

**June 2019
NDSCS Action Plans
In Response to:
North Dakota State Auditor Office
Performance Audit**

State Auditor Office Recommendation 1-1: We recommend NDSCS take timely and appropriate steps to ensure compliance with its conflict of interest policies and procedures.

NDSCS Response

NDSCS agrees that the employee did not complete a "Notification of Business Interest" form indicating the employee's spouse's business interest in the Flint Group. In this case, however, the completion of this form is a formality, as all the applicable parties were aware of the relationship between the employee and their spouse, and the spouse's association with the Flint Group. The goal of the applicable policies, procedures, and form in question is to ascertain the existence of relationships that may potentially lead to a conflict of interest. In this case, there was nothing undisclosed about the relationship in question. The Report's conclusion that the relationship in question was undisclosed is not supported by the facts; nor is it supported by the Report itself. As indicated in the Report, NDSCS was aware of the employee's relationship with their spouse and the spouse's association with the Flint Group. Simply put, despite the Report's conclusion otherwise, there was nothing undisclosed about the relationship in question.

Policy 611.4

NDSCS disagrees with the finding that it failed to comply with SBHE Policy 611.4. Policy 611.4 specifically indicates that, unless certain conditions are met, "an employee of the Board may not have an interest in any contract involving the expenditure of public or institutional funds . . ." Therefore, in order to conclude that an institution violated this policy, it must be shown that the employee had an interest in the contract in question. While there is no definition of what "interest" is, it is clear that such an interest must be specific to the employee, not his/her spouse or other family members. In this case, there is no indication that the employee had any individual interest in the contract at issue, as defined by policy. To conclude otherwise would require a rewriting of the policy.

Regardless of the interest involved in this case, NDSCS complied with the requirements of Policy 611.4. As indicated above, having an interest in a contract is not forbidden. Rather, in situations where an interest may exist, the institution must ensure that N.D.C.C. §§ 12.1-13-03 and 48-02-12² do not apply, and that the contract is approved by the institution's chief financial officer. These conditions were met in this case. The CFO approved of this contract; § 48-02-12, dealing with public construction or repair contracts, is inapplicable to this contract; and there is no interest accruing to the employee personally, as required by 12.1-13-03. With all three conditions being met, there can be no conclusion that NDSCS violated Policy 611.4.

NDSCS Policy

NDSCS disagrees that it violated its more stringent conflict of interest policy, which incorporates the business interests of certain familial relationships. The goal of the NDSCS policy is to identify and root out conflicts of interests that are unknown to the administration of NDSCS, so that they can provide appropriate supervision and management over the conflict. This goal has been met in this instance. While it is true that the employee did not complete the pro forma process of filing the "Notification of Business Interest" form, it cannot be said that the employee's conflict was undisclosed – everyone involved in this contract was aware of the employee's

² This section has been repealed, but it appears that the contents have been moved to chapter 48-01.2.

relationship with their spouse, and the spouse’s association with the Flint Group. Furthermore, NDSCS provided the necessary supervision and management over this contract – the employee in question did not recommend or select the chosen vendor, nor did the employee negotiate any part of the contract with the Flint Group. The decision to retain the services of the Flint Group, including what to pay for those services, was made exclusively by me and resulted from my conversations with the CEO of the Flint Group. The involvement of the employee in question was limited to coordinating the necessary communications between the vendors – he played no role in the ultimate selection of which vendor to utilize, nor did he have any involvement in the price negotiations.

NDSCS Supplemental Response

As discussed in its initial response, NDSCS was aware of the relationship between the employee in question and their spouse. In order to avoid any confusion in the future, the employee in question has completed a new “Notification of Business Interest” form identifying Flint Group.

NDSCS Action Plan 1-1A

What: The current “Notification of Business Interest” form that is completed annually will be modified to more clearly state “Notification of Business Interest and/or Conflict of Interest” with additional details. Updating the form will be changed from annual to annual with a midyear reminder.

How: Modification of the form

When: Summer, 2019

Who: Facilities Business and Procurement Manager

(See attached **Notification of Business and/or Conflict Interest form**)



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NOTIFICATION OF BUSINESS and/or CONFLICT INTEREST
Completed annually with a midyear reminder

In compliance with the North Dakota State College of Science and [Conflict of Interest Policy](#), I disclose and submit the following concerning my business interests and/or conflict of interest. A failure to report a business relationship is in violation of College policy.

Business Identification:

Business Name _____

Street Address _____ PO Box _____

City, State, Zip _____

Telephone (_____) _____ Fax _____

Describe Business Product or Service: _____

Type of Business Entity (check one):

Corporation Partnership Sole Proprietorship Other, Please Describe:

No longer have relationship or financial interest in this business.

