

# 2026 OLA Recommendation Updates

The Office of the Legislative Auditor (OLA) conducts nonpartisan research on the performance and financial condition of state government. We conduct program evaluations at the direction of the Legislative Audit Commission, select entities for financial audits based on factors such as risk and legislative interest, and select special reviews based on allegations and concerns regarding the misuse of public resources. Based on our work, we often make recommendations for program improvement.

The 2025 Legislature established a new requirement that directs OLA to report, as resources permit, on the implementation of OLA recommendations made in the preceding five years.<sup>1</sup> We produced this report in response to that requirement. In this report, we detail (1) the extent to which agencies have implemented recent recommendations and (2) whether the Legislature has passed legislation relevant to our recommendations in recent years.

From 2022 through 2025, we released 21 program evaluation and 7 special review reports in which we made recommendations to state agencies, the Judicial Branch, and the Legislature for improvements to state policies and programs.<sup>2</sup> We asked state agencies and the Judicial Branch to report to us the extent to which they had implemented the recommendations in those reports by November 2025. We also asked agencies to supply supporting documentation, such as policies and templates. We then assessed the agencies' and Branch's actions and determined whether it had implemented, partially implemented, or not implemented each recommendation.

In some cases, we could not confirm the agency's implementation of the recommendation based on the agency's written response and supporting documentation. In these cases, we determined that we did not have the capacity to make an assessment and indicated there is "work needed to determine implementation."

For select program evaluation and special review reports published in 2023, we performed the additional work necessary, as resources allowed, to independently determine whether agencies implemented OLA recommendations. For example, we reviewed grant files from several state agencies.

## Implementation Status

- **Implemented:** The agency has largely implemented OLA's recommendation.
- **Partially implemented:** The agency has implemented OLA's recommendation in part, but should continue its efforts to fully implement the recommendation.
- **Not implemented:** The agency has not implemented OLA's recommendation.
- **Work needed to determine implementation:** OLA would need to conduct further research to determine to what extent the agency has implemented OLA's recommendation.
- **Not applicable:** The recommendation is not currently applicable to the agency's circumstances.

<sup>1</sup> *Laws of Minnesota* 2025, chapter 39, art. 2, sec. 11, as codified in *Minnesota Statutes* 2025, 3.971, subd. 10(a).

<sup>2</sup> Throughout this document, we use "state agencies" or "agencies" to refer to all executive branch agencies, authorities, boards, commissions, councils, and taskforces to which OLA made recommendations.

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In 2023, we released four performance audit reports and one information technology performance audit report. For three of these audits, we asked state agencies to report to us the extent to which they had addressed our recommendations by March 2025. We also asked agencies to supply supporting documentation, such as agency policies, proof of corrective actions, or current transaction examples. To the extent that resources allowed, we conducted work sufficient to independently determine whether recommendations had been implemented.

In a few cases, we determined that OLA's original recommendation was not currently applicable. For example, OLA originally made recommendations to the Emergency Medical Services Regulatory Board in our program evaluation, *Emergency Ambulance Services* (2022). The Legislature has since replaced the board with the Office of Emergency Medical Services, so certain recommendations from the 2022 report no longer apply.

We organized this document by entity—individual state agency within the Executive Branch, the Judicial Branch, or the Legislature. To review implementation statuses of all recommendations from a specific report, see the Table of Contents (by OLA Report Name).

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# Executive Branch

## Department of Children, Youth, and Families

The Department of Children, Youth, and Families (DCYF) was established on July 1, 2024. Certain programs from the Department of Human Services (DHS), the Department of Public Safety, the Minnesota Department of Education, and the Minnesota Department of Health transferred to DCYF by June 2025.

### *Program Evaluation Reports*

#### [Child Protection Removals and Reunifications \(2022\)](#)

| Recommendation   | Status          | Notes   |
|--|-----------------|---|
| [DCYF] should track which entities place law enforcement emergency holds.  | Not implemented | DCYF reported that it will incorporate this capability into its data system modernization, which is in process.   |
| [DCYF] should convene a working group to make recommendations to the Legislature regarding training of law enforcement officers in child protection removals.      | Implemented     | The work group presented recommendations at the Legislative Child Protection Task Force meeting on February 9, 2024. Implementing work group recommendations would require legislative action.                      |
| [DCYF] and the Judicial Branch should continue their efforts to improve the provision and documentation of services offered to families to prevent child removals. | Implemented     | DCYF reported a number of steps taken to address this recommendation.   |
| [DCYF] should form a working group to examine how the state can better address broader social services needs for families confronting child protection issues.     | Not applicable  | DCYF was formed with the purpose of addressing broader service needs for families across different areas of state government, so this recommendation aimed at DHS no longer applies to the current agency structure |

*Department of Human Services Licensing Division: Support to Counties (2024)*

| Recommendation   | Status  | Notes  |
|--|---|--|
| If [DCYF] wishes to implement continuous licensing, it should work with the Legislature to amend statutes in a manner that allows the process.   | Implemented   | The Legislature amended statutes to allow DCYF to implement continuous licensing. <i>Laws of Minnesota 2025, First Special Session, chapter 3, art. 14, secs. 2 and 7</i> , codified as <i>Minnesota Statutes 2025, 142B.10, subd. 14; and 142B.30, subd. 1</i> .  |
| [DCYF] should:   |   |  |
| <ul style="list-style-type: none"> <li>(1) develop a formal policy and establish a timeframe in which staff must respond to triage inquiries from county licensors, and</li> <li>(2) track how long it takes staff to respond to each inquiry.</li> </ul>                                  | Implemented   |  |
| [DCYF] should provide written guidance that is easily accessible to all county licensors.  | Partially implemented   | DCYF reported that it has taken some steps to implement this recommendation, including adjusting newsletter content. DCYF said that it is in the process of further updating the information included in newsletters.  |
| [DCYF] should:   |   |  |
| <ul style="list-style-type: none"> <li>(1) establish timeframes for processing licensing actions that are uniform across programs with county-delegated licensing, and</li> <li>(2) ensure that it addresses all recommendations for licensing actions within those timeframes.</li> </ul> | <p>Implemented</p> <p>Work needed to determine implementation</p> | <p>DCYF's Licensing Action Protocols for Family Child Care and Child Foster Care establish a consistent timeline for processing licensing actions.</p> <p>OLA would need to do additional research to determine if DCYF ensures that it addresses all recommendations for licensing actions within established timeframes.</p> |
| DHS and DCYF should take extra care to provide clear and consistent guidance on the respective roles of state agencies and county licensors, especially in light of the transition to two departments.   | Implemented   |  |
| DCYF should adopt the recommendations from this report that are relevant to its activities.  | Partially implemented   |  |

Note: All recommendations from the *Child Protection Removals and Reunifications and Department of Human Services Licensing Division: Support to Counties* reports directed at DHS now apply to DCYF, which has taken over responsibility for Children and Family Services programs.

# Department of Commerce

## Program Evaluation Reports

### Department of Commerce's Civil Insurance Complaint Investigations (2022)

| Recommendation  | Status   | Notes   |
|---|--|---|
| The Department of Commerce (Commerce) should:   |  |   |
| <ul style="list-style-type: none"> <li>Ensure all insurance companies notify the department when they institute or modify their antifraud plans, as required by law.</li> <li>Coordinate antifraud plan review efforts across teams.</li> </ul>   | <p>Work needed to determine implementation</p> <p><b>Implemented</b></p>                           | <p>OLA would need to conduct additional research to determine the extent to which companies have properly notified the department.</p> <p>Commerce reported a number of actions taken by the department to address this recommendation.</p> |
| Commerce should:  |  |   |
| <ul style="list-style-type: none"> <li>Add detail to its policy regarding the importance of complaint complexity and legal considerations when assigning complaints for investigation.</li> <li>Either (1) ensure intake staff follow the current policy for assigning civil insurance complaints for investigation, or (2) update the policy to align with managerial expectations.</li> </ul> | <b>Implemented</b>   |   |
| Commerce should develop written policies for prioritizing complaints for investigation. The policy should include timelines and criteria based on potential risk or harm to consumers.  | <b>Implemented</b>   |   |
| Commerce should:  |  |   |
| <ul style="list-style-type: none"> <li>Adopt policies informed by National Association of Insurance Commissioners recommendations that outline investigation and documentation standards for key components of civil insurance investigations.</li> <li>Clearly communicate these policies to staff.</li> <li>Ensure investigators consistently follow these policies.</li> </ul>               | <p><b>Implemented</b></p> <p><b>Implemented</b></p> <p>Work needed to determine implementation</p> | <p>OLA would need to conduct additional research to determine to what extent Commerce has ensured investigators consistently follow these policies.</p>   |
| Commerce should establish formal timelines for completing key investigation activities, as well as written policies for reviewing complaints that are open for an extended period of time.  | <b>Implemented</b>   |   |
| Commerce should establish policies for the frequency and content of communications with complainants and respondents.   | <b>Implemented</b>   |   |

*Special Review Reports*[Department of Commerce Fraud Bureau \(2022\)](#)

| Recommendation   | Status         | Notes   |
|--|----------------|---|
| Commerce should adopt a written policy that specifies the circumstances in which the Commerce Fraud Bureau will assist another law enforcement agency with an investigation. | Not applicable | The 2025 Legislature moved responsibility for fraud investigations from the Department of Commerce to the Bureau of Criminal Apprehension. <i>Laws of Minnesota 2025</i> , chapter 35, art. 3, sec. 4, codified as <i>Minnesota Statutes 2025</i> , 45.0135, subd. 2g(a). |

# Department of Employment and Economic Development

## Financial Audit Reports

### [COVID-19-Related Emergency Purchases \(2023\)](#)

| Recommendation   | Status                                  | Notes  |
|--|---|--|
| The Department of Employment and Economic Development (DEED) should obtain delegated authority to make emergency purchases before bypassing the vendor solicitation process. | Implemented                             | OLA tested all DEED emergency purchases made between April 2023 and March 2025. DEED obtained the appropriate delegated authority for all tested purchases.  |
| DEED should resolve inaccurate payments and prepayments with vendors.  | Not implemented                         | DEED told us it is not recovering an overpayment of \$3,750 due to the low dollar amount.  |
| DEED should enhance internal controls over advanced payments.  | Work needed to determine implementation | DEED's standard process is to pay invoices after goods or services are received. DEED told us that any exception to that process would require justification and special approval by the appropriate approval authority. More work is needed to determine if a preapproval practice is in place. |

## Program Evaluation Reports

### [Unemployment Insurance Program: Efforts to Prevent and Detect the Use of Stolen Identities \(2022\)](#)

| Recommendation   | Status                                  | Notes   |
|--|---|---|
| The Unemployment Insurance (UI) Division should evaluate its processes for referring fraud cases to the Bureau of Criminal Apprehension for investigation.   | Partially implemented                   | DEED reported that it has begun evaluating its processes. It plans to develop a standardized business process for referring cases to the Bureau of Criminal Apprehension and for tracking those cases.  |
| The UI Division should submit a formal request to the U.S. Department of Labor's Office of Inspector General for additional coordination and resources in investigating and combatting fraud from imposters and hijackers.   | Implemented                             |   |
| The UI Division should develop processes to proactively investigate accounts that may be incorrectly identified as suspicious.   | Implemented                             |   |
| The UI Division should:  |   |   |
| <ul style="list-style-type: none"> <li>(1) establish metrics and methods for evaluating the efficacy of its data analysis processes and imposter screening processes;</li> <li>(2) evaluate these processes on a regular basis;</li> <li>(3) collect the necessary data to conduct such evaluations; and</li> <li>(4) use such evaluations to refine its processes.</li> </ul> | Work needed to determine implementation | DEED reported that it has conducted quarterly reviews to determine whether certain fraud detection processes are effective. OLA would need to complete additional work to evaluate the extent to which these reviews implement recommendations. |
| As the initial challenges created by the COVID-19 pandemic subside, the UI Division should reevaluate some of the changes it implemented during the pandemic to prevent and detect fraud, as those changes competed with its responsibility to issue prompt payments to eligible applicants.   | Implemented                             |   |

### *State Programs That Support Minnesotans on the Basis of Racial, Ethnic, or American Indian Identity (2023)*

| Recommendation   | Status      | Notes  |
|--|-------------|--|
| State agencies should consider developing policies outlining the circumstances under which grant program materials should be translated into languages other than English. | Implemented |  |
| If partner organizations determine program eligibility in future programs, DEED should spot check partner organizations' determinations.                                   | Implemented | OLA reviewed DEED's oversight of three newly established grant or loan programs for which partner organizations were responsible for determining program eligibility and found that DEED spot-checked partner organizations' eligibility determinations. |

