

Arizona School Safety—Emergency Operations Planning

Initial Followup of Report 24-212

The December 2024 *Arizona School Safety—Emergency Operations Planning* special audit found that none of the school emergency operations plans (EOPs) we reviewed fully met the State’s EOP Minimum Standards, and none of the schools we reviewed had fully implemented and tested their plans; additionally, student safety could be enhanced State-wide through efforts to provide more guidance to schools, review and update the EOP Minimum Standards, monitor compliance, and clarify the role of emergency responders.

We made **24** total recommendations: **9** recommendations to school districts and charter schools; **3** recommendations to Arizona Department of Education (ADE); **9** recommendations jointly to ADE and Arizona Department of Emergency and Military Affairs (DEMA); **2** recommendations to charter sponsors—the Arizona State Board for Charter Schools (Charter Board) and Arizona State University (ASU); and **1** recommendation to the Legislature.

Districts’ and charters’ status in implementing 9 recommendations

Implementation status	Number of recommendations
 In process	8 recommendations
 Not implemented	1 recommendation

ADE’s status in implementing 3 recommendations

Implementation status	Number of recommendations
 Implemented	3 recommendations

ADE’s and DEMA’s status in implementing 9 recommendations

Implementation status	Number of recommendations
 Implemented	3 recommendations
 In process	5 recommendations
 Not yet applicable	1 recommendation

Charter sponsors’ status in implementing 2 recommendations

Implementation status	Number of recommendations
 In process	2 recommendations

Legislature’s status in implementing 1 recommendation

Implementation status	Number of recommendations
 Implemented	1 recommendation

Our work during this followup was based on the updated EOP Minimum Standards ADE and DEMA issued in August 2024, which became effective in July 2026. In August 2026, ADE and DEMA issued a subsequent update to the EOP Minimum Standards that will become effective in March 2027. We will review the status of these recommendations again at a 36-month followup after the updated EOP Minimum Standards have gone into effect.

Recommendations to all entities

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

Recommendations to districts and charters

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

► Status: **Implementation in process.**

For this followup, we reviewed a subset of both the EOP Minimum Standards requirements and the school EOPs that we assessed during the 2024 special audit and found that, although some schools have made progress toward developing compliant EOPs, continued work is needed. Our 2024 audit evaluated EOPs from 47 schools and found that none of the 47 fulfilled all 30 of the EOP requirements we evaluated during our review. For this followup, we judgmentally selected 14 standards based on their criticality in preparing schools to respond to emergencies, and we considered these selected standards when evaluating EOPs from 26 of 47 schools that we reviewed during the audit.¹ As further discussed in recommendation 13, ADE and DEMA issued updated EOP Minimum Standards in August 2024, which became effective in July 2026. We used these updated standards for our review to provide schools with more relevant and useful feedback as they revise their EOPs to meet the updated requirements.²

Through our EOP review process, we found that the 3 charter schools that lacked formal written EOPs during the audit have since developed them. We also found that schools with EOPs that had met requirements included in the 2019 EOP Minimum Standards, which we assessed during the audit, generally complied with the equivalent requirements in the 2024 updated standards. For example, most of the schools we reviewed during the audit and for this followup had EOPs that addressed plan activation and specified how the school would notify staff of an emergency.

However, similar to our audit findings, we also found that none of the 26 EOPs we evaluated for this followup met all 14 of the critical standards we selected for review. Additionally, many schools' EOPs continued to lack critical components that could impact schools' readiness to respond to emergency situations.

¹ We selected 30 schools for our EOP followup review, but were unable to review 4 schools' EOPs. Two of the schools reported to be in the process of developing and/or updating their EOPs and did not have completed EOPs available for review, 1 school had not made any changes to its EOP since the initial audit, and 1 school reported that it was unable to locate its EOP and may have lost or misplaced it.

² In August 2026, ADE and DEMA issued updated EOP Minimum Standards that will become effective in March 2027. ADE and DEMA reported that they developed the updated EOP Minimum Standards based on feedback from various organizations, including school districts and law enforcement agencies, and our 2024 special audit. The updates included standardized descriptions for Incident Command Structure (ICS) roles and emergency response scenarios; additional acceptable trainings for ICS staff to meet the mandatory training requirement; additional details to clarify some EOP Minimum Standards; and changes to certain requirements, such as requirements for emergency drills, drill debriefs, and posted safe reference materials.

