



Arizona Ombudsman-Citizens' Aide

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Members of the Arizona Legislature

The Honorable Jan Brewer, Governor

Pursuant to A.R.S. § 41-1376, I have the honor of submitting my annual report on the performance of our office during calendar year 2010.

This is our fifteenth annual report and we hope it paints a picture of what our office does for the people of Arizona. As in previous reports, we have included a sampling of the kinds of problems that people bring to us and how we responded to them. We have also included information that statute directs us to provide to the legislature, governor and public.

We all know that in these tough economic times, every dollar counts. Everyone is hurting: the state has a huge budget deficit, small businesses are struggling, our fellow citizens are coping with reduced income, and state employees are dealing with downsizing, mandatory furloughs and smaller paychecks.

As state agencies have fewer resources to handle an increased demand for their services, things slip through the crack. Agencies can't do all the things they did several years ago. State administrators face greater challenges today than at any time since we opened the Ombudsman's Office.

Our role in this environment is to hold state agencies accountable for doing the job that needs to be done, in spite of tough times. As an independent office of the legislative branch, we look at how agencies are treating our fellow citizens to make sure government agencies are doing the things the law requires them to do. On the other hand, we also look at how the agencies are coping with reduced resources and verify when cut-backs in services are legitimate.

It's important to have someone in these tough times who is independent and can take an impartial look at how the cut-backs impact people. Our office does that by investigating citizen complaints. We don't do top-down studies and we don't review strategic plans. Instead, we look at how the agency's policies and procedures are impacting real people because we investigate their complaints. Since we are not under the agency's control, we can make an independent assessment. When an agency is wrong, we work with them to correct the situation. When an agency is right, we explain why they are right.

Many times, our complaint resolution results in financial savings. Sometimes it's the state agency that saves money. Sometimes, it's a small business or a private citizen who benefits, and sometimes everyone saves. Later in this report we will provide some examples of how our intervention has saved money. I think it's important to note that the financial benefit to state government from what we do far outweighs the cost of our office.

We hope you find this report useful and informative. Please contact us if you have any questions or comments. We welcome the opportunity to sit down and discuss our program with you.

We could also use your help in spreading the word about the services we offer. If you know of someone who could use our help, please let us know so we can contact him or her.

Pat Shannahan
Ombudsman-Citizens' Aide

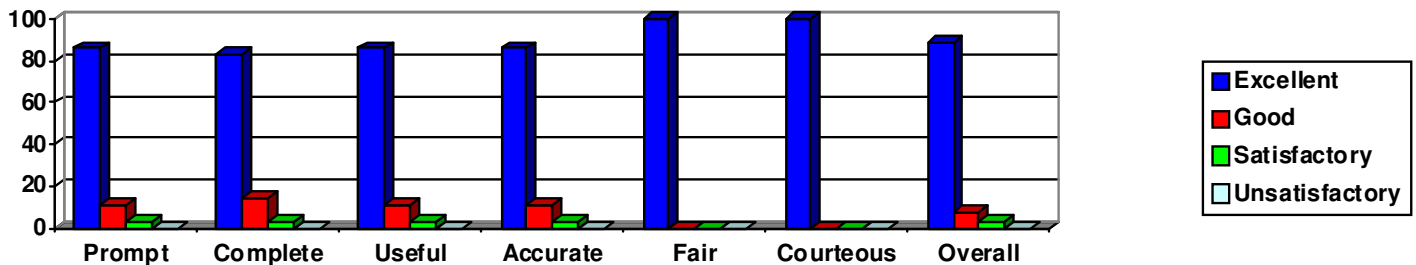
Customer Satisfaction Survey

It is important for us to receive feedback from the citizens we help so that we can evaluate our performance, correct shortcomings and improve our service. One way we get feedback is through our customer satisfaction survey. The survey measures how well we are accomplishing six standards that we developed in our strategic plan. These standards are:

- Respond **promptly** to citizen inquiries.
- Provide as **complete** a response as possible.
- Provide **useful** solutions to citizens.
- Provide **accurate** response to citizen complaints.
- Treat everyone **fairly**.
- Treat everyone **with courtesy and respect**.

The following chart and comments summarize the results of the survey for calendar year 2010:

Customer Satisfaction Survey Results -- Percent



Selected Survey Comments from the Past Year

In these tight budget times and general criticism of government services, I had a pleasant surprise when working with Kate Otting. She went out of her way to help. Thank you.

Dollar for dollar, I think what the Ombudsman's Office does, a bit like the OAH as well, is one of the best uses of tax dollars imaginable.

Thank you for the kind and considerate treatment that I received.

The woman who helped me was so great!! She was understanding, sympathetic, and efficient. Totally because of this woman I still have a roof over my and my family's head. Thank you so very much.

Every time I've contacted the ombudsman's office the information received has been excellent.

I get email responses to my queries within the hour from the Ombudsman's office. That is highly unusual. Please keep it up.

Liz, thanks for such a great training this morning. Your presentation was a good overview of the Public Records Law, and I am so glad to know who to call if any questionable issues crop up.

I was assisted by Liz Hill. She was very professional and prompt in her response to my inquiry. I was very impressed and pleased with her customer service.

Ms. Hill was very helpful and responsive. She gave me excellent information and was friendly yet professional. She is an excellent representative for the Arizona Ombudsman office.

With Liz's assistance we have gained access to numerous documents and much needed information. Ms. Hill was also instrumental in insuring the district reduced their copy cost by over 60 percent.

It is so helpful to have this service available. Feedback is given promptly and this timeliness is important and needed. This resource is incredibly necessary for those of us who need guidance in the Open Meeting Law arena. Many thanks!

Joanne was very accommodating and gave us time to talk without rushing us.

Joanne was very nice and helpful. Quick too.

When I spoke to Kate, she took down as much information as I had about my problems I was having with the state of Az, and kept me informed through out the day what was the status of her findings. I highly HIGHLY recommend anyone to use Ombudsman-Citizens' Aide. Ms. Kate got me to the right information and now I am completely happy with the state of Az. Once again Kate, you're awesome and thank you so very very much for your helping.

I think her name was Kate. She was smart, fast, wonderful. She's a real keeper.

Case Examples from the Past Year

1. The following examples highlight several cases where the resolution of the problem resulted in financial savings to a state agency.

1003862. **Department of Economic Security, Family Assistance Administration (FAA)**

A woman called our office because she has been trying to get medical coverage for her son through the Arizona Health Care Cost Containment System (AHCCCS) for several months. Her 3-year old son had a serious medical condition that resulted in his tibia breaking very easily, causing him pain and swelling and difficulty walking. Without medical attention, the condition was worsening. While waiting for approval of coverage, the mother paid out-of-pocket to have the boy seen by a physician. The physician said the boy needed to be seen immediately by an orthopedic surgeon, which the mother could not afford. The physician said the boy's condition, if not treated immediately could lead to a more serious condition, would cost far more to treat later on and may leave the child unable to walk.

We contacted FAA and discovered that the mother had not submitted a piece of information required to complete the enrollment. Unfortunately, this problem was not communicated to the mother. The caseworkers then mixed up the family's case file with another family, causing them to believe that the application for the child was for an adult, and they discontinued medical assistance for the entire family. After we followed up with FAA, got them the information they needed, and explained to them that the application was for a child who needed immediate medical attention, they took care of the enrollment within a matter of hours.

