

Arizona

State Roles and Responsibilities for PK-12 Public School Facilities



2025 State Profile



**National Center on
School Infrastructure**



Authors & Acknowledgements

Author: 21st Century School Fund

This profile was created as part of the National Center on School Infrastructure (NCSI).

Disclaimers

This state profile represents our best understanding of state policies, standards, and laws governing public PK-12 educational facilities. Any errors or omissions are the responsibility of the authors. This document should not be considered an officially approved statement of state policy.

Contents of this profile were developed under Award #S184R230005 from the U.S. Department of Education. However, the contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.

Acknowledgements

The authors wish to thank the individuals from each state who reviewed and fact-checked each profile. We are grateful for their expertise and attention to detail.



**National Center on
School Infrastructure**

The National Center on School Infrastructure is a national resource hub that supports states and school districts in the stewardship of America's elementary and secondary public school facilities.



CONTENTS

ARIZONA EXECUTIVE SUMMARY	3
ARIZONA ELEMENTARY AND SECONDARY EDUCATION.....	6
<i>CONSTITUTIONAL BASIS</i>	<i>6</i>
<i>SCALE OF SCHOOL HOUSING</i>	<i>6</i>
ARIZONA PK-12 PUBLIC EDUCATIONAL FACILITIES GOVERNANCE.....	8
<i>LEGISLATIVE COMMITTEES AFFECTING FACILITIES</i>	<i>8</i>
<i>STATE BOARD OF EDUCATION</i>	<i>8</i>
<i>SUPERINTENDENT OF PUBLIC INSTRUCTION.....</i>	<i>9</i>
<i>GUBERNATORIAL ROLE IN SCHOOL FACILITIES</i>	<i>10</i>
<i>ARIZONA SCHOOL FACILITIES OVERSIGHT BOARD</i>	<i>10</i>
<i>Ad Hoc COMMITTEES, BOARDS, AND COMMISSIONS.....</i>	<i>11</i>
<i>Governor's Minimum Adequacy Guidelines Modernization Committee (2023-2024)</i>	<i>11</i>
ARIZONA PK-12 PUBLIC EDUCATIONAL FACILITIES MANAGEMENT	12
<i>ARIZONA DEPARTMENT OF EDUCATION</i>	<i>12</i>
<i>ARIZONA DEPARTMENT OF ADMINISTRATION, SCHOOL FACILITIES DIVISION</i>	<i>13</i>
<i>Supporting America's School Infrastructure (SASI) Initiative</i>	<i>14</i>
ARIZONA PK — 12 SCHOOL FACILITIES DATA MANAGEMENT	15
<i>Enrollment Data</i>	<i>16</i>
<i>Inventory Data</i>	<i>16</i>
<i>Design Data</i>	<i>16</i>
<i>Utilization Data</i>	<i>17</i>
<i>Condition Data</i>	<i>17</i>
<i>Budget and Finance Data.....</i>	<i>18</i>
<i>Facility Performance Data.....</i>	<i>18</i>
<i>Maintenance Planning.....</i>	<i>19</i>
<i>Capital Planning</i>	<i>20</i>
ARIZONA PK-12 EDUCATIONAL FACILITIES FUNDING.....	21
<i>JUDICIAL DECISIONS AFFECTING FACILITIES</i>	<i>22</i>
<i>MAINTENANCE AND OPERATIONS FUNDING</i>	<i>23</i>
<i>Emergency Deficiencies Correction Fund</i>	<i>24</i>
<i>FACILITIES CAPITAL FUNDING</i>	<i>24</i>
<i>New School Facilities Fund</i>	<i>25</i>
<i>Building Renewal Grant Fund</i>	<i>26</i>
<i>FACILITIES FINANCING.....</i>	<i>27</i>
ARIZONA PK — 12 SCHOOL FACILITIES STANDARDS AND ACCOUNTABILITY	28
<i>MAINTENANCE AND OPERATIONS STANDARDS</i>	<i>28</i>
<i>BUILDING STANDARDS.....</i>	<i>30</i>
<i>EDUCATIONAL ADEQUACY STANDARDS</i>	<i>31</i>
<i>HEALTH AND SAFETY STANDARDS.....</i>	<i>31</i>
<i>Air Quality.....</i>	<i>31</i>



Chemical Hazards 32

Extreme Heat..... 33

Water Quality 34

ENVIRONMENTAL AND ENERGY STANDARDS 35



ARIZONA EXECUTIVE SUMMARY

This document provides an overview of the state of Arizona's roles and responsibilities regarding public elementary and secondary (PK12) school facilities. It is part of a National Center on School Infrastructure technical assistance project to document public school facility policy and practice across all U.S. states and territories to help build state capacity for aiding districts in their efforts to provide students and staff with healthy, safe, resilient, and educationally adequate public school buildings and grounds.

The governance and management of PK-12 public school facilities are primarily managed at the local level.¹ Local Education Agencies (LEAs) have the authority and responsibility for the day-to-day operations and maintenance of public school facilities, as well as for long-term planning, design, financing, and construction.

States, however, also assume a range of roles and responsibilities regarding the governance and management of school facilities. These include establishing and implementing state policies and practices to support local PK-12 public school facilities planning, facility data collection, capital and maintenance funding for buildings and grounds, facilities management, and facility standards and implementing systems for accountability.



Governance & Decision Making



Management



Data & Information



Planning



Funding



Accountability

State agencies may additionally offer technical assistance and training to help districts meet modern facility standards, mitigate risks, and enhance the overall quality of local stewardship for public school buildings and grounds. The extent of state involvement in public school facilities varies widely across states.

Governance: Arizona's public school facilities governance is structured through multiple state-level entities. [The Arizona State Board of Education](#) (SBE), established

¹ This is true in all states, except Hawaii, which is a unitary state and local education agency.



under Article 11, Section 3 of the Arizona Constitution, adopts statewide procurement rules and prescribes minimum facility design standards. The Governor appoints members to the School Facilities Oversight Board (SFOB) and the Director of the Arizona Department of Administration (ADOA), which houses the School Facilities Division (SFD). The Legislature exercises oversight through standing committees and appropriations processes, with the Joint Legislative Budget Committee (JLBC) reviewing facilities contracts and budgets. Judicial decisions, particularly [Roosevelt v. Bishop \(1994\)](#), required the state to assume greater responsibility for providing and maintaining uniform and adequate school facilities. In response, the Legislature enacted the Students FIRST Act of 1998, which established the Minimum School Facility Adequacy Guidelines (MAG) as the baseline standard for all state-supported school construction, renovation, and repairs.

Management: Local Education Agencies (LEAs) in Arizona retain primary responsibility for the daily operations and maintenance of public school facilities. At the state level, the SFD administers facility assessments, oversees the Preventive Maintenance Program, coordinates Building Renewal Grant applications, and facilitates compliance with state adequacy standards, including the MAG. The Arizona Department of Education (ADE) collaborates with the SFD in administering federal and state grant programs affecting school infrastructure but does not directly manage facilities. The Governor’s Minimum Adequacy Guidelines Modernization Committee, convened in 2023, submitted recommendations for updating the MAG, which are under review by the SFOB as of 2025.

Data: Arizona maintains a centralized, statewide school facilities database managed by the SFD. School districts are required to submit annual updates on facility conditions, repairs, renovations, and preventive maintenance activities. The SFD also conducts physical inspections of school buildings or certifies district self-inspections every five years, as required under [A.R.S. § 41-5702](#). Facilities data informs the administration of funding programs, monitors compliance with the MAG, and supports long-range state facilities planning. Public access to facilities funding data is available through the School Facilities Division’s website, while detailed facility condition reports are accessible to districts through secure portals.

Planning: Arizona’s school facility planning process is primarily enrollment-driven. Districts must submit annual Capital Plans to the SFOB, identifying projected needs for new school construction or land acquisition based on [Average Daily Membership](#)



(ADM) forecasts. Capital Plans are reviewed by the SFD for compliance with space adequacy calculations based on the Minimum Adequacy Guidelines, which prescribe minimum square footage per pupil. Planning at the state level focuses on capacity needs and does not require reporting on broader building condition issues, security upgrades, or sustainability measures. Preventive Maintenance planning, required separately under [A.R.S. § 15-2002](#), operates independently from the Capital Plan submission process.