For example, most of the school EOPs we reviewed for the audit, and subsequently for this followup, did not fully address previous or updated requirements for:

- Primary and alternate evacuation routes for on- and off-site evacuations.
- Procedures for accommodating students with disabilities or limited English language skills during emergencies.
- Emergency procedures for before- and after-school programs and off-campus activities.

Accordingly, districts and charters should continue taking steps to ensure they have developed an EOP for each school site in accordance with the relevant EOP Minimum Standards, as required by A.R.S. §15-341(A)(31).

Recommendations to ADE

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

▶ Status: **Implemented at 12 months.**

ADE reported its staff completed a review of State, local, and federal rules, regulations, and statutes related to school safety. Based on the review, ADE published an updated list of relevant requirements and statutes on its website and made the list available to the Arizona Charter School Association (ACSA), which also published ADE's updated list on its website. The updated list added references to A.R.S. §§15-183(E)(1) and 15-341(A)(31), which require charter schools to develop EOPs in accordance with the EOP Minimum Standards.

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

▶ Status: **Implemented at 12 months.**

ADE reported that its staff reviews applicable federal, State, local rules, regulations, and statutes at the conclusion of each legislative session to identify needed updates. To inform charter schools of their responsibilities, ADE reported that it participates in quarterly calls with the ACSA to discuss updates, training opportunities, and other information related to EOP and other requirements. Additionally, ADE staff presented information about charter school EOP requirements at the ACSA Compliance Summit in April 2026. ADE also produces a monthly newsletter, *Safety Spotlights*, to inform district and charter schools of legislative updates, school safety best practices, and EOP assistance tools, and ACSA began disseminating these newsletters to its members beginning in April 2026.

Recommendation to ADE and DEMA

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

► Status: **Implementation in process.**

Based on the findings from our 2024 special audit and ADE's own review of school EOPs, ADE reported that it is aware of the need to consider differences in school size and geographic location when supporting schools' EOP development. As such, ADE reported that it has taken steps to increase outreach and better engage geographically diverse school communities. For example, in January 2026, ADE hosted regional school safety conferences in Coconino, Pima, and Maricopa Counties to provide guidance and relevant updates to districts and charter schools on developing EOPs in accordance with EOP Minimum Standards. ADE reported it will continue to engage school districts and charters State-wide through regional conferences and school safety consortia in collaboration with the Arizona School Risk Retention Trust (Trust). It also reported plans to work with the ACSA to provide focused EOP trainings tailored to the unique needs of charter schools of various sizes and geographic locations. Additionally, DEMA reported that it continues to provide access to Federal Emergency Management Agency (FEMA) Incident Command System (ICS) and other emergency preparedness trainings through its website and will provide in-person trainings if requested.

ADE reported that its school preparedness specialists assist individual schools by reviewing EOPs, conducting on-site visits, and providing targeted EOP technical assistance calls. ADE also developed and posted resources for schools on its website, such as EOP development tips, a self-assessment checklist, and a supplemental checklist video. In conjunction with these efforts, ADE indicated that it is in the process of reviewing the EOP Minimum Standards with the Comprehensive School Advisory Council (Council) to make the EOP Minimum Standards clearer, more concise, and more adaptable for districts and charters.³ ADE convened the Council in February 2026 to gather input from stakeholders. Council membership includes representatives from school districts, charter schools and charter sponsors, school resource officers (SROs), emergency responders, school mental health professionals, and other partner organizations. ADE indicated as part of its review of the EOP Minimum Standards, it will incorporate feedback received from the Council, information from technical assistance calls, and observed implementation challenges.

However, during our review, we also found that many school districts and charter schools reported they continued to lack clarity about how to implement certain requirements set forth in State laws and the EOP Minimum Standards. For example, State law requires that EOPs address how schools and emergency responders will communicate with and assist students with disabilities during emergencies. During this

³ The Council was formerly called the School Preparedness Advisory Council (SPAC).

followup, several district and charter administrators reported needing clarity on what they are required to develop for students with disabilities and what should be included in their EOPs to meet this requirement. Accordingly, ADE and DEMA should continue to develop strategies for communicating updated guidance to school districts and charter schools to ensure schools are aware of and understand State laws and EOP Minimum Standards when developing their EOPs.