The following day, the mother took her son to the doctor, but since AHCCCS approval takes 72 hours to show up in their system, the doctor was unable to get the authorization needed to treat the child. The doctor insisted that the boy should not wait another day to be treated and he asked if there were some way to work directly with DES to get the authorization required for the boy to be treated by an orthopedic surgeon, as he would need immediate care, X-rays and possibly surgery. The mother could not take any more time off from her job, either, so it was critical that the AHCCCS approval go through for the boy on that day.

We contacted FAA again to see what could be done to expedite the boys' medical care. An administrator at FAA spoke directly to the physician to give authorization on the phone so the child could be treated immediately. The mother called our office, in tears, because she was grateful that her son would receive the medical care he needed, and that she would not have to quit her job in order to make it to another medical appointment. She said this could not have been possible without our assistance in facilitating the completion of her son's approval for medical insurance through

AHCCCS. In addition to treating the child's serious medical condition, we also saved the state money because a delay would have resulted in significantly higher charges.

1000394. Arizona Health Care Cost Containment System (AHCCCS)

A patient who was receiving medical benefits told us that she had been in and out of the hospital during the last month and needed heart medication. She had been approved for AHCCCS a few days prior but her pharmacy did not have her on the system yet. She had gone without the medication for two days and would have to visit an emergency room if she couldn't get the medication from the pharmacy.

We contacted AHCCCS and they updated the woman's record the same day. The woman was able to get her medicine without going to the hospital. Our efforts saved AHCCCS the cost of a hospital visit.

1002801. Arizona Peace Officer Standards and Training Board (AZ POST)

A Pinal county resident complained that the county sheriff's office was refusing to discipline three of their deputies. He demanded the AZ POST investigate these men. The man said he was going to sue the state because AZ POST wasn't complying with the law.

We reviewed the law and spoke to AZ POST. They said they are required to investigate in situations where a peace officer was convicted of a felony or was terminated or suspended, but they otherwise have discretion under Arizona Administrative Code R13-4-109(D) which says the Board has discretion to investigate or not in other instances. The conduct of the three deputies did not rise to a level requiring an investigation.

We informed the complainant that AZ POST had authority to decide not to investigate and we explained the law to the man. We also discussed other options he had to resolve his complaint. After listening to our explanation, the man agreed not to sue the state.

We get hundreds of cases each year in which the complainant threatens to sue the state. We don't know how many of these threats are credible, but we're including this one because the man sounded very credible to us. We've even had cases that were already in court and both sides agreed to stop the lawsuit and abide by our investigative finding.

When we head-off a law suit, it's just as likely to save a small business or a private citizen money as it is to save the state money. When we resolve a problem informally, everyone agrees to a solution that is satisfactory to them, no one loses, and we save lawyers fees court costs.

2. The following examples highlight several cases where the resolution of the problem resulted in financial savings to a small business.

1001229 and 1001627.
Division (MVD)

Department of Transportation, Motor Vehicle

A small businessman was upset the State was refusing to license his motorcycle training business. MVD said they would only license a certain number of motorcycle schools throughout the State of Arizona. After they reached their quota, they put the rest on a waiting list. The small businessman said this was not fair because he was operating on an Air Force base under a federal contract.

We asked MVD to state their authority for the decision. They cited Laws 2005, chapter 313, section 9, and said it provided an appropriation for no more than fifteen additional motorcycle schools to be licensed statewide. Once the fifteen additional schools were licensed MVD stopped licensing any more.

This did not seem correct, as it seemed unduly restrictive to commerce and not in keeping with other licensing. We examined the law and also asked Legislative Council to examine the question.

Legislative Council thought MVD had misinterpreted this law. They said the appropriation was to allow fifteen motorcycle dealers to become authorized third parties to administer an examination for a motorcycle license. This is a limit on dealers who can administer the motorcycle test, not on driving schools.

Upon our request, the MVD legal office reassessed their interpretation and reversed it. They sent the complainant a packet for the motorcycle school license and agreed to contact other businesses on the waiting list.

We informed the complainant and told him to expect the package. Other businesses, which had been turned down also contacted us on this matter. We confirmed the change in MVD policy had opened the State to more competition in regard to motorcycle training and allowed numerous small businesses to stay open.

1000468. **State Compensation Fund (SCF)**

A small businessman complained that the SCF and Industrial Commission were demanding he pay worker compensation fees despite the fact he had no employees. The man explained he was the only active member in his LLC and thought he should be entitled to a waiver because he did not employ any workers and carried insurance on himself. This was not being allowed by the Industrial Commission and the State Compensation Fund.

We contacted the Industrial Commission and they said they would defer to the SCF. We conferred with both agencies. During the course of our investigation, the Industrial

Commission and the SCF attorneys reviewed their policy, decided to change it and began granting more worker compensation waivers because they agreed the law exempted companies run by an owner with no employees. Given the change, the Industrial Commission agreed to update their web site to make it more accurate. The SCF said they would change their forms to make their new policy clear too.

We informed the complainant and the state senator who asked us to originally look into these questions. The resolution of this complaint resulted in financial savings for numerous small businesses.

1003398. **AHCCCS – Healthcare Group of Arizona (HCG)**

A small business owner called to complain about administrative problems she has had dealing with HCG, which is run by the state under AHCCCS. The caller purchased HCG coverage for employees because it was affordable, but she kept running into administrative problems with them. The business was being erroneously double-billed by HCG. Additionally, their payments were misplaced by HCG, despite the business owner's continued attempts to clear up the problems. The business owner asked our office if HCG was facing bankruptcy and if so, she thought she should find a new insurance company for her employees.

We reached the Assistant Director of HCG, who agreed to investigate, contact the business owner and resolve the matter. She reassured our office as well as the business owner that HCG, which offers insurance to private businesses, is operating in the black and bringing in revenue for the state. The business owner thanked our office for helping to resolve her concerns regarding insurance for her employees. She said without HCG insurance, her business would have difficulty affording insurance and providing her employees the healthcare coverage they need.

3. The following examples highlight several cases where the resolution of the problem resulted in financial savings to a citizen.

1000760. **Department of Economic Security, Division of Child Support Enforcement (DCSE)**

A non custodial parent complained that he had finished paying his child support three months ago, but his wages were still being garnished by his employer. He had contacted DCSE, but felt that no one was listening to him.

We worked with DCSE and after reviewing the file, they determined that the original order to stop the garnishment did not go through, as it should have. They immediately issued another stop order and faxed it to the employer that same day. They also issued a refund the next day.

1001661. **Department of Revenue (DOR)**

A tax payer complained that DOR had misplaced her tax refund. She called the Department after she didn't receive her refund and was told that it had been deposited into her bank account. This could not have happened because she did not give them her bank information and had requested the refund by check. A DOR representative told her that she would have to wait until the money was recovered before they would start to process a check. The taxpayer did not feel she should be penalized because the Department made a mistake.

We contacted the DOR and after reviewing the case, DOR agreed it was their mistake and issued the check the same week.

1003500. **Department of Economic Security, Vocational Rehabilitation Program (VR)**

A student, who was enrolled in a vocational rehabilitation program, told us that VR had contracted with Verizon Wireless High Speed Internet Service for him to be able to complete his schooling/internship. He complained that VR had not paid the bill for the last three months, even though he had provided them with multiple copies of the bill. He indicated that Verizon threatened to shut off his service and charge him \$200 as a cancellation fee. He felt VR was ignoring him and did not know where else to turn.

