
OLA Evaluation and Special Review Recommendation Updates (2022-2024)

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, and special reviews based on allegations and concerns regarding the misuse of public resources. From 2022 through 2024, we released 17 program evaluation and 5 special review reports in which we made recommendations to state agencies and the Legislature for improvements to state policies and programs.¹ This document reports on the extent to which agencies and the Legislature have implemented our recommendations.

To conduct our work, we asked state agencies to report to us the extent to which they had implemented our recommendations by December 2024. We also asked agencies to supply supporting documentation, such as agency policies and templates. We then assessed the agency'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 solely on the agency's written response and supporting documentation. In these cases, we (1) made an initial assessment that the recommendation was either implemented or partially implemented but indicated there is "additional work needed to confirm" the assessment, or (2) determined that we did not have the capacity to make an initial assessment and indicated there is "work needed to determine implementation."²

Implementation Status

- **Implemented:** The agency has largely implemented OLA's recommendation. In some cases, the agency reported it had implemented the recommendation but OLA could not confirm, so we note there is "additional work needed to confirm."
- **Partially implemented:** The agency has implemented OLA's recommendation in part, but should continue its efforts to fully implement the recommendation. In some cases, the agency reported it had partially implemented the recommendation but OLA could not confirm, so we note there is "additional work needed to confirm."
- **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.

Note: OLA does not currently have plans to conduct follow up research on previous reports, unless directed to do so by the Legislative Audit Commission or the Legislature.

¹ 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 from 2022 through 2024.

² OLA does not currently have plans to conduct follow up research on previous reports, unless directed to do so by the Legislative Audit Commission or the Legislature.

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 this report no longer apply.

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

Following our description of the agency’s implementation of OLA recommendations, we include a chart that shows the percentage of the recommendations the agency (or Legislature) has implemented, partially implemented, and not implemented. We note that not all recommendations are of the same magnitude; some may require extensive or ongoing work from the agency while others may be accomplished more quickly.

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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 have transferred or will transfer to DCYF by June 2025.

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

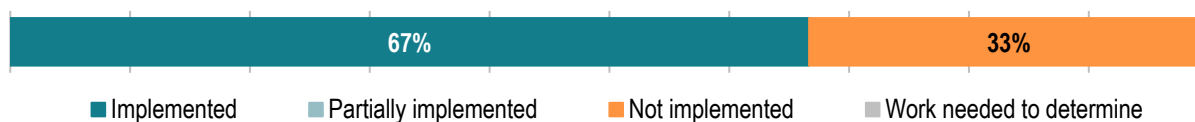
Recommendation	Status	Notes
DHS should track which entities place law enforcement emergency holds. ^a	Not implemented	DCYF reported that it will incorporate this capability into its system modernization, which is in process.
DHS should convene a working group to make recommendations to the Legislature 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.
DHS 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; work to implement the recommendation is ongoing.
DHS 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
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.	Not applicable	DCYF has not yet assumed licensing responsibilities from DHS, so this recommendation is currently not relevant to DCYF.
DCYF should adopt the recommendations from this report that are relevant to its activities.	Not applicable	DCYF has not yet assumed licensing responsibilities from DHS, so this recommendation is currently not relevant to DCYF.

^a All recommendations from the *Child Protection Removals and Reunifications* report directed at DHS now apply to DCYF, which has taken over responsibility for Children and Family Services programs.

Department of Children, Youth, and Families: Implementation of OLA Recommendations (2022-2024)



Note: This graph excludes recommendations that OLA determined are not currently applicable.

Department of Commerce

[Department of Commerce Fraud Bureau \(2022\)](#)

Recommendation	Status	Notes
The Department of Commerce (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.	Implemented	

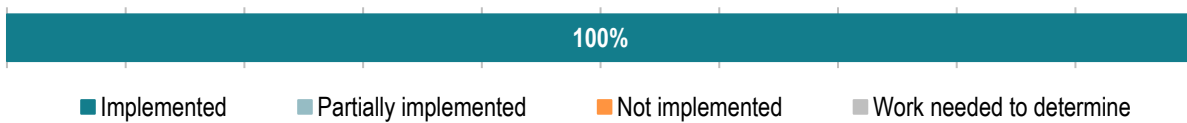
[Department of Commerce's Civil Insurance Complaint Investigations \(2022\)](#)

Recommendation	Status	Notes
Commerce should: <ul style="list-style-type: none"> – Ensure all insurance companies notify the department when they institute or modify their antifraud plans, as required by law. – Coordinate antifraud plan review efforts across teams. 	<p>Implemented, but additional work needed to confirm</p> <p>Implemented</p>	Commerce reported a number of actions by the department to address this recommendation, but OLA would need to conduct additional research to determine the extent to which companies have properly notified the department.
Commerce should: <ul style="list-style-type: none"> – Add detail to its policy regarding the importance of complaint complexity and legal considerations when assigning complaints for investigation. – 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. 	Implemented	
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.	Implemented	
Commerce should: <ul style="list-style-type: none"> – Adopt policies informed by National Association of Insurance Commissioners recommendations that outline investigation and documentation standards for key components of civil insurance investigations. – Clearly communicate these policies to staff. – Ensure investigators consistently follow these policies. 	<p>Implemented, but additional work needed to confirm</p>	Commerce has implemented the first two parts of this recommendation, but OLA would need to conduct additional research to determine to what extent Commerce has ensured investigators consistently follow these policies.

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

Recommendation	Status	Notes
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.	Implemented	
Commerce should establish policies for the frequency and content of communications with complainants and respondents.	Implemented	

**Department of Commerce:
Implementation of OLA Recommendations (2022-2024)**



Note: "Implemented" status includes some initial assessments of the agency's work to implement a recommendation that OLA could not independently confirm without additional research.