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

Recommendations to districts and charters

- 5.** Districts and charters should regularly conduct training for all staff, including substitute teachers, on their EOP and emergency procedures in accordance with the EOP Minimum Standards.

► Status: **Implementation in process.**

During this followup, we conducted site visits at 10 of 47 schools included in the 2024 special audit to evaluate, among other requirements, the status of their EOP training efforts. Each of the schools we visited reported offering emergency training to staff, which includes training on their respective EOPs. However, during our followup site visits conducted in May and June 2026, we found that, similar to the 2024 audit, schools continued to experience challenges with training substitute teachers and noninstructional staff members on school emergency response procedures. Specifically, we found that 7 of 10 school sites we visited could not demonstrate that all staff, including substitute teachers and noninstructional staff, received emergency response training in fiscal year 2026. In the 2024 special audit, we found that substitute teachers lacked an understanding of the schools' EOPs and emergency response procedures. By not ensuring all school staff are trained on its emergency response procedures, schools continue to increase the risk that substitute teachers and/or noninstructional staff may not know how to respond to school safety emergencies.

- 6.** Districts and charters should develop and implement procedures to track training attendance and ensure all staff receive EOP and emergency procedures training.

► Status: **Implementation in process.**

Almost all of the 10 school sites we visited during this followup had procedures to provide emergency response training and track staff attendance at training sessions held at the beginning of the school year. However, as discussed in recommendation 5, 7 of 10 school sites could not demonstrate that they had trained all staff on their emergency response procedures. Specifically, 6 of the school sites we visited lacked procedures to ensure they provided and documented attendance at emergency response training for substitute teachers, noninstructional staff, and/or instructional

staff who were hired after the beginning of the school year. A seventh school site had developed procedures to provide emergency response training and track attendance for all staff, but the procedures were insufficient to ensure the school provided training to all substitute teachers who are contracted through a third-party vendor.

7. Districts and charters should conduct lockdown and evacuation drills in accordance with the EOP Minimum Standards.

► Status: **Implementation in process.**

Our May and June 2026 followup review of drill documentation at 10 school sites found that, similar to our 2024 audit findings, most schools conducted all required evacuation drills. However, we found that some school sites counted unplanned evacuations in place of required monthly evacuation drills, which is not allowed by the International Fire Code, which EOP Minimum Standards require schools to follow. When we brought this to school officials' attention, many reported being unaware that unplanned evacuations did not qualify as an evacuation drill.⁴

Additionally, we found that the requirement to conduct 4 lockdown-type drills continued to pose a challenge for some schools. Almost none of the schools we reviewed for the 2024 audit had performed all required lockdown-type drills. Our followup review found that 4 of 10 schools had each conducted the required 4 lockdown-type drills, although 1 of these school sites did not document performing 1 of these drills while students were outside the classroom, as required by EOP Minimum Standards. By not performing required drills, schools increase the risk that students may not know how to respond to different types of drills or may experience panic or stress in actual school safety emergencies. Further, it could increase the risk that staff may not be aware of how students, including students with disabilities, will react during safety emergencies, and staff may not be prepared to respond appropriately when students experience panic or stress.

8. Districts and charters should hold debrief sessions after each drill in accordance with the EOP Minimum Standards and after each EOP activation.

► Status: **Not implemented.**

ADE has revised the EOP Minimum Standards for drill debrief sessions, and we found that the 10 schools we reviewed had not yet implemented the new requirements. At the time of our 2024 special audit, schools were required to conduct debriefing sessions after each drill, and 12 of 47 schools we reviewed had documented debriefing sessions for all the drills they conducted. ADE's August 2024 update to the EOP Minimum Standards specified new components that should be covered and documented during drill debrief sessions, such as areas for improvement and action steps to address any gaps or challenges identified during drills. Our May and June 2026 review of 10 school

⁴ In July 2026, ADE officials reported they were aware that many schools were unfamiliar with some emergency drill requirements, including the requirement for planned evacuation drills, through their discussions with school officials and other stakeholders. To address this issue, ADE and DEMA updated the EOP Minimum Standards, which they published in August 2026, to revise some emergency drill and drill debrief requirements. ADE officials also reported they are continuing to develop guidance for schools related to the updated EOP Minimum Standards.

sites' drill documentation found that none of the sites documented covering all the required components during drill debriefs. By not doing so, schools increase the risk that they do not identify and/or address deficiencies that could impact the timeliness and effectiveness of their emergency response.