We worked with VR. After reviewing the files and obtaining copies of the Verizon bill through our office, they paid the bill the following week. The complainant called us when the Verizon bill was paid. He was very grateful and thankful.

1003436. **Department of Economic Security, Family Assistance Administration (FAA)**

A mother called because her cash assistance had not arrived, despite being told that it should be there already. Her power and water were shut off as a result. We contacted FAA and they discovered a problem in the computer system that affected the caller as well as several other citizens. Within a matter of hours, DES corrected the system error for all of their clients. Money was in the woman's account by 5 AM the next day and she was able to restore power and water to her home.

4. The following example highlights a case where the resolution of the problem resulted in financial savings to a state employee.

1003409. **Department of Economic Security**

A state employee said that DES incorrectly handled her donated leave. The lady had a severe medical condition and could not work for several months. She had submitted doctor's notes to corroborate her claim and had been on approved leave. Once she exhausted her accrued leave, her fellow employees had donated some of their own accrued leave to help her through this medical crisis. Unfortunately, DES failed to add

in the donated leave and the employee got a bill for insurance and no pay check. The employee said she brought the matter to DES managers' attention, but the problem continued.

We checked with DES human resource staff and their donated leave specialist. DES confirmed that middle managers had misunderstood an instruction and had put the employee into a medical leave without pay status incorrectly. DES staff corrected the error, resolved the insurance bill and credited the lady's account. They cut a paycheck the next day.

5. The following examples show how we help resolve grievances against state agencies, even though the resolution might not involve a financial benefit.

9003531. **Department of Racing**

A horse trainer thought the Racing Department staff was irresponsible to give a trainer license to an alien who did not have immigration employment status. He alleged that the Arizona Department of Racing officials were selectively enforcing alien status laws and abusing their discretion as exemplified by their granting of a license to a non-immigrant alien who lacked the proper employment status for licensure. We investigated and substantiated the allegations and made ten findings.

Our investigation found the ADOR licensing process is inconsistent and leads to some licensees losing their licenses because they lack appropriate proof of lawful presence and alien status while others do not. ADOR and their advisers at the Attorney General Office professed that A.R.S. §41-1080, "Licensing eligibility; authorized presence; documentation; applicability; definitions," has very limited application and does not apply to any trainer, owner or groom licensed by ADOR. In fact, the two agencies said that no state law requires ADOR to verify lawful presence or alien status of their licensees.

We and the General Counsel of the State Legislature disagreed with this interpretation and believed the law applied to ADOR licensees. We believe the Arizona Legislature intended that agencies verify citizenship or lawful alien status and presence before issuing licenses, even though the Attorney General may be advising agencies differently. Therefore, we recommended the legislature consider changing statute to clarify their intent.

For consistency, we also recommended the Legislature amend A.R.S. §§ 1-501, 1-502, and 41-1080 so the Arizona statutes' lists of approved documents better match the United State Citizenship and Immigration Service (USCIS) approved list of citizenship and alien status documents.

We also found that the Department stewards were making decisions which impacted licenses, yet did not record these decisions as required by public record law.

The Department of Racing admitted they erred in granting the trainer license and their subsequent steward review, but insisted they should not correct the situation by re-ordering the race results where the improperly licensed trainer competed against lawful trainers. They explained that this was justified because at the time they issued the license, they "reasonably believed" they issued the license correctly. We think this is an abuse of their discretion and reported our findings and recommendations to the Legislature.

1003232. Child Protective Services (CPS)

A cousin and maternal grandmother were upset that Child Protective Services (CPS) placed the family's children with an ex-husband who was not related to the children. The family told the CPS case worker that the birth dad was in jail for molesting children and the ex-husband was convicted, along with his wife, of child abuse in Tennessee. They claimed the CPS worker ignored information given to them by some of the family children.

We gave CPS this information and they immediately acted on it. They said the case was not a CPS case originally, but started as a private petition to the court by the family. After we brought the situation to the attention of management, CPS decided to get involved and met with the family and investigated their concerns.

We went back to the aunt and confirmed that CPS spoke to the children and researched the matter. The aunt said that CPS had helped change the placement. She was happy that CPS staff had changed their minds and gotten involved.

1000093. Department of Economic Security, Division of Benefits and Medical Eligibility (DBME)

A couple had applied for medical assistance in October. They were told in December that their application was denied because the husband's employer had not signed the income disclosure form. The husband said he could prove this was incorrect, but DBME said the couple would have to start over. The couple was in the process of trying to get the problem addressed when the wife had a baby.

We contacted DES and they told us the couple failed to submit documentation by the deadline. We asked them to double check the file because the couple had proof they submitted the information. The DES manager found that the staff had not performed as expected and notified supervisors to intervene. DES recognized their error, corrected the file, and backdated the approval to the proper date so that the medical bills were covered.

1003361. Arizona Department of Transportation (ADOT)

A small business owner called to find out what could be done about the construction of a drainage ditch that was affecting his place of business. The man is the owner of a

restaurant and store in the northwestern corner of Arizona, bordering Utah and Nevada. His rural business sells a high volume of Arizona lottery tickets because of its proximity to other states, so he believes the state should be concerned about the decreased parking capacity of his property.

After conferring with ADOT, we determined that Mojave County was primarily responsible for construction and engineering of the project. We helped the businessman connect with engineers at the county and state level who oversee the project. The project was given a 45-day hold so that the engineers could come to a consensus about whether or not it made sense, from financial and logistical perspectives, to continue construction of the drainage ditch.

The man called our office and thanked us because, even though we did not have jurisdiction over the project, he said we were the only people who listened to him. He felt ours was the only office that provided him with the resources and support he needed to bring in the right individuals to consider a practical solution to a problem affecting his business.

1003870. **Department of Economic Security, Division of Benefits and Medical Eligibility (DBME)**

A mother called our office because her food stamps and medical benefits were cut after she and her family fled a domestic violence situation. She had changed her name to protect her family and then moved out of a shelter in one district and into transitional housing in another. She had called DBME in the first district and was transferred to phone numbers that did not work, so she was unable to speak directly with anyone to let them know about the changes in her situation. In the second district, she was also having difficulty making contact with caseworkers. An interruption in services would be especially harmful for this family because the woman's daughter is diabetic and depended on medical assistance for prescriptions and treatment.

We worked with DBME management and they worked with the woman to change her name in their records, update her contact information and restore medical and nutrition assistance for her family. Within two days of calling our office, the family's medical benefits were approved. The woman called our office and thanked us for assisting her because her family would now be able to get the medication they needed and DBME was aware of the need to keep their identity confidential for their safety.

1003858. **DES - Employment and Rehabilitation - Unemployment Insurance (UI)**

A woman in Mojave County called our office because she was having trouble getting her unemployment insurance benefits. When she tried to resolve the matter on her own, staff gave her incorrect phone numbers of caseworkers she needed to call. This forced her to go into the closest office, 30 miles away from her rural home. Without her unemployment checks, she had no funds left to purchase fuel.

We intervened with the UI central office and they took care of the problem by getting the information they needed directly from the woman. They also spoke with caseworkers in the local office and asked them to be more accommodating when citizens live out of town. They also gave the caller instructions for faxing information to them in the future, so she no longer had to drive 30 miles to the office. She called afterward to let us know how much she appreciated our assistance because she would have lost her home without it.