Department of Employment and Economic Development

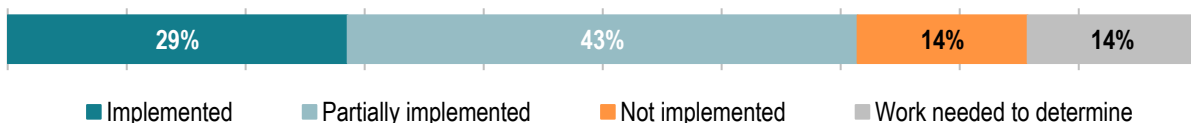
[Unemployment Insurance Program: Efforts to Prevent and Detect the Use of Stolen Identities \(2022\)](#)

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	The Department of Employment and Economic Development (DEED) reported that it works with the Bureau of Criminal Apprehension, but not how it has evaluated its referral processes.
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.	Not implemented	DEED has not submitted a formal request to the U.S. Department of Labor for additional support addressing fraud.
The UI Division should develop processes to proactively investigate accounts that may be incorrectly identified as suspicious.	Partially implemented	DEED reported that it has taken steps to address this recommendation, but did not demonstrate that it has developed a process to proactively investigate these accounts.
The UI Division should: (1) establish metrics and methods for evaluating the efficacy of its data analysis processes and imposter screening processes; (2) evaluate these processes on a regular basis; (3) collect the necessary data to conduct such evaluations; and (4) use such evaluations to refine its processes.	Partially implemented, but additional work needed to confirm	DEED reported that it has conducted a review to determine whether certain detection processes are effective. However, DEED did not demonstrate that it had established metrics and methods for evaluating the efficacy of processes or that it evaluates these processes on a regular basis.
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.	Work needed to determine implementation	To determine to what extent DEED has implemented this recommendation, OLA would need to conduct further research.

[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	DEED provides some guidance on translation of materials for certain programs, and it plans to focus more on language access in 2025.
If partner organizations determine program eligibility in future programs, DEED should spot check partner organizations' determinations.	Implemented, but additional work needed to confirm	DEED reported that it has implemented this recommendation for a recent grant program, but OLA would need to conduct additional research to confirm this.

Department of Employment and Economic Development: Implementation of OLA Recommendations (2022-2024)



Note: "Implemented" and "Partially implemented" status includes some initial assessments of the agency's work to implement a recommendation that OLA could not independently confirm without additional research.

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 statuses from that report in DCYF Recommendation Updates.

[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.	Partially implemented	DHS’s revised RFP templates contain all but one of the essential elements in OGM policy. DHS reported it will further revise its templates to address the last element.
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.	Implemented, but additional work needed to confirm	DHS reported that it has implemented a contracts management system to maintain documentation. However, OLA would need to conduct additional research to determine to what extent DHS has maintained complete documentation.
DHS should ensure that Cultural and Ethnic Minority Infrastructure Grant recipients satisfy quarterly reporting requirements.	Partially implemented, but additional work needed to confirm	DHS reported that its contracts management system will allow for improved progress report tracking and that it is in the process of developing an oversight and monitoring plan to ensure compliance with grant requirements. OLA would need to conduct additional research to determine to what extent DHS has ensured grantees satisfy requirements.

[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.	Not implemented	DHS reported that it has proposed a statute amendment that would address this recommendation.
DHS should improve the support it provides for Community Residential Settings licensors.	Partially implemented, but additional work needed to confirm	DHS reported that it is in the process of implementing a number of changes that address this recommendation, but OLA would need to conduct additional research to confirm to what extent DHS has improved its support for licensors.
DHS should (1) develop a formal policy and establish a timeframe in which staff must respond to triage inquiries from county licensors, and (2) track how long it takes staff to respond to each inquiry.	Partially implemented	DHS has a timeframe for responding to certain triage inquiries and has created a new system for tracking staff response times. DHS plans to begin using its new system in January 2025.
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.

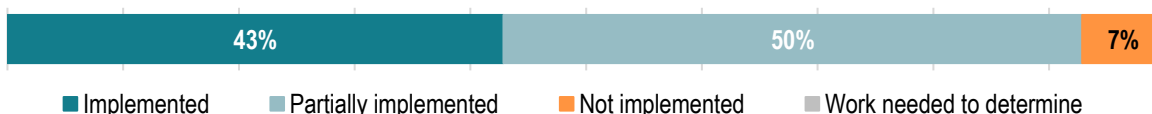
Department of Human Services Licensing Division: Support to Counties (2024)

Recommendation	Status	Notes
DHS should (1) establish timeframes for processing licensing actions that are uniform across programs with county-delegated licensing, and (2) ensure that it addresses all recommendations for licensing actions within those timeframes.	Partially implemented	DHS reported that its foster care licensors began a continuous improvement project in August 2024 that establishes a shorter timeframe for processing licensing actions. Upon completion of the project in February 2025, DHS plans to (1) shorten timeframes for processing licensing actions and (2) share lessons learned from the project with family childcare licensors.
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.	Partially implemented	DHS has created a communications plan for the transition of these functions to DCYF. Work to address this recommendation is ongoing.

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 retain that form.	Implemented, but additional work needed to confirm	DHS reported that it has reviewed recent grant programs 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.	Implemented, but additional work needed to confirm	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.	Implemented, but additional work needed to confirm	DHS reported that it is using a new checklist to review single/sole source grant justification forms, but OLA would need to conduct additional research to confirm whether the division has clearly documented its justification for using these grants.
The Behavioral Health Division and Minnesota State Arts Board should complete pre-award risk assessments, as required by state law and OGM policy.	Implemented, but additional work needed to confirm	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 Human Services:
Implementation of OLA Recommendations (2022-2024)**



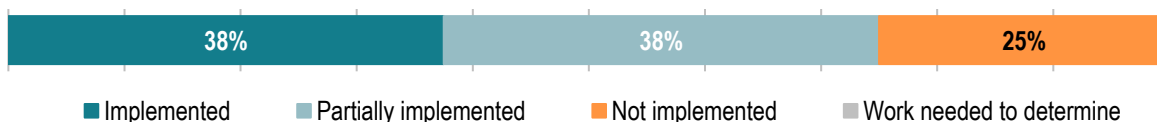
Note: "Implemented" and "Partially implemented" status includes some initial assessments of the agency's work to implement a recommendation that OLA could not independently confirm without additional research.

