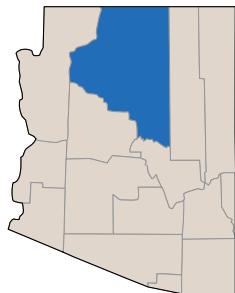
Although the County did not provide a contract that contained detailed pricing information, the County used a national cooperative contract with BuyBoard. The Navigate360 price list is a part of the BuyBoard contract. Cochise County accepted an order form from Navigate360 which did include pricing.

One of the benefits of using cooperative contracts is to alleviate duplicating effort on contract development and implementation.

# Coconino County Sheriff's Office

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## Coconino County general information (fiscal year 2024)



Population	151,400
School age population (projection for July 2024)	21,704
Number of public schools	57
Number of students enrolled at public schools	16,438

## Overview of School Safety Interoperability Fund monies

The Coconino County Sheriff's Office was allocated \$1,250,000 through the School Safety Interoperability Fund program. Agency officials stated they opted out of the program because the county dispatch is operated by Flagstaff Police Department, and the majority of students within the county are under Flagstaff Police Department's jurisdiction. The agency reported the Fund allocation was offered to the Flagstaff Police Department, which also declined the monies.<sup>1</sup> The agency reported it could still communicate with schools during emergency incidents using other communication technologies and is working on connecting its systems to interoperable communication systems purchased by county public schools.

## Coconino County Sheriff's Office's response

**Agency response:** Not applicable.

We did not request a response from the Coconino County Sheriff's Office because we did not make any recommendations to it.

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<sup>1</sup> According to Flagstaff Police Department officials we spoke with, the Flagstaff Police Department declined Fund monies due to its limited capacity to oversee the interoperable communication system and concerns about the ongoing system costs.

# Gila County Sheriff's Office

## Gila County general information (fiscal year 2024)



Population	54,600
School age population (projection for July 2024)	7,796
Number of K-12 public schools	28
Number of students enrolled at K-12 public schools	7,441

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$1,710,540</b>
Pilot program allocation	\$430,540
School Safety Interoperability Fund allocation through fiscal year 2025	\$1,000,000
Fiscal year 2026 allocation	\$280,000
Total interoperable communication system contracted amount	\$1,430,540
Total expenditures	\$1,430,540
Allocation amount remaining	\$280,000
Submitted all required annual expenditure reports to JLBC?	<b>No</b>
Spent monies only for authorized purposes?	<b>Yes</b>

## Interoperable communication system information

Interoperable communication system vendor selected	Mutualink
Reported number of public safety agencies participating	10
Reported number of K-12 public schools participating	7
Number of students enrolled at participating K-12 public schools	2,037
Interoperable communication system utilized during real emergency event?	Yes

## System procurement

The Gila County Sheriff's Office, procurement office, and board of supervisors were involved in the procurement process for the interoperable communication system.

Procurement method	Sole source
Followed applicable procurement policies and procedures?	No

## Contracting best practices

Created a contract outside of vendor proposal?	Yes
Contract included standards/provisions for evaluating vendor performance?	No
Contract included incentives and/or penalties linked to performance?	Yes
Contract included termination provisions for either/both parties?	Yes
Contracts contained detailed pricing information?	No

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	Yes
Could the agency receive panic button alerts?	Yes
Could the agency view live security camera footage?	Yes
Could the agency access school maps and/or building plans?	No
Was access to systems limited to active emergencies?	Yes

At the time of our observation, law enforcement could not view the school's site maps because the school had not submitted them to the vendor to be uploaded to the system.

## Implementation delays

Agency officials reported that the interoperable communication system did not have a contractual deadline for implementation. However, the agency reported that the implementation process was difficult due to vendor staff turnover. Agency officials further reported that 3 participating public schools decided to no longer participate in the interoperable communication system due to the implementation delays and a lack of communication from the vendor.

## Timeline of system implementation

2021	
<b>December</b>	Allocated \$215,270 in Fund monies.
↓	
2022	
<b>January</b>	Allocated \$107,635 in Fund monies.
<b>April</b>	Allocated \$107,635 in Fund monies.
<b>September</b>	Signed \$430,540 contract with Mutualink and paid Mutualink \$215,270.
↓	
2023	
<b>January</b>	Allocated \$1,000,000 in Fund monies.
<b>August</b>	Signed \$1,000,000 contract extension with Mutualink and paid Mutualink \$715,270.
<b>December</b>	Paid Mutualink \$250,000.
↓	
2024	
<b>July</b>	Made final \$250,000 payment to Mutualink.
<b>November</b>	Agency reported first school successfully connected to its interoperable communication system.
↓	
2025	
<b>June</b>	We conducted our system observation.

## Future plans

The agency's contract with Mutualink expired in June 2025. According to agency officials, they are considering other interoperable communication system options with input from participating public safety agencies and public schools. Agency officials further reported that whether or not they contract with another vendor depends on whether the remaining allocation of Fund monies is sufficient to contract with another interoperable communication system vendor.

## Recommendations to the Gila County Sheriff's Office

1. Follow the requirement set forth in A.R.S. §41-1733(B) to report all Fund expenditures for the preceding fiscal year to JLBC by November 1 each year, and, as applicable, promptly submit any required reports that were not previously submitted for prior years' expenditures.
2. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its board of supervisors, the Legislature, and the Governor.
3. Follow its applicable procurement requirements for any future expenditures of Fund monies.
4. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables, and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.
5. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.
6. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
7. Evaluate the implementation status and functionality of its interoperable communication system and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
8. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its board of supervisors, the Legislature, and the Governor.

## Gila County Sheriff's Office's response

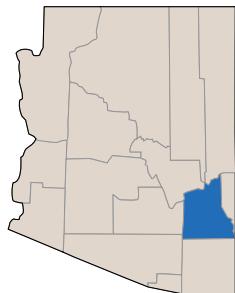
**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

**Response explanation:** The Gila County Sheriff's Office will make every effort to:

- Comply with A.R.S. § 41-1733(B) reporting requirements and submit any past-due reports.
- Develop a cost estimate for FY 2027–2031 system operations in coordination with the vendor and share it as required. Develop a long-term funding and operations plan for review by the State
- Ensure all future Fund expenditures adhere to applicable procurement requirements.
- Include clearly defined deliverables and detailed, verifiable pricing in all contracts and amendments.
- Implement a structured process to monitor vendor compliance with contract terms.
- Formalize regular testing with agencies and schools of the interoperable communications system
- Assess system functionality, deficiencies with vendors, and consult legal counsel when needed.
- Provide progress updates as these actions are implemented

# Graham County Sheriff's Office

## Graham County general information (fiscal year 2024)



Population	39,400
School age population (projection for July 2024)	7,495
Number of K-12 public schools	24
Number of students enrolled at K-12 public schools	6,615

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$1,254,930</b>
Pilot program allocation	\$224,930
School Safety Interoperability Fund allocation through fiscal year 2025	\$750,000
Fiscal year 2026 allocation	\$280,000
Total interoperable communication system contracted amount	\$974,930
Total expenditures	\$974,930
Allocation amount remaining	\$280,000
Submitted all required annual expenditure reports to JLBC?	<b>Yes</b>
Spent monies only for authorized purposes?	<b>Yes</b>

## Interoperable communication system information

Interoperable communication system vendor selected	Mutualink
Reported number of public safety agencies participating	6
Reported number of K-12 public schools participating	18
Number of students enrolled at participating K-12 public schools	6,237
Interoperable communication system utilized during real emergency event?	N/A <sup>1</sup>

<sup>1</sup> The agency reported the system was not functional as of June 2025.

## System procurement

The Graham County board of supervisors and finance department were involved in the procurement process for the interoperable communication system.

Procurement method	Sole source
Followed applicable procurement policies and procedures?	No

## Contracting best practices

Created a contract outside of vendor proposal?	Yes
Contract included standards/provisions for evaluating vendor performance?	No
Contract included incentives and/or penalties linked to performance?	Yes
Contract included termination provisions for either/both parties?	Yes
Contracts contained detailed pricing information?	No

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	No
Could the agency receive panic button alerts?	No
Could the agency view live security camera footage?	No
Could the agency access school maps and/or building plans?	No
Was access to systems limited to active emergencies?	No

We were unable to observe the system in use during the audit because the agency reported it was not functional. The agency reported it could still communicate with schools during emergency incidents using other communication technologies, such as traditional 911 service.

## Implementation delays

Agency officials reported delays in system implementation were due to difficulties working with the vendor, including poor communication, a lack of training for agency and public school staff, and vendor staff turnover. Agency officials further reported that the system repeatedly failed to work when the agency tested the system at participating public schools.

## Timeline of system implementation

2021	
<b>October</b>	Allocated \$112,465 in Fund monies.
↓	
2022	
<b>January</b>	Allocated \$56,233 in Fund monies.
<b>April</b>	Allocated \$56,233 in Fund monies.
<b>October</b>	Signed \$974,930 contract with Mutualink.
<b>December</b>	Allocated \$750,000 in Fund monies and paid Mutualink \$234,733.
↓	
2023	
<b>March</b>	Paid Mutualink \$234,733.
<b>November</b>	Paid Mutualink \$234,733.
↓	
2024	
<b>March</b>	Made final \$234,733 payment to Mutualink.
<b>September</b>	Agency reported first school successfully connected to its interoperable communication system.

## Future plans

The agency's contract with Mutualink expires in December 2025. Agency officials reported in November 2025 that the agency is continuing to work with participating public schools and the vendor, and is making progress implementing the system. Agency officials further indicated they are considering other interoperable communication system options with input from participating public schools, but if Fund monies are no longer available to the agency, it may not be able to continue operating a system due to lack of funding.

## Recommendations to the Graham County Sheriff's Office

1. In conjunction with its vendor, as necessary, develop a cost estimate for their system's ongoing operational costs for fiscal years 2027 through 2031 and provide this information to its boards of supervisors, the Legislature, and the Governor.
2. Follow their applicable procurement requirements for any future expenditures of Fund monies.
3. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables, incentives and/or penalties tied to vendor performance, and contract termination provisions; and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.
4. Establish a process to monitor contracts that involve the use of Fund monies to the vendor complies with contract terms, including any requirements to provide regular communication or updates.
5. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
6. Evaluate the implementation status and functionality of its interoperable communication system and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
7. Make a plan to address the interoperable communication system' ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its governing body, the Legislature, and the Governor's Office.

## **Graham County Sheriff's Office's response**

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

**Response explanation:** These responses correspond to the numbered recommendations received:

1. We have already requested 2027-2031 costs from the vendor and will communicate these estimates to the Board of Supervisors, the Legislature, and the Governor when received.
2. We are looking into possibly adding sole source language to our procurement policy.
3. We will work to add the items listed into the terms of the pending contract with the vendor.
4. We will establish a monitoring policy.
5. We will again work to add the items listed into the terms of the pending contract with the vendor.
6. We will again work to add the items listed into the terms of the pending contract with the vendor.
7. There is no ongoing operating plan beyond the State's appropriation.

# Greenlee County Sheriff's Office

## Greenlee County general information (fiscal year 2024)



Population	9,700
School age population (projection for July 2024)	1,860
Number of K-12 public schools	7
Number of students enrolled at K-12 public schools	1,799

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$859,338</b>
Pilot program allocation	\$189,338
School Safety Interoperability Fund allocation through fiscal year 2025	\$500,000
Fiscal year 2026 allocation	\$170,000
Total interoperable communication system contracted amount	\$689,338
Total expenditures	\$689,338
Allocation amount remaining	\$170,000
Submitted all required annual expenditure reports to JLBC?	<b>No</b>
Spent monies only for authorized purposes?	<b>Yes</b>

## Interoperable communication system information

Interoperable communication system vendor selected	Mutualink
Reported number of public safety agencies participating	0
Reported number of K-12 public schools participating	0
Number of students enrolled at participating K-12 public schools	0
Interoperable communication system utilized during real emergency event?	N/A <sup>1</sup>

<sup>1</sup> The agency reported the system was not functional as of June 2025.

## System procurement

The Greenlee County sheriff's office, treasurer's office, and board of supervisors were involved in the procurement process for the interoperable communication system.

Procurement method	Sole source
Followed applicable procurement policies and procedures?	No

## Contracting best practices

Created a contract outside of vendor proposal?	No
Contract included standards/provisions for evaluating vendor performance?	No
Contract included incentives and/or penalties linked to performance?	No
Contract included termination provisions for either/both parties?	No
Contracts contained detailed pricing information?	No

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	No
Could the agency receive panic button alerts?	No
Could the agency view live security camera footage?	No
Could the agency access school maps and/or building plans?	No
Was access to systems limited to active emergencies?	No

We were unable to observe the system in use during the audit because the agency reported it was not functional. The agency reported it could still communicate with schools during emergency incidents using other communication technologies, such as traditional 911 service.

## Implementation delays

Agency officials reported delays in system implementation were due to county and vendor staff turnover, outdated communication infrastructure, and a lack of communication from the vendor. Agency officials further reported that the participating public schools in the county decided to no longer participate in the interoperable communication system due to the implementation delays.

## Timeline of system implementation

2021	
<b>October</b>	Allocated \$94,669 in Fund monies.
<b>November</b>	Signed \$189,338 contract with Mutualink.
↓	
2022	
<b>January</b>	Allocated \$47,335 in Fund monies.
<b>April</b>	Allocated \$47,335 in Fund monies.
<b>June</b>	Paid Mutualink \$94,669.
<b>December</b>	Allocated \$500,000 in Fund monies.
↓	
2023	
<b>September</b>	Signed \$500,000 contract extension with Mutualink.
<b>November</b>	Paid Mutualink \$94,669.
↓	
2024	
<b>March</b>	Paid Mutualink \$250,000.
↓	
2025	
<b>June</b>	Paid Mutualink \$125,000.
<b>July</b>	Made final \$125,000 payment to Mutualink.

## Future plans

The agency's contract with Mutualink expired in June 2025, and the agency reported it is considering other interoperable communication system options with input from county public schools.

## Recommendations to Greenlee County Sheriff's Office

1. Follow the requirement set forth in A.R.S. §41-1733(B) to report all Fund expenditures for the preceding fiscal year to JLBC by November 1 each year, and, as applicable, promptly submit any required reports that were not previously submitted for prior years' expenditures.
2. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its board of supervisors, the Legislature, and the Governor.
3. Follow its applicable procurement requirements for any future expenditures of Fund monies.
4. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables, incentives and/or penalties tied to vendor performance, and contract termination provisions; and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.
5. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.
6. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
7. Evaluate the implementation status and functionality of its interoperable communication system, and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
8. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its board of supervisors, the Legislature, and the Governor.

## **Greenlee County Sheriff's Office's response**

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

**Response explanation:** The Greenlee County Sheriff's Office has had a new administration as of 01/01/2024. It should be noted this current administration under Sheriff Eric Ellison had no prior knowledge of any agreements or contracts which Sheriff Sumner signed or agreed to.

# La Paz County Sheriff's Office

## La Paz County general information (fiscal year 2024)



Population	17,000
School age population (projection for July 2024) <sup>1</sup>	2,083
Number of K-12 public schools	12
Number of students enrolled at K-12 public schools	2,173

<sup>1</sup> The school age population is a projection of the county's population for July 2024, provided by the Arizona Office of Economic Opportunity. The number of students enrolled at public schools is school-reported data collected by the National Center for Education Statistics. The number of students enrolled in public schools appears to be higher than the total school age population due to the difference in data sources and the uncertainty inherent in making population projections.