1001810. Arizona Department of Environmental Quality (ADEQ)

A business woman who ran a gun range for a shooters association complained that ADEQ was intimidating her with threats of fines and a lawsuit because they said activity on her private property could potentially harm a dry river a couple of miles away. The ADEQ alleged her small range was polluting a wash with spent shell casings.

The business woman said she had hired people to rake up the casings, but ADEQ did not like that. She asked them what she could do to remediate it and they said they couldn't approve anything. ADEQ staff also said they didn't have legal authority to shut the range down, but it would be better if she did so. At one time, she had a meeting scheduled with a supervisor, but ADEQ cancelled it. The woman said she was frustrated and just wanted to know what she could do to resolve the problem, but felt she couldn't get a straight answer from ADEQ.

We reviewed information she provided about the property and her correspondence with ADEQ. We reviewed the ADEQ case material and examined relevant statutes, rules and case law. We talked with ADEQ staff who said their concern was that the wash running through the property periodically ran with water when there was a big storm. The wash dumped into the Aqua Fria River which emptied into Lake Pleasant. They said that lead bullets and shell casings could get washed downstream.

We worked with both sides to mediate the dispute. ADEQ met with the complainant and they developed a clean up plan that each considered reasonable. They also developed a plan to reorient the shooting range away from the wash.

Public Access Program

OUTREACH AND EDUCATION

Educational Materials

We continue to receive requests for copies of our open meeting law and public records law booklets, which are available on our website along with the applicable updates. We will create and publish a revised and more comprehensive booklet in 2011.

Website

We continually update our website with publications, guidance, current statutes, links to other resources such as the Arizona Agency Handbook and Attorney General Opinions, summaries of changes and developments in the open meeting and public records law, and training opportunities. This information is provided to free of charge and is available 24 hours a day.

Newsletter

Each quarter we disseminate “The Public Record”, our public access newsletter, to public officials, public employees, and members of the public throughout the State. We distribute the newsletter via e-mail in order to save money. We maintain the four most recent newsletters on our website and older newsletters are always available upon request. The newsletters include discussion on hot issues relating to Arizona’s open meeting law and public record laws, legislative updates, summaries of recent attorney general opinions, information on upcoming training opportunities, and more. In October, “The Public Record” recognized several unsung heroes. These were public employees nominated by their peers and members of the public for their exception efforts in promoting open government in Arizona.

Trainings and Outreach

During the past four years our office has become well known for providing quality training on Arizona’s public records and open meeting laws. As a result, we continue to receive requests for training from the media, various organizations and associations, public bodies, government employees, and public officials.

In addition, the Attorney General’s Office, Arizona State Library, Archives, and Public Records, Arizona Board of Charter Schools, and other agencies refer government entities to us for guidance and training.

Although we had to decline a few requests during the first half of the year as a result of budget constraints, we managed to provide 34 training sessions during 2010 as well as participate in a podcast for the ASU Morrison Institute for Public Policy. Numerous trainings and presentations are already scheduled for 2011.

In an effort to streamline training and cut travel costs, we offer quarterly trainings at the Carnegie Center in Phoenix and have successfully coordinated regional trainings throughout the state (i.e., Mohave County, Cochise County, Pima County, and Pinal

County). Trainings will be held in Santa Cruz County and Yuma County the first part of 2011.

Saving the State Money

Providing quality training and educational materials free of charge encourages government entities to seek guidance and assistance. They might be less willing to do so if they had to pay an attorney. Not only does this eliminate training costs, it increases compliance with the law and thus, helps reduce litigation costs and attorney fees. This is particularly true for those political subdivisions and special districts that hire private counsel.

Law suits to resolve public record disputes and alleged open meeting law violations do not come cheap. When a public body or public official withholds records, fails to promptly respond to requests, or violates the open meeting law individuals may file a complaint with our office and attempt to informally resolve the dispute or file an action in superior court.

While our office reviews complaints free of charge, a court action may result in costly litigation including courts costs and attorney fees. Once it is named as a defendant, public bodies must use their resources to convince a judge that it appropriately withheld records, promptly responded, or complied with the open meeting law. If the plaintiff prevails, the court may also order the public body to pay the other side's costs and attorneys' fees. The same is not true the other way around.

Pursuant to A.R.S. §39-121.02(B) and (C), if the requesting party substantially prevails they may recoup costs, attorney fees, and damages. There is no similar provision for public bodies or public officials. Therefore, while litigation is costly for everyone, it can be much more costly for public bodies that are found to have inappropriately responded to public record requests or violated open meeting laws.

For example, consider *Lake v. City of Phoenix*, 222 Ariz. 547, 218 P.3d 1004 (2009), one of the more recent public record disputes that made its way to the Arizona Supreme Court. It took approximately four years to litigate this matter. Ultimately, Plaintiff, David Lake, substantially prevailed on the merits. As a result, the City was potentially liable for his costs and attorney fees amounting to \$70,000. The issues of costs and fees are currently pending at the Arizona Court of Appeals. This means costs and fees will continue to accrue.

In addition, although not all of the City's costs associated with litigating this case were available, the City spent \$48,000 in attorney fees alone to brief and argue the matter before the Arizona Supreme Court and subsequently litigate the attorney's fee issue at superior court.

In 2010, the City of Phoenix again found itself the defendant in several other public record disputes. Three of which, the superior court upheld the City's denial of public records. The City spent \$68,100 in attorney fees to defend itself against

unsubstantiated allegations that is inappropriately withheld public records. Plaintiffs appealed so the fees and costs will continue to rise.

The point is that it costs government money to defend allegations of open meeting law and public record law violations regardless of the outcome. Our coaching, assistance, training and intervention helps alleviate some of these costs because it helps public bodies, public officials, the media, and members of the public better understand government's responsibilities and obligations as well as the laws' limitations. This curbs inappropriate government actions as well as unwarranted complaints. When problems do arise, as they inevitably will, our independent and impartial findings and recommendation often resolve disputes one way or the other, making costly court intervention less necessary.

INQUIRIES AND INVESTIGATIONS

During 2010, this office received 872 calls regarding matters related to public access. Of those calls, 476 were public record inquires and 396 were open meeting inquiries. Table 1 provides a breakdown of the number of inquires received from the public, the media, and government agencies. Table 2 provides the number of inquiries received about state agencies, county agencies, city or town agencies, school districts, and other local jurisdictions.

Inquiries Received

	Inquiries from the Public	Inquiries from the Media	Inquiries from Government Agencies
Number of inquires	393	54	425

Inquiries About Different Jurisdictions

	State Agencies	County Agencies	City or town agencies	School Districts	Other Local Jurisdictions
Number of inquires	218	96	275	108	175

Of the 872 inquiries, 828 required coaching or assistance and 44 resulted in an investigation.

SAMPLE CASES

1000426.

Bus driver in Quartzsite, AZ was the subject of a disciplinary action. She complained that the Quartzsite School District Governing Board (Board) did not permit her to attend an executive session and did not properly describe the executive session on the meeting agenda.