### *Department of Employment and Economic Development Grants Management (2025)*

| Recommendation  | Status                                  | Notes  |
|---|---|--|
| DEED should use program data to establish measurable performance goals for the Pathways to Prosperity and the Adult Career Pathways (ACP) legislatively named grant programs.   | Partially implemented                   | DEED reported that it is gathering input from stakeholders and working with the state's Task Force on Workforce Development System Reform to develop performance measures for certain ACP grants.                      |
| DEED should complete the workforce program net impact analysis report as required by law.   | Not applicable                          | The Legislature repealed the net impact analysis report requirement. <i>Laws of Minnesota 2025, First Special Session, chapter 6, art. 4, sec. 39</i> , codified as <i>Minnesota Statutes 2025, 116L.98, subd. 7</i> . |
| DEED should update its: <ul style="list-style-type: none"> <li>• Agencywide policies and procedures to incorporate each of the Office of Grants Management's (OGM's) requirements.</li> <li>• Division-specific procedures to describe how program staff must oversee grants to ensure compliance with OGM requirements.</li> </ul> | Partially implemented                   | DEED has updated some of its procedures and reported that it is in the process of updating its policies to ensure compliance with OGM requirements.  |
| DEED should ensure its program staff comply with all OGM requirements.  | Work needed to determine implementation | OLA would need to conduct additional research to determine to what extent DEED ensures its program staff comply with OGM requirements.   |

## Department of Human Services

In July 2024, certain Children and Family Services programs at the Department of Human Services (DHS) transferred to the newly established Department of Children, Youth, and Families (DCYF). Therefore, we do not discuss DHS's implementation of recommendations from our *Child Protection Removals and Reunifications* (2022) report in the table below; see the implementation status of recommendations from that report on page 1 of this report.

### *Financial Audit Reports*

#### [COVID-19-Related Emergency Purchases \(2023\)](#)

| Recommendation  | Status      | Notes  |
|---|-------------|--|
| DHS should resolve inaccurate sales and use tax payments with the Department of Revenue.  | Implemented | DHS remitted to the Department of Revenue all unpaid sales and use taxes identified in the audit.                          |
| DHS should strengthen internal controls to ensure it accurately pays sales and use taxes. | Implemented | DHS updated its process, and OLA reviewed examples of the internal controls it uses to accurately pay sales and use taxes. |

### *Program Evaluation Reports*

#### [State Programs That Support Minnesotans on the Basis of Racial, Ethnic, or American Indian Identity \(2023\)](#)

| Recommendation   | Status                | Notes  |
|--|-----------------------|--|
| DHS and the Minnesota Housing Finance Agency should create request for proposal (RFP) templates that include the essential elements in Office of Grants Management (OGM) policy. | Implemented           |  |
| State agencies should consider developing policies outlining the circumstances under which grant program materials should be translated into languages other than English.       | Implemented           | DHS reported that it considered grant program material translation and decided to only translate materials to languages other than English upon request.   |
| DHS should maintain complete documentation about its application review process and decisions for its competitive grant programs.  | Partially implemented | OLA reviewed Cultural and Ethnic Minority Infrastructure Grant (CEMIG) application materials. DHS documented some aspects of its application review process, including its applicant scoring. However, it did not document others. In addition, OLA found in a 2026 financial audit, <i>Department of Human Services: Behavioral Health Administration Grants</i> , that DHS did not use a competitive award process for certain grants when it should have. |
| DHS should ensure that Cultural and Ethnic Minority Infrastructure Grant recipients satisfy quarterly reporting requirements.  | Partially implemented | CEMIG 2024 grant contract agreements required grantees to submit progress reports biannually. OLA reviewed progress reports submitted by five grantees and found that grantees submitted progress reports but did not always do so on time.  |

Department of Human Services Licensing Division: Support to Counties (2024)

| Recommendation  | Status                                  | Notes   |
|---|---|---|
| If DHS wishes to implement continuous licensing, it should work with the Legislature to amend statutes in a manner that allows the process.   | Implemented                             | The Legislature amended statutes to allow DHS to implement continuous licensing. <i>Laws of Minnesota 2025, chapter 38, art. 5, secs. 6–7, codified as Minnesota Statutes 2025, 245A.04, subd. 7; and 245A.16, subd. 1.</i>                         |
| DHS should improve the support it provides for Community Residential Settings (CRS) licensors.  | Implemented                             | DHS has improved its support of CRS licensors through several changes, including establishing monthly webinars and newsletters targeted to CRS licensors and adding an additional consultant to answer CRS-related licensor questions.              |
| DHS should:   |   |   |
| <ul style="list-style-type: none"> <li>(1) develop a formal policy and establish a timeframe in which staff must respond to triage inquiries from county licensors, and</li> <li>(2) track how long it takes staff to respond to each inquiry.</li> </ul>                                 | Implemented                             | DHS established a formal triage policy that requires staff to respond to triage inquiries from county licensors within three business days. DHS also tracks how long it takes staff to respond to each triage inquiry.                              |
| DHS should provide written guidance that is easily accessible to all county licensors.  | Partially implemented                   | DHS reported that it has taken some steps to implement this recommendation, including adjusting newsletter content. DHS stated that it is in the process of further updating the information included in newsletters.                               |
| DHS should:   |   |   |
| <ul style="list-style-type: none"> <li>(1) establish timeframes for processing licensing actions that are uniform across programs with county-delegated licensing and</li> <li>(2) ensure that it addresses all recommendations for licensing actions within those timeframes.</li> </ul> | Implemented                             | DHS established a standard timeframe of 120 days to process licensing actions. DHS also created a protocol that includes detailed instructions on how staff should address recommendations for licensing actions within the established timeframes. |
| DHS and DCYF should take extra care to provide clear and consistent guidance on the respective roles of state agencies and county licensors, especially in light of the transition to two departments.  | Work needed to determine implementation | OLA would need to do additional research to confirm that DHS addresses all recommendations for licensing actions within the timeframe.  |
|   | Implemented                             |   |

Grant Award Processes (2024)

| Recommendation   | Status                                  | Notes  |
|--|---|--|
| The Behavioral Health Division should ensure that each grant reviewer completes a conflict of interest disclosure form after reviewing a comprehensive list of grant applicants and retains that form. | Work needed to determine implementation | DHS implemented a new conflict of interest policy in September 2025. DHS reported that it has reviewed grant programs since OLA made this recommendation and found that conflict of interest forms were appropriately completed. However, OLA would need to conduct additional research to confirm this. |
| The Behavioral Health Division should evaluate grant applications using standardized scoring systems that match the criteria the division identifies in its requests for proposals.                    | Work needed to determine implementation | DHS reported that it has taken multiple actions to address this recommendation, but OLA would need to conduct additional research to confirm that the division is using standardized scoring systems that match those in the requests for proposals.   |
| The Behavioral Health Division should clearly document justification for using a single/sole source grant.   | Not implemented                         | In a 2026 financial audit, <i>Department of Human Services: Behavioral Health Administration Grants</i> , OLA found that DHS used single source grants when they were not justified and did not always sufficiently document its reasons for using single source grants.                                 |
| The Behavioral Health Division and the Minnesota State Arts Board should complete pre-award risk assessments, as required by state law and OGM policy.   | Work needed to determine implementation | DHS reported that it has taken multiple actions to address this recommendation, but OLA would need to conduct additional research to confirm that the division is appropriately completing pre-award risk assessments.   |

# Department of Labor and Industry

## Program Evaluation Reports

### Worker Misclassification (2024)

| Recommendation  | Status  | Notes   |
|---|---|---|
| The Department of Labor and Industry (DLI) should propose to the Legislature updates to the construction worker classification requirements outlined in <i>Minnesota Statutes 2023</i> , 181.723.   | Implemented   | The Legislature passed revised construction worker classification requirements in 2024; revised requirements went into effect on March 1, 2025. <i>Laws of Minnesota 2024</i> , chapter 127, art. 10, sec. 8, codified as <i>Minnesota Statutes 2025</i> , 181.723. |
| DLI should adopt standards and implement a systematic process to monitor and ensure the timely completion of worker misclassification investigations.   | Work needed to determine implementation                           | DLI has adopted a new policy to systematically monitor and ensure timely completion of investigations. OLA would need to conduct additional research to determine whether DLI ensures timely completion of worker misclassification investigations.                 |
| DLI should:   |   |   |
| <ul style="list-style-type: none"> <li>Establish standards for communicating with parties about its worker misclassification investigations.</li> <li>Consistently communicate with complainants and respondents about key investigation milestones.</li> </ul> | <p>Implemented</p> <p>Work needed to determine implementation</p> | <p>DLI released a memorandum to its staff outlining communication expectations for investigations.</p> <p>OLA would need to conduct additional research to determine whether DLI has consistently communicated with complainants and respondents.</p>               |
| DLI should evaluate and report to the Legislature on the effectiveness of its efforts to address misclassification.   | Implemented   | DLI reported to the Legislature in February 2025 about the effectiveness of its efforts to address misclassification  |

# Department of Public Safety

## Program Evaluation Reports

### Oversight of State-Funded Grants to Nonprofit Organizations (2023)

| Recommendation  | Status  | Notes   |
|---|---|---|
| <p>The Department of Public Safety (DPS) should:</p> <ul style="list-style-type: none"> <li>(1) revise and formalize its grants management procedures to include greater specificity and direction, and</li> <li>(2) ensure grant managers fully comply with all Office of Grants Management (OGM) policies.</li> </ul> | <p><b>Implemented</b></p> <p><b>Partially implemented</b></p> | <p>DPS has revised its grants management procedures to help ensure staff comply with OGM policies.</p> <p>OLA reviewed documentation for three grants DPS awarded since 2023 and found that DPS followed most, but not all, OGM policies. For example, DPS executed the grant agreement and issued payment for one grant before completing a risk assessment.</p> |

## Special Review Reports

### Hometown Heroes Assistance Program (2023)

| Recommendation  | Status                                  | Notes   |
|---|---|---|
| DPS should ensure that its pre-award risk assessments are sufficiently thorough.  | <b>Implemented</b>                      | OLA reviewed three grants DPS awarded since 2023 and found that DPS performed a thorough risk assessment for all three grantees.  |
| DPS should ensure that the state's authorized representative reviews grantee payment requests in accordance with state grant policy.  | <b>Implemented</b>                      | OLA reviewed three grants DPS awarded since 2023 and found that an authorized representative documented review of grant payment requests.   |
| DPS should conduct a full audit of the Minnesota Firefighter Initiative's requests for payment for expenses it charged to the Hometown Heroes grant. <sup>a</sup>                             | <b>Implemented</b>                      |   |
| DPS should provide consistent direction in its grant manuals—for example, regarding the extent of expenditure documentation that DPS staff should review prior to authorizing grant payments. | <b>Implemented</b>                      |   |
| DPS should ensure grant payments are made as reimbursements, rather than advance payments, unless it has approved a written justification for doing so.                                       | <b>Implemented</b>                      | OLA reviewed three grants DPS awarded since 2023 and found that DPS issued reimbursement payments rather than advanced payments, unless there was an approved written justification.                                    |
| DPS should ensure that it conducts monitoring visits and financial reconciliations in accordance with state grant policy.   | Work needed to determine implementation | DPS has implemented monitoring and financial reconciliation procedures, but OLA would need to perform additional work to confirm DPS conducts monitoring and financial reconciliations in accordance with state policy. |
| DPS should ensure that staff review grant progress reports before approving payments, in accordance with state grant policy.  | <b>Partially implemented</b>            | OLA reviewed three grants DPS awarded since 2023 and found that DPS issued payment before receiving a required progress report in one case.   |

### Hometown Heroes Assistance Program (2023)

| Recommendation   | Status                                  | Notes   |
|--|---|---|
| DPS should ensure that grant closeout evaluations include all elements required by state grant policy.   | Work needed to determine implementation | DPS has updated its grant closeout evaluation form to be used for all grants expiring after December 31, 2023; additional OLA research would be needed to evaluate the extent to which DPS has met this recommendation. |
| DPS should ensure that grantees properly understand procurement requirements, and it should monitor and enforce compliance with those requirements.                      | Work needed to determine implementation | DPS has completed a new manual that provides direction to grant managers. OLA would need to perform additional research to ensure that DPS enforced compliance with these requirements.                                 |
| Chief Deputy State Fire Marshal Swenson should take immediate steps to remediate the violation of state ethical conduct policies.  | Implemented                             |   |
| Chief Deputy State Fire Marshal Swenson should avoid situations in the future that would violate state ethical conduct laws or policies.                                 | Implemented                             |   |
| DPS should work with Minnesota Management and Budget to take any additional necessary actions to address Chief Deputy State Fire Marshal Swenson's misconduct.           | Implemented                             |   |
| The Fire Service Advisory Committee and DPS should strengthen their processes for awarding and overseeing allocations to nonstate entities from the Fire Safety Account. | Work needed to determine implementation | OLA would need to conduct further research to determine to what extent DPS has implemented this recommendation.   |

<sup>a</sup> Since 2021, the Legislature has directed the commissioner of Public Safety to award a grant to the Minnesota Firefighter Initiative, or MnFIRE, to administer the Hometown Heroes Assistance Program.