Department of Labor and Industry

[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</i> 2023, 181.723.	Implemented	The Legislature passed the revised construction worker classification requirements in 2024; revised requirements go into effect on March 1, 2025.
DLI should adopt standards and implement a systematic process to monitor and ensure the timely completion of worker misclassification investigations.	Partially implemented	DLI has adopted a new policy but has yet to implement a process to monitor and ensure timely completion of investigations.
DLI should: <ul style="list-style-type: none"> – Establish standards for communicating with parties about its worker misclassification investigations. 	Implemented	
<ul style="list-style-type: none"> – Consistently communicate with complainants and respondents about key investigation milestones. 	Partially implemented, but additional work needed to confirm	DLI released a memorandum to its staff outlining communication expectations for investigations. However, to determine to what extent DLI has met those expectations and consistently communicated with complainants and respondents, OLA would need to conduct additional research.
DLI should evaluate and report to the Legislature on the effectiveness of its efforts to address misclassification.	Not implemented	In 2024, the Legislature established the Intergovernmental Misclassification Enforcement and Education Partnership, which includes DLI, the Department of Employment and Economic Development, and the Department of Revenue, among others. The partnership is required to report to the Legislature by March 2025. DLI indicated that the presentation will include an update on the effectiveness of its efforts to address misclassification.

**Department of Labor and Industry:
Implementation of OLA Recommendations (2022-2024)**



Notes: “Partially implemented” status includes some initial assessments of the agency’s work to implement a recommendation that OLA could not independently confirm without additional research. For one recommendation, OLA assigned different statuses to the two different parts of the recommendation; we have weighted each part of the recommendation so that they sum to just one recommendation in the chart.

Department of Public Safety

The Hometown Heroes Assistance Program special review included recommendations for the Department of Public Safety (DPS) and the Chief Deputy State Fire Marshal. The State Fire Marshal Division is located within DPS; it has administered the Hometown Heroes Assistance Program since mid-2022, after program administration transferred from the Office of Justice Programs (OJP), a separate unit within DPS.

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

Recommendation	Status	Notes
DPS should ensure that its pre-award risk assessments are sufficiently thorough.	Implemented, but additional work needed to confirm	DPS has created a new pre-award risk assessment document, but OLA would need to conduct additional research to evaluate the document and confirm the extent to which DPS has used the document throughout its grant programs.
DPS should ensure that the state's authorized representative reviews grantee payment requests in accordance with state grant policy.	Implemented, but additional work needed to confirm	DPS has implemented this recommendation for the Hometown Heroes Assistance Program grant. OLA would need to conduct additional research to evaluate the extent to which DPS has ensured the state's authorized representative reviews grantee payment requests for other grants.
DPS should conduct a full audit of the Minnesota Firefighter Initiative's requests for payment for expenses it charged to the Hometown Heroes grant. ^a	Implemented	
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.	Partially implemented	DPS is in the process of completing a new manual providing direction for OJP grant managers. It is unclear whether this manual will provide information that is consistent with DPS's other grant manuals.
DPS should ensure grant payments are made as reimbursements, rather than advance payments, unless it has approved a written justification for doing so.	Implemented, but additional work needed to confirm	DPS has implemented this recommendation for the Hometown Heroes Assistance Program grant. OLA would need to conduct additional research to evaluate the extent to which DPS has ensured grant payments are made as reimbursements for other grants.
DPS should ensure that it conducts monitoring visits and financial reconciliations in accordance with state grant policy.	Implemented, but additional work needed to confirm	DPS has implemented this recommendation for the Hometown Heroes Assistance Program grant. OLA would need to conduct additional research to evaluate the extent to which DPS has conducted monitoring visits and financial reconciliations for other grants.
DPS should ensure that staff review grant progress reports before approving payments, in accordance with state grant policy.	Implemented, but additional work needed to confirm	DPS has implemented this recommendation for the Hometown Heroes Assistance Program grant. OLA would need to conduct additional research to evaluate the extent to which DPS has ensured staff review grant progress reports before approving payments for other grants.

Hometown Heroes Assistance Program (2023)

Recommendation	Status	Notes
DPS should ensure that grant closeout evaluations include all elements required by state grant policy.	Partially implemented, but additional work needed to confirm	DPS has completed a grant closeout evaluation for the Hometown Heroes Assistance Program since this recommendation was issued; the evaluation included all but one element required by state grant policy. DPS has updated its grant closeout evaluation form to be used for all grants expiring after December 31, 2023, and additional OLA work would be needed to evaluate the extent to which DPS has met this recommendation more broadly.
DPS should ensure that grantees properly understand procurement requirements, and it should monitor and enforce compliance with those requirements.	Partially implemented, but additional work needed to confirm	DPS is in the process of implementing this recommendation for one grantee. OLA would need to conduct additional research to determine whether the department has monitored and enforced requirements for other grantees.
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	Chief Deputy State Fire Marshal Swenson reported that she has taken actions to avoid situations that would violate state ethical conduct laws or policies. Work to implement this recommendation is ongoing.
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	To determine to what extent DPS has implemented this recommendation, OLA would need to conduct further research.

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

Recommendation	Status	Notes
DPS should (1) revise and formalize its grants management procedures to include greater specificity and direction and (2) ensure grant managers fully comply with all Office of Grants Management (OGM) policies.	Partially implemented, but additional work needed to confirm	DPS has revised its grants management procedures and plans to roll out a new grants management system in 2025 to help ensure staff comply with OGM policies. OLA would need to conduct additional research to determine whether grant managers are following OGM policies.

^a 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.

**Department of Public Safety:
Implementation of OLA Recommendations (2022-2024)**



Note: "Implemented" and "Partially implemented" status includes some initial assessments of the agency's work to implement a recommendation that OLA could not independently confirm without additional research.

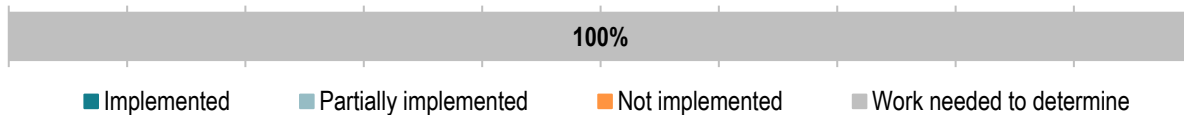
Fire Service Advisory Committee

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

[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	To determine to what extent the Fire Service Advisory Committee has implemented this recommendation, OLA would need to conduct additional research.