Funding: Arizona funds school facilities through a combination of annual General Fund appropriations, authorized bond issuances, and revenues from the lease and sale of state trust lands. Maintenance and Operations (M&O) funding is supported through local property tax revenues and state equalization assistance under [A.R.S. § 15-971](#). Major capital projects are financed through state-administered programs, including the New School Facilities Fund ([A.R.S. § 41-5741](#)), the Building Renewal Grant Fund ([A.R.S. § 41-5731](#)), and the Emergency Deficiencies Correction Fund ([A.R.S. § 41-5721](#)). The SFOB has authority to issue up to \$200 million annually in revenue bonds and up to \$800 million in School Improvement Revenue Bonds to support facility construction and deficiencies corrections. Arizona operates primarily on a pay-as-you-go basis, without a revolving capital fund, and allocates state resources annually based on legislative appropriations.

Accountability: Accountability for school facilities is structured around compliance with state-adopted facility adequacy standards, with the Minimum Adequacy Guidelines (MAG) serving as the central benchmark. Maintenance and operations requirements mandate that major building systems remain functional, with districts submitting preventive maintenance records annually and undergoing audits every five years. New construction and major renovations must comply with locally adopted building codes and meet MAG standards under [A.R.S. § 41-5711](#). Health and safety standards, including indoor air quality ([A.A.C. R7-6-215](#)), chemical hazard notification ([A.R.S. § 15-152](#)), and water quality ([A.A.C. R9-8-706](#)), are incorporated into state oversight. Arizona also enforces classroom temperature standards and encourages local policies for outdoor heat management. Environmental and energy standards promote high-efficiency system design and voluntary sustainability practices. The SFD provides technical assistance to help districts comply with reporting and adequacy requirements tied to funding eligibility.



ARIZONA ELEMENTARY AND SECONDARY EDUCATION

CONSTITUTIONAL BASIS

Public education is a state responsibility established in the Arizona State Constitution.

[Ariz. Const. Art. 11, § 1](#)

The legislature shall enact such laws as shall provide for the establishment and maintenance of a general and uniform public school system, which system shall include:

1. Kindergarten schools.
2. Common schools.
3. High schools.
4. Normal schools.
5. Industrial schools.

[Ariz. Const. Art. 11, § 6](#)

The legislature shall provide for a system of common schools by which a free school shall be established and maintained in every school district for at least six months in each year, which school shall be open to all pupils between the ages of six and twenty-one years.

[Ariz. Const. Art. 11, § 9](#)

The laws of the state shall enable cities and towns to maintain free high schools, industrial schools, and commercial schools.

Article XI, Section 1 of the Arizona Constitution requires the state to provide for "the establishment and maintenance of a general and uniform public school system." In [Roosevelt Elementary School District No. 66 v. Bishop, 179 Ariz. 233](#) (1994), the Arizona Supreme Court found that disparities in school facility conditions violated this constitutional requirement. As a result, Arizona law assigns certain responsibilities to the state to support school facility standards across school districts.

SCALE OF SCHOOL HOUSING

Arizona's 719 local education agencies (LEAs) reported to the U.S. Census of Governments that they operated 2,506 PK through 12th grade (and adult



education) schools in fiscal year 2022. These districts enroll about 1,114,995 students and are the workplace for about 110,517 staff. These schools encompass about 148,277,601 million gross square feet of building space statewide.



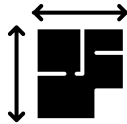
2,506

Schools



719

Districts



148,277,601

Sq. Ft.

Reported



110,517

Staff



1,114,995

Students

[\[1\]](#) U.S. Department of Education, National Center for Education Statistics, Common Core of Data (CCD), "Local Education Agency (School District) Universe Survey", FY2022; "State Nonfiscal Public Elementary/Secondary Education Survey", Fiscal Year 2022. State gross square feet of building space, provided by National Council on School Facilities state officials, or estimated by the 21st Century School Fund based on estimates of gross square feet by student, multiplied by 2021-2022 enrollments. **Data includes charter students, schools, and districts.**

The following sections describe Arizona's state-level roles and responsibilities for public school facilities.



ARIZONA PK-12 PUBLIC EDUCATIONAL FACILITIES

GOVERNANCE

State-level engagement in PK-12 public school facilities is firmly embedded in state systems. State boards of education, state education agencies, state legislatures, governors, and in some cases, independent commissions and facilities authorities make decisions about state roles and responsibilities associated with the quality and delivery of public school facilities. These bodies govern through state codes, regulations, standards, and budgets, which direct and influence local policies and practices regarding public school buildings and grounds. In some states, education finance equity and adequacy court cases have also played a role in defining state responsibilities for public school facilities.

LEGISLATIVE COMMITTEES AFFECTING FACILITIES

In Arizona, legislative oversight of education policy and school facilities is managed through standing committees of the Legislature.

- The [Senate Education Committee](#) and the [House Education Committee](#) consider legislation related to K-12 public education, including curriculum standards, school finance, accountability, and matters affecting school facility funding and management.
- The [Joint Legislative Budget Committee](#) (JLBC) provides fiscal analysis, prepares budget recommendations, and reviews contracts related to school facilities entered into by the Division of School Facilities under the Arizona Department of Administration, as prescribed in [A.R.S. § 41-5711](#). The JLBC also monitors appropriations affecting school district facility maintenance, repair, and construction.

These committees review and recommend legislation and appropriations that govern the maintenance, renovation, and construction of public school facilities statewide.

STATE BOARD OF EDUCATION

The authority of the [Arizona State Board of Education](#) (SBE) is provided for in [Article 11, Section 3](#) of the Arizona Constitution. The Board's duties and



composition are further defined by A.R.S. § 15-203.. The SBE consists of 11 members, including the elected Superintendent of Public Instruction and members appointed by the Governor and confirmed by the Senate, representing public and charter schools, higher education institutions, and the general public.

Under A.R.S. § 15-203, the State Board of Education is responsible for establishing statewide academic standards, prescribing minimum course requirements, selecting statewide assessments, and overseeing the state accountability system for public schools.

In addition to its academic responsibilities, the SBE adopts procurement rules that govern the bidding, contracting, and purchasing procedures for building renewal projects and new school construction undertaken by school districts. These procurement rules are codified in the [Arizona Administrative Code, Title 7, Chapter 2, Articles 10 and 11](#) (A.A.C. R7-2-1001 through R7-2-1195).

The State Board of Education also prescribes minimum standards for the design of school facilities for school districts, as provided in A.R.S. § 15-203(A)(14).

SUPERINTENDENT OF PUBLIC INSTRUCTION

The office of the [Superintendent of Public Instruction](#) is established by [Article 5, Section 1](#) of the Arizona Constitution. The Superintendent is elected by Arizona voters to a four-year term and serves as the executive officer of the Arizona Department of Education (ADE), directing its operations and overseeing the administration of K–12 public education programs pursuant to [A.R.S. § 15-231](#).

Under [A.R.S. § 15-2001](#), the Superintendent serves as a nonvoting member of the Arizona School Facilities Oversight Board (SFOB), participating in board discussions related to school facility construction, maintenance, and funding. Through the Arizona Department of Education, the Superintendent administers the distribution of state and federal education funds that support educational programs and operations within school districts. Capital funding for school facility construction and major renovations is administered by the School Facilities Oversight Board and the Division of School Facilities within the Arizona Department of Administration.



The Superintendent also serves as a voting member and secretary of the Arizona State Board of Education, implementing academic and operational policies established by the Board.

GUBERNATORIAL ROLE IN SCHOOL FACILITIES

The [Governor of Arizona](#) exercises authority related to public school facilities primarily through executive appointments, budget recommendations, and executive orders. The Governor appoints members to the School Facilities Oversight Board (SFOB) and the Governor’s Regulatory Review Council (GRRC), both of which influence regulatory and administrative aspects of school facility governance.

The Governor submits an annual executive budget to the Legislature, which includes funding proposals for school facility maintenance, building renewal, and new construction programs administered by the School Facilities Oversight Board and the Division of School Facilities within the Arizona Department of Administration. In addition, the Governor appoints the Director of the Arizona Department of Administration, who oversees the Division of School Facilities.