We explained that the open meeting law does not require the Board to invite her into the executive session. Indeed, A.R.S. § 38-431.03(A)(1) requires that an employee receive 24 hours separate written notice explaining the matter to be discussed and advising the employee of their right to demand that the discussion take place in public. She acknowledged that she received a letter, but was lead to believe that if she did not exercise that right she would be permitted to attend the executive session. We clarified the law and explained that regardless of whether she is invited to attend the executive session, she has a right to access the portion of the executive session recording or meeting minutes that pertain to her.

Upon review of the agenda, we found that the Board failed to provide an adequate description of the matters to be discussed. We contacted the District and it was referred to its attorney. The attorney agreed that it lacked an adequate description and agreed to work with the Board on future agendas to make sure they comply with the law.

1002290.

Former Bisbee Unified School District Superintendent called for assistance obtaining records from Bisbee Unified School District Governing Board Members. The records at issue were emails and telephone records of the board members personal phones. We decided not to pursue the telephone records. They are records of phone calls made from a private phone maintained by the private telephone companies. Neither the school district nor the public officials (board members) possess the records requested. Accordingly, I do not believe they fall with the scope of the public records law

I contacted the two board members at issue regarding the responsive emails. After speaking with each of them, I found that one did not possess responsive e-mails other than those previously provided. We discussed retention of e-mail and she now has a better understanding of what is required.

The other board member did have the e-mails sought, but argued that not all of the pages fell within the scope of the request. Upon review of the e-mails at issue, I disagreed and explained my reasoning. He agreed to provide the remaining pages.

1003861.

Bowie Water Irrigation District contacted me regarding a potential personnel matter. Basically he wanted to know how to avoid letting an individual know that they might get fired. I explained that is not really possible. Personnel matters must be noticed and placed on an agenda. Moreover, if the Board may vote to possibly discuss this matter

in executive session, it must provide the employee with separate written notice describing the matters to be discussed and the employee's right to demand that the discussion take place in public.

In addition, because the board members may not discuss these matters outside a properly noticed meeting, the agenda item would be neutral. For instance, to discuss performance, etc. Any decision to terminate an employee would not be taken or known until the public portion of a meeting.

1001764.

Dewey Humbolt Town Manager called to discuss the validity of a recent vote taken to appoint a new council member. There was concern that the newly appointed council member "lobbied" four of the existing council members before the meeting conveying discussions he had with the other members possibly including how they intended to vote. If so, the question is whether that is an open meeting law violation and whether the subsequent action is null and void.

Upon review of the applicable law, we opined that separate conversations between the applicant and four of the council members would not be deemed open meeting law violations. It would be difficult to trump a private individual's right to freedom of speech with the open meeting law.

Conversely, if the applicant knowingly attempted to circumvent the open meeting law or intentionally aid the council members in violating the open meeting law by conveying their thoughts, opinions, or intentions on this particular agenda item among a quorum of the members; that might tip the scales in favor of a violation. Section 38-431.07(A) provides that, "the court may impose a civil penalty not to exceed five hundred dollars against a person who violates this article or who knowingly aids agrees to aid or attempts to aid another person in violating this article and order such equitable relief as it deems appropriate in the circumstances." It applies to any person and is not limited to members of the public body or staff. In addition, the board members should refrain from commit their votes outside a public meeting or other permissible forum.

However, even if the one-on-one conversations were deemed to constitute an open meeting law violation, we do not find that that alone renders the subsequent "legal action" taken on the matter during a lawful meeting null and void. *Valencia v. Cota*, 126 Ariz. 555, 617 P.2d 63 (1980)(holding that even when a public body may have discussed a matter at an unlawful meeting, subsequent "final action" taken at a lawful meeting is not void).

Elizabeth S. Hill

Assistant Ombudsman - Public Access

Child Protective Services

As the Assistant Ombudsman for Child Protective Services, I provide assistance to people who contact our office with questions, concerns and requests for an investigation about a CPS case, process or procedure. We classify cases as coaching, assistance or investigation.

Coaching:

A large number of the calls are attempts by the caller to locate information about their particular case or the agency in general. Frequently, parents who recently had their children removed call us because they have questions about their rights and how the process will work. Other requests may consist of locating the correct number for the CPS worker assigned to that caller's case or the address of the closest office. There were multiple calls from parents who wish to obtain a copy of the CPS report that involves them. I provide the caller the information on the process that is used to receive a redacted copy of the report as well as the number to contact to initiate the process.

This past year there were two calls from different states by individuals hoping to obtain information on how our office came about, our mission statement and what we do for our citizens as they were in the process of setting up ones to address their child protection organizations.

Assistance:

The majority of the calls that we receive are requests for assistance by parents, grandparents, extended family members and the community regarding a Child Protective Services case. These requests may be as simple as getting a case manager or supervisor to return a call, to the more complicated requests in which family members are trying to obtain visitation with the children in CPS custody, or a person wishes to be considered as a possible placement.

One such case involved a father, who had his children returned to his care by the agency. The children were eligible for social security benefits, which were going to the state while they were in care. When the agency placed the children with their father the worker had failed to inform Social Security of the placement change and thus the father was not able to receive the benefits. The father had not received the children's benefits for nearly four months, since the caseworker placed them back home. The father had learned that Social Security was still sending the payments to CPS. I was able to clear up the issue with CPS and the agency refunded the amount to the father.

Another case involved a caller who wished to be considered for placement of a child that she knew through her church. She had been trying to contact the case worker to provide her name and address so that a home study could be completed and the child could be removed from his shelter placement and into her home. She reported that the case worker was not returning the messages that she had been leaving at the office. I

contacted the CPS supervisor for the worker and provided the caller's name and contact number so that a home study could be completed. The caller was contacted by the CPS worker and eventually the child was placed in her home.

This past year there were a large number of calls from parents requesting closure letters for their CPS cases, the callers denied having received them previously. There might be a variety of reasons that the letters were not received; to include an incorrect address, the parent had moved or the case had not been closed out as of yet. In each case I was able to secure a closure letter for the parent either by mail or by having them pick it up at the CPS office where their case had been handled.

There were several calls regarding the policy behind interviewing children either at school or without an adult present. One caller had been an elementary school administrator who wanted clarification on the parameters for CPS personnel to interview children at the school; did an adult need to be present, would it be okay for just the CPS worker and child to be in the interview and did the parents need to be contacted prior to the interview. We gave the school administrator the statute that allowed for the children to be interviewed without a parent present.

Investigation:

At times there are callers who bring a specific concern or complaint to my attention that requires a deeper review and thus an investigation. The first step is to do a brief review of the written record in the CPS case notes system. This involves reviewing all of the reports, case notes and legal documentation that are held within it. After that contact is made with the case manager's supervisor or Assistant Program Manager to determine the agency's response to the complaint and to obtain additional information that has not been included in the record. At times a physical review of the file is needed or interviews are conducted. The allegations may be substantiated, or not, depending on what is found in the investigation. If required, we submit a formal report to the agency, including recommendations, for their review.

This past year there were numerous complaints surrounding the Interstate Compact Placement process (ICPC) from family members that wanted to be considered for placement purposes. In each call the concern voiced was that the referral for the home study had not been completed in a timely manner. The relatives' concern was that this would prohibit placement of a child with them due to the extended time in care in the foster home in Arizona and how removal would be detrimental to that child. There does appear to be concerns with when the ICPC requests are being referred and how this is affecting the placement of children with family members versus remaining in their foster home. It is an issue that will require further review by this office as well as the agency.