## Overview of School Safety Interoperability Fund monies

As of September 2025

Total allocation	\$950,000
Pilot program allocation	\$0
School Safety Interoperability Fund allocation through fiscal year 2025	\$750,000
Fiscal year 2026 allocation	\$200,000
Total interoperable communication system contracted amount	\$750,000
Total expenditures	\$750,000
Allocation amount remaining	\$200,000
Submitted all required annual expenditure reports to JLBC?	Yes
Spent monies only for authorized purposes?	Yes

## Interoperable communication system information

Interoperable communication system vendor selected	Mutualink
Reported number of public safety agencies participating	3
Reported number of K-12 public schools participating	10
Number of students enrolled at participating K-12 public schools	2,104
Interoperable communication system utilized during real emergency event?	No

## System procurement

The La Paz County sheriff's office and board of supervisors were involved in the procurement process for the interoperable communication system.

Procurement method	Sole source
Followed applicable procurement policies and procedures?	No

## Contracting best practices

Created a contract outside of vendor proposal?	No
Contract included standards/provisions for evaluating vendor performance?	No
Contract included incentives and/or penalties linked to performance?	No
Contract included termination provisions for either/both parties?	No
Contracts contained detailed pricing information?	No

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	Yes
Could the agency receive panic button alerts?	Yes
Could the agency view live security camera footage?	Yes
Could the agency access school maps and/or building plans?	No
Was access to systems limited to active emergencies?	Yes

During our observation, the agency had difficulty viewing the school's live security camera footage but was able to do so after a delay of approximately 3 minutes. Additionally, the agency could not view the school's site maps because the school had not submitted them to the vendor to be uploaded to the system. The agency reported that it is working with participating schools and the vendor to ensure that site maps are uploaded to the system.

## Implementation delays

Agency officials reported that delays in system implementation were due to vendor staff turnover.

## Timeline of system implementation

2022	
<b>October</b>	Allocated \$750,000 of Fund monies and signed \$750,000 contract with Mutualink.
<b>December</b>	Paid Mutualink \$375,000.
↓	
2025	
<b>February</b>	Agency reported first school successfully connected to its interoperable communication system.
<b>April</b>	We conducted our system observation.
<b>August</b>	Made final \$375,000 payment to Mutualink.

## Future plans

The agency's contract with Mutualink expired in June 2025. The agency reported that it will extend its contract with Mutualink and continue to operate the system using its fiscal year 2026 Fund allocations. Agency officials reported that if Fund monies are no longer available to the agency, it may not be able to continue operating the system due to lack of funding.

## Recommendations to the La Paz County Sheriff's Office

1. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its board of supervisors, the Legislature, and the Governor.
2. Follow its applicable procurement requirements for any future expenditures of Fund monies.
3. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables, incentives and/or penalties tied to vendor performance, and contract termination provisions; and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.

4. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.
5. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
6. Evaluate the implementation status and functionality of its interoperable communication system and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
7. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its board of supervisors, the Legislature, and the Governor.

## **La Paz County Sheriff's Office's response**

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

**Response explanation:** The La Paz County Sheriff's Office has reviewed the school safety and interoperability report and findings conducted by the Auditor General's office. Through this review the La Paz Sheriff's Office has made aware of areas in which best practices were not followed or utilized for the benefit of the purchaser. I agree with the report and its findings as they are outlined in the review. It also identified areas where things could have been put in place to better protect the purchaser in this case the Sheriff's Office and County. The experience was eye-opening and allowed for a better understanding on the part of myself, the Sheriff and my staff to seek more answers and set expectations when negotiating with vendors in situations such as this moving forward.

It is the intent of this agency in conjunction with the county to utilize best practices when entering into contractual agreements for products and or services in the future moving forward allowing us the purchaser to maintain better controls in such situations, thus providing further protection for the department and county.

It was a very educational experience and will allow us to be better prepared for future contract negotiation and implementation. Thank you for the time and attention that was placed into this review process.

Respectfully,  
William Ponce,  
Sheriff La Paz County

# Maricopa County Sheriff's Office

## Maricopa County general information (fiscal year 2024)



Population	4,757,600
School age population (projection for July 2024)	785,530
Number of K-12 public schools	1,165
Number of students enrolled at K-12 public schools	696,724

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$5,150,000</b>
Pilot program allocation	\$2,100,000
School Safety Interoperability Fund allocation through fiscal year 2025	\$3,050,000
Fiscal year 2026 allocation	\$0
Total interoperable communication system contracted amount	\$2,761,119
Total expenditures	\$449,151
Allocation amount remaining	\$4,700,849
Submitted all required annual expenditure reports to JLBC?	<b>Yes</b>
Spent monies only for authorized purposes?	<b>Yes</b>

## Interoperable communication system information

Interoperable communication system vendor selected	Motorola Solutions
Reported number of public safety agencies participating	1 <sup>1</sup>
Reported number of K-12 public schools participating	5 <sup>1</sup>
Number of students enrolled at participating K-12 public schools	1,665
Interoperable communication system utilized during real emergency event?	Yes

<sup>1</sup> The agency reported it focused on making its interoperable communication system available to schools the agency identified as having the greatest need for improved interoperable communication.

## System procurement

The Maricopa County sheriff's office, procurement department, and board of supervisors were involved in the procurement process for the interoperable communication system.

Procurement method	RFP
Followed applicable procurement policies and procedures?	Yes

## Contracting best practices

Created a contract outside of vendor proposal?	Yes
Contract included standards/provisions for evaluating vendor performance?	Yes
Contract included incentives and/or penalties linked to performance?	Yes
Contract included termination provisions for either/both parties?	Yes
Contracts contained detailed pricing information?	Yes

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	Yes
Could the agency receive panic button alerts?	Yes
Could the agency view live security camera footage?	No
Could the agency access school maps and/or building plans?	No
Was access to systems limited to active emergencies?	Yes

At the time of our observation, security cameras at the school site we visited were not connected to the system, and law enforcement could not view the school's site maps because the school had not submitted them to the vendor to be uploaded to the system. The agency reported that the issues we identified during our observations were resolved as of November 2025.

## Implementation delays

Agency officials reported delays in system implementation were due to coordinating with public schools, including establishing a memorandum of understanding with each participating public school.

## Timeline of system implementation

2021	
<b>October</b>	Allocated \$525,000 of Fund monies.
<b>November</b>	Allocated \$525,000 of Fund monies.
↓	
2022	
<b>January</b>	Allocated \$525,000 of Fund monies.
<b>April</b>	Allocated \$525,000 of Fund monies.
<b>October</b>	Allocated \$3,050,000 of Fund monies.
↓	
2023	
<b>November</b>	Signed \$2,761,119 contract with Motorola Solutions.
↓	
2024	
<b>May</b>	Paid Motorola Solutions \$449,151.
<b>September</b>	Agency reported first school successfully connected to its interoperable communication system.
↓	
2025	
<b>May</b>	We conducted our system observation.

## Future plans

The agency's contract with Motorola Solutions expires in October 2026. The agency reported it is working with State, county, and local agencies to expand its interoperable communication system to other county public schools. The agency also reported it is developing training programs for public safety agencies and public schools to more quickly implement the system at additional schools.

## Recommendations to the Maricopa County Sheriff's Office

1. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its board of supervisors, the Legislature, and the Governor.
2. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.
3. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
4. Evaluate the implementation status and functionality of its interoperable communication system and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
5. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its board of supervisors, the Legislature, and the Governor.

## Maricopa County Sheriff's Office's response

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

**Response explanation:** MCSO agrees with the information presented in this audit report with a note on two of the items: As the report states we could not view live security camera footage during the State Auditor General's test, but this functionality will be available when the system is fully implemented. Likewise, the access to school maps and building plans will also be a standard feature to the system and available when fully implemented. Also, as of this response dated December 11, 2025, we have three additional schools participating in the program for a total of eight implementations.

MCSO agrees with the audit recommendations 1 – 5 and will plan to implement them through a coordinated effort with participating schools, vendors and participating public safety agencies.

# Mohave County Sheriff's Office

## Mohave County general information (fiscal year 2024)



Population	230,900
School age population (projection for July 2024)	28,676
Number of K-12 public schools	64
Number of students enrolled at K-12 public schools	22,536

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$1,875,000</b>
Pilot program allocation	\$100,000
School Safety Interoperability Fund allocation through fiscal year 2025	\$1,250,000
Fiscal year 2026 allocation	\$525,000
Total interoperable communication system contracted amount	\$1,350,000
Total expenditures	\$1,065,104
Allocation amount remaining	\$809,896
Submitted all required annual expenditure reports to JLBC?	<b>Yes</b>
Spent monies only for authorized purposes?	<b>Yes</b>

## Interoperable communication system information

Interoperable communication system vendor selected	Mutualink
Reported number of public safety agencies participating	5
Reported number of K-12 public schools participating	51
Number of students enrolled at participating K-12 public schools	21,890
Interoperable communication system utilized during real emergency event?	No

## System procurement

The Mohave County sheriff's office, procurement department, and board of supervisors were involved in the procurement process for the interoperable communication system.

Procurement method	Sole source
Followed applicable procurement policies and procedures?	Yes

## Contracting best practices

Created a contract outside of vendor proposal?	Yes
Contract included standards/provisions for evaluating vendor performance?	No
Contract included incentives and/or penalties linked to performance?	Yes
Contract included termination provisions for either/both parties?	Yes
Contracts contained detailed pricing information?	No

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	Yes
Could the agency receive panic button alerts?	Yes
Could the agency view live security camera footage?	No
Could the agency access school maps and/or building plans?	No
Was access to systems limited to active emergencies?	Yes

We were unable to observe some system functionality because school staff could not log in to the Mutualink system during our observation. Additionally, security cameras at the school site where we performed our observation were not functioning at the time of our observation, and the school had not provided site maps to the vendor to be uploaded to the system. The agency reported that it is working with participating schools and the vendor to ensure that the system is fully functional.

## Implementation delays

Agency officials reported delays in system implementation were due to outdated communication infrastructure.

### Timeline of system implementation

2021	
<b>October</b>	Allocated \$50,000 in Fund monies.
<b>December</b>	Signed \$100,000 contract with Mutualink.
↓	
2022	
<b>January</b>	Allocated \$25,000 in Fund monies.
<b>April</b>	Allocated \$25,000 in Fund monies.
<b>May</b>	Paid Mutualink \$50,000.
<b>October</b>	Allocated \$1,250,000 in Fund monies.
<b>November</b>	Agency reported first school successfully connected to its interoperable communication system.
<b>December</b>	Signed \$1,250,000 contract extension with Mutualink and paid Mutualink \$625,000.
↓	
2024	
<b>February</b>	Paid Mutualink \$27,604.
<b>March</b>	Paid Mutualink \$50,000.
<b>April</b>	Made final \$312,500 payment to Mutualink.
↓	
2025	
<b>April</b>	We conducted our system observation.

## Future plans

The agency's contract with Mutualink did not have an expiration date. Agency officials reported they are considering other interoperable communication system options. Agency officials reported that if Fund monies are no longer available to the agency, it may not be able to continue operating the system due to lack of funding.

## Recommendations to Mohave County Sheriff's Office

1. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its board of supervisors, the Legislature, and the Governor.
2. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.
3. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.
4. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
5. Evaluate the implementation status and functionality of its interoperable communication system and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
6. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its board of supervisors, the Legislature, and the Governor.

## Mohave County Sheriff's Office's response

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

**Response explanation:** The Mohave County Sheriff's Office acknowledges the findings of the Arizona Auditor General.

The Mohave County Sheriff's Office accepts the findings and the recommendations moving forward.

The Mohave County Sheriff's Office will make every effort to satisfy the recommendations.

It is the intent of the Mohave County Sheriff's Office to utilize the system as designed.

Areas of concern are noted, and immediate corrections will be made.

The Mohave County Sheriff's Office will work with the vendor and all schools attached to ensure functionality and ease of access.

Additional training will be conducted.

Sheriff Doug Schuster  
Mohave County Sheriff's Office  
(928)753-0753

# Navajo County Sheriff's Office

## Navajo County general information (fiscal year 2024)



Population	107,700
School age population (projection for July 2024)	20,432
Number of K-12 public schools	58
Number of students enrolled at K-12 public schools	16,537

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$1,940,000</b>
Pilot program allocation	\$150,000
School Safety Interoperability Fund allocation through fiscal year 2025	\$1,250,000
Fiscal year 2026 allocation	\$540,000
Total interoperable communication system contracted amount	\$1,400,000
Total expenditures	\$1,400,000
Allocation amount remaining	\$540,000
Submitted all required annual expenditure reports to JLBC?	<b>Yes</b>
<b>Spent monies only for authorized purposes?</b>	<b>No</b>

The agency reported 1 tribal and 2 private schools were connected to its system. However, statute authorizes Fund monies to be spent only for K-12 public schools, which does not include tribal or private schools. We were unable to determine the amount of Fund monies, if any, the agency spent to benefit the tribal and private schools due to the agency's lack of specific vendor pricing documentation. However, we estimated that the value each of these tribal and private schools received from the Fund by participating in the system was approximately \$17,100.

## Interoperable communication system information

Interoperable communication system vendor selected	Mutualink
Reported number of public safety agencies participating	8
Reported number of K-12 public schools participating	37 <sup>1</sup>
Number of students enrolled at participating K-12 public schools	13,301
Interoperable communication system utilized during real emergency event?	Yes

<sup>1</sup> In addition to 37 public schools, agency officials reported that 1 nonpublic tribal school and 2 private schools were connected to its interoperable system.

## System procurement

The Navajo County sheriff's office, procurement department, and board of supervisors were involved in the procurement process for the interoperable communication system. The Navajo County Board of Supervisors approved the procurement as required, but the agency lacked a written determination from the county procurement manager justifying the sole-source procurement, which is required by county procurement policies.

Procurement method	Sole source
Followed applicable procurement policies and procedures?	No

## Contracting best practices

Created a contract outside of vendor proposal?	No
Contract included standards/provisions for evaluating vendor performance?	No
Contract included incentives and/or penalties linked to performance?	No
Contract included termination provisions for either/both parties?	No
Contracts contained detailed pricing information?	No

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	Yes
Could the agency receive panic button alerts?	Yes
Could the agency view live security camera footage?	N/A
Could the agency access school maps and/or building plans?	No
Was access to systems limited to active emergencies?	Yes

We were unable to observe live access to security cameras during our observation because the security cameras were not functional at the school site where we performed our observation. However, agency officials indicated that at the time of our observation, other schools' security cameras were connected to the system and the agency had access to the camera feeds during emergencies. Additionally, the school had not provided site maps to the vendor to be uploaded to the system. In December 2025, the agency reported that the school had provided its site maps to the vendor and the site maps had been uploaded to the system.

## Implementation delays

Agency officials reported that the interoperable communication system did not have a contractual deadline for implementation. However, the agency reported that implementation took longer than anticipated because of infrastructure limitations, such as unreliable internet or cellular service in rural areas of the county. Agency officials also reported that a lack of training on system functionality from the vendor for school and public safety staff further delayed implementation.

## Timeline of system implementation

2021	
<b>October</b>	Allocated \$37,500 in Fund monies.
<b>November</b>	Allocated \$37,500 in Fund monies.
↓	
2022	
<b>January</b>	Allocated \$37,500 in Fund monies.
<b>February</b>	Signed \$150,000 contract with Mutualink and paid Mutualink \$75,000.
<b>April</b>	Allocated \$37,500 in Fund monies.
<b>October</b>	Allocated \$1,250,000 in Fund monies.
<b>November</b>	Signed \$1,250,000 contract extension with Mutualink.
<b>December</b>	Paid Mutualink \$625,000.
↓	
2023	
<b>February</b>	Agency reported first school successfully connected to its interoperable communication system.
<b>August</b>	Paid Mutualink \$75,000.
↓	
2024	
<b>January</b>	Paid Mutualink \$312,500.
<b>August</b>	Made final \$312,500 payment to Mutualink.
↓	
2025	
<b>March</b>	We conducted our system observation.

## Future plans

The agency's contract with Mutualink expired in June 2025. The agency reported that it will extend its contract with Mutualink and continue to operate the system using its fiscal year 2026 Fund allocations. Agency officials reported that if Fund monies are no longer available to the agency, it would evaluate whether it is able to continue operating the system using other funding sources.