## Fire Service Advisory Committee

The Fire Service Advisory Committee makes recommendations to the Department of Public Safety (DPS) regarding Fire Safety Account funds.

### *Special Review Reports*

#### [Hometown Heroes Assistance Program \(2023\)](#)

| Recommendation   | Status                                  | Notes  |
|--|---|--|
| The Fire Service Advisory Committee and DPS should strengthen their processes for awarding and overseeing allocations to nonstate entities from the Fire Safety Account. | Work needed to determine implementation | OLA would need to conduct additional research to determine to what extent the Fire Service Advisory Committee has implemented this recommendation. |

# Metropolitan Council

## Program Evaluation Reports

### Southwest Light Rail Transit Construction: Metropolitan Council Decision Making (2023)

| Recommendation   | Status                                  | Notes   |
|--|---|---|
| The Metropolitan Council should make greater efforts to avoid introducing major project changes once the competitive bidding process concludes.  | Work needed to determine implementation | OLA would need to conduct further research to determine to what extent the Metropolitan Council has implemented this recommendation.  |
| On future capital construction projects, the Metropolitan Council should enforce the schedule requirements of the contract.  | Work needed to determine implementation | OLA would need to conduct further research to determine to what extent the Metropolitan Council has implemented this recommendation.  |
| The Metropolitan Council should consider additional external reviews for high-risk or high-cost project elements.  | Implemented                             | The Metropolitan Council hired a consultant and added additional reviews for high-risk project elements on the Blue Line Light Rail Transit Extension. Work on this recommendation should be ongoing as the Council continues managing public works projects. |
| In its public communications regarding projected cost increases, the Metropolitan Council should more clearly indicate the level of uncertainty surrounding its estimates of future costs. | Implemented                             | The Metropolitan Council adopted a Transitway Advancement Policy that requires the Council be informed of key risks and areas of uncertainty at its public meetings before it approves major actions to advance a transitway project.                         |

### Southwest Light Rail Transit Construction: Metropolitan Council Oversight of Contractors (2023)

| Recommendation   | Status                                  | Notes  |
|--|---|--|
| The Metropolitan Council should:   |   |  |
| <ul style="list-style-type: none"> <li>Require its contractors to meet contractual obligations related to change orders.</li> <li>Ensure contracts include adequate language to hold contractors accountable for change order requirements.</li> <li>Negotiate change order costs and schedule delays in a timely manner.</li> <li>Inform change order approval bodies when changes include language that leaves open the possibility of additional delays and related costs.</li> </ul> | Work needed to determine implementation | OLA would need to conduct further research to determine to what extent the Metropolitan Council has implemented this recommendation. |
| The Metropolitan Council should:   |   |  |
| <ul style="list-style-type: none"> <li>Make greater efforts to limit change work that occurs before the cost and schedule impacts are negotiated.</li> <li>Improve its policies for managing change orders based on a contractor's reported costs.</li> </ul>  | Work needed to determine implementation | OLA would need to conduct further research to determine to what extent the Metropolitan Council has implemented this recommendation. |

[Southwest Light Rail Transit Construction: Metropolitan Council Oversight of Contractors \(2023\)](#)

| Recommendation  | Status                                  | Notes  |
|---|---|--|
| The Metropolitan Council should:  |   |  |
| <ul style="list-style-type: none"> <li>• Hold its cost estimating consultant accountable for delivering acceptable estimates.</li> <li>• Consider changing its cost estimation policies and contracts.</li> </ul>   | Implemented                             |  |
| The Metropolitan Council should reform its processes for determining and justifying final change order costs.   | Work needed to determine implementation | The Metropolitan Council reported that it has taken some steps to address this recommendation, such as seeking assistance from a consultant. OLA would need to conduct additional research to determine whether these actions have improved the Council's processes for determining and justifying final change order costs. |
| The Metropolitan Council should improve its documentation practices regarding:  |   |  |
| <ul style="list-style-type: none"> <li>• Its decision making related to nonconformance reports.</li> <li>• Costs associated with responding to and resolving nonconformance reports.</li> <li>• Which entity paid for work associated with nonconformance reports.</li> <li>• Estimated deduction amounts.</li> </ul> | Not implemented                         | The Metropolitan Council did not demonstrate it has made changes to improve its documentation practices related to nonconformance reports.   |
| The Metropolitan Council should ensure its future contracts include sufficient enforcement mechanisms.  | Work needed to determine implementation | The Metropolitan Council is in the process of updating its construction contract language and has implemented a vendor suspension and debarment policy. OLA would need to conduct further research to determine to what extent the Metropolitan Council ensures its contracts include sufficient enforcement mechanisms.     |
| The Metropolitan Council should fully enforce its contracts.  | Work needed to determine implementation | OLA would need to conduct further research to determine to what extent the Metropolitan Council has implemented this recommendation.   |
| The Metropolitan Council should ensure it has documentation to support its decisions.   | Work needed to determine implementation | OLA would need to conduct further research to determine to what extent the Metropolitan Council has implemented this recommendation.   |

### Metro Mobility (2024)

| Recommendation   | Status  | Notes  |
|--|---|--|
| The Metropolitan Council should: <ul style="list-style-type: none"><li>Take additional steps to address service quality issues.</li><li>Ensure that the bonus related to fulfilling all ride requests is only given in instances when the trip provider has earned it.</li></ul> | <b>Partially implemented</b><br><br>Work needed to determine implementation | <p>The Metropolitan Council made certain amendments to provider contracts to improve service quality. However, the agency has not formalized performance improvement plans for trip providers nor has it increased penalties for failing to meet performance goals.</p> <p>The Metropolitan Council reported that it had hired an additional staff person to ensure that payments to trip providers are issued in accordance with the Council's contracts. OLA would need to perform additional research to determine the extent to which the Council is ensuring bonus payments are paid.</p> |
| The Metropolitan Council should explore alternative technologies for scheduling and providing ride services.   | <b>Partially implemented</b>  | The Metropolitan Council has begun, but not yet completed, implementing certain alternative technologies for scheduling and providing ride services.   |
| The Metropolitan Council should limit the role of trip providers in the complaints process.  | Work needed to determine implementation                                     | The Metropolitan Council reported that it hired a staff person who will be responsible for communicating directly with customers. OLA would need to perform additional research to determine the extent to which this change has limited the role of trip provider staff in the complaints process.  |
| The Metropolitan Council should update its written procedures to provide more complete guidance to staff.  | <b>Implemented</b>  |  |
| The Metropolitan Council should identify ways to better encourage riders to submit all complaints to Metropolitan Council staff rather than to trip provider staff.  | <b>Partially implemented</b>  | The Metropolitan Council reported it updated signage on Metro Mobility vehicles to direct customers to contact Metropolitan Council staff with comments and concerns. In addition, the Council has updated its procedures related to customer calls. However, the Metropolitan Council has not made adequate changes to customer service center call menus.  |
| The Metropolitan Council should change the incentive structure in contracts with trip providers to encourage providers to forward complaints to the Metropolitan Council.  | <b>Not implemented</b>  | The Council reported that it will re-bid the contract for one of three service areas in 2026 and will revise incentives to encourage providers to forward complaints to the Council in the new contract.   |
| The Metropolitan Council should systematically track data related to all rider concerns and use the information to improve riders' experiences.  | Work needed to determine implementation                                     | The Metropolitan Council developed a new call tracking system, but OLA would need to conduct additional research to confirm to what extent the council has used systematically tracked data with this system to improve riders' experiences.   |
| The Metropolitan Council should ensure that it only pays bonuses to providers when those bonuses are earned.   | Work needed to determine implementation                                     | The Metropolitan Council reported that it hired additional staff to increase its capacity to ensure payments to trip providers are in accordance with contract requirements. OLA would need to conduct further research to determine to what extent the Metropolitan Council paid bonuses correctly.   |

# Minnesota Board on Aging

## Financial Audit Reports

### [Minnesota Board on Aging: Senior Nutrition Program \(2023\)<sup>a</sup>](#)

| Recommendation  | Status                | Notes  |
|---|-----------------------|--|
| The Minnesota Board on Aging (MBA) or other responsible entity should have supporting documentation that substantiates the meal reimbursement rates for the Tribal service providers.               | Implemented           | MBA gathered and maintained supporting documentation that substantiates the meal reimbursement rates for the Tribal service providers.   |
| MBA should ensure that the Tribal service providers accurately calculate meal reimbursement rates and follow MBA's requirements.  | Implemented           | MBA ensured that Tribal service providers incorporated the correct meal rates into agreements.   |
| MBA should ensure that service providers have valid contracts with all entities that provide meals for the Senior Nutrition Program by reviewing and approving all of these contracts prior to use. | Partially implemented | MBA reviewed contracts to ensure they existed and were signed but did not ensure they included all required provisions because a formalized checklist for Area Agencies on Aging (AAAs) was not finalized. MBA expected updated policies, which require the use of a checklist, to be implemented in October 2025.   |
| MBA should clarify its responsibility for the review of contracts between service providers and subcontractors that are for-profit organizations.   | Partially implemented | MBA drafted policies clarifying its role and requiring the completion of a waiver when service providers contract with for-profit organizations. MBA expected these policies to be implemented in October 2025.  |
| Either AAAs or MBA should review and approve all contracts between service providers and subcontractors.  | Partially implemented | MBA reviewed contracts to ensure they existed and were signed but did not ensure they included all required provisions because a formalized checklist for AAAs was not finalized. MBA expected updated policies, which require the use of a checklist, to be implemented in October 2025.  |
| MBA should prescribe specific steps for how AAAs should document their review and approval of contracts between service providers and subcontractors.   | Not implemented       | MBA drafted policies, expected to be implemented in October 2025, that will require AAAs to submit completed contracts, but it has not identified specific steps for how AAAs should document their review and approval of the contracts.  |
| MBA and AAAs should ensure that the data in MBA's participant database are accurate and reliable.   | Partially implemented | MBA drafted policies, expected to be implemented in October 2025, which include a requirement to verify the accuracy and reliability of participant data during site visits. MBA also issued new participant data forms in additional languages to assist with the collection of data from participants. However, MBA had not started site visits (as of May 2025) to verify the accuracy and reliability of participant data.   |
| MBA should ensure that service providers offer program participants an option to contribute but do not require them to pay for the Senior Nutrition Program meals.                                  | Not implemented       | MBA has drafted a policy, expected to be implemented in October 2025, that requires providers to clearly communicate to program participants that payments are optional. MBA has also drafted a contribution letter for AAAs (or providers) to send to program participants, which includes language emphasizing that any payments are optional. MBA and AAA verification of optional contributions by participants had not yet started since the policy and letters had not yet been implemented at the time of our review. |

[Minnesota Board on Aging: Senior Nutrition Program \(2023\)<sup>a</sup>](#)

| Recommendation   | Status                | Notes   |
|--|-----------------------|---|
| MBA should ensure that service providers clearly communicate payment options to program participants.  | Not implemented       | MBA has drafted a policy, expected to be implemented in October 2025, that requires providers to clearly communicate to program participants that payments are optional and to document this during site visits. MBA and AAA verification of optional contributions by participants had not yet started since the policy and letters had not yet been implemented at the time of our review.                      |
| MBA should complete required monitoring activities.  | Partially implemented | MBA has conducted financial reconciliations of advance and reimbursable payment requests, but it has not conducted site visits or grant closeout evaluations.   |
| MBA should establish processes for conducting monitoring visits, financial reconciliations, advance payments reconciliations, and grant closeout evaluations.  | Partially implemented | MBA has drafted monitoring policies and procedures expected to go into effect in October 2025 that address certain monitoring processes; however, the draft policies do not address conducting grant closeout evaluations.  |
| MBA should have effective internal controls, such as clear policies and procedures, over monitoring activities.  | Partially implemented | MBA has drafted monitoring policies and procedures expected to be implemented in October 2025.  |
| MBA should provide proper oversight to ensure that AAAs perform the required number of monitoring site visits each year.   | Partially implemented | MBA provided training to AAAs on how to submit site visit documentation electronically. Not all AAAs have provided documentation of their site visits, preventing MBA from ensuring all AAAs have performed required site visits. Additionally, MBA has not yet conducted site visits of AAAs, which is a second verification method. MBA said it planned to begin site visits between October and December 2025. |
| AAAs and MBA should perform regular monitoring activities, such as conducting site visits, reviewing recertification forms, and verifying participant data in the system, to ensure service providers annually recertify program participants. | Partially implemented | MBA has partially implemented this recommendation through system improvements that provide functionality to filter and sort participant data. However, MBA has not yet conducted site visits or tested a sample of recertification forms. MBA said it planned to begin site visits between October and December 2025.   |
| MBA should update its payment process for direct service payments to Tribal service providers.   | Implemented           | MBA updated its process to require Tribal service providers to submit a payment workbook when requesting payment.   |
| MBA should ensure that it accurately pays Tribal service providers based on documented meal counts.  | Implemented           | MBA updated its process to ensure that it accurately pays Tribal service providers based on supporting documentation.   |

<sup>a</sup> OLA completed a review of MBA's implementation of recommendations from our report, *Minnesota Board on Aging: Senior Nutrition Program*, in summer 2025. Our notes reflect the work completed at that time.