*Kara VanHise
Asst Ombudsman for CPS*

The Ombudsman and Staff

Patrick Shannahan, Ombudsman-Citizens' Aide. Pat was appointed Arizona's first Ombudsman-Citizens' Aide on July 1, 1996. He is a former military officer with extensive experience in management, problem solving, strategic planning, and negotiation. Pat's last military assignment was with the Joint Chiefs of Staff where he participated in international arms control negotiations, represented the Joint Chiefs at interagency working groups and helped formulate national security policy. Pat has completed the mediation training program presented by the Attorney General's Office and investigator training through the Council on Licensure, Enforcement and Regulation. He has a bachelor's degree from Arizona State University, a master's degree from Webster University and was a research fellow at the National Defense University in Washington DC. He is active in the United States Ombudsman Association and the Arizona State University Alumni Association.

Joanne C. MacDonnell - Deputy Ombudsman. Joanne joined the office in 2005 after serving nearly eight years as the Arizona Corporation Commission Director of Corporations. Joanne has experience in management, human resources, problem resolution, customer service, strategic planning and process analysis. Joanne has Bachelor of Science in Business Administration & Real Estate from the University of Arizona. She is an Investigator certified by the Council on Licensure, Enforcement & Regulation and completed mediation training through South Mountain Community College. She completed additional training including the Executive Course, Project & Investment Justification Training, various risk management, procurement and ethics courses through Arizona Government University (AZGU); the Leadership Module through Rio Salado College and AZGU; and ombudsman training prescribed by the US Ombudsman Association (USOA). She is on the Board of Directors of the U.S. Ombudsman Association, and chairs the Outreach and Development Committee. Prior to working in government, Joanne worked in the private sector at FCC Investors, Inc, serving on the Board of Directors and as an accountant. She also worked in real estate as a licensed Realtor associate and real estate appraiser.

Kara VanHise - Assistant Ombudsman for Child Protective Services. Kara joined the office in 2007 after serving for nearly 3 years as a program supervisor for foster care with Catholic Community Services. Prior to this Kara worked for five and a half years as a Child Protective Services specialist for the State of Arizona. Kara has also worked for the Salvation Army providing case management services to homeless individuals and families. She has a bachelor's degree in sociology from Portland State University. In addition to her work for the Ombudsman - Citizens' Aide office Kara participates as a member of the State Citizen Review Panel on child fatalities, the Court Improvement Project and the Children's Action Alliance Child Welfare Committee. Kara completed the National Certified Investigator/Inspector Basic Training Program through CLEAR in October 2007. In addition she completed a 40-hour course in September 2008 entitled Introduction to Mediation.

Carmen Salas, Assistant Ombudsman. Carmen joined the Ombudsman's office in July 2005. She previously worked at the Arizona Corporation Commission for nine years. For three of those years she was the Supervisor in the Corporations Division's Annual Reports Section. For the last two years she was the Management Analyst for the division. Carmen has experience in customer service, process analysis and problem resolution. She received her Bachelor of Science degree in Business Management from the University of Phoenix in October 2005. She has completed additional training including ethics and various risk management courses, which included the Leadership Module through Arizona Government University. She has also completed ombudsman training prescribed by the US Ombudsman Association. Carmen has also completed the National Certified Investigator/Inspector Basic Training Program. She also completed the mediation program through Interaction Management Associates. Carmen is fluent in Spanish.

Elizabeth S. Hill, Assistant Ombudsman for Public Access. Liz joined the office in February 2007, after serving three years as an Arizona Assistant Attorney General in the Civil Division and member of the Open Meeting Law Enforcement Team. Prior to working at the Office of the Arizona Attorney General, Liz spent two years working with the Arizona Department of Revenue as a Tax Analyst and Tax Counsel. She has a bachelor's degree from Northern Arizona University, a law degree from Gonzaga University School of Law, and is licensed to practice law in Arizona. Liz also completed mediation training through Interaction Management Associates and investigator training through the Council on Licensure, Enforcement and Regulation. She is an active member of the Arizona State Bar Association, the United States Ombudsman Association, and the American Bar Association (ABA), currently serving as Vice-Chair of the ABA's Administrative Law and Regulatory Section's Ombuds Committee.

Kate Otting, Kate Otting, Assistant Ombudsman. Kate is the former Director of Conflict Resolution Programs for the Arizona Attorney General. Prior to that she held the same position for the Iowa Peace Institute. She was the Vice President for International Services with the International Center for Community Journalism, introducing former Soviet journalists to US concepts of freedom of the press. She founded Interaction Management Associates, leading seminars on mediation, negotiation and conflict management for businesses and public agencies in Arizona and throughout the U.S. She has mediated employment, housing discrimination, family, ADA, EEOC, US Postal Service and public policy cases. She has over 15 years of experience as a practicing mediator and trainer. She produced the manual, Conflict Prevention and Intervention: Positive Approaches to School Conflict and was featured for her work with school mediation programs in a PBS documentary, The American Promise. She has a master's degree in international management, with a concentration on alternative dispute resolution, and has worked in Europe, Africa and Asia.

REQUESTS FOR INVESTIGATION

Declined*	5
Complaint withdrawn or resolved during investigation	6
Investigation completed	167
Ongoing	20
TOTAL REQUESTS FOR INVESTIGATION	198

* The Ombudsman-Citizens' Aide has the statutory authority to decline to investigate a complaint if there is another adequate remedy available; the complaint relates to a matter that is outside the duties of the ombudsman-citizens aide; the complaint relates to an administrative act that the complainant has had knowledge of for an unreasonable time period; the complainant does not have a sufficient personal interest in the subject matter of the complaint; the complaint is trivial or made in bad faith; or the resources of the office of ombudsman-citizens aide are insufficient to adequately investigate the complaint.

INVESTIGATIVE FINDINGS

SUPPORTED/PARTIALLY SUPPORTED		47
Requires further consideration by agency	13	
Other action by agency required	24	
Referred to the legislature for further action		
Action was arbitrary or capricious		
Action was abuse of discretion		
Administrative act requires modification/cancellation		
Action was not according to law	10	
Reasons for administrative act required		
Statute or Rule requires amendment		
Insufficient or no grounds for administrative act		
INDETERMINATE		5
NOT SUPPORTED		115
TOTAL COMPLETED INVESTIGATIONS		167