9. Districts and charters should develop and implement procedures to document the results of each drill and debrief session and ensure issues identified are corrected.

► Status: **Implementation in process.**

During this followup, we reviewed drill debrief documentation at 10 of 47 schools included in the 2024 special audit to evaluate whether the schools' drill debriefs included the required components. While some sites reported changes to their drill and debrief session procedures, such as updating their methods for documenting drill debriefs, continued efforts are needed to develop and implement procedures to meet the updated EOP Minimum Standards. As discussed in recommendation 8, none of the school sites' debrief documentation included all the required components.

10. Districts and charters should develop safety reference materials and post these materials in classrooms, assembly areas, and transportation vehicles in accordance with the EOP Minimum Standards and ensure staff are familiar with their contents.

► Status: **Implementation in process.**

In August 2024, ADE and DEMA revised the EOP Minimum Standards that required safety reference materials to be posted in every classroom, assembly area, and school bus. The updated EOP Minimum Standards now require schools to store safety reference materials in each classroom and indoor assembly area for quick access, but the materials are no longer required to be posted in a visible location. For this followup, we visited 10 school sites and found that 2 met the updated requirement for maintaining safety reference materials in each classroom and indoor assembly area. We observed that the schools that did not meet the requirement generally had some safety reference materials available, but they were not readily available in each indoor assembly area or classroom, as required by the EOP Minimum Standards.

Additionally, the revised EOP Minimum Standards eliminated the requirement to post safety reference materials in school buses, which none of the 47 schools we reviewed for the 2024 audit met. The requirement now specifies that such materials must be readily accessible to student transportation drivers. However, the revised requirement was implemented at only 1 of 7 schools with student transportation programs that we visited during our May and June 2026 followup review.

11. Districts and charters should develop and implement procedures to regularly review school sites and transportation vehicles to ensure that required materials are posted and visible and staff are familiar with their contents.

► Status: **Implementation in process.**

During our followup, some school administrators reported updating their policies relating to emergency response materials to comply with the revised 2024 EOP Minimum Standards. However, as previously discussed, most of the school sites we visited lacked procedures sufficient to ensure safety reference materials were available in all required locations.

12. Districts and charters should develop and implement procedures to annually review and evaluate their EOP(s), including steps to document the review and provide stakeholders with any revisions, in accordance with the EOP Minimum Standards.

► Status: **Implementation in process.**

Although administrators at 8 of 10 school sites we reviewed during this followup reported having a policy to annually review their site's EOP, most lacked procedures outlining the steps for documenting the review and informing stakeholders of any revisions. Our EOP reviews at these school sites found that only 2 of 10 sites documented performing an EOP review within the past year.

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

Recommendations to ADE and DEMA

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

- a. Seeking input from relevant stakeholders, such as districts, charters, charter sponsors, SPAC, and law enforcement;

► Status: **Implemented at 12 months.**

In August 2026, ADE and DEMA jointly issued updated EOP Minimum Standards that will become effective in March 2027 and indicated that the new standards incorporated feedback from relevant stakeholders. As discussed in recommendation 4, ADE convened the Council in February 2026 to gather input from stakeholders and reportedly incorporated feedback from the Council, information from technical assistance calls, and observed implementation challenges in developing these updates. Both agencies also reported conducting other meetings with stakeholders, such as school district and public safety officials, to solicit feedback on the EOP Minimum Standards and any potential revisions to them.