Nature of Business Interest (complete those that apply):

Personal Ownership	No	Yes	Percentage _____
Related to Owner	No	Yes	Relationship _____
Employment	No	Yes	Position _____

Other, Please Describe: _____
(Ex: Investor, Director, etc.)



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Conflict of Interest Identification:

Identify any interests related to actual transactions known to you that may be conducted for you, or your family member (Spouse, child, sibling, parent, relative-in-law), or a company, or a partnership that you are affiliated with that would clash with NDSCS’s interest and the private pecuniary interest of yourself.

Questionnaire:

This questionnaire has been prepared to assist employees of NDSCS in identifying situations that may be a conflict of interest under NDSCS’s Conflict of Interest Policy. <http://policy.ndscs.edu/policies/conflict-of-interest-policy>

As you fill out this form, please keep in mind that conflicts are common and not necessarily inappropriate. If you answer yes (or maybe) to any of the questions set out below, this does not necessarily mean that you are in violation of NDSCS policy. Rather, it means that you have identified a potential issue that requires yours and the attention of NDSCS.

Outside interests/activities:

1. Do you or a family member have an employment, consulting or similar relationship with any provider of goods or services to NDSCS? Yes No
2. Do you or a family member have an ownership or similar interest in any provider of goods or services to NDSCS? Yes No
3. Are you a member of a board of directors of any entity that may provide goods or services to NDSCS? Yes No
4. Are you involved in any other activity or relationship that could have the appearance of a conflict of interest that is not covered by the questions above? Yes No

If you answer yes to any of the above four questions please complete the following:

Family member:

Please identify the circumstances (family ownership or employment) giving rise to the potential conflict and the nature of your relationship with that entity.

Name of Business family member owns, is employed at or serves on the board of: _____

Family member owned Yes No Percentage _____

Family member employed Yes No

(If employed, has ownership or a vested interest, please provide information below)

Name of family member and relationship <small>Spouse, child, sibling, parent, relative-in-law:</small>	
Position held at business:	
Years employed (if applicable):	



Facilities Management

Purchasing

Patterson Maintenance Center | 701.671.2211 | Fax: 701.671.2148

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Employee Name _____

Department _____

Signature _____

Date _____

S:\PURCHASING\Business Interest\Business Interest Form.docx

NDSCS Action Plan 1-1B

What: Additional responsibility for oversight of Notification of Business Interest and/or Conflict of Interest processing.

How: Added oversight responsibility to Facilities Business and Procurement Manager job description.

When: Summer, 2019

Who: Vice President for Administrative Affairs

NDSCS Action Plan 1-1C

What: Currently annual training for conflict of interest is conducted. We will include in the annual training additional instruction on completion of Business Interest and/or Conflict of Interest form for all employees. Also, include in this training review of the requirement to provide electronic copies of contracts/MOUs to the Purchasing Department.

How: Addition to the annual conflict of interest training

When: Fall 2019 and annual thereafter

Who: Human Resources Executive Director

State Auditor Office Recommendation 1-2: We recommend the State Board of Higher Education and management take any and all necessary actions to prevent future efforts to obstruct or mislead the Office of the State Auditor in carrying out its statutory duties.³

NDSCS Response

NDSCS disagrees that there was any attempt to obstruct or mislead the Auditor's Office, willfully or otherwise. This finding centers around 700 emails that were provided to the Auditor's Office by the NDUS. According to the Report, the Auditor's Office received these emails after submitting a very specific request for emails to the NDUS. Specifically, the Report indicates that the Auditor's Office submitted a request for emails "sent to or from Mr. Grindberg and President Richman, which mentioned Flint, Roger Reiersen (CEO of Flint) or Karen Grindberg (CFO of Flint)." The Report indicates that this search generated over 700 emails that should have been provided by NDSCS and that the failure to do so was an act to obstruct or mislead the Auditor's Office. The facts do not support this conclusion.

First, and perhaps most importantly, the Auditor never submitted a detailed request for records to NDSCS. Had NDSCS received a detailed request akin to the one received by the NDUS, it could have easily directed its IT professionals to conduct the search, returning the same or substantially similar results to those provided by the NDUS IT professionals. The requests submitted to NDSCS by the Auditor, however, were entirely subjective and did not identify any specific records from NDSCS, nor did they provide any meaningful search parameters for NDSCS to conduct a search. According to the Report, the Auditor submitted the following three requests to NDSCS in an effort to uncover the emails in question:

³ According to the Auditor's presentation at the March 27th meeting, it is this finding that required the Auditor to deviate from its normal practice of affording NDSCS the opportunity to respond to the Report.