**Fire Service Advisory Committee:
Implementation of OLA Recommendations (2022-2024)**



Metropolitan Council

[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	To determine to what extent the Metropolitan Council has implemented this recommendation, OLA would need to conduct further research.
On future capital construction projects, the Metropolitan Council should enforce the schedule requirements of the contract.	Work needed to determine implementation	To determine to what extent the Metropolitan Council has implemented this recommendation, OLA would need to conduct further research.
The Metropolitan Council should consider additional external reviews for high-risk or high-cost project elements.	Implemented	The Metropolitan Council has added additional reviews for high-risk project elements on the Blue Line Light Rail Extension and hired a consultant to review high-risk project elements. 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
<p>The Metropolitan Council should:</p> <ul style="list-style-type: none"> – Require its contractors to meet contractual obligations related to change orders. – Ensure contracts include adequate language to hold contractors accountable for change order requirements. – Negotiate change order costs and schedule delays in a timely manner. – Inform change order approval bodies when changes include language that leaves open the possibility of additional delays and related costs. 	Work needed to determine implementation	To determine to what extent the Metropolitan Council has implemented this recommendation, OLA would need to conduct further research.
<p>The Metropolitan Council should:</p> <ul style="list-style-type: none"> – Make greater efforts to limit change work that occurs before the cost and schedule impacts are negotiated. – Improve its policies for managing change orders based on a contractor’s reported costs. 	Work needed to determine implementation	To determine to what extent the Metropolitan Council has implemented this recommendation, OLA would need to conduct further research.

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

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

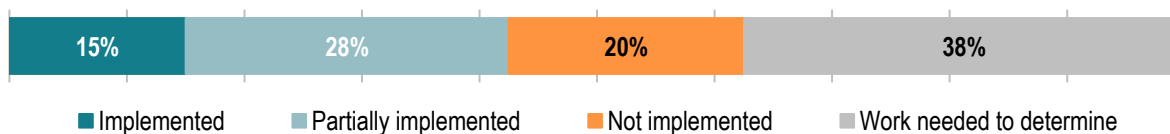
[Metro Mobility \(2024\)](#)

Recommendation	Status	Notes
<p>The Metropolitan Council should:</p> <ul style="list-style-type: none"> – Take additional steps to address service quality issues. – Ensure that the bonus related to fulfilling all ride requests is only given in instances when the trip provider has earned it. 	Partially implemented, but additional work needed to confirm	<p>The Metropolitan Council reported that it has taken some steps to improve service quality, such as adding new vehicles to its fleet. However, the Council has not yet introduced changes to its contracts with trip providers that may address service quality issues.</p>
	Work needed to determine implementation	<p>To determine to what extent the Metropolitan Council has implemented this recommendation, OLA would need to conduct further research.</p>

Metro Mobility (2024)

Recommendation	Status	Notes
The Metropolitan Council should explore alternative technologies for scheduling and providing ride services.	Partially implemented	The Metropolitan Council is continuing to explore alternative technologies for scheduling and providing ride services.
The Metropolitan Council should limit the role of trip providers in the complaints process.	Not implemented	The Metropolitan Council reported that it will hire a staff person in early 2025 dedicated to complaint investigations. It is unclear whether this change will limit the role of trip providers in the complaint process.
The Metropolitan Council should update its written procedures to provide more complete guidance to staff.	Not implemented	The Metropolitan Council has updated its procedures related to complaints processing, but the updated procedures neither (1) specify the criteria to determine which rider concerns qualify as a complaint nor (2) provide guidance to ensure corrective action is taken when necessary.
The Metropolitan Council should identify ways to better encourage riders to submit all complaints to Metropolitan Council staff rather than to trip provider staff.	Partially implemented	The Metropolitan Council reported that it is in the process of updating signage on Metro Mobility vehicles to indicate that customers should contact the Metropolitan Council with complaints.
The Metropolitan Council should change the incentive structure in contracts with trip providers to encourage providers to forward complaints to the Metropolitan Council.	Not implemented	The Metropolitan Council reported that it will address this recommendation in 2026 when it issues new contracts with trip providers.
The Metropolitan Council should systematically track data related to all rider concerns and use the information to improve riders' experiences.	Partially implemented, but additional work needed to confirm	The Metropolitan Council reported that it has developed a new call tracking system, but OLA would need to conduct additional research to confirm to what extent the council has used data from 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	To determine to what extent the Metropolitan Council has implemented this recommendation, OLA would need to conduct further research.

**Metropolitan Council:
Implementation of OLA Recommendations (2022-2024)**



Notes: "Partially implemented" status includes some initial assessments of the agency's work to implement a recommendation that OLA could not independently confirm without additional research. For one recommendation, OLA assigned different statuses to the two different parts of the recommendation; we have weighted each part of the recommendation so that they sum to just one recommendation in the chart.

Minnesota Department of Administration

The *Grant Award Processes (2024)* and *Oversight of State-Funded Grants to Nonprofit Organizations (2023)* 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.

[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, but work on this recommendation is ongoing. Specifically, 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.	Partially 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	To determine to what extent Admin has implemented this recommendation, OLA would need to conduct further research.

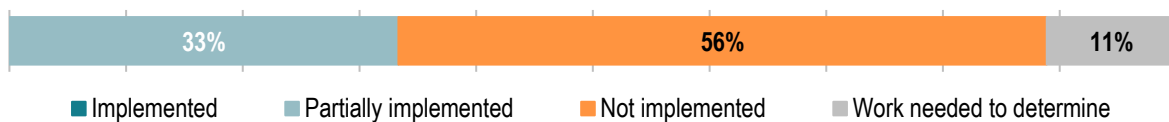
[Oversight of State-Funded Grants to Nonprofit Organizations \(2023\)](#)

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.	Not implemented	In 2023, the Legislature appropriated additional funding to Admin for grants administration oversight. Admin reported that it is working to fully staff OGM and expand training and technical assistance in this area. However, Admin did not demonstrate how it has provided guidance to state agencies regarding grant reviewer selection.
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 defines when state employees must declare conflicts of interest, and therefore it has not acted to implement the recommendation.
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 the recommendation.
OGM should provide further guidance on minimum single/sole source justification search standards.	Not implemented	In 2023, the Legislature appropriated additional funding to Admin for grants administration oversight. Admin reported that it is working to fully staff OGM and expand training and technical assistance in this area. However, Admin did not demonstrate how it has provided guidance to state agencies regarding single/sole source justification.