## Minnesota Department of Administration

The *Oversight of State-Funded Grants to Nonprofit Organizations* (2023) and *Grant Award Processes* (2024) reports directed recommendations to the Office of Grants Management (OGM), which is located within the Department of Administration (Admin). The Office of the State Archaeologist—the subject of our 2022 special review—is also housed within Admin.

### Financial Audit Reports

#### [COVID-19-Related Emergency Purchases \(2023\)](#)

| Recommendation   | Status          | Notes  |
|--|-----------------|--|
| Admin should develop emergency purchasing guidance related to its statutory authority.   | Not implemented | Admin has not developed new or additional guidance related to approving state agency emergency purchase requests. Admin does not plan to develop new or additional guidance. |
| Admin should not approve Request for Emergency Purchasing Authorization forms that are too general to be able to determine if the purchase meets an immediate need and requires an exception to the procurement process. | Implemented     | OLA reviewed a sample of Emergency Purchasing Authorization forms. The forms included sufficient, detailed information to support an immediate need.                         |
| Admin should enforce its requirement for state entities to submit final reports on emergency purchases.  | Not applicable  | Admin removed the requirement for state entities to submit final reports on emergency purchases.   |

### Program Evaluation Reports

#### [Oversight of State-Funded Grants to Nonprofit Organizations \(2023\)](#)

| Recommendation  | Status                | Notes  |
|---|-----------------------|--|
| OGM should strengthen its grants management policies and provide more specific guidance to state agencies on how to implement the policies. | Partially implemented | OGM has strengthened certain policies, including adding specificity to the policy on pre-award risk assessments. However, OGM has not strengthened other key policies, such as establishing minimum standards for progress reports or requiring site visits. |

#### [Grant Award Processes \(2024\)](#)

| Recommendation   | Status          | Notes   |
|--|-----------------|---|
| OGM should provide additional guidance to state agencies to help standardize grant reviewer selection processes.   | Implemented     |   |
| OGM should require state employees who are involved in the pre-award grant process—including those who make funding decisions—to complete a conflict of interest disclosure form for each grant process. | Not implemented | Admin indicated that it believes the current policy, which references the state's Code of Ethical Conduct, already addresses this recommendation, and therefore it has not acted to implement it. |

### Grant Award Processes (2024)

| Recommendation   | Status          | Notes  |
|--|-----------------|--|
| OGM should recommend that state agencies proactively provide scoring details to grant applicants after this data becomes public. | Not implemented | Admin indicated that it believes Minnesota's Data Practices Act already addresses this recommendation, and therefore it has not acted to implement it. |
| OGM should provide further guidance on minimum single/sole source justification search standards.                                | Implemented     |  |

### *Special Review Reports*

#### Office of the State Archaeologist (2022)

| Recommendation   | Status                                  | Notes  |
|--|---|--|
| The Office of the State Archaeologist should provide clear information on its website defining categories of licensure and indicating how to apply for licenses.   | Partially implemented                   | Admin has made changes to the Office of the State Archaeologist website. Admin reported that the Office of the State Archaeologist and the Minnesota Historical Society are currently working on changes to the license qualification and application process.   |
| The Office of the State Archaeologist should update written guidance related to archaeological fieldwork.  | Not implemented                         | Admin reported that work on this recommendation has paused but will resume when it finishes streamlining the qualification and application process, as described above.  |
| The Office of the State Archaeologist should amend its fieldwork manuals and website to provide information on the Office of Collaboration and Dispute Resolution, options of mediation and arbitration for resolving disputes, and options for reporting allegations of unethical behavior. | Not implemented                         | Admin indicated that it believes the recommendation is not consistent with state law, and therefore has not acted to implement it.   |
| The Office of the State Archaeologist should ensure that it communicates more effectively with the broader archaeology community than it has in recent years, and that it solicits input from these professionals when needed.   | Work needed to determine implementation | Admin indicated that it has communicated with the archaeology community through email over the past year and continues to develop a communication plan as part of projects that affect the larger archaeologist community. OLA would need to conduct additional research to confirm the extent to which Admin communicates effectively with the community. |

# Minnesota Department of Education

## Financial Audit Reports

### [COVID-19-Related Emergency Purchases \(2023\)](#)

| Recommendation  | Status         | Notes   |
|---|----------------|---|
| The Minnesota Department of Education (MDE) should only use its emergency authority to make purchases that meet an immediate need and that require exceptions to the procurement process. | Not applicable | MDE has not requested any emergency authorization purchases since the issuance of the <i>COVID-19-Related Emergency Purchases</i> report. |

## Program Evaluation Reports

### [Minnesota Department of Education's Role in Addressing the Achievement Gap \(2022\)](#)

| Recommendation   | Status                                  | Notes   |
|--|---|---|
| MDE should better communicate the availability of resources to support school districts and charter schools.   | Work needed to determine implementation | MDE reported several actions that it has taken to address this recommendation. However, OLA would need to conduct additional research to determine to what extent its communication has improved.   |
| MDE should annually monitor school districts' and charter schools' progress toward their World's Best Workforce (now Comprehensive Achievement and Civic Readiness) goals—including closing the achievement gap—and report the results to the Legislature. | Implemented                             | MDE included school districts' and charter schools' progress toward meeting goals in its 2025 report to the Legislature.  |
| MDE should take a more active role in helping school districts develop their Achievement and Integration improvement plans.  | Partially implemented                   | The 2025 Legislature increased MDE's funding to administer the Achievement and Integration Program. <i>Laws of Minnesota 2025</i> , First Special Session, chapter 10, art. 2, sec. 18, codified as <i>Minnesota Statutes 2025</i> , 124D.862, subd. 1(b). MDE reported that it has hired one additional staff member and is in the process of hiring two more. MDE said that the expanded team will allow MDE to take a more active role in supporting school districts. |
| MDE should develop a strategic plan and long-term framework for American Indian education that meets the requirements in statute, including approaches to reduce the achievement gap.  | Partially implemented                   | MDE has developed a strategic plan for American Indian education that incorporates four of five goals required by statute.  |

### Oversight of State-Funded Grants to Nonprofit Organizations (2023)

| Recommendation  | Status   | Notes   |
|---|--|---|
| MDE should: <ol style="list-style-type: none"> <li>(1) create agency-specific grants management procedures that provide more specific direction to grant managers and</li> <li>(2) ensure grant managers comply with all Office of Grants Management (OGM) policies.</li> </ol> | <b>Partially implemented</b><br><b>Partially implemented</b> | <p>OLA reviewed documentation for three grants awarded since 2023 and found that MDE had created an agency-specific policy on advance payments but had not created agency-wide policies for several other activities, such as site visits.</p> <p>In the grants OLA reviewed, MDE complied with most grants management policies. MDE did not, however, conduct annual monitoring visits for a grant worth nearly \$1 million or document its monitoring visits.</p> |

### *Special Review Reports*

#### Minnesota Department of Education: Oversight of Feeding Our Future (2024)

| Recommendation  | Status   | Notes   |
|---|--|---|
| MDE should take additional steps to verify information provided in support of sponsorship applications submitted by high-risk applicants.   | Work needed to determine implementation                            | MDE has created and implemented a procedure to identify high-risk Child Nutrition Program applicants for additional monitoring. MDE stated that it requests additional documentation whenever it finds irregularities in applications. OLA would need to conduct additional research to confirm the extent to which MDE has verified information. |
| MDE should conduct follow-up reviews, as needed, to ensure sponsors fully implement corrective action plans that result from administrative reviews.  | Work needed to determine implementation                            | MDE reported that it conducts follow-up reviews when there are findings on previous administrative reviews. OLA would need to conduct additional research to confirm to what extent MDE is conducting follow-up reviews.  |
| MDE should place a greater emphasis on program integrity and risk-based monitoring if oversight requirements are waived again in the future.  | Work needed to determine implementation                            | MDE said it places additional reporting requirements on sponsors that use waivers, including reporting specific to program integrity plan implementation and meal counts. OLA would need to conduct additional research to confirm the extent to which MDE emphasizes program integrity in their waiver approval and oversight process.           |
| MDE should revise its Child and Adult Care Food Program and Summer Food Service Program complaint investigation procedures so that they: <ul style="list-style-type: none"> <li>• Include criteria for prioritizing complaints and initiating proactive investigations.</li> <li>• Address all common types of complaints that MDE staff may encounter.</li> <li>• Provide detailed guidance on evidence collection.</li> </ul> | <b>Not implemented</b><br><b>Implemented</b><br><b>Implemented</b> | MDE implemented a new complaint process and procedure in May 2025. The procedure discusses common types of complaints and provides detailed guidance on evidence collection. However, the new procedure does not include criteria for prioritizing complaints or initiating proactive investigations.   |

[Minnesota Department of Education: Oversight of Feeding Our Future \(2024\)](#)

| Recommendation   | Status                                  | Notes   |
|--|---|---|
| MDE should prioritize independent fact-finding in response to complaints.  | Work needed to determine implementation | MDE implemented a new complaint procedure in May 2025. The procedure states that "fact-finding should remain independent to the maximum extent possible." OLA would need to conduct additional research to confirm the extent to which MDE has followed the new procedure.  |
| MDE should limit the information it shares with the subject of a complaint in an effort to protect complainants from retaliation.                                  | Work needed to determine implementation | MDE implemented a new complaint procedure in May 2025. The procedure states that complainants should be kept "confidential from sponsors to the maximum extent possible" and describes safeguarding the privacy and safety of the complainant as a "priority." OLA would need to conduct additional research to confirm the extent to which MDE has followed the new procedure. |
| MDE should evaluate the implementation of recent statutory changes related to its investigative authority, and promptly propose needed changes to the Legislature. | Implemented                             | MDE proposed changes to the MDE Office of Inspector General's statute during the 2025 legislative session. The Legislature did not pass any of MDE OIG's recommended changes.   |
| MDE should conduct more active follow-up to ensure sponsors and sites fully implement corrective action plans that result from serious deficiency processes.       | Work needed to determine implementation | MDE reported that it had made changes that address this recommendation. OLA would need to conduct additional research to determine to what extent MDE had conducted more active follow-up.  |