- The first request, received on October 15, 2018, asked NDSCS to provide "Any procurement documentation related to the selection of Flint Communications related to contracts in effect 7/1/2014 to 10/12/2018."
- The second request, received on November 9, 2018, asked NDSCS if they knew "who was involved in the decision making process for contracting Flint Communications to provide the contracted services in 2017? If so, could you provide me a listing of the individuals?"
- The third request, received on February 15, 2019, asked NDSCS to provide "all correspondence related to the selection of the Flint Group as a consultant on the Workforce Career Academy initiative."

In reviewing these requests, it is clear that they are vastly different from the request that was submitted by the Auditor's Office to the NDUS. The request submitted to the NDUS is objective and can be performed or verified by neutral third parties. The requests submitted to NDSCS, however, are entirely subjective, and cannot be verified by third parties; additionally, the requests submitted to NDSCS are vague in defining the records they are searching for. Based on this, it seems clear that these requests were not designed to elicit the same responses/information, nor is it reasonable to think that these requests would produce the same results. With these things in mind, however, at the time of receiving the requests from the Auditor's Office, NDSCS tasked the necessary employees with attempting to respond to the Auditor's requests. To that end, the necessary employees conducted searches of their email inbox in order to locate records. Notably, however, this search was being conducted more than a year after the procurement in question. After conducting these searches, NDSCS produced the records for the Auditor's Office. However, due to the vague nature of the requests, and the time that had passed since the procurement, NDSCS was unable to provide a response that included all 700 emails that were eventually included in the response from the NDUS.⁴ There is simply no evidence to suggest that the discrepancy in these responses is due to a willful attempt on the part of NDSCS to obstruct or mislead the Auditor's Office - the discrepancy in these responses is due to the vague nature of the requests and the considerable time that had passed between the procurement and the request for records.

Second, the Auditor's revelations resulting from the review of the 700 emails do not demonstrate any attempt to conceal any information from the Auditor's Office, nor do they reveal any attempt to obstruct the efforts of the Auditor's Office. Rather, the revelations reveal what NDSCS has been consistently saying throughout the process of this audit – the employee in question was not involved in selecting or recommending Flint Group, nor was the employee involved in the negotiation of price terms with Flint Group. Due to his role as the VP for Workforce Affairs, the employee *was*, however, involved in acting as a courier of information between NDSCS and the two vendors that were approached about providing services.

The Report provides the following revelations with regard to the 700 emails provided by the NDUS:

1. Mr. Grindberg was personally involved in recommending and engaging Flint Group for the consulting services related to the Career Academy (refer to e-mails starting on page A-14).
2. Mr. Grindberg submitted a written Request for Proposal to Flint Group (see page A-22 in appendix).

⁴ Until receiving a copy of the Report, NDSCS was unaware that the Auditor's Office had submitted a request for emails from the NDUS. NDSCS remains unaware of the timing of said request and the contents of the response provided by NDUS.

3. E-mail correspondence suggested Praxis, a strategic partner of Flint Group, would be a better candidate for this project than Flint Group; however, Mr. Grindberg stated he was hesitant to use Praxis (see pages A-16 and A-17 in appendix).
4. Mr. Grindberg received a written proposal from Flint Group via e-mail (see page A-21 in appendix).
5. Mr. Grindberg forwarded or copied President Richman on correspondence related to the Request for Proposal and forwarded a copy of the Flint Proposal. President Richman responded to Mr. Grindberg's correspondence. (see pages A-14, A-25, A-28 and A-32 in appendix).
6. Mr. Grindberg proposed modifications to the proposal, including specific payment terms. (see page A-30 in appendix).
7. Mr. Grindberg submitted the proposed contract to Flint Group's CEO (see page A-31 in appendix).

Revelations two through seven are easily explained when considering the roles and responsibilities of the VP of Workforce Affairs. Specifically, the VP of Workforce Affairs is responsible for coordinating communication with any and all vendors related to workforce affairs matters. Having controlled for any potential conflict of interest resulting from this transaction (See NDSCS's response to recommendation 1-1), the employee in question was free to complete these responsibilities in acting as a liaison between NDSCS and the Flint Group. The revelations contained in the Report do nothing more than show that the employee was involved in the administrative process of circulating paperwork in order to have the contract executed- actions that are clearly within the roles and responsibilities of the VP for Workforce Affairs.

As to revelation one, NDSCS disagrees with the conclusion that the employee in question was involved in recommending and engaging the Flint Group. In fact, the Report itself indicates that the Flint Group was recommended by the Cass County CTE Director (see page A-15 of the Report). Additionally, as stated earlier, the selection of the Flint Group was made exclusively by me in my role as President - the employee in question did not participate in the selection process. My decision making process carefully considered NDSCS's past experiences in working with the Flint Group, the Flint Group's familiarity with the various stakeholders and potential partners of the Career Academy, and the higher education experience of the Flint Group's CEO in serving as a Board Trustee for the Higher Learning Commission. Most notably, however, I selected the Flint Group due to their genuine excitement and passion in advancing the message and communicating the need for the Career Academy. Furthermore, as indicated in the Report, NDSCS's selection process for this contract involved contacting two vendors. Once the first vendor withdrew from consideration, the Flint Group was the only vendor being considered. Therefore, barring the Flint Group withdrawing from consideration, NDSCS had only one option remaining.