**Minnesota Department of Administration:
Implementation of OLA Recommendations (2022-2024)**



Minnesota Department of Education

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

Recommendation	Status	Notes
The Minnesota Department of Education (MDE) should better communicate the availability of resources to support school districts and charter schools.	Implemented, but additional work needed to confirm	MDE reported several actions that it has taken to address this recommendation. However, to determine to what extent its communication has improved, OLA would need to conduct additional research.
MDE should annually monitor school districts' and charter schools' progress toward their World's Best Workforce goals—including closing the achievement gap—and report the results to the Legislature.	Implemented	MDE included school districts' and charter schools' progress at meeting goals in its 2024 report to the Legislature. Work to implement this recommendation is ongoing.
MDE should take a more active role in helping school districts develop their Achievement and Integration improvement plans.	Not implemented	MDE reported that it does not currently have resources to address this recommendation. The 2026-2027 Governor's budget proposal recommends increasing program administration funding, so MDE could take a more active role.
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 is in the process of developing a stand-alone strategic plan for American Indian education, which includes approaches to reducing the achievement gap.

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

Recommendation	Status	Notes
MDE should (1) create agency-specific grants management procedures that provide more specific direction to grant managers and (2) ensure grant managers comply with all Office of Grants Management (OGM) policies.	Partially implemented, but additional work needed to confirm	MDE is in the process of updating its grants management procedures. OLA would need to conduct additional research to determine to what extent the department has ensured grant managers comply with OGM policies.

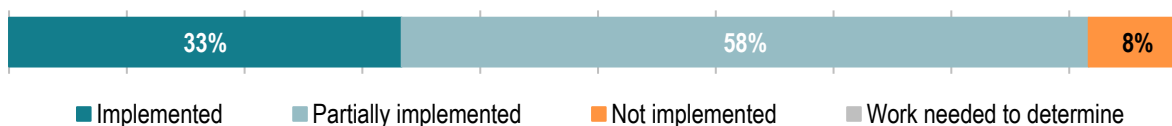
[Minnesota Department of Education: Oversight of Feeding Our Future \(2024\)](#)

Recommendation	Status	Notes
MDE should take additional steps to verify information provided in support of sponsorship applications submitted by high-risk applicants.	Partially implemented, but additional work needed to confirm	MDE has made several changes to its sponsor application review process to verify unusual or unexpected information. MDE continues to work on refining application review procedures and updating its application technology system. OLA would need to conduct additional research to confirm the extent to which MDE has implemented the recommendation.
MDE should conduct follow-up reviews, as needed, to ensure sponsors fully implement corrective action plans that result from administrative reviews.	Implemented, but additional work needed to confirm	MDE reported that it conducts follow-up reviews when there are findings on previous administrative reviews. However, OLA would need to conduct additional research to confirm to what extent MDE is conducting follow-up reviews.

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

Recommendation	Status	Notes
MDE should place a greater emphasis on program integrity and risk-based monitoring if oversight requirements are waived again in the future.	Partially implemented, but additional work needed to confirm	MDE reported that it has addressed some aspects of this recommendation; for example, it has implemented additional program integrity requirements for some waivers. To determine to what extent MDE has implemented this recommendation, OLA would need to conduct additional research.
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"> – Include criteria for prioritizing complaints and initiating proactive investigations. – Address all common types of complaints that MDE staff may encounter. – Provide detailed guidance on evidence collection. 	Partially implemented	MDE is in the process of drafting complaint investigation procedures.
MDE should prioritize independent fact-finding in response to complaints.	Partially implemented, but additional work needed to confirm	MDE is in the process of drafting complaint investigation procedures; the department reported that it prioritizes independent fact-finding in its new investigation procedures. OLA would need to conduct additional research to confirm the extent to which MDE has prioritized independent fact-finding.
MDE should limit the information it shares with the subject of a complaint in an effort to protect complainants from retaliation.	Partially implemented, but additional work needed to confirm	MDE is in the process of drafting complaint investigation procedures; the department reported that the new procedures have been updated to ensure that it limits information shared with the subject of a complaint. OLA would need to conduct additional research to confirm the extent to which MDE has limited information it shares with the subject of a complaint.
MDE should evaluate the implementation of recent statutory changes related to its investigative authority, and promptly propose needed changes to the Legislature.	Not applicable	This report was released in June 2024; MDE has not yet had the opportunity to address the Legislature during session.
MDE should conduct more active follow-up to ensure sponsors and sites fully implement corrective action plans that result from serious deficiency processes.	Implemented, but additional work needed to confirm	MDE reported that it has made changes that address this recommendation. To determine to what extent MDE has conducted more active follow-up, OLA would need to conduct additional research.

**Minnesota Department of Education:
Implementation of OLA Recommendations (2022-2024)**



Notes: “Implemented” and “Partially implemented” status includes some initial assessments of the agency’s work to implement a recommendation that OLA could not independently confirm without additional research. This graph excludes recommendations that OLA determined are not currently applicable.

Minnesota Housing Finance Agency

[RentHelpMN \(2023\)](#)

Recommendation	Status	Notes
The Minnesota Housing Finance Agency (Minnesota Housing) should establish clear, comprehensive, written program policies and procedures. ^a	Work needed to determine implementation	To determine to what extent Minnesota Housing has implemented this recommendation, OLA would need to conduct further research.
Minnesota Housing should ensure program participants have sufficient access to knowledgeable program staff who can answer or act on their questions or concerns.	Work needed to determine implementation	To determine to what extent Minnesota Housing has implemented this recommendation, OLA would need to conduct further research.
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.	Work needed to determine implementation	To determine to what extent Minnesota Housing has implemented this recommendation, OLA would need to conduct further research.
Minnesota Housing should establish standards for application processing time and measure the performance of application processors against those standards.	Work needed to determine implementation	To determine to what extent Minnesota Housing has implemented this recommendation, OLA would need to conduct further research.
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	To determine to what extent Minnesota Housing has implemented this recommendation, OLA would need to conduct further research.
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.	Work needed to determine implementation	To determine to what extent Minnesota Housing has implemented this recommendation, OLA would need to conduct further research.