- b. Reviewing relevant safety research and practices from other states and information contained in this report; and

► Status: **Implemented at 12 months.**

Our review found that recently developed EOP Minimum Standards updates and guidance reflect school safety research and best practices from other states and national sources. In developing the revised EOP Minimum Standard that were published in August 2026, ADE and DEMA both reported that they had reviewed our 2024 special audit report on emergency operations planning. Additionally, ADE reported reviewing relevant safety research and other states' practices. According to ADE officials, ADE's review of safety research and best practices focused on practices that emphasize integrated, systems-based approaches to school safety. Some key resources ADE indicated it had reviewed include the federal *Guide for Developing High-Quality School Emergency Operations Plans*, recommended practices from the Texas School Safety Center, and the *Comprehensive School Safety Framework* developed by the Safe and Sound Schools organization.

ADE further reported that it will continue to gather input from school districts, charter schools, and other stakeholders through regional school safety conferences, monthly regional consortia meetings, and the Council to develop guidance on developing EOPs and plan for future updates to the EOP Minimum Standards.

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

► Status: **Implementation in process.**

ADE and DEMA reported that they jointly reviewed the EOP Minimum Standards and evaluated whether EOP guidance should account for differences in school size, type, and geographic location. Further, ADE indicated that through its outreach, assistance, and guidance practices, it has found that rural school districts and charter schools have capacity and resource constraints that differ from larger urban schools. ADE reported that it and DEMA considered these factors and input from relevant stakeholders when developing the updated EOP Minimum Standards issued in August 2026.⁵

ADE further reported that it has developed and posted tips for developing EOPs and guidance documents on its website to support schools with diverse emergency planning challenges. ADE indicated that it is continuing to gather and incorporate feedback from stakeholders to make improvements to the guidance it provides to school districts and charter schools on EOP development. We will assess ADE's and DEMA's efforts to implement this recommendation after the updated EOP Minimum Standards have gone into effect and they have published updated guidance.

⁵ During our discussions with school district and charter school officials in August and September 2026, some officials reported they were not yet familiar with the updated EOP Minimum Standards. Some school district and charter officials reported they had communicated to ADE that they would not be able to meet the March 2027 deadline to implement the updated EOP Minimum Standards. ADE officials reported they are considering revising the implementation deadline to give schools more time to implement the updated standards.

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

► Status: **Implemented at 12 months.**

ADE and DEMA reported that they are working jointly to review and update the EOP Minimum Standards. According to the 2 agencies, DEMA's responsibilities include providing feedback and subject-specific assistance while reviewing the EOP Minimum Standards, and ADE is responsible for leading EOP Minimum Standards updates, coordinating stakeholder engagement, and providing guidance to school districts and charter schools. The 2 agencies participated in Council meetings, jointly reviewed the EOP Minimum Standards in April 2026, and reported they will continue to solicit feedback from stakeholders and consider updates to the EOP Minimum Standards. ADE further reported that it will continue to meet biennially with DEMA to review the EOP Minimum Standards and identify any necessary updates.

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

Recommendation to ADE

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

► Status: **Implemented at 12 months.**

ADE conducted a staffing and cost analysis for providing State-wide EOP compliance monitoring, and ADE indicated it had submitted its analysis to the Governor and Legislature. ADE also submitted to the Legislature a proposal for a State-wide School Safety Center (Center). To conduct its staffing and cost analysis, ADE collected data related to schools' demand for EOP reviews, review turnaround times, and staffing needs using the Educational Monitoring, Assistance & Compliance system (EMAC) that it implemented in December 2025. The EMAC was established to facilitate receiving and reviewing school EOPs, and ADE reported that its staff reviewed and provided feedback on 328 of 389 EOPs schools submitted through the system between February 1 and April 1, 2026.

ADE's staffing and cost analysis concluded that ADE's current school safety unit does not have the capacity to provide all district and charter schools with needed EOP technical assistance and support. The Center proposal requested an additional 10 FTE to assist in the administration of the School Safety Program, including 4 School Preparedness Specialists that would help ensure school EOPs comply with the EOP Minimum Standards.

Recommendations to ADE and DEMA

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

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

► Status: **Implementation in process.**

ADE determined the role of law enforcement and emergency response agencies is to support coordination and emergency planning efforts but not to approve or certify school EOPs. ADE reported that its determination is based on feedback received through the Council, which includes representatives from DEMA, local law enforcement, fire services, emergency management agencies, school districts, charter schools, and governing boards. However, ADE also reported that the extent to which law enforcement and emergency response agencies should support coordination and emergency planning efforts requires further clarification. Although ADE officials did not have a time frame for when this work would be completed, they indicated that ADE is continuing to collaborate with stakeholders, including law enforcement and emergency response agencies, to clarify roles and responsibilities.