# Minnesota Department of Health

## Financial Audit Reports

### COVID-19-Related Emergency Purchases (2023)

| Recommendation   | Status          | Notes   |
|--|-----------------|---|
| The Minnesota Department of Health (MDH) should conduct and document a full physical inventory at least annually for its consumable inventory and at least biennially for capital assets, as required by state policy. | Implemented     | MDH timely conducted and documented a physical inventory of its consumable inventory and capital assets.  |
| MDH should update its inventory management system to reflect the results of its physical inventories and investigate discrepancies between its inventory counts and the inventory management system.                   | Not implemented | OLA performed an unannounced audit of the inventory in MDH's Emergency Preparedness warehouse in May 2025, and we found discrepancies between the inventory management system and the actual inventory in the warehouse. MDH was unable to reconcile the discrepancies with our inventory counts. |
| MDH should restrict user access to the inventory management system or implement alternative procedures to address incompatible access, as required by policy.  | Implemented     | MDH distributes weekly inventory reports to supervisors to examine changes as a mitigating control to address incompatible access.  |
| MDH should resolve inaccurate payments with vendors.   | Implemented     | MDH resolved all inaccurate payments with vendors identified in the audit.  |
| MDH should enhance internal controls over vendor payments to ensure it accurately pays for goods and services actually received.   | Implemented     | MDH enhanced internal controls over payments by updating its policy and providing training to agency employees.   |
| MDH should ensure it receives detailed and complete support of contractors' expenditures and payments during its reconciliation of advanced payments.  | Not applicable  | MDH has not made advanced payments since the 2023 audit. MDH stopped distributing advanced payments for COVID-19 contractors.   |

### Minnesota Immunization Information Connection (2023)

| Recommendation  | Status          | Notes   |
|---|-----------------|---|
| MDH should monitor users and organizations to ensure compliance with data use agreements. | Not implemented | MDH has not monitored users or organizations of the current system, Minnesota Immunization Information Connection (MIIC). MDH told us it is in the final stages of awarding a contract to develop a replacement system for MIIC, and the requested contract requirements include monitoring tools that may address this recommendation. |

[Minnesota Immunization Information Connection \(2023\)](#)

| Recommendation  | Status                | Notes  |
|---|-----------------------|--|
| MDH should implement logging functionality to comply with Minnesota Information Technology Services' (MNIT's) logging and monitoring standard.        | Not implemented       | MNIT told us that adding these functions in the current MIIC system will require an inappropriate amount of resources. MDH told us it is in the final stages of awarding a contract to develop a replacement system for MIIC, and the requested contract requirements include logging and monitoring tools that may address this recommendation. |
| MDH should implement a process to regularly review and monitor MIIC audit logs, specifically looking for unusual or unauthorized activities.          | Not implemented       | MNIT told us that adding these functions in the current MIIC system will require an inappropriate amount of resources. MDH told us that it is in the final stages of awarding a contract to develop a replacement system for MIIC, and the requested contract requirements include monitoring tools that may address this recommendation.        |
| MDH should educate MIIC users not to enter test and training data into the production system.   | Implemented           | MIIC users now must acknowledge during their review and submission of their data use agreement that they will not enter test and training data.  |
| MDH should have adequate controls to identify or prevent test and training data from entering into the production system.                             | Implemented           | MNIT demonstrated how it now regularly reviews MIIC for test and training data.  |
| MDH should prioritize mitigation of known MIIC system vulnerabilities.  | Implemented           | MNIT corrected the known vulnerabilities in MIIC.  |
| MDH should regularly perform manual information security testing to ensure that system changes do not introduce vulnerabilities into the MIIC system. | Not implemented       | MNIT performs regular automated security scans at MDH; however, it does not perform regular manual security testing. MNIT told us its current approach allows it to efficiently manage risk across a large and complex environment with the resources available.   |
| MDH should perform a risk assessment for the MIIC system according to MNIT standards and procedures.  | Partially implemented | MDH and MNIT assessed risks using a System Security Plan (SSP) that provided a certain assessment of risks, mitigations, and remediation, but they did not use the formal risk assessment required by the MNIT policy. MDH and MNIT did not file an exception to conduct the risk assessment using an SSP.                                       |
| MDH should document known risks, mitigations, and remediations according to MNIT standards and procedures.  | Partially implemented | MDH and MNIT have documented certain risks, along with mitigations and remediation, in the SSP, but these risks are not documented in a formal risk assessment.  |
| MDH should utilize the risk assessment to assist with prioritizing risk mitigation efforts and implementing audit recommendations.                    | Partially implemented | MDH and MNIT did not utilize the formal risk assessment to document risks, mitigations, and remediation; instead, they used the SSP.   |

## Program Evaluation Reports

### Minnesota Department of Health: Human Resources Complaint Management (2025)

| Recommendation  | Status                | Notes  |
|---|-----------------------|--|
| MDH should require all MDH supervisors to attend periodic training about when to refer employee complaints.   | Implemented           |  |
| The Human Resources (HR) division should establish complaint management procedures that require investigators to: <ul style="list-style-type: none"> <li>Issue, and document the issuance of, verbal and written data practices and antiretaliation notices during intake conversations and investigation interviews.</li> </ul>  | Partially implemented | MDH has developed procedures and templates to guide the issuance and documentation of data practices and antiretaliation notices in most situations. The procedures, however, do not explicitly direct investigators to verbally issue (or document the issuance of) either data practices or antiretaliation notices during intake conversations. |
| <ul style="list-style-type: none"> <li>Consider certain factors when deciding whether to (1) investigate complaint allegation(s) and (2) interview people identified as having relevant information, and document these decisions.</li> <li>Notify each complainant when they receive and close a complaint and at any other determined points, and document when they issue such acknowledgment(s).</li> </ul> | Partially implemented | MDH created a guide for determining whether to investigate a complaint. The guide does not provide direction for determining whom to interview, or require investigators to document their interview decision making.  |
|   | Implemented           | MDH developed complaint management procedures that instruct investigators to notify complainants when the division has received their complaint and when it has closed their complaint (either without or after an investigation), and to retain this documentation.   |
| The HR division should develop procedures to address retaliation fears or experiences that emerge through complaint intake or investigation.  | Implemented           |  |
| The HR division should develop a procedure for examining instances of noncertification of probationary employees who previously submitted complaints.   | Implemented           | MDH prepared guidance and considerations for HR staff to use in instances of noncertification during probation. The guidance includes instruction to consider whether whistleblower or retaliation protections apply.  |

# Minnesota Department of Natural Resources

## Program Evaluation Reports

### Department of Natural Resources Land Acquisition (2025)

| Recommendation   | Status                | Notes   |
|--|-----------------------|---|
| The Minnesota Department of Natural Resources (DNR) should regularly produce reports identifying its inventory of DNR-managed land, as required by law.  | Not implemented       | DNR has not produced the required report, indicating that it believes its online resources accomplish the underlying goal of the statutory requirement. DNR reported that it is developing a legislative proposal to revise the existing statutory language.  |
| DNR should regularly produce reports identifying transactions from the Land Acquisition Account, as required by law.   | Implemented           | DNR's most recent Land Acquisition Account report, for Fiscal Year 2025, reports all purchases and sales from the account, as required by law.  |
| DNR should maintain data on landholdings and acquisitions in a manner that facilitates accurate reporting.   | Not implemented       | DNR reported that it lacks sufficient resources to invest in a data system that would allow centralized reporting on landholdings. DNR explained that the department understands and can manage the limitations of the current data system.   |
| To the extent that proposed solutions identified through the continuous improvement project could also apply to DNR-led acquisitions, the department should implement them to reduce the length of these acquisitions. | Partially implemented | DNR reported implementing certain solutions, such as the use of a new property information form, that have already had a positive impact on DNR-led acquisitions, but it had not yet implemented all relevant solutions. DNR indicated that the department will continue to consider the applicability of its continuous improvement efforts on DNR-led acquisitions. |

## Special Review Reports

### The Department of Natural Resources' Administration of the Shade Tree Bonding Grants Program (2025)

| Recommendation   | Status         | Notes  |
|--|----------------|--|
| DNR should clearly communicate to applicants the criteria on which it will rate applications for Shade Tree Bonding Grant funds. | Not applicable | DNR has not awarded a Shade Tree Bonding grant since the report was released. However, DNR has provided department-wide guidance for drafting requests for applications and included detailed scoring rubrics in recent requests for other DNR grants. |
| DNR should ensure grant reviewers score all grant-award criteria based on a standardized scoring system.                         | Not applicable | DNR has not awarded a Shade Tree Bonding grant since the report was released. However, DNR reported it has recently provided grant reviewers for other DNR grants with additional information about the standardized scoring process for grant review. |

# Minnesota Department of Veterans Affairs

## *Financial Audit Reports*

### [COVID-19-Related Emergency Purchases \(2023\)](#)

| Recommendation   | Status      | Notes  |
|--|-------------|--|
| The Minnesota Department of Veterans Affairs (MDVA) should resolve inaccurate sales and use tax payments with the Department of Revenue. | Implemented | MDVA remitted to the Department of Revenue all unpaid sales and use taxes identified in the audit.                       |
| MDVA should strengthen internal controls to ensure it accurately pay sales and use taxes.  | Implemented | MDVA explained its process and provided examples of the internal controls it uses to accurately pay sales and use taxes. |

# Minnesota Housing Finance Agency

## Program Evaluation Reports

### RentHelpMN (2023)

| Recommendation   | Status                                  | Notes  |
|--|---|--|
| The Minnesota Housing Finance Agency (Minnesota Housing) should establish clear, comprehensive, written program policies and procedures. <sup>a</sup>  | Partially implemented                   | OLA reviewed Minnesota Housing's policies and procedures for three grant programs established since 2023 and found that the programs generally had clear written policies and procedures, but they were not comprehensive at the time of review. |
| Minnesota Housing should ensure program participants have sufficient access to knowledgeable program staff who can answer or act on their questions or concerns.   | Not applicable                          | As of Fall 2025, Minnesota Housing was not operating programs for which this recommendation was relevant.  |
| Minnesota Housing should conduct more extensive testing of its data systems before it launches a program to ensure the systems function as expected; it should also include intended end users in the testing of those systems.          | Not applicable                          | As of Fall 2025, Minnesota Housing was not operating programs for which this recommendation was relevant.  |
| Minnesota Housing should establish standards for application processing time and measure the performance of application processors against those standards.  | Not applicable                          | As of Fall 2025, Minnesota Housing was not operating programs for which this recommendation was relevant.  |
| Minnesota Housing should collect sufficient documentation and conduct regular audits of cases to ensure accurate payment and that policies and procedures are followed.  | Work needed to determine implementation | Minnesota Housing has established monitoring policies that require the agency to collect documentation and review payments. OLA would need to perform additional research to determine the extent to which the agency has followed the policy.   |
| To maximize the odds of recovery, Minnesota Housing should develop comprehensive procedures for recouping overpayments before it issues any payments, and it should promptly begin recoupment efforts once it identifies an overpayment. | Not applicable                          | As of Fall 2025, Minnesota Housing was not operating programs for which this recommendation was relevant.  |

<sup>a</sup> RentHelpMN had largely concluded by the time OLA conducted its evaluation of the program.

### State Programs That Support Minnesotans on the Basis of Racial, Ethnic, or American Indian Identity (2023)

| Recommendation   | Status      | Notes  |
|--|-------------|--|
| The Department of Human Services and Minnesota Housing should create request for proposal (RFP) templates that include the essential elements in Office of Grants Management policy. | Implemented |  |
| State agencies should consider developing policies outlining the circumstances under which grant program materials should be translated into languages other than English.           | Implemented | Minnesota Housing developed a policy and plan to guide the translation of agency materials, including grant program materials. |

[Minnesota Housing Finance Agency: Down Payment Assistance \(2024\)](#)

| Recommendation   | Status                | Notes   |
|--|-----------------------|---|
| Minnesota Housing should establish policies to better protect borrowers participating in its programs from unreasonable fees and closing costs.  | Implemented           | Minnesota Housing has more clearly specified what fees lenders may charge borrowers and imposed a limit on the total fee amount.  |
| In its loan servicing contract, Minnesota Housing should include penalties for inadequate performance.   | Not implemented       | Minnesota Housing has not yet rebid its loan servicing contract; it plans to do so by the end of 2026.  |
| Minnesota Housing should periodically evaluate all requirements and policies of its down payment assistance programs.  | Partially implemented | Minnesota Housing has started tracking how often it reviews each program policy. It will consider the length of time since the last review when determining which policies to revisit as part of its annual program assessments. However, it has not created a schedule or policy to ensure all program parameters are periodically assessed. |
| Minnesota Housing should explore changes in how it finances a small portion of its lending activities to obtain greater flexibility to assist home buyers it does not currently reach. | Implemented           | Minnesota Housing formally considered changing its lending practices to reach more homebuyers, though it decided not to due to market conditions.   |