The [Governor’s Regulatory Review Council](#) (GRRC), established under [A.R.S. § 41-1051](#), reviews and approves or rejects administrative rules proposed by state agencies, including those that may affect school facilities. Under [A.R.S. § 41-1033](#)(C) and (D), individuals, including school districts, may petition the GRRC to review whether a substantive policy statement or practice improperly constitutes a rule or whether a rule fails to meet statutory requirements. The GRRC operates as a mechanism for regulatory oversight within the executive branch.

The Governor also holds emergency powers under [A.R.S. § 26-303](#), which may be used to mobilize state resources to address school facility needs arising from natural disasters or other declared emergencies.

ARIZONA SCHOOL FACILITIES OVERSIGHT BOARD

The [Arizona School Facilities Oversight Board](#) (SFOB) was established in 2021 following the restructuring of the former School Facilities Board (SFB) under [Laws 2021, Chapter 404](#). The SFB had been created in 1998 in response to the Arizona Supreme Court’s decision in *Roosevelt Elementary School District No. 66*



v. Bishop, 179 Ariz. 233 (1994), which held that disparities in school facility funding violated the state constitution's "general and uniform" requirement for public education. The Legislature enacted the Students FIRST Act, which established a state-managed system for school facility funding and oversight.

Under the 2021 restructuring, the responsibilities of the former School Facilities Board were divided between the newly created School Facilities Oversight Board and the Division of School Facilities within the [Arizona Department of Administration](#) (ADOA). The SFOB functions as a governing board responsible for approving grants, monitoring compliance with minimum adequacy guidelines, and overseeing programs related to the repair, maintenance, and construction of public school facilities, as authorized under [A.R.S. §§ 41-5701 to 41-5713](#).

The Division of School Facilities serves as the administrative and operational arm of the School Facilities Oversight Board, managing the implementation of board decisions, coordinating building renewal grants, emergency deficiencies corrections, and overseeing inspections to ensure compliance with established facility standards.

Ad Hoc Committees, Boards, and Commissions

GOVERNOR'S MINIMUM ADEQUACY GUIDELINES MODERNIZATION COMMITTEE (2023-2024)

In June 2023, Governor Katie Hobbs established the Governor's [Minimum Adequacy Guidelines Modernization Committee](#) through [Executive Order 2023-15](#). The Committee was tasked with reviewing and recommending updates to Arizona's minimum adequacy guidelines for public school facilities. Membership included representatives from large and small school districts, educators, public safety officials, and school architects.

The Committee submitted its [final report](#) to the Governor on November 15, 2024, providing recommendations to enhance school security, improve indoor environmental conditions, define maintenance standards for building systems, and update infrastructure to support educational technology. The Division of School Facilities is coordinating the process for the School Facilities Oversight Board to review and consider the Committee's recommended updates.



ARIZONA PK-12 PUBLIC EDUCATIONAL FACILITIES MANAGEMENT

Local Education Agencies (LEAs) have authority and responsibility for the day-to-day operations and maintenance of public school facilities, as well as for long-term facilities planning, design, financing, and construction. Although PK-12 public school facilities are managed locally, there are state facilities management roles and responsibilities that may involve strategic planning, data collection, state funding programs, standards and systems for accountability. State agencies may also include programs for technical assistance and training that help districts meet standards, mitigate risk, and increase the quality of local district stewardship of public school buildings and grounds. State roles and responsibilities related to elementary and secondary public school facilities vary widely across the U.S. states, with unitary districts in Hawaii and U.S. Territories, where the state agency and the local agency are combined.

ARIZONA DEPARTMENT OF EDUCATION

The [Arizona Department of Education](#) (ADE) is responsible for implementing state education policies, administering state and federal funding, and supporting curriculum and instruction for K–12 public schools. While ADE does not oversee the construction, maintenance, or capital funding of school facilities—those responsibilities are managed by local school districts and the Arizona Department of Administration’s Division of School Facilities—it supports facility-related needs through program administration and collaboration with other state agencies.

ADE oversees several federal and state programs that affect school facilities. These include School Nutrition programs, which may involve cafeteria and kitchen infrastructure; Native American Education programs, which can support facility improvements for eligible schools; School Safety initiatives, which address infrastructure related to security; Federal Impact Aid, which assists districts affected by federal land ownership; and Individuals with Disabilities Education Act (IDEA) funding, which supports accessibility modifications and specialized facility needs. ADE also manages State Aid distributions, which



provide operational funding that may include minor facilities-related expenditures.

In carrying out these responsibilities, ADE collaborates with the Division of School Facilities by coordinating on the administration of federal and state grant programs that support facility-related improvements. ADE works with school districts to ensure compliance with facility requirements tied to federal program funding, such as accessibility standards under IDEA, infrastructure improvements related to school safety grants, and facility upgrades required for School Nutrition program compliance. Through its oversight of operational funding and instructional standards, ADE helps ensure that facility-related expenditures align with educational and health standards established at the state and federal levels.

ARIZONA DEPARTMENT OF ADMINISTRATION, SCHOOL FACILITIES DIVISION

The [School Facilities Division](#) (SFD) of the Arizona Department of Administration (ADOA) was established on September 29, 2021, through the enactment of [Laws 2021, Chapter 404](#), which restructured the former School Facilities Board. The Division operates under the authority of [A.R.S. §§ 41-5701 through 41-5713](#) and is responsible for overseeing the management of Arizona's K–12 public school facilities.

The Division administers funding programs and services to support the maintenance and adequacy of public school buildings in accordance with state law. Under [A.R.S. § 41-5702](#), the Division's duties include assessing school facilities and equipment deficiencies, maintaining an annually updated statewide database of school facilities, and conducting or contracting for inspections of school buildings at least once every five years to verify compliance with building adequacy and capacity standards prescribed under [A.R.S. § 41-5711](#). The Division also facilitates the funding and project approval processes supporting the School Facilities Oversight Board (SFOB), including activities related to new school construction, building renewal, and deficiencies correction.

One of the key programs administered by the Division is the Preventive Maintenance Program, established under [A.R.S. § 15-2002](#). The program



requires each school district to develop and implement a systematic plan for the maintenance of critical building components, including plumbing systems, electrical systems, HVAC systems, roofing, and specialized equipment. Districts must schedule maintenance activities quarterly, semi-annually, or annually based on the requirements for each component. Districts are required to meet with their assigned SFOB liaison to review maintenance plans and must utilize standardized templates and checklists available through the Division's website. Preventive maintenance reporting is required annually, with maintenance task completion data submitted to the Division by October 1 of each year, as prescribed in A.R.S. § 15-2002(C). The Division conducts on-site audits of district maintenance programs at least once every five years to assess compliance, as required under A.R.S. § 15-2002(B)(1).

The Division also provides technical assistance to school districts to support compliance with preventive maintenance and facility adequacy requirements. Under A.R.S. § 15-2002(A)(8), the Division is responsible for offering technical guidance, resources, and support to assist districts in implementing maintenance best practices and in meeting state standards. Supporting resources provided by the Division include the Life Expectancies Informational Sheet, which outlines the expected service life of major building components, and the Planning Guide for Maintaining Facilities, developed in collaboration with the National Forum on Education Statistics and the Association of School Business Officials International (ASBO). In addition, the Division offers task sheets for HVAC, plumbing, roofing, and other systems to assist districts in completing maintenance requirements.

SUPPORTING AMERICA'S SCHOOL INFRASTRUCTURE (SASI) INITIATIVE

The [Supporting America's School Infrastructure](#) (SASI) grant program of the U.S. Department of Education, is designed to help state elementary and secondary public school facility agencies build internal capacity to support high-need school districts in addressing deficiencies in public school buildings and grounds. Funds awarded through the SASI program may not be used for direct construction or renovation. Instead, they are intended to strengthen state-level administrative infrastructure, including data systems, technical assistance networks, and cross-agency coordination to support local efforts.



Arizona’s SASI grant will support the Arizona School Facilities Improvement (ASFI) Project. The project includes technical assistance and training for approximately 50 high-need school districts, modernization of the state’s Building Inventory Database, development of a new Facilities Condition Index (FCI), and completion of a School Facilities Cost Study. Activities also include coordination between the School Facilities Division (SFD) and the Arizona Department of Education (ADE), and an evaluation of the state’s public school infrastructure funding systems to inform future planning and support.