CONTACTS

Agency	Coaching	Assistance	Investigation	Total
Academy of Math and Science	1	0	0	1
Accountancy Board	3	0	0	3
Acorn Montessori Charter School	1	0	0	1
Acupuncture, Board of Examiners of	2	0	0	2
Administration, Department of	16	10	1	27
Administrative Hearings, Office of	1	1	0	2
Agriculture, Department of	4	0	0	4
Agua Fria High School	4	0	0	4
AHCCCS	42	36	1	79
Alpine Water Improvement District	1	0	0	1
Amphitheater Public School District	0	0	1	1
Apache	1	1	0	2
Apache County Assessor	1	0	0	1
Apache County Attorney's Office	2	1	0	3
Apache County Board of Supervisors	3	1	0	4
Apache County Sheriff's Office	1	0	0	1
Apache Junction	1	0	0	1
Apache Junction Police Department	2	1	0	3
Appraisal, Arizona Board of	1	2	0	3
Arizona City Sanitary District	0	1	0	1
Arizona Commission for the Deaf & Hard of Hearing	3	0	0	3
Arizona Peace Officer Standards and Training Board	0	0	1	1
Arizona Power Authority	1	0	0	1
Arizona State Hospital	1	0	0	1
Arizona State University	6	0	0	6
Attorney General, Office of	39	10	0	49
Auditor General	2	0	0	2
Avondale Elementary School District	0	0	1	1
Avra Fire District	1	0	0	1
AZ SILC	1	0	0	1
Ball Charter Schools	1	2	0	3
Beaver Valley Water Improvement District	2	0	0	2
Behavioral Health Examiners, State Board of	7	10	1	18
Benson	6	0	0	6
Big Park Domestic Wastewater Improvement District	1	0	0	1
Bisbee	14	1	0	15
Bisbee Unified School District	0	1	1	2
Bowie Water District	1	0	1	2
Boxing Commission	0	1	0	1
Bradley Academy	1	0	0	1
Buckeye Police Department	1	0	0	1
Buckskin Sanitary District	3	0	0	3
Bullhead City	1	0	2	3
Camelback High School	1	0	0	1
Camp Verde	1	0	0	1
Carefree	0	1	0	1
Carefree Town Council	0	0	1	1
Casa Grande	1	0	0	1
Casa Grande Attorney's Office	1	0	0	1
Central Arizona Valley Institute of Technology	1	0	0	1

Central Yavapai Metropolitan Planning Organization	1	0	0	1
Chandler	1	0	0	1
Chandler City Clerk	1	0	0	1
Chandler Heights Citrus Irrigation District	1	0	0	1
Chandler Municipal Airport Commission	0	0	1	1
Chandler Police Department	1	0	0	1
Chandler Unified School District	0	1	0	1
Charter Schools, Arizona State Board of	5	0	0	5
Chino Valley	4	0	1	5
Chiropractic Examiners, State Board of	1	2	0	3
Chloride Water Improvement District	6	0	0	6
Citizens Clean Elections Commission	1	0	0	1
City of Maricopa	17	0	0	17
Clarkdale	1	0	0	1
Cochise	2	0	0	2
Cochise County Attorney	9	0	1	10
Cochise County Board of Supervisors	6	0	1	7
Cochise County Health Department	1	0	0	1
Cochise County Hospital	1	0	0	1
Coconino	2	0	0	2
Coconino County Assessor	0	1	0	1
Coconino County Parks & Recreation Department	1	0	0	1
Coconino County Planning and Zoning Commission	1	0	0	1
Coconino Natural Resource Conservation District	1	0	0	1
Commerce, Department of	4	4	0	8
Commission for the Deaf & Hard of Hearing	3	0	0	3
Commission of Judicial Conduct	2	0	0	2
Compensation Fund	1	2	1	4
Congress Domestic Water District	1	0	0	1
Congress Elementary School District	1	0	1	2
Cornville School District	1	0	0	1
Corporation Commission	14	7	0	21
Corrections, Department of	18	2	0	20
Cosmetology, Board of	2	1	0	3
Cottonwood	2	0	0	2
Deer Valley Unified School District	4	1	1	6
Dental Examiners, Board of	22	10	1	33
Department of Economic Security	16	5	0	21
DES - Aging & Community Services	118	5	0	123
DES - Benefits and Medical Eligibility	95	389	2	486
DES - Child Protective Services	156	322	119	597
DES - Child Support Enforcement	25	92	3	120
DES - Children and Family Services	0	1	0	1
DES - Developmental Disabilities	9	11	1	21
DES - Employment and Rehabilitation	26	169	2	197
DES - Other	16	6	0	22
DES- Adult Protective Services	5	3	0	8
Desert Marigold School	2	0	0	2
Developmental Disabilities Council	6	0	0	6
Dewey Humbolt Planning and Zoning Commission	1	0	0	1
Dewey-Humboldt	5	0	0	5
Dewey-Humbolt Town Council	14	0	1	15
Discovery Plus Academy	1	0	0	1

Duncan School District	1	0	0	1
Dysart School District	3	0	0	3
Early Childhood Development & Health Board	1	0	0	1
Education, Department of	11	1	0	12
EduPreneurship Student Center	1	0	0	1
El Mirage	0	1	0	1
Electrical District No. 3 of Pinal County	1	0	0	1
Elfrida Elementary School District #12	1	0	0	1
Elfrida Fire District	3	0	0	3
Environmental Quality, Department of	7	3	1	11
Financial Institutions, Arizona Department of	15	5	0	20
Fingerprinting, Board of	2	0	0	2
Fire Building and Life Safety, Department of	5	0	0	5
Fire Marshall	0	1	0	1
Flagstaff	1	0	0	1
Flagstaff Unified School District	0	1	0	1
Florence	0	1	0	1
Fredonia	1	0	1	2
Frye fire district	1	0	0	1
Gadsden Elementary	0	1	0	1
Game and Fish Commission Recommendations Board	1	0	0	1
Game and Fish, Department of	4	1	3	8
Gaming, Department of	2	0	0	2
Gila	1	0	0	1
Gila Bend	1	0	0	1
Gila Bend Elementary	1	0	0	1
Gila Community College	1	0	0	1
Gilbert Municipal Court	1	0	0	1
Glendale	1	0	0	1
Glendale Police Department	2	0	0	2
Golden Valley Fire District	2	0	0	2
Goodyear	7	0	0	7
Government Information Technology Agency	1	0	0	1
Governor, Office of	26	2	1	29
Governor's Council of Aging	2	0	0	2
Health Services, Department of	59	10	0	69
Health Services, Vital Records Office	3	4	0	7
Hearing Impaired Council for the	1	0	0	1
Highland Pines DWID	1	0	0	1
Holbrook Police Department	1	0	0	1
Homeopathic Board of	1	0	0	1
Housing, Department of	5	2	0	7
Industrial Commission	30	14	2	46
Industrial Development Authority of Sierra Vista	1	0	0	1
Insurance, Department of	18	2	0	20
Iron Springs Sanitary District	1	0	0	1
Jerome	7	0	0	7
Judicial Conduct, Commission on	6	1	0	7
Junipine Fire District	2	0	0	2
Kingman Regional Medical Center	1	0	0	1
La Paz County Attorney	1	0	0	1
Lake Havasu Unified School District	2	1	0	3
Land, Department of	3	0	0	3