## Recommendations to the Navajo County Sheriff's Office

1. Determine the amount of Fund monies spent for the benefit of any nonpublic schools, and report this information to the Arizona Department of Administration.
2. Develop and implement procedures to ensure that ongoing interoperable communication system costs, such as licensing fees, for any nonpublic schools are not paid with Fund monies.
3. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its board of supervisors, the Legislature, and the Governor.
4. Follow its applicable procurement requirements for any future expenditures of Fund monies.
5. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables, incentives and/or penalties tied to vendor performance, and contract termination provisions; and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.
6. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.
7. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
8. Evaluate the implementation status and functionality of its interoperable communication system and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
9. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its board of supervisors, the Legislature, and the Governor.

## **Navajo County Sheriff's Office's response**

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

### **Response explanation:**

#### **Page 1 – Overview of School Safety Interoperability Fund Monies**

Spent monies only for authorized purposes? – Findings: NO

Response: The Navajo County Sheriff's Office recognizes that there were 3 schools identified as non-public that took part in the school safety project within the County. While these schools may not be considered public, these schools fall within the public safety response area of the Sheriff's Office in the event of an emergency. It is our recommendation and request that all schools in Navajo County be able to get access to funding to participate in the county-wide school safety project.

# Pinal County Sheriff's Office

## Pinal County general information (fiscal year 2024)



Population	486,500
School age population (projection for July 2024)	76,170
Number of K-12 public schools	126
Number of students enrolled at K-12 public schools	60,671

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$2,455,192</b>
Pilot program allocation	\$655,192
School Safety Interoperability Fund allocation through fiscal year 2025	\$1,800,000
Fiscal year 2026 allocation	\$0
Total interoperable communication system contracted amount	\$2,455,192
Total expenditures	\$2,005,192
Allocation amount remaining	\$450,000
Submitted all required annual expenditure reports to JLBC?	<b>No</b>
Spent monies only for authorized purposes?	<b>Yes</b>

## Interoperable communication system information

Interoperable communication system vendor selected	Mutualink
Reported number of public safety agencies participating	8
Reported number of K-12 public schools participating	66
Number of students enrolled at participating K-12 public schools	38,094
Interoperable communication system utilized during real emergency event?	N/A <sup>1</sup>

<sup>1</sup> The agency reported the system was not functional as of June 2025.

## System procurement

The Pinal County sheriff's office, treasurer's office, and board of supervisors were involved in the procurement process for the interoperable communication system.

Procurement method	Sole source
Followed applicable procurement policies and procedures?	No

## Contracting best practices

Created a contract outside of vendor proposal?	No
Contract included standards/provisions for evaluating vendor performance?	No
Contract included incentives and/or penalties linked to performance?	No
Contract included termination provisions for either/both parties?	No
Contracts contained detailed pricing information?	No

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	No
Could the agency receive panic button alerts?	No
Could the agency view live security camera footage?	No
Could the agency access school maps and/or building plans?	No
Was access to systems limited to active emergencies?	No

We were unable to observe the system in use during the audit because the agency reported it was not functional. The agency reported it could still communicate with schools during emergency incidents using other communication technologies, such as traditional 911 service.

## Implementation delays

Agency officials reported delays in system implementation were due to unreliable technology infrastructure and a lack of communication and training from the vendor. Agency officials further reported the vendor has not successfully implemented the system at any participating public schools in the county.

## Timeline of system implementation

2022	
<b>January</b>	Signed \$655,192 contract with Mutualink.
<b>March</b>	Allocated \$655,192 in Fund monies and paid Mutualink \$327,586.
<b>October</b>	Allocated \$1,800,000 in Fund monies.
<b>December</b>	Signed \$1,800,000 contract extension with Mutualink.



2023	
<b>February</b>	Paid Mutualink \$450,000.
<b>March</b>	Paid Mutualink \$450,000.
<b>September</b>	Paid Mutualink \$327,596.
<b>December</b>	Paid Mutualink \$450,000.

## Future plans

The agency's contract with Mutualink expired in June 2025. The agency reported it will not renew its contract with Mutualink due to the system not functioning to the agency's standards. Further, the agency reported that it is withholding its final \$450,000 payment to Mutualink and is pursuing reimbursement from the vendor for costs it has already paid due to the vendor's failure to provide contracted services. The agency reported it is considering other interoperable communication system options. Agency officials reported that if Fund monies are no longer available to the agency, it would evaluate whether it is able to continue operating a system using other funding sources.

## Recommendations to the Pinal County Sheriff's Office

1. Follow the requirement set forth in A.R.S. §41-1733(B) to report all Fund expenditures for the preceding fiscal year to JLBC by November 1 each year, and, as applicable, promptly submit any required reports that were not previously submitted for prior years' expenditures.
2. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its board of supervisors, the Legislature, and the Governor.
3. Follow its applicable procurement requirements for any future expenditures of Fund monies.
4. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables, incentives and/or penalties tied to vendor performance, and contract termination provisions; and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.
5. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.
6. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
7. Evaluate the implementation status and functionality of its interoperable communication system and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
8. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its board of supervisors, the Legislature, and the Governor.

## Pinal County Sheriff's Office's response

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

**Response explanation:** The Pinal County Sheriff's Office will move forward with the recommendations from this audit. We will wait to view the final draft before we choose to move on with a company that actually works and will benefit the citizens of Pinal County.

# Santa Cruz County Sheriff's Office

## Santa Cruz County general information (fiscal year 2024)



Population	49,400
School age population (projection for July 2024) <sup>1</sup>	9,254
Number of K-12 public schools	25
Number of students enrolled at K-12 public schools	10,175

<sup>1</sup> The school age population is a projection of the county's population for July 2024, provided by the Arizona Office of Economic Opportunity. The number of students enrolled at public schools is school-reported data collected by the National Center for Education Statistics. The number of students enrolled in public schools appears to be higher than the total school age population due to the difference in data sources and the uncertainty inherent in making population projections.

## Overview of School Safety Interoperability Fund monies

As of September 2025

Total allocation	\$1,100,000
Pilot program allocation	\$0
School Safety Interoperability Fund allocation through fiscal year 2025	\$750,000
Fiscal year 2026 allocation	\$350,000
Total interoperable communication system contracted amount	\$750,000
Total expenditures	\$750,000
Allocation amount remaining	\$350,000
Submitted all required annual expenditure reports to JLBC?	Yes
Spent monies only for authorized purposes?	No

### Spent monies only for authorized purposes?

The agency reported 1 private school was connected to its system. However, statute authorizes Fund monies to be spent only for K-12 public schools, which does not include private schools. According to the agency, the private school does not have any Mutualink licenses assigned to it, and thus, we were unable to estimate the value of any benefit the private school may have improperly received from being reportedly connected to the system.

## Interoperable communication system information

Interoperable communication system vendor selected	Mutualink
Reported number of public safety agencies participating	9
Reported number of K-12 public schools participating	21 <sup>1</sup>
Number of students enrolled at participating K-12 public schools	9,929
Interoperable communication system utilized during real emergency event?	Yes

<sup>1</sup> In addition to 21 public schools, the agency reported that 1 private school was connected to its interoperable communication system.

## System procurement

The Santa Cruz County sheriff's office, finance department, and board of supervisors were involved in the procurement process for the interoperable communication system.

Procurement method	Sole source
Followed applicable procurement policies and procedures?	Yes

## Contracting best practices

Created a contract outside of vendor proposal?	Yes
Contract included standards/provisions for evaluating vendor performance?	No
Contract included incentives and/or penalties linked to performance?	Yes
Contract included termination provisions for either/both parties?	Yes
Contracts contained detailed pricing information?	No

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	Yes
Could the agency receive panic button alerts?	Yes
Could the agency view live security camera footage?	Yes
Could the agency access school maps and/or building plans?	Yes
Was access to systems limited to active emergencies?	Yes

## Implementation delays

Agency officials reported that the interoperable communication system did not have a contractual deadline for implementation. However, implementation took longer than anticipated due to infrastructure limitations, such as outdated communication equipment that had to be updated before the Mutualink system could be installed.

## Timeline of system implementation

2022	
<b>November</b>	Allocated \$750,000 in Fund monies.
↓	
2023	
<b>May</b>	Signed \$750,000 contract with Mutualink.
<b>June</b>	Paid Mutualink \$187,500.
<b>July</b>	Paid Mutualink \$187,500.
<b>November</b>	Paid Mutualink \$187,500.
↓	
2024	
<b>October</b>	Agency reported first school successfully connected to its interoperable communication system.
↓	
2025	
<b>April</b>	We conducted our system observation.
<b>June</b>	Made final \$187,500 payment to Mutualink.

## Future plans

The agency's contract with Mutualink expired in June 2025. The agency reported that it will continue to operate its Mutualink system using its fiscal year 2026 Fund allocation but is also considering other interoperable communication system options. The agency also reported it would like to develop intergovernmental agreements for each participating school's use of the system. Agency officials reported that if Fund monies are no longer available to the agency, it would evaluate whether it is able to continue operating the system using other funding sources.

## Recommendations to the Santa Cruz County Sheriff's Office

1. Determine the amount of Fund monies spent for the benefit of any nonpublic schools, and report this information to the Arizona Department of Administration.
2. Develop and implement procedures to ensure that ongoing interoperable communication system costs, such as licensing fees, for any nonpublic schools are not paid with Fund monies.
3. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its board of supervisors, the Legislature, and the Governor.
4. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.
5. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.
6. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
7. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its board of supervisors, the Legislature, and the Governor.

## **Santa Cruz County Sheriff's Office's response**

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

**Response explanation:** As part of the future IGA with Mutualink/Public Schools, define system cost. projection cost for future year(s). Incorporate recommendations, such as system testing & updates. The interoperability system was designed & deployed as required for Public Safety & Public Schools to rapidly respond to ANY school in crisis. Private schools will be reevaluated going forward.

# City of Tucson Police Department

## Pima County general information (fiscal year 2024)



Population	1,087,900
School age population (projection for July 2024)	163,561
Number of K-12 public schools	323
Number of students enrolled at K-12 public schools	137,287

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$2,000,000</b>
Pilot program allocation	\$0
School Safety Interoperability Fund allocation through fiscal year 2025	\$2,000,000
Fiscal year 2026 allocation	\$0
Total interoperable communication system contracted amount	\$3,566,204
Total expenditures	\$557,936
Allocation amount remaining	\$1,442,064
Submitted all required annual expenditure reports to JLBC?	<b>Yes</b>
Spent monies only for authorized purposes?	<b>Yes</b>

## Interoperable communication system information

Interoperable communication system vendor selected	Motorola Solutions <sup>1</sup>
Reported number of public safety agencies participating	10
Reported number of K-12 public schools participating	91
Number of students enrolled at participating K-12 public schools	43,990
Interoperable communication system utilized during real emergency event?	No

<sup>1</sup> In December 2024, the agency canceled its contract with Motorola Solutions. The agency reported that it is developing its own interoperable communications functionality with input from participating K-12 public schools and public safety agencies.

## System procurement

The City of Tucson police department, public safety communications department, business services department, and office of the city manager were involved in the procurement process for the interoperable communication system.

Procurement method	RFP
Followed applicable procurement policies and procedures?	Yes

## Contracting best practices

Created a contract outside of vendor proposal?	Yes
Contract included standards/provisions for evaluating vendor performance?	Yes
Contract included incentives and/or penalties linked to performance?	Yes
Contract included termination provisions for either/both parties?	Yes
Contracts contained detailed pricing information?	Yes

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	N/A
Could the agency receive panic button alerts?	N/A
Could the agency view live security camera footage?	N/A
Could the agency access school maps and/or building plans?	N/A
Was access to systems limited to active emergencies?	N/A

The agency originally contracted with Motorola Solutions but canceled its contract in December 2024 after it determined the system would not meet schools' needs.

## Implementation delays

Agency officials did not report any implementation delays while working with Motorola Solutions, but the agency canceled its contract in December 2024 after it determined the system would not meet schools' needs.

### Timeline of system implementation

2022	
<b>October</b>	Allocated \$2,000,000 in Fund monies.
↓	
2024	
<b>April</b>	Signed \$3,566,204 contract with Motorola Solutions.
<b>June</b>	Paid Motorola Solutions \$329,823.
<b>December</b>	Terminated contract with Motorola Solutions.
↓	
2025	
<b>March</b>	Made final \$288,113 payment to Motorola Solutions.

### Future plans

The agency reported that it is developing its own interoperable communications functionality that it will make available to schools throughout Pima County. The agency is also working with local public schools to connect with their panic button alert systems. Additionally, the agency reported it plans to grant school district security staff restricted access to the agency's real-time crime center and dispatch systems to provide real-time communication between school district security and agency dispatch staff.

### Recommendations for the Tucson Police Department

1. Work with participating public safety agencies and public schools to ensure any interoperable communication system purchased or developed using Fund monies meets their needs and the requirements listed in A.R.S. §41-1733(A).

2. For any school safety program established using Fund monies pursuant to A.R.S. §41-1733, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031, as applicable, and provide this information to its city council, the Legislature, and the Governor.
3. Follow applicable procurement requirements for any purchases using Fund monies, and establish a process to monitor any associated contracts to ensure vendors comply with contract terms.
4. Establish a process for routinely testing any interoperable communication system purchased or developed using Fund monies to ensure it is functioning across participating public safety agencies and public schools.

## **Tucson Police Department's response**

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

# Yavapai County Sheriff's Office

## Yavapai County general information (fiscal year 2024)



Population	254,700
School age population (projection for July 2024)	30,086
Number of K-12 public schools	83
Number of students enrolled at K-12 public schools	23,682

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$2,550,000</b>
Pilot program allocation	\$150,000
School Safety Interoperability Fund allocation through fiscal year 2025	\$1,800,000
Fiscal year 2026 allocation	\$600,000
Total interoperable communication system contracted amount	\$1,950,000
Total expenditures	\$1,950,000
Allocation amount remaining	\$600,000
Submitted all required annual expenditure reports to JLBC?	<b>Yes</b>
<b>Spent monies only for authorized purposes?</b>	<b>No</b>

The agency reported 1 private school was connected to its system. However, statute authorizes Fund monies to be spent only for K-12 public schools, which does not include private schools. We were unable to determine the amount of Fund monies, if any, the agency spent to benefit the private school due to the agency's lack of specific vendor pricing documentation. However, we estimated that the value the private school received from the Fund by participating in the system was approximately \$17,100.

## Interoperable communication system information

Interoperable communication system vendor selected	Mutualink
Reported number of public safety agencies participating	7
Reported number of K-12 public schools participating	34 <sup>1</sup>
Number of students enrolled at participating K-12 public schools	12,345
Interoperable communication system utilized during real emergency event?	No

<sup>1</sup> In addition to 34 public schools, the agency reported that 1 private school was connected to its interoperable communication system.

## System procurement

The Yavapai County sheriff's office, finance department, and board of supervisors were involved in the procurement process for the interoperable communication system. Although the Yavapai County Board of Supervisors approved the procurement as required, the agency lacked certain documentation, such as a list of the alternative sources considered, required by the county's procurement policies for all proprietary procurements.

Procurement method	Proprietary
Followed applicable procurement policies and procedures?	No

## Contracting best practices

Created a contract outside of vendor proposal?	No
Contract included standards/provisions for evaluating vendor performance?	No
Contract included incentives and/or penalties linked to performance?	No
Contract included termination provisions for either/both parties?	No
Contracts contained detailed pricing information?	No

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	Yes
Could the agency receive panic button alerts?	Yes
Could the agency view live security camera footage?	Yes
Could the agency access school maps and/or building plans?	Yes
Was access to systems limited to active emergencies?	Yes

## Implementation delays

Agency officials reported that the interoperable communication system did not have a contractual deadline for implementation. However, implementation took longer than anticipated due to vendor staff turnover, difficulties scheduling school staff trainings on system functionality, and difficulties connecting agency and participating school IT systems to the interoperable communication system.