ARIZONA PK — 12 SCHOOL FACILITIES DATA MANAGEMENT

Extensive data and information are needed for educational facility planning, decision making, and oversight. Relevant data helps stakeholders understand the broad impacts of their PK -12 infrastructure spending and investments on health, education, community and beyond. Facilities data falls into five major categories: ([NCES Forum Guide to Facilities Information Management](#)).

Inventory: Data include addresses, geo-codes, building areas, site acreage, and year of construction.

Design: Data include space descriptions, number of stories, designed-for purposes (i.e., elementary school, performance center).

Utilization: Data includes school capacity for enrollment based on the educational programs provided, spaces that are shared, and the gross square footage per enrolled student.

Condition: Data includes facility condition assessment data on the age and condition of major components, systems, and finishes.

Budget and Finance: Data elements include the district expenditures for maintenance, operations, and capital improvements.

Beyond these standard data sets, an increasing amount of data is also being collected and analyzed on building performance. This includes data on building performance metrics for energy efficiency, indoor air quality, lead levels in water, and the presence of hazardous materials like asbestos, mold, or PCBs.



ENROLLMENT DATA

Under [A.R.S. § 41-5741](#), each district must submit enrollment projections to the School Facilities Oversight Board (SFOB) by December 15 each year. Projections must cover five years for elementary schools and eight years for middle and high schools. The SFOB reviews and may adjust these projections using demographic and historical data.

In addition to projections, the SFOB relies on [average daily membership \(ADM\)](#) data certified by the Arizona Department of Education. ADM and projections are entered into the **School Facilities Database** maintained by the School Facilities Division (SFD) for use in determining eligibility for New School Facilities (NSF) funding. Public reporting of enrollment data is available through the Arizona Department of Education's **Annual Financial and Statistical Reports**, which include ADM and related student counts.

INVENTORY DATA

The School Facilities Division (SFD) of the Arizona Department of Administration is required to maintain a [statewide database](#) of school district facilities. Under [A.R.S. § 41-5702\(A\)\(2\)](#), this database must contain information on the age and condition of school buildings and be updated to reflect changes reported by districts. The database is used to administer state funding programs and to monitor compliance with building adequacy standards.

School districts must provide annual updates to the SFD on the status of their facilities. As required by A.R.S. § 41-5702(C), each district must report by September 1 on major repairs or renovations completed during the previous fiscal year and identify any buildings that are closed, vacant, partially used, or leased. The SFD incorporates these reports into the statewide database and may adjust the recorded age of a building when a major remodel extends its useful life.

The statewide facilities database is used by the SFD to administer New School Facilities funding under [A.R.S. § 41-5741](#) and Building Renewal Grants under [A.R.S. § 41-5731](#).

DESIGN DATA

Design data in Arizona are governed by the **Minimum Adequacy Guidelines (MAG)** adopted under [A.R.S. § 41-5711](#). For each New School Facilities project, the School Facilities Oversight Board (SFOB) must certify that the submitted design plans comply with the MAG. The MAG establish minimum requirements



for instructional and support spaces, as well as building systems, to ensure adequacy of new construction. Certification records of compliance with the MAG are maintained by the SFOB. Statute does not require the creation of a statewide database of design plans or their publication for public access.

UTILIZATION DATA

Arizona law requires reporting on the use of school facilities as part of the statewide facilities database maintained by the School Facilities Division (SFD). Under [A.R.S. § 41-5702\(C\)](#), each district must submit an annual report to the SFD by September 1 identifying any school buildings that are closed, vacant, or partially used. Districts must also report on facilities that are leased to charter schools or other entities. This information is incorporated into the statewide database and used in determining eligibility for state funding programs.

Student capacity and square footage are also maintained in the SFD database. These data are applied in the calculation of New School Facilities (NSF) funding eligibility under [A.R.S. § 41-5741](#). The School Facilities Oversight Board (SFOB) may approve adjustments to student square footage when buildings undergo significant renovations or reach the end of their useful life, as provided in A.R.S. § 41-5702(A)(2).

CONDITION DATA

The School Facilities Division (SFD) is required to conduct inspections of school buildings to determine compliance with the Minimum Adequacy Guidelines. Under [A.R.S. § 41-5702\(A\)\(3\)](#), the SFD must inspect, or certify district self-inspections of, every school building at least once every five years. The statute authorizes the SFD to contract with third-party inspectors to carry out these inspections.

Preventive maintenance reporting is required in connection with state facilities funding. [A.R.S. § 41-5731](#) requires school districts to submit a preventive maintenance plan to the SFD and provide records of maintenance work. The statute links this reporting to eligibility for Building Renewal Grants.

On June 29, 2023, Governor Katie Hobbs issued [Executive Order 2023-14](#), directing that all school facilities must be inspected in person at least once every five years. The order reiterates the statutory requirement for periodic inspections and clarifies expectations for compliance.



BUDGET AND FINANCE DATA

The School Facilities Division (SFD) is required to report on the distribution of state facilities funding. Under [A.R.S. § 41-5731\(D\)](#), the SFD must submit a monthly report to the School Facilities Oversight Board (SFOB) on Building Renewal Grant (BRG) distributions. The statute also requires the SFD to provide an annual report on unobligated balances in the BRG fund.

The SFD is required to brief the Joint Committee on Capital Review (JCCR) on the status of facilities funding. A.R.S. § 41-5731(E) directs the SFD to present annual reports to the JCCR regarding Building Renewal Grants, Emergency Deficiencies Correction (EDC) projects, and New School Facilities (NSF) fund use.

District-level budget and finance information is reported through the Arizona Department of Education. Districts submit Annual Financial Reports (AFRs), which include expenditures for operations and capital projects. These AFRs are compiled and published by the Department of Education each year.

FACILITY PERFORMANCE DATA

Arizona law authorizes the collection of data on school facility performance related to energy, water, and indoor environmental quality. Under [A.R.S. § 41-5702\(A\)\(7\)](#), the School Facilities Division (SFD) may obtain utility consumption data directly from public service corporations, municipal providers, and other entities that supply energy and water to schools. These data are used to evaluate the efficiency of school buildings and to inform decisions regarding facility design and operations.

The SFD is also required to provide school districts with information on maintaining indoor environmental quality. According to A.R.S. § 41-5702(A)(8), the Division must distribute updated information to districts at least once every two years. This includes technical guidance and best practices for maintaining healthy school environments.

Facility performance data are incorporated into the statewide database maintained by the SFD alongside other facility information. While the Division has statutory authority to collect utility and environmental quality information, public reporting is limited to program-level summaries and does not include facility-level performance datasets.

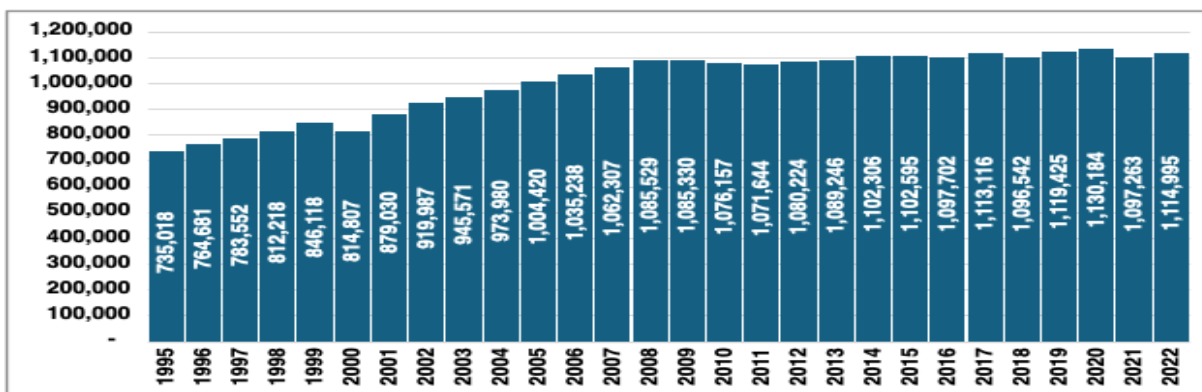


Arizona PK — 12 School Facilities Planning

School facilities require planning at many different levels to meet educational and community purposes. Educational facilities planning is needed for facilities operations, maintenance, and capital projects. Planning PK- 12 public school facilities enables states, districts, and communities to align their resources to their needs, ensure that priorities are met fairly, and that facilities are operated, managed, and built to modern health, safety, educational, and environmental standards.