# Minnesota IT Services

## Financial Audit Reports

### Minnesota Immunization Information Connection (2023)

| Recommendation  | Status                | Notes  |
|---|-----------------------|--|
| Minnesota IT Services (MNIT) should utilize code analysis software to test for security coding vulnerabilities for all of its updates to the Minnesota Immunization Information Connection (MIIC) software. | Not implemented       | MNIT added a control to document vulnerability scan results within change management tickets. However, MNIT did not utilize code analysis software to test for security coding vulnerabilities for all of its updates to the MIIC software, and we identified gaps in the completion of static and dynamic scans.  |
| MNIT should implement logging functionality to comply with its logging and monitoring standard.   | Not implemented       | MNIT told us that adding these functions in the current MIIC application will require an inappropriate amount of resources. The Minnesota Department of Health (MDH) told us it is in the final stages of awarding a contract to develop a replacement system for MIIC, and the requested contract requirements include logging and monitoring tools that may address this recommendation. |
| MNIT should implement a process to regularly review and monitor MIIC audit logs, specifically looking for unusual or unauthorized activities.   | Not implemented       | MNIT told us that adding these functions in the current MIIC application will require an inappropriate amount of resources. MDH told us it is in the final stages of awarding a contract to develop a replacement system for MIIC, and the requested contract requirements include monitoring tools that may address this recommendation.  |
| MNIT should educate MIIC users not to enter test and training data into the production system.  | Implemented           | MIIC users now must acknowledge during their review and submission of their data use agreement that they will not enter test and training data.  |
| MNIT should have adequate controls to identify or prevent test and training data from entering into the production system.  | Implemented           | MNIT demonstrated how it regularly reviews MIIC for test and training data.  |
| MNIT should prioritize mitigation of known MIIC system vulnerabilities.   | Implemented           | MNIT corrected the known vulnerabilities in MIIC.  |
| MNIT should regularly perform manual information security testing to ensure that system changes do not introduce vulnerabilities into the MIIC system.  | Not implemented       | MNIT performs regular automated security scans at MDH; however, they do not perform regular manual security testing. MNIT told us its current approach allows it to efficiently manage risk across a large and complex environment with the resources available.   |
| MNIT should prepare a full restoration plan describing the necessary procedures to restore MIIC from backup.  | Implemented           | MNIT updated the MIIC disaster recovery plan to describe the necessary procedures to restore MIIC from backup.   |
| Working with MDH, MNIT should develop, implement, and test a strategy to meet the desired recovery time objective for MIIC.   | Partially implemented | A disaster recovery plan is present with an implementation strategy; however, no disaster recovery test was performed.   |

[Minnesota Immunization Information Connection \(2023\)](#)

| Recommendation  | Status                | Notes   |
|---|-----------------------|---|
| MNIT should perform a risk assessment for the MIIC system according to MNIT standards and procedures.                               | Partially implemented | MDH and MNIT assessed risks using a System Security Plan (SSP) method that provided certain assessment of risks, mitigations, and remediation, but they did not use the formal risk assessment required by the MNIT policy. MDH and MNIT did not file an exception to conduct the risk assessment using an SSP. |
| MNIT should document known risks, mitigations, and remediations according to its standards and procedures.                          | Partially implemented | MDH and MNIT have documented certain risks, along with mitigations and remediation, in the SSP, but these risks are not documented in a formal risk assessment.   |
| MNIT should utilize the risk assessment to assist with prioritizing risk mitigation efforts and implementing audit recommendations. | Partially implemented | MDH and MNIT did not utilize the formal risk assessment to document risks, mitigations, and remediation; instead, they used the SSP.  |

# Minnesota Pollution Control Agency

## Program Evaluation Reports

### Petroleum Remediation Program (2022)

| Recommendation   | Status                                  | Notes   |
|--|---|---|
| The Minnesota Pollution Control Agency (MPCA) should:  |   |   |
| <ul style="list-style-type: none"> <li>Consider additional steps it could take to reduce risks resulting from future changes to petroleum-contaminated properties.</li> </ul>                          | Implemented                             | MPCA considered additional steps to reduce risks resulting from future changes to petroleum-contaminated sites and released a report with seven recommendations. MPCA is currently performing additional work related to four of the recommendations. |
| <ul style="list-style-type: none"> <li>Ensure staff take a consistent approach in the extent to which they consider how a property may be used in the future when they make site decisions.</li> </ul> | Work needed to determine implementation | MPCA has taken some steps to encourage consistency, including using standard report review forms. OLA would need to conduct further research to determine to what extent staff have taken a consistent approach.                                      |
| MPCA should define the characteristics of release sites it considers to be a “low potential risk.”   | Implemented                             |   |
| MPCA should...ensure passive bioremediation is used at those sites as required by law.   | Work needed to determine implementation | OLA would need to conduct further research to determine to what extent MPCA has implemented this recommendation.  |
| MPCA should establish measurable objectives pertaining to the quality of the Petroleum Remediation Program’s work and regularly evaluate the extent to which it meets those objectives.                | Partially implemented                   | MPCA has internal processes for reviewing site decisions, including some metrics related to program quality. The agency proposed one—but has yet to formalize any—measurable objectives pertaining to the quality of the program’s work.              |
| MPCA should make data regarding consultant performance more accessible to responsible parties.   | Implemented                             |   |

### State Programs That Support Minnesotans on the Basis of Racial, Ethnic, or American Indian Identity (2023)

| Recommendation   | Status      | Notes  |
|--|-------------|--|
| State agencies should consider developing policies outlining the circumstances under which grant program materials should be translated into languages other than English. | Implemented | MPCA reported that it proactively translates materials or provides language services, and outlines on its website the factors it considers when deciding to do so. |

# Minnesota State Arts Board

## *Program Evaluation Reports*

### Grant Award Processes (2024)

| Recommendation  | Status                                  | Notes   |
|---|---|---|
| The Minnesota State Arts Board (MSAB) should ensure it correctly classifies expenditures and follows applicable requirements for single/sole source grants. | Work needed to determine implementation | MSAB reported that it changed how it classifies certain expenditures and has completed single/sole source justification forms. However, OLA would need to conduct additional research to confirm to what extent MSAB has correctly classified expenditures and followed requirements. |
| The Behavioral Health Division and MSAB should complete pre-award risk assessments, as required by state law and Office of Grants Management policy.        | Work needed to determine implementation | OLA would need to conduct further research to determine to what extent MSAB has completed pre-award risk assessments.   |

## Office of Emergency Medical Services

The Office of Emergency Medical Services (OEMS) was established on January 1, 2025, to replace the Emergency Medical Services Regulatory Board (EMSRB). Unless otherwise specified in the notes, all recommendations from the *Emergency Ambulance Services (2022)* report directed at EMSRB now apply to OEMS, which has taken over EMSRB's responsibilities.<sup>3</sup>

### Program Evaluation Reports

#### [Emergency Ambulance Services \(2022\)](#)

| Recommendation  | Status                                  | Notes   |
|---|---|---|
| [OEMS] should ensure that ambulance services meet requirements in law.  | Partially implemented                   | OEMS has increased its inspections and has issued correction orders against noncompliant ambulance services. OEMS has not adjusted its license renewal application to fully conform with <i>Minnesota Rules 4690.0200</i> , or initiated a rule change.                               |
| EMSRB should work with the Legislature to ensure it has sufficient authority to implement performance standards.  | Partially implemented                   | The Legislature created OEMS and granted that office authority to enforce standards related to the quality of medical care. The office could still work with the Legislature to clarify its authority to establish nonclinical standards, such as ambulance response time standards.  |
| [OEMS] should explore reporting mechanisms that would enable it to track nonresponse by ambulance services.   | Implemented                             |   |
| [OEMS] should update its administrative rules.  | Partially implemented                   | OEMS has made changes to two administrative rules and is considering additional changes.  |
| [OEMS] should improve its documentation and publication of primary service area boundaries.   | Implemented                             |   |
| Unless the Legislature decides to repeal the statutory requirement for a financial data collection system, EMSRB should develop and implement this system.  | Implemented                             |   |
| The EMSRB board should:   |   |   |
| <ul style="list-style-type: none"> <li>• Improve its oversight of the executive director.</li> <li>• Ensure that the organization fulfills its responsibilities and maintains adequate staff to do so.</li> </ul> | Work needed to determine implementation | EMSRB conducted regular performance reviews of the executive director and also increased staffing levels. OLA would need to conduct additional research to determine the extent to which OEMS has provided oversight and ensured the organization has fulfilled its responsibilities. |

<sup>3</sup> *Laws of Minnesota 2024*, chapter 122, art. 1, secs. 3 and 5, codified as *Minnesota Statutes 2025*, 144E.011, 144E.015, and 144E.016.

## Office of the Governor and Lieutenant Governor

### *Financial Audit Reports*

#### [COVID-19-Related Emergency Purchases \(2023\)](#)

| Recommendation   | Status          | Notes   |
|--|-----------------|---|
| The Office of the Governor and Lieutenant Governor (Office) should develop emergency purchasing guidance related to its statutory authority.   | Not implemented | The office did not develop new or additional guidance related to its statutory authority for emergency purchases, and the office does not plan to develop guidance. |
| The office should only charge allowable expenditures to federal awards.  | Implemented     | The office properly reallocated from the Federal Fund into the General Fund unallowable expenditures identified in the audit.                                       |
| The office should strengthen internal controls to ensure it only charges allowable expenditures to federal awards and that allocated expenditures are supported by sufficient documentation. | Not applicable  | The office has not charged any expenditures to federal awards since the issuance of the <i>COVID-19-Related Emergency Purchases</i> report.                         |

## Recommendations Not Specific to an Agency

OLA's Program Evaluation Division released two program evaluation reports from 2022 through 2025 with recommendations that were not directed at a specific agency. In one of these reports, *State Programs That Support Minnesotans on the Basis of Racial, Ethnic, or American Indian Identity* (2023), OLA made a recommendation broadly to all state agencies regarding translation of grant program materials.

In the other report, *Sustainable Building Guidelines* (2023), OLA recommended that the Legislature first identify an agency to administer and oversee the sustainable building guidelines, after which the identified agency should act on OLA's recommendations. As the Legislature has not identified an agency to administer and oversee the state's sustainable building guidelines, the recommendations are currently not applicable to any state agency.

### *Program Evaluation Reports*

#### *State Programs That Support Minnesotans on the Basis of Racial, Ethnic, or American Indian Identity (2023)*

| Recommendation   | Status                                  | Notes   |
|--|---|---|
| State agencies should consider developing policies outlining the circumstances under which grant program materials should be translated into languages other than English. | Work needed to determine implementation | To determine to what extent most state agencies have implemented this recommendation, OLA would need to conduct further research. |

#### *Sustainable Building Guidelines (2023)*

| Recommendation   | Status         | Notes |
|--|----------------|-------|
| The agency that the Legislature tasks with administering and overseeing the sustainable building guidelines should ensure that the guidelines clearly define the roles of all individuals responsible for implementing the guidelines.                               | Not applicable |       |
| The agency that the Legislature tasks with administering and overseeing the sustainable building guidelines should ensure that all individuals responsible for implementing the guidelines receive adequate training on their respective roles and responsibilities. | Not applicable |       |
| The agency that the Legislature tasks with administering and overseeing the sustainable building guidelines should ensure that project team members receive adequate support to implement the guidelines.  | Not applicable |       |
| The agency to which the Legislature assigns responsibility for identifying projects subject to the sustainable building guidelines should clearly define and document the criteria for making applicability determinations.  | Not applicable |       |

Sustainable Building Guidelines (2023)

| Recommendation   | Status         | Notes |
|--|----------------|-------|
| The agency to which the Legislature assigns responsibility for identifying projects subject to the sustainable building guidelines should directly inform project teams that their projects are subject to the guidelines.   | Not applicable |       |
| The agency that the Legislature tasks with administering and overseeing the sustainable building guidelines should ensure that the individuals responsible for implementing the guidelines are clearly informed of who is responsible for granting variances and the circumstances in which variances are appropriate. | Not applicable |       |
| The agency that the Legislature tasks with administering and overseeing the sustainable building guidelines should ensure that waivers are approved in the manner permitted by law and consistent with the guidelines.   | Not applicable |       |
| The agency that the Legislature tasks with administering and overseeing the sustainable building guidelines should ensure that all project teams track their compliance with the guidelines.   | Not applicable |       |