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

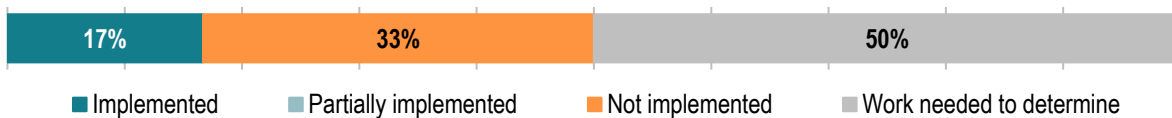
Recommendation	Status	Notes
The Department of Human Services and Minnesota Housing should create request for proposal (RFP) templates that include the essential elements in Office of Grants Management policy.	Implemented	
State agencies should consider developing policies outlining the circumstances 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.	Not implemented	Minnesota Housing reported that it plans to address unreasonable lender fees, but it has not yet acted on this recommendation.
In its loan servicing contract, Minnesota Housing should include penalties for inadequate performance.	Not implemented	Minnesota Housing has not rebid its loan servicing contract yet, but it plans to do so before the end of 2026.
Minnesota Housing should periodically evaluate all requirements and policies of its down payment assistance programs.	Not implemented	Minnesota Housing indicated that it will incorporate this recommendation into its annual program review.
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.	Not implemented	Minnesota Housing reported that it will explore changes at its spring 2025 finance team meeting.

^a RentHelpMN had largely concluded by the time OLA conducted its evaluation of the program. Minnesota Housing agreed that the report recommendations reflect good government practices, which they said are included in their other programs. To verify this, OLA would need to evaluate Minnesota Housing’s other programs.

**Minnesota Housing Finance Agency:
Implementation of OLA Recommendations (2022-2024)**



Minnesota Pollution Control Agency

[Petroleum Remediation Program \(2022\)](#)

Recommendation	Status	Notes
<p>The Minnesota Pollution Control Agency (MPCA) should:</p> <ul style="list-style-type: none"> – Consider additional steps it could take to reduce risks resulting from future changes to petroleum-contaminated properties. – 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. 	<p>Implemented</p>	<p>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.</p>
<p>MPCA should define the characteristics of release sites it considers to be a “low potential risk.”</p>	<p>Implemented</p>	<p>MPCA has taken some steps to encourage consistency, including using standard report review forms. To determine to what extent staff have taken a consistent approach, OLA would need to conduct further research.</p>
<p>MPCA should...ensure passive bioremediation is used at those sites as required by law.</p>	<p>Work needed to determine implementation</p>	<p>To determine to what extent MPCA has implemented this recommendation, OLA would need to conduct further research.</p>
<p>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.</p>	<p>Partially Implemented</p>	<p>MPCA has internal processes for reviewing site decisions but has not established measurable objectives pertaining to the quality of the program’s work.</p>
<p>MPCA should make data regarding consultant performance more accessible to responsible parties.</p>	<p>Implemented</p>	<p>Interested parties may request consultant performance summary reports via an e-mail address posted on MPCA’s web page.</p>

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

Recommendation	Status	Notes
<p>State agencies should consider developing policies outlining the circumstances under which grant program materials should be translated into languages other than English.</p>	<p>Implemented</p>	<p>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.</p>

Minnesota Pollution Control Agency: Implementation of OLA Recommendations (2022-2024)



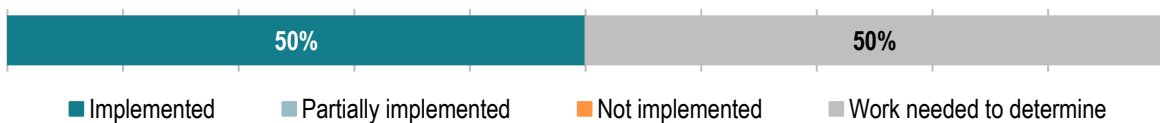
Note: For two recommendations, OLA assigned different statuses to different parts of the recommendations; we have weighted the parts of the recommendation so that each sums to just one recommendation in the chart.

Minnesota State Arts Board

[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.	Implemented, but additional work needed to confirm	MSAB reported that it has 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 implemented this recommendation.
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	To determine to what extent MSAB has implemented this recommendation, OLA would need to conduct further research.

**Minnesota State Arts Board:
Implementation of OLA Recommendations (2022-2024)**



Note: The "Implemented" status is an initial assessment of the agency's work to implement a recommendation that OLA could not independently confirm without additional research.

Office of Emergency Medical Services

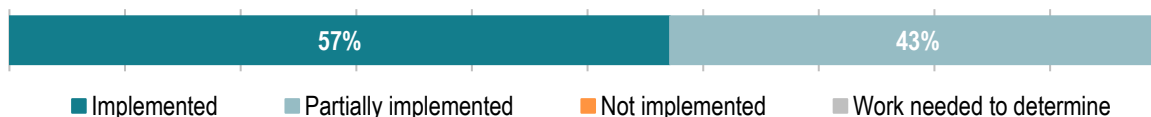
The Office of Emergency Medical Services was established on January 1, 2025, to replace the Emergency Medical Services Regulatory Board (EMSRB).