Arizona's school facilities planning system is designed to monitor and address school district facility needs related to enrollment growth, building capacity, and minimum space adequacy. The growth in enrollment of 52% since 1995 illustrated in Chart 1 illustrates the importance of this for Arizona public school facilities planning.

CHART 1: STUDENT ENROLLMENT SCHOOL YEARS 1994-1995 THROUGH 2021-2022



Source: Data from the U.S. Census of Governments Fiscal Survey; www.school-infrastructure.org Data Dashboard, of the National Center on School Infrastructure (NCSI).

MAINTENANCE PLANNING

Arizona law links maintenance planning to eligibility for state facilities funding. Under [A.R.S. § 41-5731](http://legis.az.gov/ars/41/0001_ars_41_5731.htm), school districts must submit a preventive maintenance plan to the School Facilities Division (SFD) as a condition of applying for Building Renewal Grants (BRG). The plan must outline scheduled maintenance for major building systems and components. The SFD reviews submitted plans before



awarding funding and gives priority to districts that have documented implementation of preventive maintenance.

The SFD incorporates maintenance planning into its oversight role by verifying district compliance with preventive maintenance requirements during inspections. Under [A.R.S. § 41-5702](#)(A)(3), the SFD must inspect or certify self-inspections of each school building at least once every five years. Inspections review not only building adequacy but also whether the district has followed its maintenance planning guidelines.

CAPITAL PLANNING

The framework is established primarily under [A.R.S. § 41-5702](#), which authorizes the School Facilities Division (SFD) within the Arizona Department of Administration (ADOA) to collect district facility information and administer funding programs. School districts are required to submit annual Capital Plans to the School Facilities Oversight Board (SFOB) identifying current and projected needs for new school construction and additional space based on enrollment forecasts.

District Capital Plans must include projected [Average Daily Membership](#) (ADM) figures, descriptions of proposed construction projects, and information about potential land acquisition needs. Capital Plans are submitted through the state's online system by September 1 each year. The SFD reviews district-submitted data, independently verifies enrollment projections, and prepares funding recommendations for the Board. The SFOB reviews staff analyses, approves or denies funding requests, and notifies districts of funding decisions. Districts have the opportunity to appeal funding determinations through an administrative review process.

The capital planning process follows a structured sequence. School districts prepare and submit Capital Plans through the online platform established by the SFD. After submission, SFD staff review the projected enrollment data, verify facility capacity needs based on Minimum Adequacy Guidelines, and assess proposed project scopes. Staff then prepare recommendations for the SFOB's review. The SFOB considers staff analyses in open meetings, votes to approve or deny requests for new construction funding, and issues written notifications



of its decisions. Approved projects proceed to funding agreements subject to compliance with Board conditions, while denied requests may be appealed by districts under the Board’s administrative appeal procedures.

Arizona’s Capital Plan process is centered on enrollment forecasting and instructional space requirements. District plans address projected student populations, classroom capacity needs, and potential land acquisitions to accommodate future growth. State capacity calculations are based on the Minimum Adequacy Guidelines (MAG) prescribed under [A.R.S. § 41-5711](#), which establish minimum square footage per pupil standards adjusted for grade levels and facility design. Capital Plan submissions focus on space adequacy and do not include required reporting on building condition, safety and security upgrades, energy efficiency improvements, or resilience measures.

While Arizona’s Capital Plan system focuses on enrollment-driven space needs, school districts may independently engage in broader local facility master planning. These local efforts often address modernization, building system upgrades, security enhancements, energy performance, and other facility improvements but are not reviewed as part of the state Capital Plan approval process. Preventive Maintenance planning, required separately under [A.R.S. § 15-2002](#), also supports long-term facility stewardship but operates independently from the annual Capital Plan submissions.

ARIZONA PK-12 EDUCATIONAL FACILITIES FUNDING

School facilities are funded with annually budgeted operating funds for utilities, cleaning, groundskeeping, maintenance and repairs; and periodically budgeted, and usually bond financed, capital funds, for school design, construction, renovation and major repair projects. State laws define how districts get access to local financing for school construction capital projects and whether or how states distribute state school construction funding. Federal funding for school construction is minimal—before pandemic funding—it was less than 2% of what districts paid for school construction capital outlay, with a major share of federal funding for rebuilding schools post weather related disasters.



JUDICIAL DECISIONS AFFECTING FACILITIES

Judicial decisions have played a significant role in shaping Arizona's approach to school facility funding and oversight. In [*Roosevelt Elementary School District No. 66 v. Bishop*](#), 179 Ariz. 233 (1994), the Arizona Supreme Court held that the state's reliance on local property tax revenues to fund school construction violated the constitutional requirement for a "general and uniform" public school system under [Article XI, Section 1](#) of the Arizona Constitution. The Court found that disparities in property wealth among districts resulted in unequal access to adequate school facilities and required the Legislature to create a funding system that complied with constitutional standards.

In response to *Roosevelt*, the Legislature enacted the [Students FIRST \(Fair and Immediate Resources for Students Today\)](#) Act in 1998. The Act centralized responsibility for capital funding at the state level and established a system for funding new school construction, building renewal, and emergency deficiency correction.

In [*Hull v. Albrecht*](#), 190 Ariz. 520 (1997) and *Hull v. Albrecht*, 192 Ariz. 34 (1998), the Arizona Supreme Court reviewed challenges to the timing and adequacy of the Students FIRST funding system. The Court reaffirmed that the state must ensure a system that provides adequate capital funding consistent with constitutional requirements and prohibited the delay of necessary funding for eligible school construction projects.

In [*Crane Elementary School District v. State of Arizona*](#), 195 Ariz. 414 (Ct. App. 1999), the Arizona Court of Appeals considered a challenge to whether the Students FIRST system met the constitutional requirement for a general and uniform public school system. The Court upheld the statutory framework, finding that the Students FIRST system satisfied constitutional standards while emphasizing the state's ongoing obligation to address facility deficiencies in accordance with minimum adequacy standards.

Current litigation, [*Center for Law in the Public Interest v. State of Arizona*](#) (Maricopa County Superior Court, filed 2017), challenges the existing public school facilities funding model. Plaintiffs, including several school districts and the Arizona School Boards Association, allege that continued reliance on local bonds for school maintenance funding results in unconstitutional disparities



under the “general and uniform” requirement established in *Roosevelt*. The case remains pending as of April 2025.

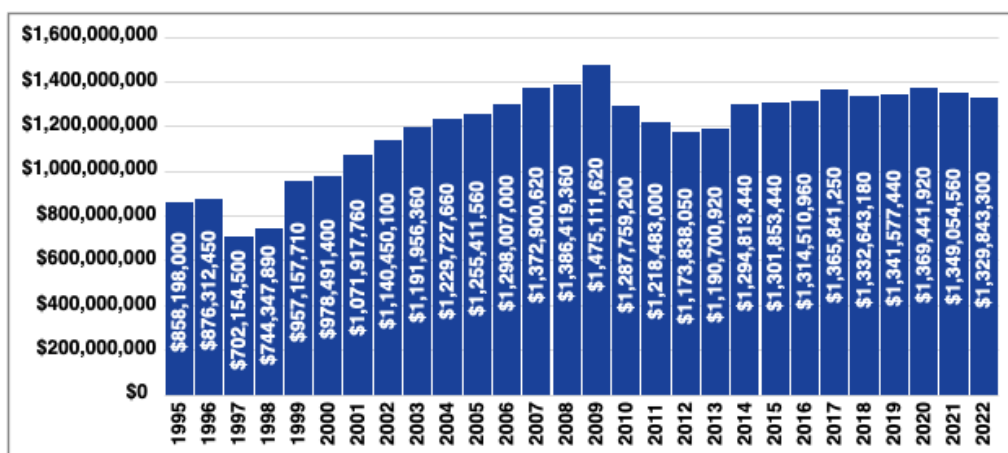
MAINTENANCE AND OPERATIONS FUNDING

Maintenance and Operations expenditures include payment for utilities, custodial staff and services, groundskeeping, related custodial and repair materials, equipment, and maintenance contracts, as well as spending for security personnel, materials, and services.