Legislature	35	0	0	35
Library, Archive & Records Dept.	17	0	1	18
Liquor Licenses and Control, Department of	1	1	0	2
Litchfield Park	2	0	0	2
Lottery	2	0	0	2
Mammoth Elementary School District	1	1	0	2
Mammoth-San Manual Unified School District	1	0	0	1
Marana	1	0	0	1
Maricopa Air Quality	1	0	0	1
Maricopa Board of Adjustments	1	0	0	1
Maricopa County Community Colleges	1	0	0	1
Maricopa County Community Services commission	1	0	0	1
Maricopa County Constables	1	0	0	1
Maricopa County Dept of Emergency Management	1	0	0	1
Maricopa County Elections	0	1	0	1
Maricopa County Environmental Services Department	0	0	1	1
Maricopa County Human Services Wokforce Dev.	2	0	0	2
Maricopa County Recorder	1	0	0	1
Maricopa County Sheriff	3	1	0	4
Maricopa Health Centers Governing Council	1	0	0	1
Maricopa Integrated Health System	1	1	0	2
Maricopa Special Health Care District	1	0	0	1
Massage Therapy, State Board of	1	0	0	1
Mayer Fire District	7	1	0	8
Mayer Water District	1	0	0	1
Medical Board, Arizona	16	7	2	25
Mesa	1	0	0	1
Mesa City Attorney's Office	2	0	0	2
Mesa Police Department	4	1	0	5
Mescal J-6 Fire District	16	2	2	20
Miami	0	1	0	1
Miami School District	1	0	0	1
Mohave Board of Supervisors	3	0	1	4
Mojave	1	0	0	1
Mountain Oak	1	0	0	1
Naco School District	3	0	0	3
Natural Resource Conservation District	2	0	0	2
Naturopathic Physicians Board of Medical Examiners	1	1	0	2
Navajo	1	0	0	1
NBCH	1	0	0	1
Nogales	1	0	0	1
Nogales Police Department	1	0	0	1
North Star Charter School	1	0	0	1
Northern Arizona University	1	0	0	1
Northwest Fire District	4	0	0	4
Nursing, State Board of	16	7	0	23
Occupational Therapy Examiners, Board of	1	0	0	1
Office of Pest Management	3	1	0	4
Ombudsman	121	7	0	128
Optometry, State Board of	1	0	0	1
Oro Valley	1	0	0	1
Osteopathic Examiners in Medicine and Surgery, Board of	3	0	1	4

Other - Government	257	10	1	268
Other - Private	240	5	0	245
Other-federal	15	1	0	16
Page	1	0	0	1
Palominas Fire District	23	4	2	29
Paradise Valley	2	0	0	2
Parks, Department of	1	0	0	1
Patagonia	3	0	0	3
Payson	1	0	0	1
Peoria	1	0	0	1
Peoria City Attorney's Office	0	1	0	1
Personnel Board	3	0	1	4
Pest Management, Office of	1	0	0	1
Pharmacy, Board	5	0	0	5
Phoenix	2	2	0	4
Phoenix Fire Department	0	0	1	1
Phoenix Industrial Development Authority	1	0	0	1
Phoenix Municipal Court	1	0	0	1
Phoenix Police Department	2	1	0	3
Physical Therapy Examiners, Board of	1	0	0	1
Picture Rocks Fire Department	1	0	0	1
Pima	2	0	0	2
Pima County Attorney's Office	1	1	0	2
Pima County Sheriff's office	0	1	1	2
Pima Unified School District	1	0	0	1
Pinal	1	0	0	1
Pinal County Attorney's Office	6	0	0	6
Pinal County Sheriff's Office	0	0	1	1
Pine-Strawberry School District	0	0	1	1
Pinetop-Lakeside	7	0	0	7
Pioneers Home	0	1	0	1
Podiatry Examiners, State Board of	3	0	1	4
Portal Fire and Rescue Board	1	0	0	1
Prescott	6	1	0	7
Prescott City Council	5	0	0	5
Prescott Police Department	2	0	0	2
Private Post-Secondary Education, Board for	1	1	0	2
Psychologist Examiners, State Board of	4	1	0	5
Public Safety, Department of	11	4	1	16
Quartzite City Clerk	1	0	0	1
Quartzsite	3	1	0	4
Quartzsite School District #4	0	0	1	1
Queen Creek	0	0	1	1
Racing, Department of	13	7	4	24
Radiation Regulatory Agency	3	0	0	3
Real Estate, Department of	11	4	0	15
Regents, Arizona Board of	1	0	0	1
Registrar of Contractors	19	22	2	43
Residential Utility Consumer Office	6	0	0	6
Respiratory Care Examiners, Board of	1	1	0	2
Retirement System, Arizona State	2	7	0	9
Revenue, Department of	13	23	0	36
Roosevelt School District	1	0	0	1

Safford	3	0	0	3
Sahuarita	1	0	0	1
Salome Elementary	2	0	0	2
San Luis	1	0	0	1
San Tan Irrigation District	13	1	1	15
Santa Cruz Attorney's Office	3	3	0	6
School Facilities Board	1	0	0	1
Scottsdale	7	0	0	7
Scottsdale Municipal Court	1	0	0	1
Scottsdale Police Department	3	0	0	3
Scottsdale Unified School District	1	1	0	2
Secretary of State, Office of	15	0	0	15
Sedona	6	0	0	6
Sedona Fire District	4	0	0	4
Senoita Elgin Fire District	1	0	0	1
Sheriff's Posse Road Improvement District	10	0	0	10
Show Low	1	1	0	2
Show Low Police Department	0	1	0	1
Sierra Vista	4	1	0	5
Sierra Vista City Council	2	0	0	2
Sierra Vista Police Department	1	0	0	1
Sierra Vista School District	5	0	0	5
Snowflake	1	0	0	1
Somerton School District	1	0	0	1
SRP	2	0	0	2
St Johns	4	0	0	4
St Johns Police department	0	1	0	1
Star Valley	4	0	0	4
State Court	4	1	0	5
Sun City West Fire District	1	0	0	1
Sunburst Farms Irrigation District	21	0	2	23
Sunsites-Pearce Fire District	1	0	0	1
Superior	1	0	0	1
Superior Court	9	0	0	9
Supreme Court	1	0	0	1
Surprise	1	0	0	1
Surprise City Council	1	0	0	1
Surprise Police Department	1	0	0	1
Taylor	2	0	0	2
Technical Registration, Board of	2	5	1	8
Tolleson	0	1	0	1
Tombstone	1	0	0	1
Tombstone Unified School District	3	0	0	3
Transportation, Department of	10	10	0	20
Transportation-Motor Vehicle Division	22	54	5	81
Tucson	0	1	0	1
Tucson Industrial Development Authority	2	0	0	2
Tucson International Academy	1	0	0	1
University of Arizona	4	0	0	4
Unknown Board of Supervisors	1	0	0	1
unknown charter school	13	0	0	13
unknown city	16	0	0	16
Unknown Community College	1	0	0	1

unknown fire district	4	1	0	5
Unknown Irrigation District	1	0	0	1
unknown local jurisdiction	3	0	0	3
unknown school district	22	0	0	22
unknown state agency	6	0	0	6
Upper San Pedro Partnership	0	1	0	1
Upper San Pedro Water District	1	0	0	1
Valentine Elementary School District	1	1	0	2
Valley Schools Management Group	2	2	1	5
Various Cities/Towns	1	0	0	1
Various school districts	1	0	0	1
Verde Valley Fire District	3	0	0	3
Veterans' Services, Department of	1	0	1	2
Veterinary Medical Examining Board	1	1	1	3
Weights and Measures, Department of	28	4	1	33
Wickenburg Police Department	1	0	0	1
Willcox	3	0	0	3
Winslow Unified School District	0	1	0	1
Yarnell Fire District	1	0	0	1
Yavapai	1	0	0	1
Yavapai County School Superintendent	1	0	0	1
Yavapai County Special Districts	1	0	0	1
Yuma	2	0	0	2
Yuma City	17	3	4	24
Yuma City Attorney's Office	2	0	0	2
Yuma County Recorder	1	1	0	2
Yuma County Sheriff's Office	2	2	0	4
Yuma Police Department	1	1	0	2
TOTAL NUMBER OF CONTACTS	2369	1396	198	3963