## Timeline of system implementation

2021	
<b>October</b>	Allocated \$75,000 in Fund monies.
↓	
2022	
<b>January</b>	Allocated \$37,500 in Fund monies.
<b>April</b>	Allocated \$37,500 in Fund monies.
<b>June</b>	Signed \$150,000 contract with Mutualink.
<b>July</b>	Paid Mutualink \$75,000.
<b>December</b>	Allocated \$1,800,000 in Fund monies and signed \$1,800,000 contract extension with Mutualink.
↓	
2023	
<b>January</b>	Paid Mutualink \$900,000.
<b>March</b>	Paid Mutualink \$75,000.
<b>July</b>	Paid Mutualink \$450,000 and agency reported first school successfully connected to its interoperable communication system.
↓	
2025	
<b>April</b>	We conducted our system observation.
<b>June</b>	Made final \$450,000 payment to Mutualink.

## Future plans

The agency's contract with Mutualink expired in June 2025. The agency reported that it will extend its contract with Mutualink and continue to operate its system using its fiscal year 2026 Fund allocation. Additionally, agency officials reported they will review participating public safety agency and school licenses to ensure the agency is billed accurately for future Mutualink payments. Agency officials reported that if Fund monies are no longer available to the agency, it will pay the system licensing costs for public safety agencies and schools that already participate in the system.

## Recommendations to the Yavapai County Sheriff's Office

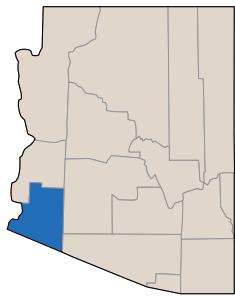
1. Determine the amount of Fund monies spent for the benefit of any nonpublic schools, and report this information to the Arizona Department of Administration.
2. Develop and implement procedures to ensure that ongoing interoperable communication system costs, such as licensing fees, for any nonpublic schools are not paid with Fund monies.
3. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its board of supervisors, the Legislature, and the Governor.
4. Follow its applicable procurement requirements for any future expenditures of Fund monies.
5. Ensure that any contracts, contract addendums, or contract extensions that involve the use of Fund monies follow recommended practices for contracting by including elements such as clearly defined deliverables, incentives and/or penalties tied to vendor performance, and contract termination provisions; and obtain detailed pricing information sufficient to verify that charges are accurate and reasonable.
6. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.
7. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
8. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its board of supervisors, the Legislature, and the Governor.

## **Yavapai County Sheriff's Office's response**

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

# City of Yuma Police Department

## Yuma County general information (fiscal year 2024)



Population	216,100
School age population (projection for July 2024)	38,635
Number of K-12 public schools	72
Number of students enrolled at K-12 public schools	37,699

## Overview of School Safety Interoperability Fund monies

As of September 2025

<b>Total allocation</b>	<b>\$1,350,000</b>
Pilot program allocation	\$0
School Safety Interoperability Fund allocation through fiscal year 2025	\$1,350,000
Fiscal year 2026 allocation	\$0
Total interoperable communication system contracted amount	\$1,167,727
Total expenditures	\$137,404
Allocation amount remaining	\$1,212,596
Submitted all required annual expenditure reports to JLBC?	<b>Yes</b>
Spent monies only for authorized purposes?	<b>Yes</b>

## Interoperable communication system information

Interoperable communication system vendor selected	Motorola Solutions
Reported number of public safety agencies participating	7
Reported number of K-12 public schools participating	35
Number of students enrolled at participating K-12 public schools	23,353
Interoperable communication system utilized during real emergency event?	No

## System procurement

The City of Yuma police department, IT department, finance department, and city council were involved in the procurement process for the interoperable communication system.

Procurement method	Cooperative agreement
Followed applicable procurement policies and procedures?	Yes

## Contracting best practices

Created a contract outside of vendor proposal?	Yes
Contract included standards/provisions for evaluating vendor performance?	Yes
Contract included incentives and/or penalties linked to performance?	Yes
Contract included termination provisions for either/both parties?	Yes
Contracts contained detailed pricing information?	Yes

## Interoperable communication system functionality

Could the agency determine the emergency's location and who reported it?	N/A
Could the agency receive panic button alerts?	N/A
Could the agency view live security camera footage?	N/A
Could the agency access school maps and/or building plans?	N/A
Was access to systems limited to active emergencies?	N/A

We were unable to observe the system because the agency signed its contract with Motorola Solutions in December 2024 and the system had not been fully implemented at any public safety agency or school at the time we conducted our system observations. The agency reported it could still communicate with schools during emergency incidents using other communication technologies, such as traditional 911 service.

## Implementation delays

Agency officials reported that challenges connecting agency dispatch systems to the interoperable communication system caused implementation delays.

## Timeline of system implementation

2024	
<b>October</b>	Allocated \$1,350,000 in Fund monies.
<b>December</b>	Signed \$1,167,727 contract with Motorola Solutions.
↓	
2025	
<b>March</b>	Paid Motorola Solutions \$7,944.
<b>June</b>	Paid Motorola Solutions \$129,460.
<b>August</b>	Agency reported first school successfully connected to its interoperable communication system.

## Future plans

The agency's contract with Motorola Solutions expires in December 2029. The agency reported it is developing standard operating procedures for the system with input from participating public safety agencies and schools, and will continue to work with them to evaluate system performance. Agency officials reported that if Fund monies are no longer available to the agency, it will continue operating the system and determine how to split ongoing system costs between participating public safety agencies and public schools.

## Recommendations to the City of Yuma Police Department

1. In conjunction with its vendor, as necessary, develop a cost estimate for ongoing system operational costs for fiscal years 2027 through 2031 and provide this information to its city council, the Legislature, and the Governor.
2. Establish a process to monitor contracts that involve the use of Fund monies to ensure the vendor complies with contract terms, including any requirements to provide regular communication or updates.

3. Establish a process for routinely testing the interoperable communication system purchased with Fund monies to ensure it is functioning across participating public safety agencies and public schools, including determining whether software updates have been installed, and whether authorized system user information is accurate and up to date and authorized system users have been trained to use system features relevant to their positions.
4. Evaluate the implementation status and functionality of its interoperable communication system and work with vendors, as applicable, to resolve functional deficiencies; if resolution is not achieved, determine what actions the agency will pursue, in consultation with legal counsel, as needed.
5. Make a plan to address the interoperable communication system's ongoing operating costs, including actions the agency will take if the State does not provide further funding for existing interoperable communication systems; provide this plan to its city council, the Legislature, and the Governor.

## **City of Yuma Police Department's response**

**Agency response:** The information presented on these pages is agreed to. The audit recommendations will be implemented.

**Response explanation:** The City of Yuma Police Department recognizes the importance of strengthening our interoperable communication system to support school safety across Yuma County. The recommendations outlined align with our ongoing efforts to enhance accountability, system performance, and long-term sustainability. We will work with our partner agencies to develop accurate cost projections for future operational needs. Our team will establish formal processes to monitor contract compliance and ensure timely communication. Routine testing protocols will be implemented to verify system functionality, software updates, and user readiness. We will create a long-term funding plan and provide it to our governing bodies to ensure continuity of school safety communications. The Yuma Police Department remains committed to fully implementing these recommendations and improving service to our community. Chief Garrity

### School Safety Interoperability Fund allocations and expenditures

This appendix presents the total amount each law enforcement agency was allocated from the Fund, as well as the contracted amounts for each agency's interoperable communication system, and how much of its allocated Fund monies each agency had expended as of September 2025.

The total allocations shown in Table 6, pages b-2 through b-3, include:

- \$4 million allocated to 8 county sheriff's offices in 2021 participating in the School Safety Pilot Program or the Rural County Interoperability Communication Program;
- \$20 million allocated in 2022 to 15 law enforcement agencies, including 13 county sheriff's offices and 2 local law enforcement agencies; and
- \$3.2 million allocated in 2025 to 9 county sheriff's offices, of which \$1.25 million was initially allocated to the Coconino County Sheriff's Office in 2022, but was subsequently reallocated to other agencies because the Coconino County Sheriff's Office declined to spend its Fund allocation.<sup>1</sup>

We present the combined amounts because the Fund now encompasses the previous 2 programs, and all agencies used or plan to use their Fund allocations for interoperable communication systems that connect with participating schools and public safety agencies.

The Fund expenditures shown in Table 6, pages b-2 through b-3, were all paid to interoperable communication system vendors and include all expenditures of Fund monies that agencies made between January 2021 and September 2025. We generally found that agencies spent all Fund monies for statutory authorized purchases, including software licensing and distribution, hardware configuration, and system training for law enforcement agency and school staff.<sup>2</sup> Less than 1% of the purchases were for equipment to support the interoperable communication system functionality in dispatch centers.<sup>3</sup> However, 4 of 14 agencies may have improperly benefited some nonpublic schools by enabling them to connect to interoperable communication systems purchased with Fund monies.

For detailed information specific to each agency about total Fund allocations, compliance with applicable procurement requirements, interoperable communication system functionality, and future plans for interoperable communication systems purchased with Fund monies, see the individual agency pages in Appendix A, pages a-1 through a-72.

<sup>1</sup> The Gila, Graham, Greenlee, and Pinal County Sheriff's Offices participated in the Rural County Interoperability Communication Program, receiving a total of \$1.5 million as part of this program. The Maricopa, Mohave, Navajo, and Yavapai County Sheriff's Offices participated in the School Safety Pilot Program, receiving a total of \$2.5 million as part of this program. The Apache, Gila, Graham, Greenlee, La Paz, Mohave, Navajo, Santa Cruz, and Yavapai County Sheriff's Offices were allocated Fund monies for fiscal year 2026.

<sup>2</sup> The invoices we reviewed lacked necessary detail to itemize the agencies' expenditure information.

<sup>3</sup> The Mohave County Sheriff's Office purchased equipment, including radio gateway servers, through Mutualink for \$27,604.19 in February 2024, and Yuma Police Department purchased computer equipment from Dell Technologies for \$7,944.25 in March 2025. Both agencies reported that the equipment purchased was to support their interoperable communication systems.

**Table 6**

**Agencies have contracted to spend nearly all Fund monies allocated through September 2025, and 4 agencies likely spent Fund monies for nonpublic schools, contrary to statute**

Agency	Vendor	Contracted amount	Allocated Fund monies through Sept. 2025	Expenditures through Sept. 2025	Allocation amount remaining as of Sept. 2025	Used only for statutorily authorized purposes?
<b>County sheriff's offices</b>						
Apache	Mutualink	\$1,000,000	\$1,275,000	\$1,014,000 <sup>1</sup>	\$261,000	No <sup>2</sup>
Cochise	Navigate360	471,312 <sup>3</sup>	1,500,000	447,945	1,052,055	Yes
Coconino <sup>4</sup>	None	0	N/A	0	0	N/A
Gila	Mutualink	1,430,540	1,710,540	1,430,540	280,000	Yes
Graham	Mutualink	974,930	1,254,930	974,930	280,000	Yes
Greenlee	Mutualink	689,338	859,338	689,338	170,000	Yes
La Paz	Mutualink	750,000	950,000	750,000	200,000	Yes
Maricopa	Motorola Solutions	2,761,119	5,150,000	449,151	4,700,849	Yes
Mohave	Mutualink	1,350,000	1,875,000	1,065,104	809,896	Yes
Navajo	Mutualink	1,400,000	1,940,000	1,400,000	540,000	No <sup>2</sup>
Pinal	Mutualink	2,455,192	2,455,192	2,005,192	450,000	Yes
Santa Cruz	Mutualink	750,000	1,100,000	750,000	350,000	No <sup>2</sup>
Yavapai	Mutualink	1,950,000	2,550,000	1,950,000	600,000	No <sup>2</sup>
<b>Police departments</b>						
Tucson <sup>5</sup>	Motorola Solutions	3,566,204	2,000,000	557,936	1,442,064	Yes
Yuma	Motorola Solutions	1,167,727	1,350,000	137,404	1,212,596	Yes
<b>Total</b>	—	<b>\$20,716,362</b>	<b>\$25,970,000</b>	<b>\$13,621,540</b>	<b>\$12,348,460</b>	—

## Table 6 continued

- <sup>1</sup> Apache County representatives reported that the Apache County Sheriff's Office made a use-tax payment of \$14,000 related to the purchase of its interoperable communication system in addition to the contracted amount. The County could not provide information about the source of monies it used for this use-tax payment.
- <sup>2</sup> Statute specifies that Fund monies may only be used for public schools, and the agency reported that some nonpublic schools, such as tribal or private schools, were connected to its interoperable communication system. For more information about each law enforcement agency's spending of Fund monies, see Appendix A, pages a-1 through a-72.
- <sup>3</sup> The cooperative agreement contract used by Cochise County Sheriff's Office to purchase Navigate360 from July 2023 to July 2026 did not include a total price for the system, stating that prices would be outlined in the order forms provided by the vendor. We calculated the total contracted amount based on system implementation costs obtained from the order forms and subscription costs from pricing lists for the 3-year contract term.
- <sup>4</sup> The Coconino County Sheriff's Office was allocated \$1.25 million in Fund monies but declined to participate in the School Safety Interoperability Fund program, and those monies were reallocated to other agencies in fiscal year 2026. See Coconino County Sheriff's Office's agency page in Appendix A, page a-16, for more information.
- <sup>5</sup> The Tucson Police Department canceled its contract with Motorola Solutions in December 2024 after the vendor had started implementing its interoperable communication system at the police department. The system was never fully implemented. See Tucson Police Department's agency page in Appendix A, pages a-60 through a-63, for more information.

Source: Auditor General staff review of Laws 2021, Ch. 403, §19; Laws 2022, Ch. 313, §5; agency-provided documentation related to contracts and expenditures for interoperable communication systems for fiscal year 2021 through September 2025; and auditor-conducted interviews.

### School Safety Interoperability Fund

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This appendix contains the requirements set forth by A.R.S. §41-1733 for expenditures from the School Safety Interoperability Fund, including the schools to be served and the standards an interoperable communication system purchased with Fund monies must meet. For our evaluation, we reviewed all Fund expenditures and considered the schools reportedly participating in systems purchased with Fund monies. We also determined whether the systems agencies purchased met, or were reportedly capable of meeting, statutory requirements. Some statutory requirements for interoperable communication systems could not be tested directly or were unclear, and this appendix also includes a discussion of how we evaluated whether a system met those requirements.

#### **A.R.S. §41-1733. School safety interoperability fund; school safety program; annual report**

- A. The school safety interoperability fund is established consisting of monies appropriated to the fund by the legislature. The department of administration shall administer the fund. Monies in the fund are continuously appropriated. Monies in the fund shall be distributed to the sheriff of a county or a city or town police department that establishes a school safety program and may be used only for a school safety program that meets all of the following:
  1. Encompasses schools throughout this state.
  2. In a school safety program county, enables the deployment of a secure, multimedia data communications system to a user base consisting of public safety agencies and public schools providing instruction in any combination of kindergarten programs and grades one through twelve.
  3. Provides a communications solution environment that allows for:
    - (a) Identifying system users' identity, location and operational status during an incident.
    - (b) Secure text messaging and file sharing to all users involved in an incident.
    - (c) Secure sharing of collaborative maps, building floor plans and images between schools and public safety agencies.
    - (d) Integrating manually activated panic alarm systems that, when activated, establish direct collaboration between schools and public safety agencies.

- (e) Using multiple forms of real-time communications and information collaboration, including voice and full-motion video sharing, during an incident.
- 4. Is capable of being deployed to end users on existing communications assets owned by participating entities.
- 5. Allows each participating entity to maintain discretionary real-time control of all communications assets owned or operated by the entity.
- 6. Encrypts all media communications.
- 7. Is certified under the United States department of homeland security safety act as qualified anti-terrorism technology.
- 8. Is compatible with the federal emergency management agency interoperable gateway system for disaster communications.
- 9. Ensures student and staff privacy.
- 10. Enables integration to school access control systems to allow remote lockdown by law enforcement through the same multimedia system.