Arizona school districts reported spending about \$1.3 billion (2024\$) M&O annual operating-budget expenditures to the U.S. Census of Governments for FY2022. Adjusting district annual expenditures with the Consumer Price Index for inflation for years 1995-2022—shown in Chart 2, this was an average of \$3,631 for facilities maintenance and operations per FY2022 student for the last three years.

The [State Equalization Assistance](#) formula provides state funding to school districts that do not raise sufficient local revenues to meet their basic support levels. Districts with higher property tax bases fund a greater portion of their M&O budgets locally, while districts with lower property tax bases receive proportionally more state aid.

CHART 2: M&O SPENDING, FY1995-FY2022 (INFLATION-ADJUSTED 2024 DOLLARS)



Source: Data from the U.S. Census of Governments Fiscal Survey; actual M&O spending data available at www.school-infrastructure.org Data Dashboard, of the National Center on School Infrastructure (NCSI).



EMERGENCY DEFICIENCIES CORRECTION FUND

The [Emergency Deficiencies Correction Fund](#) (EDC), authorized under [A.R.S. § 41-5721](#), provides state funding to address facility deficiencies that pose immediate threats to health, safety, or district operations and that exceed a school district's current fiscal year budget capacity. Eligible emergencies include situations requiring urgent action to restore safe and functional learning environments.

School districts may apply for EDC funding by submitting an Emergency Deficiencies Correction Application detailing the nature of the emergency and proposed corrective measures. Applications are reviewed by the School Facilities Division (SFD) to determine eligibility under statutory criteria. Final funding decisions are made by the School Facilities Oversight Board (SFOB) based on the severity and immediacy of the need. Funding is limited to repairs or replacements necessary to correct critical infrastructure deficiencies that could disrupt school operations or endanger public health and safety if not addressed. In fiscal year 2024, \$350,331 was disbursed through the Emergency Deficiencies Correction Fund.

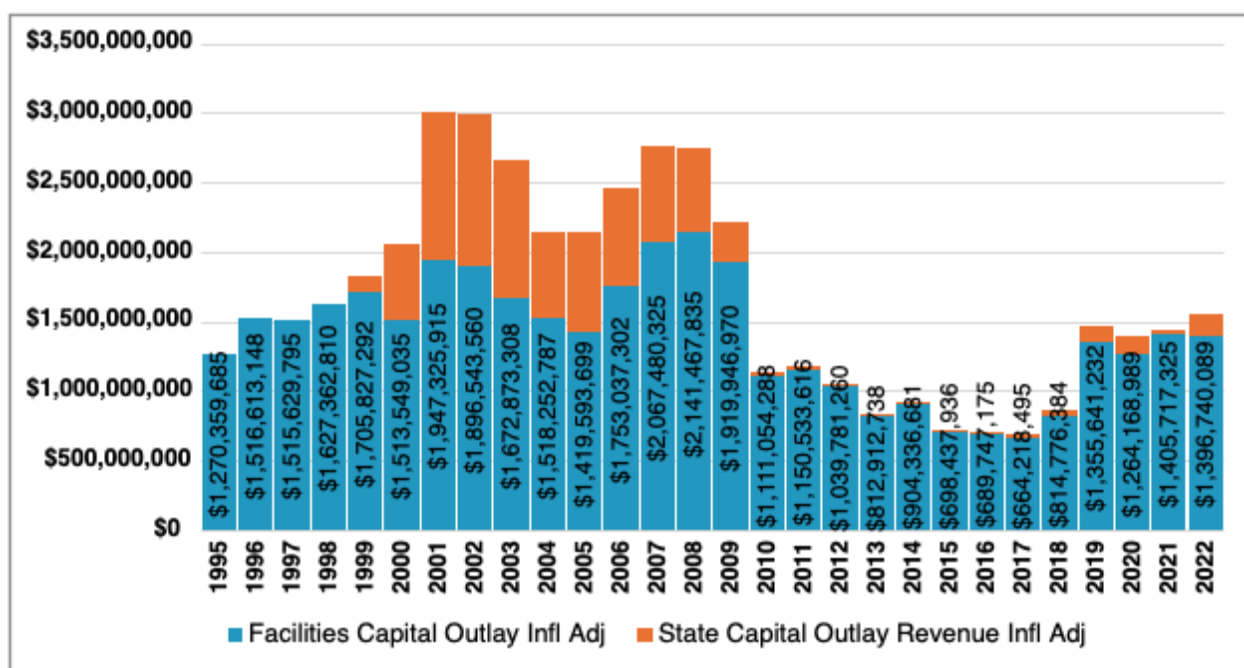
FACILITIES CAPITAL FUNDING

In addition to annual operating funds for facilities, school districts are responsible for the long-range planning, design, financing, construction, and major renovation and systems renewals of public school buildings and grounds. These capital outlay expenditures are used for new school construction, as well as for such items as roof replacements and upgrades to mechanical systems. In 2022, the facilities capital outlay for school construction and other equipment expended by Arizona local school districts was nearly \$1.4 billion (inflation-adjusted dollars). This excludes the cost of land, existing structures, and instructional equipment reported as part of the total capital outlay by school districts to the U.S. Census of Governments. Chart 3 shows inflation-adjusted school construction and other equipment capital expenditures from 1995 through fiscal year 2022 and the revenue that the districts reported from the state for capital outlay and debt service to support their school construction and renovation projects. From FY 2018 to FY2022, state revenue for capital outlay averaged percent.



Arizona's capital outlay programs provide financial support for school districts to construct new facilities, acquire land, and address major repairs and deficiencies necessary to maintain compliance with minimum facility adequacy standards. These programs operate separately from routine maintenance funding and are funded through annual appropriations from the State General Fund.

CHART 3: CAPITAL OUTLAY FOR SCHOOL CONSTRUCTION AND OTHER EQUIPMENT FY 1995 – FY 2002 (IN 2024\$)



Source: Data from the U.S. Census of Governments Fiscal Survey; actual Capital Outlay spending data available at www.school-infrastructure.org Data Dashboard, of the National Center on School Infrastructure (NCIS).

NEW SCHOOL FACILITIES FUND

The [New School Facilities](#) Fund, established under the Students FIRST program and governed by [A.R.S. § 41-5741](#), provides state funding for the construction of new school facilities and the acquisition of land needed to accommodate enrollment growth and maintain compliance with the Minimum Adequacy Guidelines (MAG) established under [A.R.S. § 41-5711](#). The program supports the development of additional instructional space based on projected student enrollment.



Eligibility for funding is determined annually based on a school district's Average Daily Membership (ADM) projections and the additional square footage required to meet state minimum space standards. Funding allocations are calculated by multiplying ADM by grade-specific square footage requirements, with adjustments based on student characteristics, district size, and geographic factors. Districts classified as rural receive an additional 1.05 percent adjustment to account for geographic considerations. The resulting figure is multiplied by the cost per square foot, which is adjusted annually under A.R.S. § 41-5741(D)(3)(c) to reflect construction market conditions. In fiscal year 2024, the Legislature approved a 6.52 percent increase to the cost per square foot based on an index developed by the Joint Legislative Budget Committee.

Districts may apply for funding to address projected construction needs within four years or anticipated land acquisition needs within ten years. The New School Facilities Fund is supported through annual appropriations from the State General Fund, and funding eligibility is determined independently of local district wealth. Since the inception of the Students FIRST program, the School Facilities Oversight Board has funded approximately 125 new school facilities or major additions statewide.

BUILDING RENEWAL GRANT FUND

The [Building Renewal Grant \(BRG\) Fund](#), established under [A.R.S. § 41-5731](#), provides financial assistance to school districts for major repairs, system replacements, and renovations necessary to maintain compliance with the Minimum Adequacy Guidelines (MAG). The program is administered by the School Facilities Division (SFD) of the Arizona Department of Administration and supports projects that address deficiencies in building systems and infrastructure.