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

► Status: **Implementation in process.**

ADE reported that it identified critical information for an effective emergency response, which it and DEMA incorporated into the EOP Minimum Standards revisions issued in August 2026. However, ADE indicated that schools retain responsibility for coordinating with emergency response agencies to develop their EOPs and for providing EOP information to relevant agencies to facilitate an effective emergency response. As such, ADE had not developed or implemented a process for schools to follow to annually submit information to relevant law enforcement and emergency response agencies, as recommended.

DEMA similarly had not taken action to develop or implement a process for schools to follow to submit critical emergency response information to relevant law enforcement and emergency response agencies. DEMA officials indicated that doing so is outside the agency's scope of authority. When we asked DEMA officials for additional details to support its assertion, they referred us to DEMA's response to the 2024 special audit in which DEMA indicates its statutory authority is limited to jointly developing the EOP Minimum Standards with ADE.

However, as discussed in the audit report, A.R.S. §15-341(A)(31) requires ADE and DEMA to jointly develop EOP Minimum Standards. Accordingly, ADE and DEMA are best positioned to ensure schools clearly understand and effectively implement the EOP Minimum Standards, including facilitating a process for schools to regularly submit critical emergency response information to relevant law enforcement and emergency response agencies.

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

► Status: **Not yet applicable.**

ADE reported that it worked with the Legislature to make statutory changes to clarify that charter schools are required to have an EOP that meets the EOP Minimum Standards. However, although ADE reported that it has identified that legislative action is likely needed to ensure law enforcement and emergency response agencies fulfill their roles related to school EOPs, ADE has not yet pursued any such legislative action. DEMA indicated that it has not identified any legislative actions required to ensure that agencies fulfill their roles related to school EOPs.

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

► Status: **Implementation in process.**

As discussed in recommendation 16(a), through its work with stakeholders, ADE determined that law enforcement and emergency response agencies' roles are to support coordination and emergency planning efforts, but additional work is needed to clarify the extent of these activities. Although ADE and DEMA indicated they are still gathering stakeholder input, both agencies have each taken steps to increase communication with and outreach to stakeholder groups. For example, DEMA updated its agency website to include links to ADE's EOP Minimum Standards guidance website and copresented information at the August 2025 Arizona School Administrators annual School Safety and Security Summit (Summit) on the EOP Minimum Standards with ADE and our Office. DEMA also reported participating in the November 2025 and June 2026 biannual all-hands meetings, during which DEMA reportedly provided updates to emergency management and public safety partners on new EOP Minimum Standards. Additionally, DEMA indicated that its staff can facilitate FEMA trainings for school districts upon a district's request. However, while DEMA communicated this training option to schools during the Summit, DEMA officials reported they have received few requests for these trainings as of September 2026.

In addition to its outreach efforts previously discussed, ADE reported making presentations in conjunction with a City of Surprise emergency manager at 3 school safety conferences held throughout the State in January 2026. These conferences focused on comprehensive school safety and engaging community partners.

Recommendations to charter sponsors

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

► Status: **Implementation in process.**

The Charter Board has taken several steps to ensure charter schools develop EOPs, as required, and the Charter Board reported it is developing additional strategies to ensure that charter school EOPs comply with the EOP Minimum Standards. The Charter Board reported that 1 of its members sits on the Council to provide feedback to ADE and DEMA, but it did not indicate that it has separately worked with local law enforcement or emergency response agencies to help ensure charter EOPs meet EOP Minimum Standards.

The Charter Board's efforts to ensure that each charter school site has an EOP include updating the charter application process to require new operators to submit an EOP no later than September 30 of the charter school's first year of operation. Additionally, the Charter Board reportedly incorporated a step to verify school sites have documented EOPs into the charter school reviews that it conducts during the first and second year of a charter school's operation and every 5 years as part of the charter renewal process. The Charter Board also provides a charter school site-visit compliance document on its website and reported that specialized accountability reviews, which are conducted periodically and on an as-needed basis, and applicable compliance investigations will now include verification that a charter school has an EOP.

