



November 25, 2024

Lindsey Perry, CPA, CFE, Arizona Auditor General  
Office of the Auditor General  
2910 North 44th Street, Suite 410  
Phoenix, Arizona 85018-7271

***Re: Auditor General's Special Audit Report—School Safety and Emergency Response Practices***

Dear Auditor General Perry,

Please find the Arizona State University (ASU) response to the Auditor General's Special Audit Report—School Safety and Emergency Response Practices. We appreciate the opportunity to respond to the Auditor General's recommendations regarding Emergency Operations Plans (EOPs) for charter schools. Ensuring student and staff safety is a top priority, and we fully support the development of consistent processes to enhance EOP compliance. While ASU does not have the capacity to independently monitor adherence to EOP Minimum Standards, we strongly advocate for a centralized, specialized agency to oversee this critical function.

In line with the recommendations, ASU has committed to updating its Performance Framework to ensure alignment with statutory requirements and best practices. Our response underscores a collaborative approach that leverages expertise and ensures equitable oversight across public schools, fostering safe and secure learning environments for all.

Sincerely,

A handwritten signature in black ink, appearing to read "James Rund".

James Rund  
Senior Vice President  
Educational Outreach and Student Services  
Arizona State University

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#### **Finding # 4**

**ASU Response:** The finding of the Auditor General is agreed to.

#### **Response explanation:**

**Recommendation 17:** Develop and implement processes to ensure charters meet the statutory requirement to develop an EOP for each school site that meets EOP Minimum Standards in conjunction with local law enforcement and emergency response agencies.

**ASU Response:** The recommendation of the Auditor General will not be implemented.

**Response Explanation:** ASU supports the establishment of a formalized process to ensure all schools, including charter and district schools, develop and maintain Emergency Operations Plans (EOPs) that meet the Minimum Standards. To achieve this, we recommend that a dedicated school safety organization be tasked with overseeing the development of these standards, monitoring practices, and ensuring compliance. This organization should collaborate with local law enforcement and emergency response agencies to align EOPs with statutory requirements and best practices.

ASU does not have the expertise or capacity to monitor whether schools meet EOP Minimum Standards. However, we fully endorse the creation of a consistent process under the leadership of a specialized entity with the requisite expertise. This approach would ensure equitable and effective implementation of EOPs across charter and district schools, thereby enhancing safety for all students and staff.

**Recommendation 18:** Incorporate charter school EOP compliance monitoring into the statutorily required review and renewal process and, for any state-wide monitoring process that may be developed, coordinate with the responsible agency or agencies.

**ASU Response:** The audit recommendation will be implemented in a different manner.

**Explanation:** ASU supports integrating Emergency Operations Plan (EOP) compliance monitoring into the statutorily required review and renewal process in coordination with a dedicated agency or agencies responsible for state-wide monitoring. ASU has adopted a comprehensive Performance Framework (framework) to annually evaluate the academic, financial, and operational performance of each ASU-authorized charter school. As part of this process, Section 5 of the Annual Performance Evaluation outlines clear expectations for operational performance, including compliance with health, safety, and facilities requirements.

ASU staff annually conduct a compliance check to ensure charter operators adhere to contractual and statutory obligations. Safety indicators, as outlined in Section 5(b) of the Performance Framework, include the requirement to maintain up-to-date emergency response plans (EOPs) compliant with the National Incident Management System (NIMS). Supporting

documentation is collected to substantiate compliance. If any operational noncompliance issues are identified, the charter operator must address them as part of its Five-Year Review.

In response to this recommendation, ASU will update Section 5(b) of the framework to clarify that EOPs must also meet the Minimum Requirements established by the Arizona Department of Education (ADE) and the Arizona Department of Emergency Military Affairs (DEMA) pursuant to ARS 15-341(A)(31).

While ASU supports consistent oversight of EOP compliance across charter and district schools, we recommend that this function be coordinated with a dedicated agency with expertise in monitoring and enforcing EOP standards. Requiring one agency to oversee all monitoring ensures consistent standards, avoids duplication of efforts, and leverages specialized expertise, whereas independent monitoring by each authorizer could result in variability and inefficiencies.