Historically, Arizona maintained a Building Renewal Fund under A.R.S. § 15-2031, which provided automatic annual payments to school districts for major repairs and renovations based on the age and square footage of facilities. This funding mechanism was repealed in 2013 and replaced with the current Building Renewal Grant (BRG) Fund authorized under A.R.S. § 41-5731. Under the grant system, districts must apply for project-specific funding to address deficiencies related to facility adequacy standards. Building renewal funding is



no longer formulaic, but awarded through a project-based review and approval process administered by the School Facilities Oversight Board (SFOB).

Districts may apply for BRG funding to support projects such as HVAC system repairs or replacements, roof repairs, plumbing upgrades, electrical system repairs, and other major building component improvements related to facility adequacy. Applications are reviewed by SFD staff, and funding decisions are made by the School Facilities Oversight Board (SFOB). Project management, reimbursement requests, and reporting are conducted through the Arizona School Facilities Portal, and funded projects must adhere to established timelines and reporting requirements.

In fiscal year 2024, the Legislature appropriated \$199,967,900 to the Building Renewal Grant Fund. During that period, the SFD approved 1,219 BRG projects. The Building Renewal Grant Fund continues to serve as a primary mechanism for supporting facility repairs and maintaining the adequacy of Arizona's public school infrastructure.

FACILITIES FINANCING

Arizona funds public school facilities through a combination of annual legislative appropriations, authorized bond issuances, and revenues generated from state land transactions. The primary sources of revenue include appropriations from the State General Fund, proceeds from the lease and sale of state trust lands under [A.R.S. § 37-221](#), and revenues directed under [A.R.S. § 41-5762](#) to support facility-related funds.

The primary state financing mechanisms for public school facilities are direct appropriations and revenue bonds. Appropriations support the New School Facilities Fund ([A.R.S. § 41-5741](#)), the Building Renewal Grant Fund ([A.R.S. § 41-5731](#)), and the Emergency Deficiencies Correction Fund ([A.R.S. § 41-5721](#)). In addition to appropriations, the School Facilities Oversight Board (SFOB) is authorized under [A.R.S. § 41-5751](#) to issue up to \$200 million in revenue bonds per fiscal year for school construction purposes. The SFOB also holds authority under [A.R.S. § 41-5781](#) to issue up to \$800 million in School Improvement Revenue Bonds for major infrastructure projects and emergency deficiencies corrections. Bond repayments are secured by revenues generated from the lease or sale of state trust lands.



School districts often finance their school construction and major capital projects since the life of the building or improvement will last for many years. The level of debt per student varies widely across states and districts. In Arizona there was \$5.72 billion of local district long term debt outstanding at the end of FY2022—about \$5,300 per student. A total of \$380,044,000 in interest was paid in FY2022 by local education agency districts for this debt. The level of debt, and how districts can access the bond markets is defined in state law.

Under the [Arizona Constitution, Article 9, Section 8](#), the state is subject to limitations on general obligation debt. However, revenue bonds issued under [A.R.S. § 41-5751](#) and [§ 41-5781](#) are not considered general obligation debt because they are repaid from non-tax revenues rather than the general taxing power of the state.

ARIZONA PK — 12 SCHOOL FACILITIES STANDARDS AND ACCOUNTABILITY

Accountability systems for facilities involve facility standards, assessments, and reporting on the health, safety, education, and other factors associated with PK – 12 public school buildings and grounds. It involves systems for measuring and communicating conditions, and the authority to encourage or enforce changes in school design, construction, operations and maintenance.

Oversight of school facilities financing is shared between the Legislature, which sets annual appropriation levels, and the SFOB, which reviews and approves project funding requests and manages bond issuances. The School Facilities Division (SFD) of the Arizona Department of Administration supports this process through project evaluation and compliance monitoring. All projects funded through state programs must meet statutory and administrative requirements related to facility adequacy.

MAINTENANCE AND OPERATIONS STANDARDS

In Arizona, school districts are responsible for the management, maintenance, and operation of public school facilities under state law. [A.R.S. § 15-341](#) grants district governing boards the authority to acquire, manage, maintain, repair,



improve, and dispose of school property, subject to applicable statutory requirements.

School districts are required to develop and implement a [Preventive Maintenance Program](#) under [A.R.S. § 15-2002](#). Preventive maintenance plans must include scheduled inspections, servicing, and repairs of major building systems, including HVAC systems, plumbing, electrical systems, roofing, and specialized equipment. Districts are required to use standardized preventive maintenance templates and checklists provided by the School Facilities Division (SFD) of the Arizona Department of Administration.

Districts must submit annual preventive maintenance reporting to the School Facilities Oversight Board (SFOB) by October 1 of each year, documenting maintenance activities completed during the previous fiscal year. The SFOB is required to conduct on-site audits of district preventive maintenance programs at least once every five years to verify compliance with preventive maintenance requirements. Audit reviews compare district-submitted records to preventive maintenance standards and support facility condition monitoring for state funding eligibility. Compliance with preventive maintenance requirements is a condition for accessing Building Renewal Grant funding under [A.R.S. § 41-5731](#).

In addition to preventive maintenance reporting, operational standards require that major building systems be maintained in functional working order. Under [A.A.C. R7-6-265](#), HVAC, plumbing, electrical, and mechanical systems must be capable of operating as designed, with sufficient life expectancy and parts availability for maintenance. Systems must remain functional and safe for continued occupancy.

Specific operational safety systems are also subject to mandatory maintenance requirements. Under [A.A.C. R7-6-256](#), schools must maintain two-way communication systems capable of supporting both routine communications and emergency responses. Under [A.A.C. R7-6-257](#), school facilities must maintain and regularly test fire alarm systems in accordance with applicable fire safety codes.



BUILDING STANDARDS

Public school buildings in Arizona are required to comply with both general building code requirements applicable to public facilities and school-specific minimum facility standards. New school construction and major renovations must meet the building codes adopted by the local jurisdiction in which the school is located. Most local governments in Arizona have adopted versions of the International Building Code (IBC), the International Fire Code (IFC), the International Plumbing Code (IPC), the International Mechanical Code (IMC), and the National Electrical Code (NEC). These codes establish requirements for structural integrity, fire safety, mechanical, plumbing, and electrical systems, and accessibility in public buildings, including schools.

In addition to general building code compliance, public school facilities must meet minimum facility standards prescribed by the [Arizona Administrative Code \(A.A.C.\), Title 7, Chapter 6](#). These minimum school facility standards apply to all new construction and significant renovations of public schools and address building system functionality, environmental health, site safety, and operational requirements.

Under [A.A.C. R7-6-265](#), major building systems, including HVAC, plumbing, electrical, and mechanical systems, must be designed, installed, and maintained to ensure operational reliability and energy efficiency. Under A.A.C. R7-6-271, the exterior building envelope, interior surfaces, and finishes must meet standards for durability, energy efficiency, and be free of hazardous materials, including lead-based paint and asbestos-containing materials. Additional standards set requirements for fire alarm and communication systems, accessibility, and building circulation safety.

Arizona law further requires that public school facilities be structurally sound and capable of meeting Minimum Adequacy Guidelines (MAG) standards under [A.R.S. § 41-5711](#). Structural soundness is defined to include the ability of the building to withstand normal loads without significant deterioration or safety hazards.

Compliance with both locally adopted general building codes and state minimum facility standards is required for school projects receiving state funding assistance through the Students FIRST program. Facilities must meet or



exceed the minimum adequacy standards to qualify for New School Facilities Fund or Building Renewal Grant support.

EDUCATIONAL ADEQUACY STANDARDS

Arizona's public school facilities are governed by the Minimum School Facility Adequacy Guidelines (MAG), which establish baseline facility conditions necessary to support educational programs. The MAG framework is authorized under [A.R.S. § 41-5711](#) and codified in the [Arizona Administrative Code, Title 7, Chapter 6](#).

The Minimum Adequacy Guidelines define the minimum requirements for instructional spaces, specialized facilities, and building systems. They specify standards for classroom size and design (R7-6-212), temperature control (R7-6-213), lighting (R7-6-212), acoustical performance (R7-6-214), and the performance of building systems such as HVAC, plumbing, electrical, and communication (R7-6-251 through R7-6-269). Specialized instructional spaces such as science laboratories (R7-6-246), libraries and media centers (R7-6-241), special education classrooms (R7-6-244), gymnasiums and physical education spaces (R7-6-251), cafeterias (R7-6-242), and outdoor activity areas (R7-6-251 and R7-6-253) are also subject to minimum size, safety, and functionality requirements under MAG.