B. On or before November 1 of each year, the sheriff of a county or a city or town police department that has established a school safety program pursuant to this section shall submit a report to the joint legislative budget committee of all expenditures made for the school safety program in the preceding fiscal year.

## **Auditor evaluation of A.R.S. §§41-1733(A)(3) through (A)(10) requirements**

Based on our review, not all the requirements listed in A.R.S. §§41-1733(A)(3) through (A)(10) were observable during system tests at the agencies and schools we visited. Some statutory requirements were unclear or could not be tested directly, and Table 7, pages c-3 through c-4, lists the requirements we were unable to directly observe and explains how we evaluated whether systems met them.

**Table 7****Select statutory requirements for interoperable communication systems, and methods auditors used to evaluate whether systems purchased using Fund monies met these requirements**

Statutory requirement	Auditor evaluation
Identifying system users' identity, location, and operational status during an incident.	Statute does not define "operational status," and each vendor had a different understanding of this requirement. We determined that a system met this requirement based on the vendor's interpretation of the requirement and whether the system demonstrated the function the vendor described.
Secure text messaging and file sharing to all users involved in an incident.	We determined that a system met this requirement if all system users, including school and public safety agency staff members, were able to send text messages to one another and share files, such as PDF and Microsoft Word files, with one another.
Enables integration to school access control systems to allow remote lockdown by law enforcement through the same multimedia system.	We were unable to directly test this function during our review. Each of the 3 vendors explained that although their systems could be configured to allow law enforcement to remotely lockdown schools, none of the schools they currently service in Arizona had access control systems to accommodate this functionality. Additionally, none of the 8 schools where we observed system tests had access controls that would allow for remote lockdown of the campus.
Encrypts all media communications.	We reviewed system encryption documentation provided by each vendor as compared to encryption industry standards and recommended practices to determine whether each system met this requirement.
Ensures student and staff privacy.	Statute does not define "privacy" nor the specific functionality a system should perform to meet this requirement. We analyzed each system's reported safety and security technical specifications as compared to credible industry standards and recommended practices to determine whether each system met this requirement.
Is certified under the U.S. Department of Homeland Security Safety Act as qualified anti-terrorism technology.	We verified whether each system was a qualified anti-terrorism technology under the federal Security Safety Act by searching each system's certification credentials through the U.S. Department of Homeland Security's website.

**Table 7 continued**

Statutory requirement	Auditor evaluation
Is compatible with the Federal Emergency Management Agency (FEMA) interoperable gateway system (IGS) for disaster communications.	Mutualink developed and manages the FEMA IGS under a federal contract (see Chapter 1, pages 6 through 19). During the audit, officials from Mutualink and FEMA indicated that any system would be compatible with the IGS, but vendors would be required to work directly with FEMA and Mutualink to access the IGS platform. Based on the information provided by FEMA and Mutualink officials, as well as Motorola Solutions and Navigate360's interpretation of how their systems could communicate with FEMA, we determined that each system was compatible with FEMA's IGS.

Source: Auditor General staff analysis of A.R.S. §41-1733.

# Selected states' funding mechanisms and programs for addressing school emergency communication needs

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This appendix presents information about funding provided by Arizona and selected states to public schools between fiscal years 2021 and 2026 for emergency communication technologies and the statutory provisions that govern how these monies may be spent. Our review considered school emergency communication requirements and funding efforts in Arizona and 6 other states. The other states we judgmentally selected for review included neighboring Colorado, New Mexico, and California; Ohio, which has a standalone school safety entity; and Texas and Florida, which each have laws requiring schools to adopt specific communication technologies.

As described in the sections that follow, most of these states have multiple school safety funding mechanisms. We provide information about funding and requirements for programs that are exclusively for emergency communication technology purchases and for programs that allow for emergency communication technology purchases but may also be used for other school safety priorities. Also included are state-wide public school enrollment numbers to provide some context for the amount of funding each state allocates relative to the number of students potentially served under the various programs.

## State funding exclusively for emergency communication technologies

Most of the selected states provided funding for specific emergency communication technologies, but none provided funding exclusively for multimedia interoperable communication systems like those described in Arizona law. As shown in Table 8, pages d-2 through d-4, 5 of the states we reviewed provided designated funding primarily for radios and panic buttons to enable schools to notify public safety agencies of emergencies. Not all the emergency communication technologies funded through programs provide for interoperable communication. Specifically, the panic buttons funded by Florida, New Mexico, and Texas must notify public safety agencies of an emergency but are not considered interoperable because they do not need to provide direct 2-way communication capabilities.

Colorado, Florida, and New Mexico provided emergency communications funding through legislative appropriations over multiple years. Ohio and Texas provided 1-time allocations for their respective programs. We did not identify any programs in California specifically dedicated to funding emergency communication technology in schools.

**Table 8**

**Most states we reviewed provide funding specifically for emergency communication technologies that allow schools to contact public safety agencies**

State and program(s)	Program funding (fiscal years 2021 through 2026)		
	Summary of allowable expenditures	Time frame	Total amount
<b>Arizona</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 1,117,630		
School Safety Interoperability Fund, A.R.S. §41-1733	► Interoperability technology that allows for multimedia communication in accordance with certain statutory requirements.	Three 1-time appropriations received over 3 years (fiscal years 2022, 2023, and 2026).	<b>\$26 million<sup>2</sup></b>
<b>California</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 5,837,338		
No program(s)	We did not identify a state-level funding program exclusively for schools' emergency communications.	N/A	<b>N/A</b>
<b>Colorado</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 865,661		
School Access for Emergency Response (SAFER) Program, C.R.S. §§24-33.5-2104 and 2107 <sup>3</sup>	► Interoperable technology, including maintenance and upgrades to current systems. ► Any necessary radio system capacity expansions. ► Training programs to teach effective communications with first responders in an emergency.	Annual appropriations over 6 years (fiscal years 2021 through 2026).	<b>\$30 million</b>

**Table 8 continued**

<b>State and program(s)</b>	<b>Summary of allowable expenditures</b>	<b>Program funding (fiscal years 2021 through 2026)</b>	
		<b>Time frame</b>	<b>Total amount</b>
<b>Florida</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 2,872,335		
Silent Panic Alert Technology funding, FL General Appropriations	<ul style="list-style-type: none"><li>▶ Silent panic buttons.</li><li>▶ Communication infrastructure to support panic alert notifications.</li></ul>	Annual appropriations over 6 years (fiscal years 2021 through 2026).	<b>\$40 million</b>
<b>New Mexico</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 311,719		
Panic Button Technology funding, NM General Appropriations	<ul style="list-style-type: none"><li>▶ Silent panic buttons.</li></ul>	Annual appropriations over 6 years (fiscal years 2021 through 2026).	<b>\$7.1 million</b>
<b>Ohio</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 1,675,300		
Multi-Agency Radio Communication Systems (MARCS) in Schools <sup>4</sup>	<ul style="list-style-type: none"><li>▶ Radio equipment. The program provides the equipment directly to schools rather than providing monies for schools to separately purchase it.</li></ul>	One-time appropriation received in fiscal year 2025.	<b>\$1.2 million</b>
<b>Texas</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 5,532,518		
Silent Panic Alert Technology (SPAT) Grant	<ul style="list-style-type: none"><li>▶ Silent panic buttons.</li><li>▶ Communication infrastructure to support panic alert notifications.</li></ul>	One-time appropriation administered over 3 years (fiscal years 2022 through 2024).	<b>\$17.1 million</b>

## Table 8 continued

- <sup>1</sup> Auditor General staff review of student enrollment data from the National Assessment of Educational Progress's Nation's Report Card website. Retrieved 11/20/25 from <https://www.nationsreportcard.gov/profiles/stateprofile/overview/>
- <sup>2</sup> Arizona's \$26 million program funding total includes monies that were appropriated to the Public Safety Interoperability Fund in fiscal year 2019. These monies were not allocated to agencies until fiscal year 2021, when they were allocated to county sheriff's offices and municipal police departments through the School Safety Interoperability Fund.
- <sup>3</sup> Funding for Colorado's SAFER Program began in 2018 and will continue until 2028. The corresponding amounts in the table include the legislative funding for this program between fiscal years 2021 and 2026.
- <sup>4</sup> The specialized MARCS radios for schools were first funded by the state in 2013 that funded a grant allowing schools to acquire the radios.

Source: Auditor General staff review of state statutes, school safety emergency communication grant opportunities, and interviews with the state agencies and organizations in Arizona, California, Colorado, Florida, New Mexico, Ohio, and Texas.

## **State funding for general school safety purposes, which may include emergency communication systems**

In addition to providing funding expressly for emergency communication technologies, Arizona and 4 of the other states we reviewed also provided monies that could be used for a variety of school safety purposes. These additional school safety funding programs, which allow for but are not limited to spending for emergency communication technologies, are described in Table 9, pages d-6 through d-8. We found that most of these other school safety program monies can be used for purposes such as school safety training, building and equipment improvements, and school resource officers, as well as for emergency and/or interoperable communication systems. We did not include in the table programs that did not permit spending for emergency communication technologies, such as those that were exclusively for school safety capital projects.

In 3 states we reviewed, including Arizona, these other school safety funding programs are competitive and require schools to apply for grant monies to fund their school safety initiatives. Total allocations for these programs vary from year to year, and not all schools that apply receive funding. Florida and Texas, however, provide all public schools with annual school safety funding to pay for their individual safety needs and priorities. The amount each school receives is based on set criteria, including enrollment.

**Table 9**

**Most states we reviewed provide school safety funding that can be used for multiple purposes, including emergency communication technologies, but the amounts allocated vary substantially**

State and program(s)	Summary of allowable expenditures	Program funding (fiscal years 2021 through 2026)	
		Time frame	Total amount
<b>Arizona</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 1,117,630		
School Safety Program, A.R.S. §15-154	<ul style="list-style-type: none"> <li>▶ School resource and safety officers.</li> <li>▶ School counselors and social workers.</li> <li>▶ Emergency communication systems.</li> <li>▶ Building and equipment safety improvements.</li> </ul>	Annual appropriation in fiscal year 2026. <sup>2</sup>	<b>\$82 million</b>
<b>California</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 5,837,338		
No program(s)	We did not identify a state-level general school safety program.	N/A	<b>N/A</b>
<b>Colorado</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 865,661		
School Security Disbursement Grant Program, C.R.S. §24-33.5-1810	<ul style="list-style-type: none"> <li>▶ School resource officers.</li> <li>▶ Emergency communication systems.</li> <li>▶ Building and equipment safety improvements.</li> <li>▶ School safety trainings.</li> <li>▶ Student violence prevention programs.</li> </ul>	Annual appropriations over 4 years (fiscal years 2023 through 2026).	<b>\$25 million</b>

**Table 9 continued**

<b>State and program(s)</b>	<b>Summary of allowable expenditures</b>	<b>Program funding (fiscal years 2021 through 2026)</b>	
		<b>Time frame</b>	<b>Total amount</b>
<b>Florida</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 2,872,335		
Safe Schools Allocation legislative appropriation, FL Statute §1011.62	<ul style="list-style-type: none"><li>▶ School safety purchases related to public school compliance with FL statute §§1006.07 through 1006.12, including school resource officers, school safety trainings, student discipline, emergency communication systems, and school bus safety improvements.</li></ul>	Annual appropriations over 6 years (fiscal years 2021 through 2026). <sup>3</sup>	<b>\$1.4 billion</b>
<b>New Mexico</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 311,719		
No program(s)	We did not identify a state-level general school safety program.	N/A	<b>N/A</b>
<b>Ohio</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 1,675,300		
School safety training grants administered by the Ohio Attorney General	<ul style="list-style-type: none"><li>▶ Emergency communication systems.</li><li>▶ Building and equipment safety improvements.</li><li>▶ School safety trainings.</li><li>▶ Certification training for school resource officers.</li></ul>	Annual appropriations over 6 years (fiscal years 2021 through 2026). <sup>4</sup>	<b>\$70 million</b>
Ohio K-12 School Safety Grants	<ul style="list-style-type: none"><li>▶ Building and equipment safety improvements.</li></ul>	Appropriations made through 5 grants over 3 years (fiscal years 2021 through 2023).	<b>\$215 million</b>

**Table 9 continued**

State and program(s)	Summary of allowable expenditures	Program funding (fiscal years 2021 through 2026)	
		Time frame	Total amount
<b>Texas</b>	Fiscal year 2024 student enrollment: <sup>1</sup> 5,532,518		
School Safety Standards Formula Grant and Safety and Facilities Enhancement (SAFE) Grant	<ul style="list-style-type: none"> <li>▶ School safety purchases directly related to public school compliance with TX regulation §61.1031, including emergency communication systems, building and equipment safety improvements, school resource officers, school counselors, and social workers.</li> </ul>	Appropriations made through 3 grants over 2 years (fiscal years 2022 and 2023).	<b>\$1.5 billion</b>
School Safety Allotment, annual budgetary funding	<ul style="list-style-type: none"> <li>▶ School safety technology and infrastructure improvements.</li> <li>▶ School safety officers.</li> <li>▶ School safety trainings.</li> <li>▶ School counselors and social workers.</li> </ul>	Annual appropriations made to school districts over 6 years (fiscal years 2021 to 2026). <sup>5</sup>	<b>\$737 million</b>

<sup>1</sup> Auditor General staff review of student enrollment data from the National Assessment of Educational Progress's Nation's Report Card website. Retrieved 11/20/25 at <https://www.nationsreportcard.gov/profiles/stateprofile/overview/>

<sup>2</sup> Laws 2025, Ch. 233, §31. Only fiscal year 2026 appropriations to Arizona's School Safety Program are reflected in this table because it is the first fiscal year that the program began allowing expenditures for emergency communication systems and building and equipment safety improvements. Prior to this change, Arizona's School Safety Program allowed for expenditures to be spent on school resource officers, juvenile probation officers, school counselors, and social workers. A total of \$391,751,100 has been allocated to this program between fiscal years 2021 and 2026.

<sup>3</sup> Florida's Safe Schools Allocation began in 2017 and has no specified end date. Each school district receives a minimum \$250,000 allocation plus funding based on student enrollment and the Florida Crime Index provided by the Department of Law Enforcement.

<sup>4</sup> Ohio's school safety training grants program administered by the Ohio Attorney General began in 2020 and has been renewed through 2027. The corresponding amounts in the table include the legislative funding for this program between fiscal years 2021 and 2026.

<sup>5</sup> Texas's School Safety Allotment began in fiscal year 2020 and has no specified end date. It is formula-based funding that depends on each school's student enrollment and number of campuses. The total amount presented for the School Safety Allotment is based on estimates produced by the Texas Legislative Budget Board. Information on the actual appropriations from the School Safety Allotment were not consistently available on the Texas Education Agency's website.

Source: Auditor General staff review of state statutes, school safety emergency communication grant opportunities, and interviews with the state agencies and organizations in Arizona, California, Colorado, Florida, New Mexico, Ohio, and Texas.

### Scope and methodology

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The Arizona Auditor General has conducted this special audit of the School Safety Interoperability Fund (Fund) in Arizona pursuant to a December 6, 2023, JLAC resolution. This audit considered whether expenditures of Fund monies were for statutorily authorized purposes and whether interoperable communication systems purchased with Fund monies were procured in accordance with applicable requirements. It also assessed whether interoperable communication systems purchased with Fund monies met statutory requirements and provides information on issues we identified related to the systems' current functionality and long-term operations.