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

Recommendation	Status	Notes
EMSRB should ensure that ambulance services meet requirements in law. ^a	Partially implemented	EMSRB increased its ambulance services inspections, and made some changes to its license renewal application to conform with <i>Minnesota Rules</i> , 4690.0200.
EMSRB should work with the Legislature to ensure it has sufficient authority to implement performance standards.	Partially implemented	The Legislature created the Office of Emergency Medical Services 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.
EMSRB should explore reporting mechanisms that would enable it to track nonresponse by ambulance services.	Implemented	EMSRB concluded it did not have authority to collect nonresponse data from 911 dispatch centers. Making changes to the Office of Emergency Medical Services' authority would require legislative action.
EMSRB should update its administrative rules.	Partially implemented	EMSRB repealed one outdated rule, <i>Minnesota Rules</i> , 4690.2600, in 2023. The Office of Emergency Medical Services has not yet taken further action on this recommendation.
EMSRB 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"> – Improve its oversight of the executive director. – Ensure that the organization fulfills its responsibilities and maintains adequate staff to do so. 	Implemented	EMSRB conducted regular performance reviews of the executive director and also increased staffing levels. Work to implement the recommendation is ongoing.

^a Unless otherwise specified in the notes, all recommendations from the *Emergency Ambulance Services (2022)* report directed at EMSRB now apply to the Office of Emergency Medical Services, which has taken over EMSRB's responsibilities.

Office of Emergency Medical Services: Implementation of OLA Recommendations (2022-2024)



Recommendations Not Specific to an Agency

OLA released two program evaluation reports from 2022 through 2024 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.

[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. ^a

[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	
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	

[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 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	

^a Although this recommendation applies to all state agencies, OLA did not request an update about the recommendation's implementation from each agency. OLA only requested updates from the following four agencies: the Department of Employment and Economic Development, the Department of Human Services, the Minnesota Housing Finance Agency, and the Minnesota Pollution Control Agency.

Minnesota Legislature

[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.	Implemented	Laws of Minnesota 2024, chapter 115, art. 18, sec. 36.

[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.	Implemented	Laws of Minnesota 2022, chapter 93, art. 2, sec. 1.

[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.	Not implemented	

[Department of Human Services Licensing Division: Support to Counties \(2024\)](#)

Recommendation	Status	Notes
If the Department of Human Services (DHS) wishes to implement continuous licensing, it should work with the Legislature to amend statutes in a manner that allows the process.	Not implemented	DHS reported that it has proposed a statute amendment that would address this recommendation.

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

Recommendation	Status	Notes
The Legislature should retain primary service areas, but it should restructure how they are created, modified, and overseen.	Implemented	Laws of Minnesota 2024, chapter 122, art. 1, secs. 3 and 5.

Emergency Ambulance Services (2022)

Recommendation	Status	Notes
<p>The Legislature should create processes for modifying primary service area boundaries.</p> <ul style="list-style-type: none"> – 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. – 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. 	Partially implemented	<p><i>Laws of Minnesota 2024</i>, chapter 122, art. 1, secs. 3 and 5. The Legislature gave authority to the newly established Office of Emergency Medical Services to modify primary service area boundaries. However, the Legislature did not create a process to review and revise boundaries on a regular basis.</p>
<p>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.</p>	Not implemented	
<p>The Legislature should adopt more stringent statutory requirements for renewal of ambulance service licenses.</p>	Not implemented	
<p>The Legislature should require ambulance services to go through the initial licensure process whenever there is a change in ownership or provider.</p>	Not implemented	
<p>The Legislature should direct EMSRB to develop and enforce performance standards for ambulance services.</p>	Partially implemented	<p>EMSRB established some performance measures, but did not set minimum standards. <i>Laws of Minnesota 2024</i>, chapter 122, art. 1, secs. 3-5. The Legislature has granted the new agency increased authority, but did not direct it to develop or enforce standards.</p>
<p>EMSRB should work with the Legislature to ensure it has sufficient authority to implement performance standards.</p>	Partially implemented	<p><i>Laws of Minnesota 2024</i>, chapter 122, art. 1, secs. 4 and 5. The Legislature gave the new Office of Emergency Medical Services 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.</p>
<p>The Legislature should explore options for improving ambulance service sustainability in Minnesota, potentially through pilot programs or other trial programs.</p>	Implemented	<p><i>Laws of Minnesota 2024</i>, chapter 122, art. 1, sec. 18.</p>
<p>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.</p>	Implemented	<p><i>Laws of Minnesota 2024</i>, chapter 122, art. 1, sec. 3, subd. 3(9). The Legislature did not require a statewide plan, but it required an annual report that fulfills the same purpose.</p>

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

Recommendation	Status	Notes
The Legislature should require the EMSRB board to regularly evaluate the executive director's performance.	Not applicable	The Legislature eliminated the EMSRB board.
The Legislature should consider whether to make structural changes to the EMSRB board or EMSRB's responsibilities.	Implemented	<i>Laws of Minnesota 2024</i> , chapter 122, art. 1.
The Legislature should clarify what constitutes a conflict of interest for EMSRB board members.	Not applicable	The Legislature eliminated the EMSRB board.
The Legislature should revise <i>Minnesota Statutes</i> 2021, 144E, to clarify contradictory or unclear language.	Not implemented	

[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.	Not implemented	

[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.	Not implemented	

[Metro Mobility \(2024\)](#)

Recommendation	Status	Notes
The Legislature should consider amending statutes to explicitly identify service requirements in the state-mandated service area.	Partially implemented	The Legislature has not updated relevant sections of statutes. However, the Legislature passed <i>Laws of Minnesota 2024</i> , chapter 127, art. 3, sec. 125, directing the commissioner of Transportation to conduct a study of Metro Mobility that includes reviewing if the "law should be amended to prohibit or restrict the denial of ride requests in the state-mandated service area."

[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.	Not applicable	This report was released in June 2024; the Legislature has not yet had the opportunity to address this recommendation during session.