# Judicial Branch

## Program Evaluation Reports

### Guardianship of Adults (2025)

| Recommendation   | Status                                  | Notes  |
|--|---|--|
| The Judicial Branch should improve its data collection practices to ensure that guardianship data are sufficiently reliable to oversee adult guardianship statewide.   | Work needed to determine implementation | The Judicial Branch has developed new data collection guidelines for Judicial Branch staff and stated that staff are in the process of improving the reliability of guardianship data. OLA would need to conduct further research to determine the extent to which guardianship data are sufficiently reliable.  |
| The Judicial Branch should protect sensitive information about respondents and people subject to guardianship.   | Not implemented                         | In 2021, the Minnesota Supreme Court amended the Rules of Public Access of Records to the Judicial Branch to require most guardianship data to be public. The Supreme Court has not made any changes to this action.   |
| The Judicial Branch should enforce statutory background check requirements for guardians in a timely manner.   | Work needed to determine implementation | The Judicial Branch did not report that it has implemented changes to address the issues we identified. OLA would need to conduct further research to determine the extent to which issues continue to persist.  |
| The Judicial Branch should revise guardians' annual report template to make it more useful and user friendly.  | Not implemented                         | The Judicial Branch told us that the annual report form is based on statutes and the Branch will revise the form if the Legislature amends statutes.   |
| The Judicial Branch should ensure that the courts act in a timely and consistent manner and in accordance with state law and Branch processes to obtain required guardian reports.   | Work needed to determine implementation | The Judicial Branch did not report that it has implemented changes to address the issues we identified. OLA would need to conduct further research to determine whether issues continue to persist.  |
| The Judicial Branch should develop systematic processes for notifying judicial officers of significant guardian performance issues.  | Partially implemented                   | The Judicial Branch developed a process to track guardians who have been removed for cause but has not implemented a system to notify judicial officers of significant guardian performance issues.  |
| The Judicial Branch should establish a process for systematically reviewing adult guardianships.   | Not implemented                         | The Judicial Branch stated that additional formal review of guardianships would be beneficial but has not made changes to current practice due to staffing and resource constraints.   |
| The Judicial Branch should: <ul style="list-style-type: none"> <li>Require all judicial officers who preside over adult guardianship hearings to complete training on guardianship.</li> <li>Consolidate the number of judicial officers who hear guardianship cases.</li> </ul> | Not implemented                         | While training is not required, the Judicial Branch told us it strongly encouraged judicial officers overseeing guardianship cases to attend an in-person training provided in late 2025, and it is developing an optional online training video on guardianship. A Branch committee is reviewing whether to consolidate judicial officers that hear guardianship and other probate cases. |
| The Judicial Branch should ensure that it completes guardianship complaint investigations in a timely manner.  | Implemented                             |  |

# Minnesota Legislature

## Status of Recommendations to the Legislature

- **Relevant legislation passed:** The Legislature passed legislation relevant to the recommendation. If the legislation did not fully address the recommendation, we provide further information in the notes column.
- No relevant legislation passed: The Legislature did not pass legislation relevant to the recommendation.
- **Not applicable:** The recommendation is not currently applicable the program's or agency's circumstances.

### Child Protection Removals and Reunifications (2022)

| Recommendation  | Status                      | Notes  |
|---|-----------------------------|--|
| The Legislature should direct child protection agencies to produce short, easy-to-understand summary documents for parents explaining the steps they should take to pursue reunification. | Relevant legislation passed | <i>Laws of Minnesota 2024</i> , chapter 115, art. 18, sec. 36, codified as <i>Laws of Minnesota 2025</i> , 260C.212, subd. 1(15)(e). |

### Department of Commerce Fraud Bureau (2022)

| Recommendation   | Status         | Notes   |
|--|----------------|---|
| The Legislature should consider whether to (1) keep statutory language that limits the jurisdiction of the Commerce Fraud Bureau to insurance-related cases, or, alternatively, (2) authorize the bureau to investigate any allegations of fraud that are within the purview of the Department of Commerce's (Commerce's) regulatory duties. | Not applicable | The Legislature moved responsibility for conducting fraud investigations from Commerce to the Bureau of Criminal Apprehension. <i>Laws of Minnesota 2025</i> , chapter 35, art. 3, sec. 4, codified as <i>Minnesota Statutes 2025</i> , 45.0135, subd. 2g(a). |

### Department of Commerce's Civil Insurance Complaint Investigations (2022)

| Recommendation  | Status                         | Notes |
|---|--------------------------------|-------|
| The Legislature should review Commerce's responsibilities related to antifraud plans and ensure requirements outlined in law meet the Legislature's expectations. | No relevant legislation passed |       |

### Department of Employment and Economic Development Grants Management (2025)

| Recommendation   | Status                      | Notes  |
|--|-----------------------------|--|
| The Legislature should direct the Department of Employment and Economic Development to establish measurable performance goals for the Pathways to Prosperity and the Adult Career Pathways legislatively named grant programs. | Relevant legislation passed | The 2025 Legislature established the Task Force on Workforce Development System Reform and required it to "investigate potential metrics for evaluating workforce development program outcomes." <i>Laws of Minnesota 2025, First Special Session, chapter 6, art. 4, sec. 37.</i> |

### Department of Natural Resources Land Acquisition (2025)

| Recommendation   | Status                         | Notes |
|--|--------------------------------|-------|
| The Legislature should consider whether statutes should require partner organizations conveying land to the state to meet the same land acquisition standards required of the Department of Natural Resources. | No relevant legislation passed |       |

### The Department of Natural Resources' Administration of the Shade Tree Bonding Grants Program (2025)

| Recommendation  | Status         | Notes  |
|---|----------------|--|
| The Legislature should clearly state in law its priorities for awarding grants through the Shade Tree Bonding Grants program. | Not applicable | This report was released in June 2025; the Legislature has not yet had the opportunity to address this recommendation. |

### Emergency Ambulance Services (2022)<sup>a</sup>

| Recommendation  | Status                         | Notes  |
|---|--------------------------------|--|
| The Legislature should retain primary service areas, but it should restructure how they are created, modified, and overseen.  | Relevant legislation passed    | <i>Laws of Minnesota 2024, chapter 122, art. 1, secs. 3 and 5, codified as Minnesota Statutes 2025, 144E.011 and 144E.016.</i>   |
| The Legislature should create processes for modifying primary service area boundaries. <ul style="list-style-type: none"> <li>The Legislature should create a process for reviewing and revising primary service area boundaries on a periodic basis to address demographic and other societal changes.</li> <li>The Legislature should authorize the Emergency Medical Services Regulatory Board (EMSRB) to administratively resolve overlaps and gaps in primary service area coverage—if necessary, without the consent of the ambulance services involved.</li> </ul> | Relevant legislation passed    | The Legislature gave the Office of Emergency Medical Services (OEMS) authority to modify primary service area boundaries but did not create a process to periodically review boundaries. <i>Laws of Minnesota 2024, chapter 122, art. 1, secs. 3 and 5, codified as Minnesota Statutes 2025, 144E.011, subd. 3(9); and 144E.016.</i> |
| The Legislature should establish a process through which local units of government have input into which services provide ambulance care and transportation in their areas.   | No relevant legislation passed |  |

### Emergency Ambulance Services (2022)<sup>a</sup>

| Recommendation  | Status                         | Notes  |
|---|--------------------------------|--|
| The Legislature should adopt more stringent statutory requirements for renewal of ambulance service licenses.   | No relevant legislation passed |  |
| The Legislature should require ambulance services to go through the initial licensure process whenever there is a change in ownership or provider.  | No relevant legislation passed |  |
| The Legislature should direct EMSRB to develop and enforce performance standards for ambulance services.  | No relevant legislation passed |  |
| EMSRB should work with the Legislature to ensure it has sufficient authority to implement performance standards.  | Relevant legislation passed    | The Legislature gave OEMS authority to enforce standards of medical care. The Legislature could still clarify the office's authority to establish certain nonclinical standards, such as ambulance response time. <i>Laws of Minnesota 2024</i> , chapter 122, art. 1, secs. 4–5, codified as <i>Minnesota Statutes 2025</i> , 144E.015–016. |
| The Legislature should explore options for improving ambulance service sustainability in Minnesota, potentially through pilot programs or other trial programs.   | Relevant legislation passed    | <i>Laws of Minnesota 2024</i> , chapter 122, art. 1, sec. 18.  |
| The Legislature should require EMSRB to create and periodically update a statewide emergency medical services plan, and report regularly on its progress toward achieving the goals outlined in the plan. | Relevant legislation passed    | The Legislature did not require a statewide plan, but it required an annual report that fulfills the same purpose. <i>Laws of Minnesota 2024</i> , chapter 122, art. 1, sec. 3, codified as <i>Minnesota Statutes 2025</i> , 144E.011, subd .3(9).   |
| The Legislature should require the EMSRB board to regularly evaluate the executive director's performance.  | Not applicable                 | The Legislature eliminated the EMSRB board. <i>Laws of Minnesota 2024</i> , chapter 122, art. 1, codified as <i>Minnesota Statutes 2025</i> , 144E.011, 144E.015, and 144E.016.  |
| The Legislature should consider whether to make structural changes to the EMSRB board or EMSRB's responsibilities.  | Relevant legislation passed    | In 2024, the Legislature established OEMS, which replaced EMSRB. <i>Laws of Minnesota 2024</i> , chapter 122, art. 1, codified as <i>Minnesota Statutes 2025</i> , 144E.011, 144E.015, and 144E.016.   |
| The Legislature should clarify what constitutes a conflict of interest for EMSRB board members.   | Not applicable                 | The Legislature eliminated the EMSRB board. <i>Laws of Minnesota 2024</i> , chapter 122, art. 1, codified as <i>Minnesota Statutes 2025</i> , 144E.011, 144E.015, and 144E.016.  |
| The Legislature should revise <i>Minnesota Statutes 2021</i> , 144E, to clarify contradictory or unclear language.  | No relevant legislation passed |  |

<sup>a</sup> The Office of Emergency Medical Services (OEMS) was established on January 1, 2025, to replace the Emergency Medical Services Regulatory Board (EMSRB). Unless otherwise specified in the notes, all recommendations from the *Emergency Ambulance Services (2022)* report directed at EMSRB now apply to OEMS, which has taken over EMSRB's responsibilities. *Laws of Minnesota 2024*, chapter 122, art. 1, secs. 3 and 5, codified as *Minnesota Statutes 2025*, 144E.011, 144E.015, and 144E.016.

[Guardian ad Litem Board: Data Access Rules \(2023\)](#)

| Recommendation   | Status                         | Notes |
|--|--------------------------------|-------|
| The Legislature should consider possible changes to state statutes regarding access to Guardian ad Litem Board data. | No relevant legislation passed |       |

[Guardianship of Adults \(2025\)](#)

| Recommendation  | Status                         | Notes |
|---|--------------------------------|-------|
| The Legislature should establish specific duties for the oversight and enforcement of adult guardianship requirements.  | No relevant legislation passed |       |
| The Legislature should amend statutes to establish minimum performance standards for guardians and court visitors.  | No relevant legislation passed |       |
| The Legislature should amend statutes to require that the key state entities investigating guardianship complaints share information about complaints.                              | No relevant legislation passed |       |
| The Legislature should establish a centralized entity in statute to administer and oversee adult guardianship.  | No relevant legislation passed |       |
| The Legislature should require the court to notify petitioners when petitions do not include all information required by law.   | No relevant legislation passed |       |
| The Legislature should establish a task force to devise a plan for administering and overseeing court visitors' work.   | No relevant legislation passed |       |
| The Legislature should amend statute to require the court to review the restrictions placed on people subject to guardianship and determine if the restrictions are allowed by law. | No relevant legislation passed |       |
| The Legislature should amend statutes to require guardians to report annually on the actions they took to meet the needs of the person subject to guardianship.                     | No relevant legislation passed |       |
| The Legislature should require all guardians to complete training prior to their appointment as guardian.   | No relevant legislation passed |       |
| The Legislature should require all court visitors to complete training prior to their involvement in guardianship cases.  | No relevant legislation passed |       |
| The Legislature should establish a guardianship complaint process in law.   | No relevant legislation passed |       |

### Hometown Heroes Assistance Program (2023)

| Recommendation   | Status                         | Notes |
|--|--------------------------------|-------|
| The Legislature should clearly indicate that allocations to nonstate entities from the Fire Safety Account should be regarded as grants. | No relevant legislation passed |       |

### Metro Mobility (2024)

| Recommendation  | Status                      | Notes  |
|---|-----------------------------|--|
| The Legislature should consider amending statutes to explicitly identify service requirements in the state-mandated service area. | Relevant legislation passed | The Legislature directed the Commissioner of Transportation, in consultation with the Metropolitan Council, to conduct a study of Metro Mobility that includes reviewing whether "law should be amended to prohibit or restrict the denial of ride requests in the state-mandated service area." The report is due February 15, 2026. <i>Laws of Minnesota 2024</i> , chapter 127, art. 3, sec. 125. |