We used various methods to address the audit's objectives, including reviewing applicable federal and State statutes and rules; interviewing officials and personnel from various entities with responsibility for school safety and/or interoperable communication, including a school safety expert consultant, charter sponsors, and the Trust—a membership-based organization providing insurance and risk-management services to most Arizona school districts. In addition, we used the following specific methods to meet this audit's objectives:

- ▶ To determine whether all agencies that received Fund monies complied with statutory requirements and spent Fund monies only for authorized purposes and whether each interoperable communication system purchased met statutory requirements, we:
  - Reviewed requirements for using Fund monies set forth in A.R.S. §41-1733; expenditure reports submitted by agencies that were allocated Fund monies to the JLBC for fiscal years 2022 through 2024; and expenditure documentation from each agency that spent Fund monies, which included 12 county sheriffs' offices and 2 municipal police departments.
  - Interviewed officials from each law enforcement agency that was allocated Fund monies, which included 13 county sheriffs' offices and 2 municipal police departments, and obtained supporting documents such as contract proposals, contracts, and information relating to participating schools and public safety agencies.<sup>1</sup>
  - Interviewed personnel from each vendor that contracted with law enforcement agencies to provide interoperable communication systems using Fund monies, observed vendor demonstrations of each interoperable communication system purchased using Fund monies, and reviewed vendor-provided documentation on each system's technical security specifications.
  - Interviewed officials from FEMA, the federal agency responsible for the national interoperable gateway system.

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<sup>1</sup> Coconino County Sheriff's Office was allocated Fund monies, but it declined to participate in the program and did not spend any Fund monies. Although there was no expenditure data for us to review, we did interview officials from the Coconino County Sheriff's Office.

► To assess compliance with applicable procurement policies, procedures, and recommended practices when procuring interoperable communication systems using Fund monies, we reviewed procurement documentation and vendor contracts associated with each system purchase and relevant county/city procurement policies and procedures, and contracting recommended practices issued by the National State Auditors Association.

► To assess the functionality of each interoperable communication system purchased using Fund monies and the ongoing use of the systems, we:

- Conducted end-to-end tests of interoperable communication systems between each law enforcement agency that spent Fund monies and reported a functioning system and a judgmentally selected participating school site. To complete each test, we visited each agency and school site; observed at least 2 test incidents using the interoperable communication system, 1 initiated by the school site and 1 initiated by the law enforcement agency; prompted and observed law enforcement and school staff to perform statutorily required system functionality; and observed each test incident's closure.

In total, we observed system tests at 8 of 14 agencies that had expended Fund monies. We did not observe system tests at 6 of 14 agencies that had spent Fund monies because these agencies reported that their interoperable communication systems were either in process of being implemented or were not functional at the time of our review. We judgmentally selected school sites for each of our 8 observed system tests based on school site participation in the interoperable communication program.

- For each school that we selected as part of the system tests described previously, we interviewed school staff including administrators, IT professionals, and safety professionals to learn about their safety technology infrastructure and practices, including emergency communication systems and any interoperable communication systems. We also toured school facilities, observed the test incidents described previously at the school site, and requested school staff to demonstrate certain system functionality to ensure systems were operating as intended. We also conducted facility tours, observations, and interviews about emergency communication systems at an additional 48 school sites, including some that participated in a law enforcement agency's school safety program. Additional information about our observations at all 56 school sites we visited will be included in our next special audit report on schools' key physical infrastructure that will be issued by December 31, 2026.

► To evaluate how Arizona's interoperable communication system practices and funding programs compared to recommended practices and other states' practices and programs, we judgmentally selected 6 states—California, Colorado, Florida, New Mexico, Ohio, and Texas—and reviewed applicable school safety and interoperable communication system information. We selected these states either because of their geographic proximity to Arizona or because they have implemented recent funding programs or statutory requirements for interoperable communication technologies. We also reviewed recommended practices for interoperable communication systems.

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 officials and staff at law enforcement agencies, school districts, charter schools, and interoperable communication system vendors we reviewed for their cooperation and assistance throughout the audit.



## ARIZONA AUDITOR GENERAL

Lindsey A. Perry, Auditor General

Melanie M. Chesney, Deputy Auditor General

**DATE:** January 20, 2026

**TO:** Representative Matt Gress, Chairman  
Senator Mark Finchem, Co-chairman  
Members, JLAC

**FROM:** Lindsey Perry, Auditor General

**SUBJECT:** Arizona State Board of Chiropractic Examiners Special Audit, January 2026  
Followup of Report 24-115

### Background

At its February 12, 2024, meeting, JLAC directed my Office to conduct a special audit of the Arizona State Board of Chiropractic Examiners (Board) to address 7 areas of concern related to the Board's operations. We contracted with the independent firm Sjoberg Evashenk Consulting, Inc. to conduct the audit. Our contract auditor's December 2024 audit identified several issues and made recommendations in each of the 7 areas and identified issues and recommendations in an additional area.

Specifically, the Board:

1. Regularly requested or subpoenaed information outside the scope of complaint allegations contrary to statute, potentially resulting in unwarranted disciplinary actions and lengthy complaint investigations.
2. Did not consistently apply statutes and rules regarding licensees' continuing education and recordkeeping and follow consistent practices when requiring licensees accused of sexual impropriety to undergo psychosexual evaluations, but consistently initiated investigations of complaints related to improper division of fees for patient referrals.
3. Did not always refer allegations of criminal wrongdoing, such as allegations of sexual contact and insurance fraud, to appropriate criminal justice agencies as required by statute, increasing public safety risks and potentially delaying or hindering criminal investigations.
4. Made progress resolving complaints dating back to 2018; however, as of May 1, 2024, 69 percent of its open complaints had been open for more than 180 days, and it took an average of 551 days to investigate and resolve high-priority complaints auditors reviewed, potentially impacting patient safety and causing undue burden for licensees under investigation for lengthy periods of time.

5. Encouraged its licensees to oppose legislation without clear statutory authority to do so, making statements that were potentially misleading and using its resources for purposes other than regulating the chiropractic profession.
6. Did not always comply with open meeting law requirements, including limiting the public's ability to address the Board during the call to the public, and altering 7 meeting recordings by deleting references to patients and licensees, thereby limiting the public's access to information.
7. Had not established processes for ensuring consistency in some Board practices and communicating changes in Board practices to licensees and the public, such as by developing substantive policy statements as authorized by statute, contributing to issues the contractor identified and potentially creating confusion among licensees and the public.
8. Did not comply with some State conflict-of-interest requirements, and its conflict-of-interest process was not fully aligned with recommended practices, increasing the risk that Board members and employees had not disclosed substantial interests that might influence their official conduct.

Our contract auditor made 28 recommendations to the Board, and the Board agreed with all findings and planned to implement or implement in a different manner all the recommendations. On January 17, 2025, we presented the initial special audit findings to the Joint Senate and House of Representatives Health and Human Services Committees of Reference.

Further, on January 13, 2026, our contract auditor issued the Board's followup report and found that the Board was in the process of implementing 25 of the 28 recommendations. For example, the Board:

- ▶ Adopted or drafted policies, procedures, and other written guidance that include:
  - Processes for identifying scopes of information the Board may request or subpoena, including requiring that all subpoenas be directly related to complaints and within the scope of the investigation and revising its subpoena template to limit standardized language to requests for responses to allegations and patient records.
  - Requirements for Board staff to review licensees' continuing education course certificates when reviewing renewal applications.
  - Guidance for consistently applying psychosexual evaluations during complaint processing and adjudication.
  - Requirements for referring complaints involving evidence of criminal wrongdoing to criminal justice agencies in some but not all cases.
  - A complaint-handling timeline that outlines the number of days for each step of its complaint-handling process.
  - A prohibition on Board members and staff encouraging licensees or the public to support or oppose legislation.
  - Requirements for Board member onboarding and annual training.
  - Requirements for helping to ensure compliance with the State's conflict-of-interest laws, such as requiring all Board members and staff to complete conflict-of-interest disclosure forms upon appointment or hire and annually thereafter.

- ▶ Created a standing legislative and Governance Committee to guide the Board in matters pertaining to legislation and advocacy activities, including communication of such matters to licensees.
- ▶ Developed and conducted or planned to conduct various trainings for Board members and staff on topics such as:
  - Issuing subpoenas.
  - Open meeting law requirements.
  - Conflict-of-interest requirements.

However, the Board had not implemented 3 recommendations to investigate and resolve complaints within 180 days, comply with all statutory open meeting law requirements, and consult with the Attorney General's Office's Open Meeting Law Enforcement team to determine what restrictions can be placed on speakers during the call to the public.

Additionally, our contract auditor identified 2 new problems related to providing timely and appropriate information to the public, including posting disciplinary actions on its website longer than allowed by statute and not maintaining a complete log of public records requests it received. As a result, our contract auditor made 4 new recommendations to the Board to address these issues.

We were asked to present information on our contract auditor's January 2026 followup report. Jeff Gove, Performance Audit Division Director, will provide an overview of information from that followup report.

**Attachment A** includes the Board's January 2026 special audit followup of Report 24-115.

### **Action required**

None. Presented for JLAC's information only.

## **Attachment A**

# **Special Audit Followup Report**

## **Arizona State Board of Chiropractic Examiners**



## ARIZONA AUDITOR GENERAL

**Lindsey A. Perry**, Auditor General

**Melanie M. Chesney**, Deputy Auditor General

January 13, 2026

Members of the Arizona Legislature

The Honorable Katie Hobbs, Governor

Executive Director Vander Veen  
Arizona State Board of Chiropractic Examiners

We have issued an initial followup report regarding the implementation statuses of the recommendations from the December 2024 *Special Audit of the Arizona State Board of Chiropractic Examiners* report (see report 24-115) conducted by the independent firm Sjoberg Evashenk Consulting under contract with the Arizona Auditor General. This audit was in response to a February 12, 2024, 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.

The December 2024 report made 28 recommendations to the Arizona State Board of Chiropractic Examiners. My Office contracted with Sjoberg Evashenk Consulting to conduct initial followup work with the Arizona State Board of Chiropractic Examiners, and as of this initial followup report, 25 recommendations are in process and 3 recommendations have not been implemented.

My Office has contracted with Sjoberg Evashenk Consulting to follow up with the Arizona State Board of Chiropractic Examiners again at 18 months to assess its progress in implementing the 28 outstanding recommendations.

Sincerely,

*Lindsey A. Perry*

Lindsey A. Perry, CPA, CFE  
Auditor General

The December 2024 Arizona Board of Chiropractic Examiners (Board) special audit found that the Board regularly subpoenaed or requested information outside the scope of complaint allegations, did not consistently apply statutes and rules regarding continuing education and record keeping, did not always report allegations of criminal wrongdoing to appropriate criminal justice agencies, did not resolve complaints within 180 days, engaged in advocacy activities with its licensees without clear statutory authority to do so, did not always comply with open meeting law, lacked established processes to ensure consistency in some practices, and did not comply with State conflict-of-interest requirements and recommended practices. We made 28 recommendations to the Board.

#### Board's status in implementing 28 recommendations

Implementation status	Number of recommendations
<input checked="" type="checkbox"/> Implemented	0 recommendations
<input type="checkbox"/> In process	25 recommendations
<input checked="" type="checkbox"/> Not implemented	3 recommendations

While performing our followup work, we identified problems in 2 additional areas—the Board's processes for posting disciplinary and nondisciplinary actions and orders on its website and for fulfilling public records requests. We discuss these 2 additional areas on pages 16 through 17 following our discussion of the audit findings and recommendations and made 4 additional recommendations to the Board to help ensure the Board complies with statutory requirements for posting licensee information on its website and appropriately and timely responding to all public records requests. We will conduct an 18-month follow-up with the Board on the status of the recommendations that have not yet been implemented.

#### **Finding 1: Board regularly requested or subpoenaed information outside the scope of complaint allegations contrary to statute, potentially resulting in unwarranted disciplinary actions and lengthy complaint investigations**

1. The Board should cease its practice of subpoenaing and requesting information that is unrelated to complaint allegations when investigating complaints.

**Implementation in process**—In October and December 2025, the Board adopted policies regarding its complaint intake and investigation processes. These policies require the Board's Executive Director, Deputy Director, and assigned Assistant Attorney General (referred to as the "Intake Committee") to meet bi-weekly to review and establish investigative parameters for newly

received complaints based on identified allegations. The Intake Committee's responsibilities include determining whether to investigate a complaint and identifying appropriate scopes of information the Board may request or subpoena according to complaint allegations and Intake Committee-designated "complexity" levels. The Board also developed a guide for its staff that lists documentation that may be appropriate to request by allegation type and complexity and provided a memo to staff that further outlines the types of records that may be appropriate to request by the level of complexity of the complaint. To address the audit report finding that the Board's use of boiler-plate language in requests and subpoenas led to consistent unwarranted scope expansions, the Board also adopted a new subpoena template that limits standardized language to requests for responses to allegations and patient records, and staff training on subpoenas is planned for January 2026 and will be part of new investigator onboarding training going forward.

The Board's policies also require all new complaints to be reviewed by the Board's Executive Director and assigned Assistant Attorney General, who utilize a standard form to describe the allegations, the statutes and/or rules that authorize Board investigation, the specific records sought, and a justification for requesting or subpoenaing the records by stating investigative need. The policies specify that all subpoenas must align with statutory and rule-based authority, must be directly related to the complaint and within the scope of the investigation, and that the Board's Executive Director and assigned Assistant Attorney General must follow specified procedures during the intake process, including reviewing the subpoena before it is issued. Given the recent adoption of these procedures, we will further assess the Board's implementation of this recommendation during our next follow-up.

2. The Board should cease the practice of using investigations as a means to monitor compliance with continuing education requirements and to evaluate the quality of a licensee's recordkeeping, and develop administrative procedures for reviewing these matters outside of the complaint investigation process.

**Implementation in process**—The Board reported no longer monitoring continuing education compliance or evaluating the quality of a licensee's recordkeeping via the complaint handling process. Our review of subpoenas or requests for information for 10 of 59 complaints received or opened by the Board since the issuance of the audit report on December 20, 2024, revealed that none included requests for information relating to continuing education. However, as of October 2025, none of the 59 complaints were resolved, so full implementation of this recommendation will be assessed during our next followup.

Additionally, the Board adopted a policy requiring licensees to submit continuing education documentation during the licensing renewal process and directing Board staff to review a licensee's continuing education course certificates before approving a renewal application. In addition to requiring staff to verify continuing education compliance upon license renewal, the policy also allows Board staff to regularly audit licensees' continuing education. However, the Board has not developed procedures to evaluate licensee recordkeeping outside the complaint handling process. We will further assess the Board's implementation of this recommendation during our next followup.

3. The Board should develop and implement policies and/or procedures that include guidance for Board staff to tailor information requests and subpoenas that are directly related to the complaint filed and within the scope of the investigation.

**Implementation in process**—As explained in recommendation 1, the Board adopted a complaint intake policy establishing an Intake Committee that is responsible for identifying appropriate scopes of information the Board may request or subpoena. The intake policy requires the Intake Committee to identify and record information about the complaint and the investigative scope in one document for all investigative staff to reference, including a complaint summary, itemized allegations, and potential violations of statute and rule, which investigators are required to use to inform the development of subpoenas or information requests. The Board also established a subpoena development guidance form and revised its subpoena template, which limits standardized language to requests for responses to allegations and patient records. Finally, in December 2025, the Board adopted a policy covering its investigation processes. Together, these policies require new complaints to be reviewed by the Board's Executive Director and assigned Assistant Attorney General and identify documents to be included in the request for information or subpoena. Board policy also requires the Executive Director and assigned Assistant Attorney General to review subpoenas before they are issued. Given the recent adoption of these policies, we will further assess the Board's implementation of this recommendation during our next followup.

4. The Board should develop and implement a documented process for the Board's Executive Director and legal counsel to review subpoenas to help ensure that the information requested or required to be provided is directly related to the complaint filed and within the scope of the investigation.