[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.	Not implemented	
The Legislature should consider more explicitly defining MDE's responsibilities with respect to addressing the achievement gap.	Not implemented	
The Legislature should clarify how MDE should annually monitor school districts' and charter schools' progress with respect to World's Best Workforce.	Not implemented	
The Legislature should amend the statutory deadline by which MDE must review school districts' progress toward Achievement and Integration goals.	Not implemented	
The Legislature should amend Minnesota statutes to shift primary responsibility for Achievement and Integration improvement planning from MDE to school districts.	Implemented	<i>Laws of Minnesota 2023, chapter 55, art. 2, sec. 57.</i>
The Legislature should consider making the services of the Regional Centers of Excellence more widely available.	Partially implemented	Certain bills have proposed expanding the Regional Centers of Excellence. For example, in 2022, House File 4300/Senate File 4113 proposed additional funding for the centers to contract with regional literacy support directors. These bills have not 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.	Not implemented	

[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.	Not implemented	
The Legislature should consider amending the Minnesota Field Archaeology Act to mention the option of mediation for resolving archaeology disputes.	Not implemented	
The Legislature should consider authorizing the creation of a board to advise the Office of the State Archaeologist on archaeology disputes.	Not implemented	

[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.	Not implemented	
The Legislature should require all state agency grants management staff to complete the grants management training program.	Not implemented	
The Legislature should direct OGM to develop standards for consistently funding grants management activities at state agencies.	Implemented	<i>Laws of Minnesota 2023, chapter 62, art. 7, sec. 10.</i> 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.
The Legislature should increase external oversight of grants management in executive branch agencies.	Partially implemented	<i>Laws of Minnesota 2023, chapter 62, art. 7.</i> 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.
The Legislature should direct the Minnesota Department of Administration to develop recommendations for improving access to comprehensive statewide data on state-funded grants.	Implemented	<i>Laws of Minnesota 2023, chapter 62, art. 1, sec. 11, subd. 2; and art. 7, sec. 14.</i> The Legislature directed the commissioner of Administration to conduct a feasibility study on implementing a statewide grants management system.

[Petroleum Remediation Program \(2022\)](#)

Recommendation	Status	Notes
The Legislature should clarify <i>Minnesota Statutes</i> 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.	Not implemented	
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.	Implemented	<i>Laws of Minnesota</i> 2023, chapter 60, art. 3, sec. 29.
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.	Implemented	<i>Laws of Minnesota</i> 2023, chapter 60, art. 3, sec. 29.

[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.	Implemented	<i>Laws of Minnesota</i> 2023, chapter 68, art. 3, secs. 29 and 34.
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.	Not implemented	

[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.	Not implemented	The Legislature proposed multiple bills in the 2023 legislative session (for example, House File 5312/Senate File 5441) which would have delegated responsibility for the sustainable building guidelines to the Department of Administration (Admin). None of the bills designating Admin as the responsible agency have passed.
The Legislature should: <ul style="list-style-type: none"> – Amend statutes to assign an agency responsibility for determining which projects are subject to the sustainable building guidelines. – Clarify law regarding the types of capital projects that are subject to the sustainable building guidelines. 	Partially implemented	<i>Laws of Minnesota</i> 2023, chapter 60, art. 12, sec. 2. Although the Legislature amended <i>Minnesota Statutes</i> 2023, 16B.325, 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.

[Sustainable Building Guidelines \(2023\)](#)

Recommendation	Status	Notes
The Legislature should amend statutes to clarify if, and under what circumstances, guideline waivers are permissible.	Not implemented	
The Legislature should amend statutes to: <ul style="list-style-type: none"> – Direct the agency that it tasks with administering and overseeing the sustainable building guidelines to oversee the guideline waiver process. – Identify the type of entity that is responsible for approving waivers to the sustainable building guidelines. 	Not implemented	
The Legislature should direct the agency it tasks with administering and overseeing the sustainable building guidelines to monitor project compliance with the guidelines.	Not implemented	
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.	Not implemented	
The Legislature should update the primary objectives of the sustainable building guidelines.	Not implemented	
The Legislature should direct the agency it tasks with administering and overseeing the sustainable building guidelines to establish measurable goals for the guidelines.	Not implemented	
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.	Not implemented	

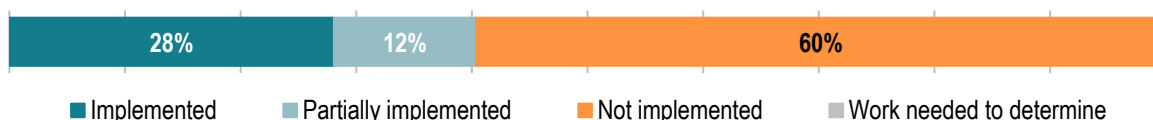
[Unemployment Insurance Program: Efforts to Prevent and Detect the Use of Stolen Identities \(2022\)](#)

Recommendation	Status	Notes
The Legislature could consider requiring the Department of Employment and Economic Development (DEED) to report, on a regular basis, about fraud in the Unemployment Insurance program.	Implemented	In 2022, the Legislature proposed House File 4355/Senate File 4091, which would require DEED to report on overpayments in unemployment insurance, including fraud. These bills did not pass.

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.	Not implemented	<i>Laws of Minnesota 2024</i> , chapter 127, art. 10, sec. 10. In 2024, the Legislature directed the Intergovernmental Misclassification Enforcement and Education Partnership to provide summary information about "industries, areas, and employers with high numbers of misclassification violations" by March 1, 2025. However, no state agencies or the Partnership are required to calculate or present misclassification rates on an ongoing basis.
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.	Not implemented	
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.	Implemented	<i>Laws of Minnesota 2024</i> , chapter 127, art. 10, secs. 9 and 10.
The Legislature should consider establishing timeliness standards for worker misclassification investigations.	Not implemented	
The Legislature should amend statutes to ensure that agencies are required to penalize employers that repeatedly misclassify workers.	Not implemented	
The Legislature should amend statutes to allow civil action by misclassified workers in all industries.	Implemented	<i>Laws of Minnesota 2024</i> , chapter 127, art. 10, sec. 6.
The Legislature should require state agencies to take a coordinated and collaborative approach to addressing worker misclassification.	Implemented	<i>Laws of Minnesota 2024</i> , chapter 127, art. 10, secs. 9 and 10.
The Legislature should either repeal or significantly overhaul the registration requirement under <i>Minnesota Statutes 2023</i> , 326B.701, for individuals performing certain construction work.	Not implemented	Although the Legislature amended <i>Minnesota Statutes 2023</i> , 326B.701, 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.	Not implemented	

**Minnesota Legislature:
Implementation of OLA Recommendations (2022-2024)**



Note: This graph excludes recommendations that OLA determined are not currently applicable.



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