### MINNCOR Industries' Contracting Practices for Interstate Commerce (2025)

| Recommendation  | Status                         | Notes |
|---|--------------------------------|-------|
| The Legislature should establish requirements for how MINNCOR: <ul style="list-style-type: none"> <li>• Calculates the rates it charges private businesses.</li> <li>• Assesses the profitability of individual contracts with private businesses.</li> </ul> | No relevant legislation passed |       |

### Minnesota Department of Education: Oversight of Feeding Our Future (2024)

| Recommendation  | Status                      | Notes   |
|---|-----------------------------|---|
| The Legislature should either establish criteria in statute or give the Minnesota Department of Education (MDE) the authority to conduct rulemaking to establish criteria that the department must consider when determining whether to approve organizations for the Child and Adult Care Food Program or Summer Food Service Program. | Relevant legislation passed | <i>Laws of Minnesota 2025</i> , chapter 10, art. 9, sec. 2, codified as <i>Minnesota Statutes 2025</i> , 125D.111, subd. 2a(c)–(e). |

### Minnesota Department of Education's Role in Addressing the Achievement Gap (2022)

| Recommendation  | Status                         | Notes |
|---|--------------------------------|-------|
| To ensure a common understanding among policy makers, MDE, school districts, and charter schools, the Legislature should define "achievement gap" in law. | No relevant legislation passed |       |

[Minnesota Department of Education's Role in Addressing the Achievement Gap \(2022\)](#)

| Recommendation   | Status                             | Notes   |
|--|------------------------------------|---|
| The Legislature should consider more explicitly defining MDE's responsibilities with respect to addressing the achievement gap.                                    | No relevant legislation passed     |   |
| The Legislature should clarify how MDE should annually monitor school districts' and charter schools' progress with respect to World's Best Workforce.             | No relevant legislation passed     |   |
| The Legislature should amend the statutory deadline by which MDE must review school districts' progress toward Achievement and Integration goals.                  | <b>Relevant legislation passed</b> | <i>Laws of Minnesota 2025, chapter 10, art. 2, sec. 19, codified as Minnesota Statutes 2025, 124D.862, subd. 8.</i> |
| The Legislature should amend Minnesota statutes to shift primary responsibility for Achievement and Integration improvement planning from MDE to school districts. | <b>Relevant legislation passed</b> | <i>Laws of Minnesota 2023, chapter 55, art. 2, sec. 57, codified as Minnesota Statutes 2025, 124D.862, subd. 8.</i> |
| The Legislature should consider making the services of the Regional Centers of Excellence more widely available.   | No relevant legislation passed     |   |

[Minnesota Housing Finance Agency: Down Payment Assistance \(2024\)](#)

| Recommendation  | Status                         | Notes |
|---|--------------------------------|-------|
| The Legislature should consider establishing priorities in statute for the Minnesota Housing Finance Agency's down payment assistance programs. | No relevant legislation passed |       |

[Office of the State Archaeologist \(2022\)](#)

| Recommendation   | Status                         | Notes |
|--|--------------------------------|-------|
| The Legislature should consider amending state law to give a state entity—the Office of the State Archaeologist—sole responsibility to issue archaeology licenses, but with explicit authority to consult with others in this process. | No relevant legislation passed |       |
| The Legislature should consider amending the Minnesota Field Archaeology Act to mention the option of mediation for resolving archaeology disputes.  | No relevant legislation passed |       |
| The Legislature should consider authorizing the creation of a board to advise the Office of the State Archaeologist on archaeology disputes.   | No relevant legislation passed |       |

### Oversight of State-Funded Grants to Nonprofit Organizations (2023)

| Recommendation   | Status                         | Notes   |
|--|--------------------------------|---|
| The Legislature should require the Office of Grants Management (OGM) to develop a grants management training program for state agency staff.                                     | No relevant legislation passed |   |
| The Legislature should require all state agency grants management staff to complete the grants management training program.  | Relevant legislation passed    | <i>Laws of Minnesota 2025, chapter 39, art. 2, sec. 41, codified as Minnesota Statutes 2025, 16B.98, subd. 6a.</i>  |
| The Legislature should direct OGM to develop standards for consistently funding grants management activities at state agencies.  | Relevant legislation passed    | While the Legislature did not direct OGM to develop standards, it stipulated that agencies may retain a specified percentage of grant appropriations for administrative costs. <i>Laws of Minnesota 2023, chapter 62, art. 7, sec. 10, codified as Minnesota Statutes 2025, 16B.98, subd. 14.</i>   |
| The Legislature should increase external oversight of grants management in executive branch agencies.  | Relevant legislation passed    | The Legislature passed legislation to improve some aspects of grants management oversight. However, it has not addressed other aspects of oversight, such as establishing an independent oversight unit to review agencies' compliance with grants management policies. <i>Laws of Minnesota 2023, chapter 62, art. 7, codified as Minnesota Statutes 2025, 16B.98.</i> |
| The Legislature should direct the Minnesota Department of Administration to develop recommendations for improving access to comprehensive statewide data on state-funded grants. | Relevant legislation passed    | The Legislature directed the commissioner of Administration to conduct a feasibility study on implementing a statewide grants management system. <i>Laws of Minnesota 2023, chapter 62, art. 1, sec. 11, subd. 2; and art. 7, sec. 14.</i>  |

### Petroleum Remediation Program (2022)

| Recommendation   | Status                         | Notes   |
|--|--------------------------------|---|
| The Legislature should clarify Minnesota Statutes 2021, 115C.09, subd. 2a, with regard to whether the Minnesota Pollution Control Agency (MPCA) is required to collect plans for certain types of site work. | No relevant legislation passed |   |
| The Legislature should direct MPCA to collaborate with the Petrofund Board to study whether and how to establish technical qualifications for consultants working on Petroleum Remediation Program sites.    | Relevant legislation passed    | <i>Laws of Minnesota 2023, chapter 60, art. 3, sec. 29.</i> |
| The Legislature should direct MPCA and the Department of Commerce to collaborate in holding consultants more accountable for poor-quality work on petroleum release sites.                                   | Relevant legislation passed    | <i>Laws of Minnesota 2023, chapter 60, art. 3, sec. 29.</i> |

### Southwest Light Rail Transit Construction: Metropolitan Council Decision Making (2023)

| Recommendation   | Status                         | Notes  |
|--|--------------------------------|--|
| The Legislature should create a framework in which the government entity responsible for light rail transit construction also bears some financial responsibility for construction costs and any potential cost increases.   | Relevant legislation passed    | <i>Laws of Minnesota 2023, chapter 68, art. 3, secs. 29 and 34, codified as Minnesota Statutes 2025, 297A.9915 and 473.4465.</i> |
| For future light rail construction projects, the Legislature should require the Metropolitan Council (or other responsible authority) to inform the Legislature if cost overruns or project delays reach certain thresholds. | No relevant legislation passed |  |

### Sustainable Building Guidelines (2023)

| Recommendation  | Status                         | Notes   |
|---|--------------------------------|---|
| The Legislature should determine which agency is responsible for administering and overseeing the sustainable building guidelines and codify those duties in law.   | No relevant legislation passed |   |
| The Legislature should: <ul style="list-style-type: none"> <li>Amend statutes to assign an agency responsibility for determining which projects are subject to the sustainable building guidelines.</li> <li>Clarify law regarding the types of capital projects that are subject to the sustainable building guidelines.</li> </ul>                              | Relevant legislation passed    | Although the Legislature amended <i>Minnesota Statutes 2023, 16B.325</i> , it has not fully clarified which types of capital projects are subject to the guidelines, nor has it assigned an agency responsibility for making that determination. <i>Laws of Minnesota 2023, chapter 60, art. 12, sec. 2, codified as Minnesota Statutes 2025, 16B.325, subd. 2.</i> |
| The Legislature should amend statutes to clarify if, and under what circumstances, guideline waivers are permissible.   | No relevant legislation passed |   |
| The Legislature should amend statutes to: <ul style="list-style-type: none"> <li>Direct the agency that it tasks with administering and overseeing the sustainable building guidelines to oversee the guideline waiver process.</li> <li>Identify the type of entity that is responsible for approving waivers to the sustainable building guidelines.</li> </ul> | No relevant legislation passed |   |
| The Legislature should direct the agency it tasks with administering and overseeing the sustainable building guidelines to monitor project compliance with the guidelines.  | No relevant legislation passed |   |
| The Legislature should amend statutes to ensure that the state can successfully collect the data needed to determine whether projects complied with the sustainable building guidelines.  | No relevant legislation passed |   |

### Sustainable Building Guidelines (2023)

| Recommendation   | Status                         | Notes |
|--|--------------------------------|-------|
| The Legislature should update the primary objectives of the sustainable building guidelines.   | No relevant legislation passed |       |
| The Legislature should direct the agency it tasks with administering and overseeing the sustainable building guidelines to establish measurable goals for the guidelines.  | No relevant legislation passed |       |
| The Legislature should direct the agency it tasks with administering and overseeing the sustainable building guidelines to systematically evaluate the effects of the guidelines on building costs and sustainability. | No relevant legislation passed |       |

### Unemployment Insurance Program: Efforts to Prevent and Detect the Use of Stolen Identities (2022)

| Recommendation   | Status                         | Notes |
|--|--------------------------------|-------|
| The Legislature could consider requiring the Department of Employment and Economic Development to report, on a regular basis, about fraud in the Unemployment Insurance program. | No relevant legislation passed |       |

### Worker Misclassification (2024)

| Recommendation  | Status                         | Notes   |
|---|--------------------------------|---|
| The Legislature should direct a state agency (or agencies) to calculate worker misclassification rates in Minnesota on an ongoing basis.  | Relevant legislation passed    | The Legislature required DLI's commissioner to provide a fraud impact report by 2027 and periodically thereafter. The report must include an estimate of the number of misclassified workers in Minnesota, among other metrics. <i>Laws of Minnesota 2025</i> , First Special Session, chapter 6, art. 5, sec. 9, codified as <i>Minnesota Statutes 2025</i> , 181.725, subd. 4b. |
| To the extent possible, the Legislature should enact common tests for determining worker classification and reduce the number of different classification tests currently in law. | No relevant legislation passed |   |
| If the Legislature would like agencies to take a more active role in addressing worker misclassification, the Legislature should direct agencies to do so in law.                 | Relevant legislation passed    | <i>Laws of Minnesota 2024</i> , chapter 127, art. 10, secs. 9 and 10, codified as <i>Minnesota Statutes 2025</i> , 181.724–725.   |
| The Legislature should consider establishing timeliness standards for worker misclassification investigations.  | No relevant legislation passed |   |

Worker Misclassification (2024)

| Recommendation   | Status                             | Notes   |
|--|------------------------------------|---|
| The Legislature should amend statutes to ensure that agencies are required to penalize employers that repeatedly misclassify workers.  | <b>Relevant legislation passed</b> | The Legislature amended statutes to increase DLI's authority to levy penalties, but has not modified DEED's authority. DEED is still only required to penalize misclassifying employers if they determine the employer intentionally misclassified an employee. <i>Laws of Minnesota 2024, chapter 127, art. 10, codified as Minnesota Statutes 2025, 177.27 and 181.722–723.</i> |
| The Legislature should amend statutes to allow civil action by misclassified workers in all industries.  | <b>Relevant legislation passed</b> | <i>Laws of Minnesota 2024, chapter 127, art. 10, sec. 6, codified as Minnesota Statutes 2025, 181.171, subd. 1.</i>   |
| The Legislature should require state agencies to take a coordinated and collaborative approach to addressing worker misclassification.   | <b>Relevant legislation passed</b> | <i>Laws of Minnesota 2024, chapter 127, art. 10, secs. 9 and 10, codified as Minnesota Statutes 2025, 181.724–725.</i>  |
| The Legislature should either repeal or significantly overhaul the registration requirement under <i>Minnesota Statutes 2023, 326B.701</i> , for individuals performing certain construction work. | No relevant legislation passed     | Although the Legislature amended <i>Minnesota Statutes 2023, 326B.701</i> , it has not revised the registration requirement to be more useful to agencies in addressing worker misclassification.   |
| The Legislature should consider whether Minnesota's current approach to classifying gig workers aligns with the state's policy goals and priorities and revise Minnesota statutes, if needed.      | No relevant legislation passed     |   |