Compliance with MAG standards is required for projects funded through the New School Facilities Fund, the Building Renewal Grant Fund, and the Emergency Deficiencies Correction Fund. Schools must meet or exceed MAG standards to qualify for state facility funding.

The Governor's Minimum Adequacy Guidelines Modernization Committee submitted recommendations in 2024 to update standards related to health, safety, technology integration, and instructional needs. The School Facilities Oversight Board is considering potential revisions based on these recommendations in 2025.

HEALTH AND SAFETY STANDARDS

AIR QUALITY

Arizona establishes specific indoor air quality requirements for public school facilities. Under [A.A.C. R7-6-215](#), classrooms, including general education,



science, and art spaces, must have HVAC systems capable of maintaining carbon dioxide (CO₂) concentrations no greater than 800 parts per million (ppm) above outdoor ambient levels. CO₂ testing must be conducted at a work surface in the approximate center of the classroom under normal occupancy conditions. A random sample of at least 10% of classrooms in each building must be assessed to verify compliance. Modular and portable buildings manufactured and installed concurrently are treated as a single building for testing purposes.

HVAC systems must be maintained in functional condition capable of providing ventilation consistent with industry standards. Under [A.A.C. R7-6-213](#) and [A.R.S. § 41-5832](#), HVAC systems are required to meet or exceed the version of the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 62 that was applicable at the time of system installation. School facilities must maintain HVAC systems to ensure continued indoor air quality performance during occupied hours.

In new school construction, Arizona law requires that indoor air quality guidelines acceptable to the School Facilities Division be incorporated into facility designs. Under A.R.S. § 41-5832, new schools must incorporate practices based on the Sheet Metal and Air Conditioning Contractors' National Association (SMACNA) Indoor Air Quality Guidelines for Occupied Buildings Under Construction, to minimize indoor air contaminants during and after construction.

School facilities must maintain continuous mechanical ventilation during occupied hours to meet indoor air quality standards and support safe indoor environments for students and staff.

CHEMICAL HAZARDS

Arizona establishes specific requirements related to chemical hazards in public school facilities through state statutes and administrative actions.

Under [A.R.S. § 15-152](#), school district governing boards must adopt pest management policies that require written notification to students, parents, and employees at least 48 hours before pesticide applications on school property. Licensed pesticide applicators must conduct applications in compliance with state regulations.



Management of asbestos in public schools is overseen at the federal level under the Asbestos Hazard Emergency Response Act (AHERA). While Arizona does not have a separate state asbestos statute, public schools in Arizona are required to comply with AHERA requirements. Compliance oversight is coordinated by EPA Region 9, with Arizona health agencies providing support to schools on inspection and management obligations.

The Arizona Department of Health Services (ADHS) encourages radon testing in schools as a voluntary health measure. Arizona has not established a mandatory state requirement for radon testing in public schools.

Laboratory chemical safety requirements are set forth in [A.R.S. § 15-151](#), which mandates that industrial-quality eye protection be worn by students, teachers, and visitors in laboratories, shops, and hazardous work areas. The Minimum Adequacy Guidelines also require that science laboratories be equipped with fume hoods, emergency eyewash stations, and appropriate chemical storage facilities.

EXTREME HEAT

Arizona has specific requirements to ensure that public school facilities maintain safe indoor temperatures, reflecting the state's high outdoor temperatures for much of the year.

Under [Arizona Administrative Code \(A.A.C.\) R7-6-213](#), all classrooms—including general education, science, and art classrooms—must have an HVAC system or another system capable of maintaining indoor temperatures between 68°F and 82°F under normal occupied conditions. This standard applies to both permanent and portable classrooms.

Temperature compliance must be verified as part of facility inspections. Under [A.A.C. R7-6-216](#), temperature readings must be taken at a work surface in the approximate center of the classroom. A random sample of at least 10% of classrooms in each building must be measured to determine whether the facility meets the indoor temperature standard.

In addition to operational temperature standards, [A.R.S. § 15-2002\(K\)](#) requires school districts to develop preventive maintenance guidelines for their facilities, which must include regular maintenance of heating, ventilation, and air



conditioning (HVAC) systems. These preventive maintenance plans are reviewed by the School Facilities Division. If inspections find that HVAC systems are inadequately maintained and not capable of meeting minimum indoor conditions, districts must use Building Renewal Grant funds to restore compliance.

Although Arizona does not have a statewide statute mandating outdoor heat policies for schools, the Arizona Department of Health Services (ADHS) recommends that school districts develop formal policies to address extreme heat conditions, particularly for outdoor activities such as recess and physical education. ADHS provides [guidance](#) on how schools can modify schedules, ensure access to hydration, and manage outdoor activities during periods of high temperatures.

WATER QUALITY

Arizona establishes sanitation requirements to ensure that public school facilities provide access to clean and safe drinking water. Under [Arizona Administrative Code \(A.A.C.\) R9-8-706](#), school officials must maintain drinking fountains, water coolers, and sanitary water dispensers in clean and safe working condition. The water stream must be protected from touching any surface before reaching the user's mouth, and fountains must be regularly washed, rinsed, and sanitized to prevent contamination.

Schools that operate their own on-site water systems, such as wells, are regulated as public water systems under the federal Safe Drinking Water Act and must comply with Arizona Department of Environmental Quality (ADEQ) requirements for water quality monitoring, reporting, and system maintenance.

While Arizona law does not mandate routine lead testing in school drinking water, the [Arizona Department of Environmental Quality](#) (ADEQ) launched a voluntary statewide [lead screening program](#) in 2017–2018, offering free testing to public schools. The [Arizona Department of Health Services](#) (ADHS) has continued lead testing efforts through EPA grant funding, with expanded sampling of additional schools and child care facilities. Schools that identify elevated lead levels in drinking water are expected to take corrective actions, such as fixture replacement or filtration installation, consistent with public health guidance.



Arizona agencies provide technical assistance to school districts to help ensure safe drinking water. ADEQ and ADHS distribute best-practice resources on maintaining potable water systems, addressing lead risks, and promoting safe water access for students and staff.

ENVIRONMENTAL AND ENERGY STANDARDS

Arizona requires that new and significantly renovated school facilities incorporate basic energy efficiency and environmental durability measures as part of minimum facility adequacy requirements.

Under [Arizona Administrative Code \(A.A.C.\) R7-6-265](#), major building systems, including HVAC, plumbing, and electrical systems, must be designed and installed to ensure operational efficiency and support long-term energy conservation. Facilities must incorporate building systems capable of maintaining required indoor environmental conditions while minimizing unnecessary energy consumption.

Building envelope design is also subject to energy durability standards. Under [A.A.C. R7-6-271](#), exterior materials, roofing systems, windows, and insulation must provide adequate protection against environmental conditions and support effective climate control within school buildings. Proper building envelope design is intended to reduce energy loss, support system efficiency, and maintain healthy indoor environments.

Arizona's facility standards also promote energy-efficient lighting. Under [A.A.C. R7-6-212](#), classrooms must provide minimum illumination levels of 50 foot-candles for traditional lighting systems or 30 foot-candles for LED lighting systems. Schools are permitted to use LED lighting technologies to meet or exceed illumination standards while improving energy efficiency.

While Arizona does not mandate statewide green building certification for public school facilities, [Governor's Executive Order 2005-05](#) established an energy efficiency benchmark for state-funded construction projects, including K–12 schools. The Executive Order, issued in 2005 and still in effect, encourages new school facilities to achieve at least a Silver certification under the Leadership in Energy and Environmental Design (LEED) program or to meet comparable energy efficiency standards. Although participation is voluntary and applied



flexibly depending on project circumstances, the Executive Order reflects the state's energy use policies.

In addition to the Executive Order, the Arizona School Facilities Division promotes energy conservation through technical assistance programs and tools such as the [Energy Efficiency & Sustainability Checklist](#) for new construction projects. School districts are also encouraged to participate in voluntary programs like the School Energy and Water Use Efficiency Program ([15-214.02](#)), which supports collaboration with utilities to implement cost-saving energy measures. Participation in these initiatives is at the discretion of local school districts unless otherwise required by local ordinances or as a condition of specific state or federal grant programs.