In August 2026, ADE and DEMA issued an update to the EOP Minimum Standards, which will require schools to use an EOP template developed by ADE and DEMA when creating their EOPs. The Charter Board reported that once the updated EOP Minimum Standards become effective, the Charter Board will incorporate into its regular reviews an evaluation of whether sites' EOPs are complete and follow the template, as required.

In addition, the Charter Board reported that it has revised the performance framework it uses to annually evaluate charter schools' compliance with various charter, State, and federal requirements to include an EOP verification metric. The evaluation will also check to determine if the school site has collaborated with local law enforcement and emergency response agencies to develop its EOP. According to Charter Board officials, if issues related to school safety compliance are brought to the Charter Board's attention by a government entity such as ADE, the Charter Board will incorporate those findings into its annual oversight processes. According to the Charter Board, any EOP compliance issues that it identifies will be added to the charter holder's performance dashboard and could result in corrective action consistent with the Charter Board's established accountability processes.

ASU has also taken some steps to address this recommendation, but we found that additional work is needed to ensure all school site EOPs meet the updated EOP Minimum Standards. ASU, which sponsors ASU Preparatory Academy charter

schools (ASU Prep), reported facilitating reviews of ASU Prep schools' EOPs by law enforcement in September 2025. The ASU police department reportedly conducted the reviews using an EOP Minimum Standards checklist developed by ASU Prep and made recommendations for revisions that schools incorporated into their EOPs. ASU reported that the review is intended to ensure that schools meet the statutory requirement to develop their EOPs in conjunction with law enforcement and meet EOP Minimum Standard requirements. According to ASU, it expects ASU Prep to work with the ASU police department to ensure its school-site EOPs are reviewed annually and to provide documentation of the reviews as part of the 5-year charter renewal process.

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

► Status: **Implementation in process.**

As discussed in recommendation 19, ADE and DEMA issued an update to the EOP Minimum Standards in August 2026 that will require schools to create EOPs using an EOP template that ADE and DEMA developed. The new requirement becomes effective in March 2027. The Charter Board reported that once the updated EOP Minimum Standards are in effect, it will incorporate into its regular charter school review and renewal processes an evaluation of whether a charter school's EOP is complete and used the required template.

Although a State-wide monitoring process has not yet been developed, the Charter Board sits on the Council to collaborate with ADE and other stakeholders by providing feedback and gaining information about school EOPs and EOP Minimum Standards. The Charter Board indicated that it plans to continue collaborating with ADE through the Council and will share any relevant EOP information with charter schools. Additionally, the Charter Board has collaborated with the ACSA to ensure charter schools were informed of the EOP guidance and expectations that ADE has developed and made available on its website.

ASU reported it incorporated into its annual performance evaluation framework requirements for the schools it charters to develop EOPs that comply with EOP Minimum Standards. ASU reported that it will review documented evidence of the ASU police department's annual reviews of ASU Prep schools' EOPs to ensure compliance with ASU's recently developed EOP review process. However, despite its new process for its schools to work with ASU police department on their EOPs, we continued to find areas where the EOPs did not meet EOP Minimum Standards. Accordingly, additional work is needed for the newly developed review process to ensure all school site EOPs meet the updated EOP Minimum Standards requirements.

Recommendation to the Legislature

- 21.** The Legislature should, upon receiving ADE’s staffing and cost analysis, and the plan for monitoring compliance with the EOP Minimum Standards, consider revising statute to grant specific statutory authority to ADE to oversee and monitor districts and charters’ compliance with the EOP Minimum Standards.

▶ Status: **Implemented at 12 months.**

In 2026, during the fifty-seventh Legislature, second regular session, the Legislature considered House Bill 2142, which proposed establishing a State-wide School Safety Center (Center) within ADE. The proposed bill specified that the Center would be responsible for overseeing the existing School Safety Grant Program and ensuring districts’ and charters’ compliance with EOP Minimum Standards. The bill passed the House of Representatives on March 3, 2026, but did not pass in the Senate and was not enacted by the Legislature during the 2026 legislative session.