**Implementation in process**—See explanation for recommendation 3.

5. The Board should include information in its subpoenas informing licensees regarding their ability to petition the Board or the Courts to revoke, limit or modify the subpoena, consistent with the practice of the Superior Courts of Arizona.

**Implementation in process**—The Board revised its subpoena template to include a paragraph advising licensees of their ability to petition the Board or the Courts to revoke, limit, or modify a subpoena. The Board has also adopted a letter for licensees to accompany any subpoena that provides information and instructions for petitioning to revoke, limit, or modify a subpoena. We reviewed 3 subpoenas the Board issued after the audit report was published December 20, 2024, and found that all 3 included the revised language. Our review of these 3 subpoenas revealed that in no case did the recipient petition the Board or court to revoke, limit, or modify the subpoena. To ensure consistent implementation over a longer period of time, we will further assess the Board's implementation of this recommendation during our next followup.

**Finding 2: Board did not consistently apply statutes and rules regarding licensees' continuing education and recordkeeping, but did consistently initiate investigations for complaints related to improper division of fees for patient referrals**

6. The Board should conduct a formal review of its use of psychosexual evaluations to assess and document their relevance and appropriateness in evaluating a chiropractor's professional competence. If determined appropriate, it should develop and implement policies, procedures, and/or guidance for when to order a licensee to complete psychosexual evaluation, including outlining how the Board will use the evaluation results.

**Implementation in process**—The Board began a review of its use of psychosexual evaluations by conducting a limited review of pertinent literature.<sup>1</sup> In December 2025, the Board adopted a policy to guide the Board in consistently applying psychosexual evaluations during complaint processing and adjudication by identifying what may trigger the use of these evaluations, the training psychosexual evaluators must complete, the documentation requirements for psychosexual evaluation referrals, the core components evaluations must include, and how the Board should address completed evaluations. The Board reported that it has not received any cases requiring a psychosexual evaluation since we issued our December 2024 special audit report. Given the recent adoption of this policy, we will further assess the Board's implementation of this recommendation during our next followup.

**Finding 3: Board did not report allegations of criminal wrongdoing to appropriate criminal justice agencies as required by statute for applicable complaints we reviewed, with 1 exception, increasing public safety risks and potentially delaying or hindering criminal investigations.**

7. The Board should revise and implement its policy to require it to report all allegations of evidence of criminal wrongdoing to the appropriate criminal justice agency within 48 hours.

**Implementation in process**—In December 2025, the Board adopted a policy that requires the Board to refer complaints to criminal justice agencies if evidence of criminal wrongdoing is found, and to do so within 48 hours of the determination. Statute requires the Board to report all allegations of evidence of criminal wrongdoing to the appropriate criminal justice agency, and the adopted policy falls short of this standard.

Since being informed of this problem during the audit engagement, the Board reported receiving 2 allegations involving potential criminal wrongdoing during the fall of 2024, and that it reported these allegations to criminal justice agencies in April and May 2025. In both instances, the Board reported allegations of potential criminal wrongdoing to the appropriate authorities, but did not do

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<sup>1</sup> This literature included a sexual violence prevention report by the Arizona Department of Health Services, an article on the role of chiropractic leadership in the eradication of sexual abuse published by the Canadian Chiropractic Association, and a Substantive Policy Statement from a fellow Arizona health profession licensing board concerning the handling of criminal conduct, including sexual misconduct

so within 48 hours of receiving such evidence. We will further assess the Board's implementation of this recommendation during our next followup.

8. The Board should revise and/or develop and implement policies or procedures that include requirements and guidance for Board staff to coordinate with criminal justice agencies when conducting complaint investigations that include allegations of criminal wrongdoing. At a minimum, the requirements and guidance should outline how Board staff should work with criminal justice agencies to share information and/or coordinate investigations with criminal justice agency personnel and when and how its staff should review the results of these agencies' investigations.

**Implementation in process**—Board staff reported having gathered and reviewed applicable policies and procedures from other State regulatory boards, as well as literature on and audits of health regulatory boards to identify best practices for collaborating with criminal justice agencies during parallel investigations, and that the Board hired an investigator with criminal justice investigative experience. Additionally, the Board's policy revision discussed in recommendation 7 for reporting evidence of criminal wrongdoing to criminal justice agency directs staff to coordinate with the relevant agency throughout an investigation, but it does not provide guidance regarding how Board staff should work with criminal justice agencies to share information or materials, coordinate investigations with criminal justice agency personnel, or when and how its staff should review the results of these agencies' investigations. The Board has also drafted a policy addressing how it will share materials as allowed by law and review the criminal justice agency's investigative outcome for possible Board action and the Executive Director intends to bring the draft policy to the Board in January 2026. We will further assess the Board's implementation of this recommendation during our next followup.

9. The Board should provide training for Board members and staff on its policies and procedures related to reporting allegations of criminal wrongdoing to criminal justice agencies.

**Implementation in process**—The Board has adopted a policy for reporting allegations of criminal wrongdoing to criminal justice agencies, as discussed in recommendation 7. The Board also adopted a separate Board member training policy in October 2025 that specifies that Board members will receive monthly training on a variety of topics, including training on handling allegations of criminal wrongdoing on an annual basis (see recommendation 22 for more information on the Board member training policy). In addition to Board member training, the Board also reported holding monthly meetings for Board staff to review sections of governing statutes—including Arizona Revised Statutes (A.R.S.) §32-924, which covers the requirement to report criminal allegations—and corresponding rules.<sup>2</sup> We will further assess the Board's implementation of this recommendation during our next followup.

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<sup>2</sup> A.R.S. §32-924(J) states that the Board shall report allegations of evidence of criminal wrongdoing to the appropriate criminal justice agency.

**Finding 4: Board has made progress in resolving complaints dating back to fiscal year 2018 but continued to not resolve complaints within 180 days, which may affect patient safety and cause undue burden for licensees under investigation for lengthy periods of time.**

10. The Board should resolve complaints within 180 days.

**Not Implemented**—The Board received 59 complaints between December 20, 2024, and September 25, 2025. As of October 2025, the Board had not resolved any of the complaints, and 11 of 59 complaints have been open for more than 180 days. See recommendations 11 through 13 for additional information on the steps the Board is taking to help it resolve complaints within 180 days and prioritize high-priority complaints for investigation. We will further assess the Board's implementation of this recommendation during our next followup.

11. The Board should develop and implement time frames for the various steps in its complaint investigation and resolution process based on severity-ranking, including notice of complaint, initial action, and final resolution.

**Implementation in process**—The Board reported reviewing the complaint-handling policies of other State regulatory boards, its existing complaint prioritization classifications, and the overall and sub-timelines of its prior complaints and, in December 2025, adopted a complaint handling timeline that outlines the number of days for each step of its complaint handling process. The timeline includes time frames for logging a complaint upon receipt, receiving the licensee's written response, and bringing the complaint before the Board for its review. The Board reported continuing to refine these timelines to effectively manage complaints and meet the goal of resolving complaints within 180 days. Given the recent adoption of this policy, we will further assess the Board's implementation of this recommendation during our next followup.

12. The Board should ensure high priority complaints are investigated and prioritized for Board review before low priority complaints by investigating and prioritizing Board review for high-priority complaints according to the developed time frame.

**Implementation in process**—In December 2025, the Board adopted a complaint prioritization matrix that categorizes complaint allegations by complexity (high, medium, and low), and dictates the priority with which these should be handled by Board staff via corresponding time frames for review and resolution. For example, according to the matrix, a high complexity complaint, such as an allegation of substance use during practice, should undergo initial review within 2 business days, and initial investigation and any needed interim action, such as an order for substance use testing, should be taken within 5 business days. Conversely, a low complexity complaint, such as a minor procedural allegation with minimal impact on patient safety, should undergo initial review within 14 days. This policy establishes timelines for key steps of the complaint handling process, irrespective of complexity level, methods to track complaints based on complexity, and executing key functions of the complaint handling process. Given the recent adoption of this policy, we will further assess the Board's implementation of this recommendation during our next followup.

13. The Board should avoid delaying complaint adjudication when the parties of the complaint may be subject to civil litigation unless necessary, and ensure timely completion of all complaints based on their severity level regardless of whether related complaints may be adjudicated by other agencies or courts unless otherwise ordered to do so by an appropriate authority.

**Implementation in process**—According to the Board, although it intends to avoid delaying complaint adjudication when the parties may be subject to civil litigation, unless necessary, it has not received any complaints subject to civil litigation since we issued our December 2024 special audit report. We will further assess the Board's implementation of this recommendation during our next followup.

**Finding 5: The Board engaged in advocacy activities with its licensees without clear statutory authority to do so, and in these efforts, made statements that were potentially misleading to its licensees, and used its resources for purposes other than regulating the chiropractic profession.**

14. The Board should immediately discontinue efforts to persuade licensees to support/oppose legislation, including using public resources to advocate for its position.

**Implementation in process**—In December 2025, the Board adopted a policy prohibiting Board members and staff from encouraging licensees or the public to support or oppose legislation. The Board has taken the additional step of creating a standing Legislative and Governance Committee to guide the Board in all matters pertaining to legislation and advocacy activities, including communication of such matters to licensees. In addition, the Board reported that it has not engaged in any advocacy campaigns since those cited in our December 2024 report. We will verify that the Board is no longer engaged in advocacy campaigns to persuade licensees on legislative matters during our next followup. See recommendation 15 for additional information on steps the Board is taking related to lobbying and advocacy activity.

15. The Board should develop and implement Board policies and procedures related to lobbying and advocacy activities, including:

- a. Specifying that any efforts to influence legislation should be conducted through the Board's designated public lobbyist and within the framework provided by statute.
- b. Developing a protocol for communicating with licensees about legislative issues to ensure the Board is providing complete and accurate information.

**Implementation in process**—Board staff reported reviewing guidance for complying with Arizona statutes and rules concerning lobbying and advocacy activity from other health profession regulatory boards. As discussed in recommendation 14, the Board also adopted a policy prohibiting Board members and staff from encouraging licensees or the public to support or oppose legislation. The adopted policy includes provisions for complying with State lobbying requirements, including defining when the Board may take official positions on legislation relevant to its governance of the chiropractic profession and specifying that Board updates to the public concerning legislation must be factual, non-advocacy-based, and compliant with Arizona lobbying

statutes. The policy also includes a process for communicating legislative issues to all stakeholders, including licensees and registered business entities, and also requires training for Board members and staff to help ensure adherence to the new policy. The Board reported that the training is scheduled for its January 2026 Board meeting.

However, the policy does not fully address the recommendation. Specifically, the policy specifies that “grassroots efforts” are exempt from Arizona lobbying registration requirements. Although the Executive Director clarified that this exemption is intended to provide for a Board Member’s right to free speech independent of their role with the Board, this provision could be misconstrued as supporting advocacy actions by Board members or staff outside of statutorily-authorized lobbying activities. That is, it could be construed to permit the Board or Board members to solicit advocacy action from the chiropractic community, for which there is not explicit statutory authority to do so. The Executive Director reported that a Board member code of conduct is being developed, which will address this concern. Overall, while the Board has begun efforts to comply with this recommendation, elements of the provided policy under development could be construed as continuing to support some of the improper actions we previously identified. We will further assess the Board’s implementation of this recommendation during our next followup.

**Finding 6: Board did not always comply with open meeting law, including the call to the public, and altered 7 meeting recordings by deleting references to patients and licensees, limiting the public’s access to information on Board decisions and the public’s ability to address Board during public meetings.**

16. The Board should comply with all statutory open meeting law requirements including but not limited to ensuring meeting notices, agendas, executive sessions, minutes, and calls to the public are handled and documented as required by statute.

**Not implemented**—We reviewed 2 of 6 Board meetings held between January and September 2025, and found that the Board complied with some, but not all, provisions of open meeting law. For example, consistent with statute and guidance provided by the Arizona Attorney General, the Board posted both meeting agendas at least 24-hours before the meetings and did not interfere with or limit any public comments during the calls to the public.<sup>3</sup> However, the Board posted the audio recording for the January 22, 2025, meeting 8 days after the meeting, later than the 5-day statutory requirement.<sup>4</sup> The Board also did not comply with all provisions of open meeting law by posting an incomplete audio recording of the meeting held on July 23, 2025. In this instance, the Board’s recording started after the meeting began, and the recording did not include a roll call identifying Board members in attendance, the date and time of the meeting, or the meeting location. The Board posted an “Audio Supplement” document along with the recording that included member and staff attendance, meeting location (virtual), and a Board member’s recusal that occurred before the recording began.

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<sup>3</sup> A.R.S. §38-431.02 and Arizona Attorney General Agency Handbook, Chapter 7, section 7.6.7.

<sup>4</sup> A.R.S. §§32-4801(A)(1) and (2); and 32-3222(B)(1) and (2)

In addition, for both the January 22, 2025, and July 23, 2025, Board meetings, the Board's posted agendas misused the *ad hoc* executive session provision, similar to what we found during the audit. As discussed in our December 2024 special audit report, the Attorney General has opined that public bodies may include a general statement on its notices and agendas indicating that matters on the meeting agenda may be discussed in executive session on an *ad hoc* basis to receive legal advice that may be required during the course of a public meeting, but which cannot be anticipated at the time the agenda was prepared. The *Attorney General Agency Handbook* specifically states that generic or *ad hoc* "statements are not sufficient for other types of executive sessions."<sup>5</sup> However, for both of these meeting agendas, the Board included a statement that it may enter into executive session on agenda items as needed, not only for legal advice, but also to discuss confidential records or information, despite the Attorney General's opinions indicating the *ad hoc* provision is only to be used for legal consultation. The statements in the 2 agendas also did not cite the statutory authority that would authorize the Board to enter into executive session according to this *ad hoc* provision, as required by statute.<sup>6</sup> We will further assess the Board's implementation of this recommendation during our next followup.

17. The Board should consult with the Open Meeting Law Enforcement Team within the Attorney General's Office to determine what type of manner restrictions it can place on speakers during the call to the public, including whether it can prohibit speakers from discussing information the Board is required to keep confidential.

**Not Implemented**—Although the Board reported that it has not yet consulted with the Open Meeting Law Enforcement Team, it chose instead to consult with its newly assigned Assistant Attorney General representative.

The Board developed guidance for members of the public who wish to participate in calls to the public that explains the purpose of the call to the public and outlines key elements of due process and confidentiality for public speakers to observe during their comments. As discussed in recommendation 16, we reviewed 2 of 6 Board meetings held between January and September 2025, including the calls to the public. Our review of the calls to the public during these 2 Board meetings found that the Board did not interfere with or limit any public comments. We will further assess the Board's implementation of this recommendation during our next followup.

18. The Board should develop and implement a policy and revise its call to the public script to specify the time, place, and manner restrictions for calls to the public that are consistent with guidance it receives from the Open Meeting Law Enforcement Team within the Attorney General's Office.

**Implementation in process**—In conjunction with the guidance document for public participation in the call to the public explained in recommendation 17, Board staff also reported reviewing the policies of other health profession regulatory boards concerning call to the public guidance, developed a Board meeting conduct policy, and revised the Board's call to the public script accordingly. The revised script identifies the limitations of the call to the public—such as that the

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<sup>5</sup> Arizona Attorney General Agency Handbook, Chapter 7, section 7.6.7.

<sup>6</sup> A.R.S. §38-431.02(B). If an executive session is scheduled, a notice of the executive session shall state the provision of law authorizing the executive session

Board cannot take action on matters raised during call to the public unless explicitly on the meeting agenda—and asks that speakers refrain from discussing personal health information, names of patients, or making speculative statements about open investigations. We will further assess the Board's implementation of this recommendation during our next followup.

19. The Board should post unaltered meeting recordings as required by statute, and cease the practice of deleting information from recordings.

**Implementation in process**—The Executive Director reported that the Board has posted unaltered meeting minutes for all 6 Board Meetings held between January and September 2025. Additionally, our review of 2 of these 6 meetings reviewed did not identify any indications that information that had been deleted previously, such as the names of patients, had been deleted. However, as described in recommendation 16, 1 of the 2 recordings reviewed was incomplete, starting in the middle of the Board's discussion of an agenda item. We will further assess the Board's implementation of this recommendation during our next followup.

20. The Board should provide regular training, during onboarding and annually, for all Board members and staff on Arizona's open meeting law, including specific requirements for meeting notices, agendas, executive sessions, minutes, and the call to the public.

**Implementation in process**—As of October 2025, our review of Board training documentation found that the Board has adopted a new annual Board member training policy, discussed in recommendation 9, that specifies that the Board will provide training on compliance with Arizona Open Meeting law every year, and the Board conducted a special Open Meeting Law training in December 2025. At the same time, the Board adopted a policy on confidentiality and implemented a memo that accompanies monthly Board meeting materials to members detailing the Board's confidentiality requirements. Specifically, the memo includes the open meeting law requirement of limiting discussion of cases before the Board to during public meetings and as detailed on the agenda. Finally, the Board has drafted a separate memo from the Executive Director to be sent to Board Members reminding members of open meeting law confidentiality requirements, such as withholding personally identifiable information—including patient names—from public discussion, the Board's practice of the Board Chair giving a pre-meeting reminder of confidentiality rules, handling public comments that mention confidential information by immediately reminding the speaker to avoid disclosing confidential information, the purpose of executive sessions for discussing confidential details, the requirement to post complete, non-redacted meeting minutes, and the prohibition on photocopying, sharing, or otherwise disseminating Board materials. We will further assess the Board's implementation of this recommendation during our next followup.

**Finding 7: Board's Executive Directors—past and present—have not established processes for ensuring consistency in some Board practices and communicating changes in Board practices to licensees and the public, resulting in several issues we identified during this audit and potential confusion among licensees and the public.**

21. For all complaints received moving forward, the Board should use the Disciplinary and Sanctioning Guidelines adopted in July 2024 when adjudicating complaints to determine appropriate disciplinary and nondisciplinary actions to address violations.

**Implementation in process**—While the report acknowledged that the Board had developed the Disciplinary and Sanctioning Guidelines in July 2024, the Board reported being in the process of updating the guidelines to reflect and incorporate some of the recommendations from our December 2024 special audit report, which was issued after adoption of the guidelines in July 2024. Specifically, the Board intends to add assessment tools, such as the psychosexual evaluation discussed in recommendation 6, into the guidelines. The Board plans to adopt an updated Disciplinary and Sanctioning Guidelines document in spring 2026, and is preparing to do so by developing and implementing a remediation disciplinary matrix, which is a quick-reference guide with additional information. We will further assess the Board's implementation of this recommendation during our next followup.

22. The Board should develop and provide training to Board members regarding key Board functions, including but not limited to complaint handling, the State's open meeting law, and authorized lobbying/advocacy activities.

**Implementation in process**—The Board has adopted 2 new policies pertaining to Board member training, including an annual Board member training policy discussed in recommendations 9 and 20, and a new Board member onboarding policy. The Board's Executive Director is responsible for developing and providing the training or arranging for training to be provided by another state agency or third party.

The annual training policy establishes the types and timing of trainings for Board members, to be conducted annually. Training topics include:

- Board structure, roles, and ethical conduct;
- Licensing and certification processes;
- Investigations and complaint handling, including complaint receipt, review, jurisdiction, investigations, subpoena authority, and permissible scope;
- Disciplinary and non-disciplinary action and consistent application of statutes and rules;
- Formal proceedings and legal frameworks;
- Special investigation considerations, including handling of allegations of evidence of criminal wrongdoing and the use of psychosexual evaluations;

- Board operations, communications, and public access, including Open Meeting Law Compliance and public records; and
- Rules and guidance concerning legislative engagement, lobbying, and advocacy.

This policy also provides some information on Board members' roles, communication protocols, professional conduct, and training compliance expectations, and requires the Executive Director to track all training activity and review this information annually for inclusion in the Board's Annual Report that it posts to its website.

The Board's new member onboarding policy outlines mandatory training that the Executive Director will provide to new Board members, including a general orientation that includes: An overview of the agency, national affiliations of the Board, a review of pertinent statute and rule, licensing and certification requirements and processes and other applications and registrations regulated by the Board, examinations for chiropractic licensure, and the Board's regulation and enforcement of various requirements. The Board's new member training materials also comprehensively cover Board meeting protocols and best practices, including parliamentary procedures, the role of the Board Chair, agenda and Boardroom management, and understanding the general operations and guiding rules and practices of meetings. The policy also requires new members to take CLEAR Board Member Training—Level Two, which is a third-party training program for new members of government regulatory boards, within 1 year of their appointment as part of ongoing onboarding and professional development.

As discussed in Recommendation 9, the Executive Director plans to prepare training materials for all training topics by spring 2026. We will further assess the Board's implementation of this recommendation during our next followup.

23. The Board should continue to develop and implement its IT system, including developing and implementing management reports for overseeing its licensing and complaint-handling processes.

**Implementation in process**—In November 2025, the Board implemented a different licensing platform because of the delayed implementation of the system that was under development at the time of the audit, prohibitive costs for building this system to meet the needs outlined by the audit, and significant cost increases for the coming years. Finally, the Board reported having working sessions with the developer twice a week for 2 hours since September 2025 to ensure the new system aligns with the needs of the Board. We will further assess the Board's implementation of this recommendation during our next followup.

24. The Board should conduct research to identify standard processes or recommended practices for developing substantive policy statements, including but not limited to contacting and requesting information from other State agencies and health regulatory boards about their substantive policy statement processes.

**Implementation in process**—The Board reviewed the processes of other health profession regulatory boards, including the Arizona Board of Medical Examiners, the Arizona State Board of Nursing, and the Arizona Board of Behavioral Health Examiners, related to drafting, approving in open meeting, and publishing substantive policy statements. Based in part on this research, the

Board adopted a charter for a new standing Board Legislative and Governance Committee, which is responsible for monitoring, evaluating, and reporting on proposed legislation, regulatory changes, and policy changes impacting the chiropractic profession and Board operations. This includes matters addressed in the December 2024 special audit report, such as conflict-of-interest requirements, discuss and develop Board positions on legislation or regulatory matters, Board governance, and the development of substantive policy statements. The Board also developed guidance for this Committee in June 2025, which defines one of the Committee's purposes as developing substantive policy statements. The guidance document also outlines steps for developing substantive policy statements, including reviewing relevant statutes, administrative code and case law, as well as national and professional guidelines and other state board practices, consulting with stakeholders or subject matter experts, drafting questions and structured agendas to facilitate Board discussion of the substantive policy statements, and presenting recommendations for proposed substantive policy language to the Board. The guidance further defines pertinent documentation for Board staff to provide the Committee, such as relevant laws or regulations, literature, public input, legal guidance, and also identifies steps for maintaining transparency and engaging the public. We will further assess the Board's implementation of this recommendation during our next followup.

25. The Board should develop and implement policies and procedures for creating and using substantive policy statements and other methods for communicating important information about its activities and practices to external parties, including but not limited to clarifying and/or communicating changes to its practices.

**Implementation in process**—See explanation for recommendation 24. The Board also reported that it is currently updating its website to include a page for communicating important information about its activities and practices to external parties. According to the Board, it is considering developing a quarterly newsletter to post on its website, and will also post the Board's Annual Report, and annually prepare and post an educational legislative summary of the previous year's legislative session, to be drafted by the new Legislative and Governance Committee. We will further assess the Board's implementation of this recommendation during our next followup.

26. The Board should discontinue using emails to licensees to communicate information that instead should be communicated through substantive policy statements.

**Implementation in process**—As explained in recommendation 14, the Board reported it has ceased advocacy campaigns and has not issued a mass communication to licensees since October 2024. As explained in recommendation 24, the Board established a new standing Legislative and Governance Committee in part to develop substantive policy statements. According to the Board, it will develop substantive policy statements when necessary in lieu of sending emails to licensees. The Board also reported that it is in the process of developing and implementing policies for tracking legislation that may impact its licensees, creating guidelines for communicating regulatory updates to external parties in a neutral and unbiased manner, and implementing a specific section on the Board's website for posting updates outside of substantive policy statements, as explained in recommendation 25. We will further assess the Board's implementation of this recommendation during our next followup.

27. The Board should review prior communications issued through less formal methods and determine whether those communications should have been issued as a substantive policy statement and, if so, issue a substantive policy statement on the matter.

**Implementation in process**—The draft guidance for the Legislative and Governance Committee discussed in recommendation 24 includes a list of topics that the Committee will prioritize for developing substantive policy statements previously addressed by the Board through less formal communications, including email correspondence and notices posted on its website, as well as topics addressed in our December 2024 audit report. The specific topics identified in the draft guidance as a priority include psychosexual evaluations, 48-hour referral of criminal wrong-doing, fee splitting, business entity registration, and others. However, because the Legislative and Governance Committee has not yet formally addressed these matters, we will further assess the Board's implementation of this recommendation during our next followup.

**Finding 8: Board did not comply with some State conflict-of-interest requirements and recommended practices, increasing risk that employees and public officers had not disclosed substantial interests that might influence or could affect their official conduct.**

28. The Board should revise and implement its conflict-of-interest policies and procedures to help ensure compliance with State conflict-of-interest requirements and implementation of recommended practices, including:

- a. Requiring Board members and employees to complete a conflict-of-interest disclosure form upon appointment/hire, including attesting that no conflicts exist, if applicable, and reminding them at least annually to update their disclosure form when their circumstances change.
- b. Storing all substantial interest disclosures, including disclosure forms and meeting minutes, in a special file available for public inspection.
- c. Developing and implementing a process to track Board member/employee completion of conflict-of-interest disclosure forms, including the date the form was completed.
- d. Establishing a process to review and remediate disclosed conflicts.
- e. Providing periodic training on its conflict-of-interest requirements, process, and disclosure form, including providing training to all Board members and employees on how the State's conflict-of-interest requirements relate to their unique programs, functions, or responsibilities.

**Implementation in process**—The Board has taken multiple steps to implement this multi-faceted recommendation, including adopting a policy for ensuring compliance with Arizona state conflict-of-interest requirements that requires all Board members and employees to complete the ADOA Conflict of Interest Disclosure Form, which includes an “affirmative ‘no’” attestation, upon appointment or hire, annually in July, and whenever circumstances change; drafting a memo to Board members and staff communicating the new policy; preparing a single dedicated special file

containing annual disclosure forms and Board meeting recusals; developing a conflict-of-interest tracking sheet to track Board member and employee conflict-of-interest disclosure forms, including the date completed; and establishing conflict-of-interest training materials.<sup>7</sup> Additionally, the Board conducted conflict of interest training in October 2025. Given the recent adoption of the policy, we will further assess the Board's implementation of this recommendation during our next followup.

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<sup>7</sup> A.R.S §38-509. Every political subdivision and public agency subject to this article shall maintain for public inspection in a special file all documents necessary to memorialize all disclosures of substantial interest made known pursuant to this article.

## Additional issues and recommendations we identified during our follow-up review

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While performing our followup audit work, we identified problems in 2 additional areas that require corrective action. Below, we describe both and make 4 additional recommendations to the Board.

### **Board incorrectly posted information longer than allowed by statute and did not post other information required by statute.**

Statute requires the Board to post disciplinary and non-disciplinary actions taken by the Board on its website for up to 5 years, excluding dismissed complaints and nondisciplinary letters of concern and advisory letters, which must be available via public request.<sup>8,9</sup> While reviewing the Board's website for information pertinent to this follow-up review in September 2025, we found that the Board's webpage for disciplinary actions contains full documentation for 66 disciplinary actions taken more than 5 years ago, between 2015 and 2019, contrary to statute. The Board reported being unaware of this content still being available on the website, and we confirmed the noncompliant information had been removed as of November 2025. Further, although the Board reported posting nondisciplinary actions to the Board's licensee directory, there was no evidence of Board action for 2 licensees marked as having received nondisciplinary sanctions in the Board's complaint log. The Board reported that this issue was due to challenges with its complaint handling system, which the Board ceased using in November 2025, when it transitioned to a new licensing system.

#### **Additional recommendations to the Board:**

29. Remove disciplinary and non-disciplinary actions more than 5 years old from the Board's website and licensee directory.
30. Develop and implement procedures for timely posting all disciplinary and non-disciplinary actions to the Board's website and/or licensee directory; and for removing all disciplinary and non-disciplinary actions to the Board's website and licensee directory after 5 years.

### **Board did not maintain a complete log of public records requests received and lacked policies and procedures for how to respond to requests.**

Although the Executive Director developed and implemented a digital tracking sheet for public records requests in March 2025, the Board did not maintain one prior to this date, and was thus out of compliance

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<sup>8</sup> A.R.S. §32-3214(B). All disciplinary actions against a licensee or certificate holder shall be available on the health profession regulatory board's website for not more than five years. If a health profession regulatory board issues a final nondisciplinary order or action, the record of the final nondisciplinary order or action shall be made available on the board's website for not more than five years. Letters of concern and advisory letters may not be made available on the website but a copy of such letters are available to the public pursuant to section 39-121 and shall be provided to any person on request.

<sup>9</sup> A.R.S. §32-3214(A). If a health profession regulatory board dismisses a complaint, the record of that complaint is available to that regulatory board and the public pursuant to section 39-121 but may not appear on the board's website. For the purposes of this subsection, "dismisses a complaint" means that a board does not issue a disciplinary or nondisciplinary order or action against a licensee or certificate holder. A pending complaint or investigation may not be disclosed to the public.

with the statutory requirement to maintain adequate documentation of official activities.<sup>10</sup> Additionally, the Board provides a fillable public records request form on its website, but did not require individuals to use the form to submit a formal request and the website does not include a statement pursuant to statute that a person may obtain additional public records relating to any licensee or certificate holder by contacting the Board directly.<sup>11</sup> According to the Executive Director, in an attempt to expeditiously respond to public records requests without creating a burden on members of the public, the Board had taken a less formal approach to public records requests. In doing so, it did not require the public to complete and submit the form, formally document requests, or perform other administrative tasks designed to ensure compliance with statute.

Failing to adequately track the Board's receipt and response to public requests for information increases the risk that the Board will not comply with statutory requirements to account for its official activities and duties, timely respond to public information requests, and provide the public with licensee information that may inform personal health and safety decisions. For example, our review identified 1 instance in which the Board received a public records request in Fall 2024, later realized in March 2025 that it had failed to respond to the request, and ultimately provided documentation to the requestor by October 2025. A contributing factor to this delay was that the request for information was submitted by a party to a lawsuit filed against the Board. The Executive Director reported providing the request to in-house counsel and then experiencing turnover of counsel. Because the request was never logged or tracked, the Executive Director neglected to follow up with the Attorney General's office on the status of their review of the request and only became aware when the requestor raised the matter in March 2025. At this time, the Executive Director established the tracking log and worked with the Attorney General's Office to prepare the Board's response to the request.

#### **Additional recommendations to the Board:**

31. Develop and implement policies and procedures for timely receiving, acknowledging, and responding to public records requests according to statute.
32. Post a statement to its website pursuant to A.R.S. §32-3214(C) that a person may obtain additional public records related to any licensee or certificate holder, including dismissed complaints and nondisciplinary actions and orders, by contacting the board directly.

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<sup>10</sup> Pursuant to A.R.S. §39-121.01(B), all officers and public bodies shall maintain all records, including records as defined in A.R.S. §41-151, reasonably necessary or appropriate to maintain an accurate knowledge of their official activities and of any of their activities that are supported by State monies.

<sup>11</sup> A.R.S. §32-3214(C). If a health profession regulatory board maintains a website, the board must display on its website a statement that a person may obtain additional public records related to any licensee or certificate holder, including dismissed complaints and nondisciplinary actions and orders, by contacting the board directly.