Finally, while it is unclear if the Auditor has made a finding regarding compliance with Policy 803.1, NDSCS disagrees with the intimation that it failed to comply with the policy. Policy 803.1 required NDSCS to solicit informal quotes or proposals from at least two vendors. As indicated in the Report, NDSCS did exactly what it was supposed to do - NDSCS solicited informal proposals from two different vendors for the required consulting services. The fact that one of the vendors did not provide such a proposal is irrelevant, as the policy does not require that NDSCS obtain two different proposals, it simply requires that NDSCS solicit (i.e. ask or try to obtain) such proposals. Similarly, the focus on the use of the word "shall" v. "should" is irrelevant. Regardless of which word is used, NDSCS did exactly what it was supposed to do in soliciting informal quotes or proposals from two vendors.

NDSCS Action Plan 1-2

What: NDSCS will develop a communication process to strengthen and clarify responses to Open Records and Audit Requests to ensure thorough and timely responses for information and audit requests.

How: A review of various colleges' Open Records and Audit Response processes.

When: Summer, 2019

Who: President

(See attached **Open/Public Records & Audit Request Communication Process**)



Open/Public Records & Audit Requests

Communication Process

Updated June 2019

Overview/Purpose

Pursuant to N.D.C.C. Section 44-04-18, except as otherwise specifically provided by law, all records of NDSCS are public records, open and accessible for inspection during regular office hours. NDSCS shall comply with the public records laws. NDSCS will not disclose information which is considered exempt under the public records laws.

NDSCS is fully committed to transparency and compliance with all NDSCS, State Board of Higher Education Policies, and applicable state laws; this process is to provide for thorough and timely responses to open/public record and audit requests.

Open/Public Records Request Process

1. **Request:** Responses to public or open records requests, shall be coordinated and routed to the NDSCS President's Office at NDSCS.President@ndscs.edu
 - a. Requests may be made through various mediums of communication (e.g. telephone, e-mail), as much and all information gathered through the initial request should be forwarded to the President's Office. Prior to responding to requests, the President's Office/delegate will ask clarifying questions to ensure transparency and thoroughness of response(s).
 - i. Clarifying questions may include, but not limited to: timeframe, search terms, individual names, dates, etc.
 - b. Relevant offices and individuals should be consulted before providing the information (e.g. Registrar, Institutional Effectiveness).
2. **Data/Information Collection:** Once it is determined that the request is allowable under Family Education Rights and Privacy Act of 1974 and other applicable policies and state laws, the President's Office will work with appropriate departments and/or individuals to obtain the requested information in a timely manner.
 - a. Every effort will be made to comply with the request as quickly as possible, allowing for prioritization of work.
 - b. Copies shall be made of records and documents in the format filed, or kept in the normal course of business.
 - c. Employees are not required to retrieve, collate and/or summarize data or prepare other special reports or documents not required by law or otherwise prepared in the normal course of business.
 - d. A fee for allowing access to documents will not be assessed; however fees to cover reasonable copying costs, including reasonable costs of computer generated document may be assessed.
 - i. The fee for standard paper copies will not exceed twenty-five cents per copy.
 - ii. A fee not to exceed twenty-five dollars per hour, excluding the first hour, may be charged per request for locating records if locating the records requires more than one hour.
 - iii. A fee not to exceed twenty-five dollars per hour, excluding the first hour, may be charged per request for excising confidential or closed material if doing so requires more than one hour
3. **Sharing of Information:** NDSCS President's Office, or designee, will communicate the information back to the requestor. The request will be tracked by the President's Office.

Audit Information Request Process

1. **Audit Request:** Various entities at NDSCS are audited to ensure compliance and transparency. When notified of an audit engagement, staff members should notify their appropriate Vice President and/or President.
2. **Audit Liaison:** To maintain consistency and ensure timeliness, the NDSCS President, or designee, will identify one Audit Liaison that will prepare and communicate information for each audit, regardless of the audit's origination.
 - a. The Audit Liaison will be selected by the President, or designee, and the individual should work directly with the areas/information identified in the scope of the audit.
 - b. The Audit Liaison will typically be a part of the senior administrative team.
 - c. The Audit Liaison will be responsible for maintaining all communication and ensuring clarity of requests made.
 - d. The Audit Liaison will ensure timeliness of requests.
3. **Data/Information Collection:** All requests for information related to audits will be communicated through the identified Audit Liaison.
 - a. Prior to responding to requests, the Audit Liaison will ask clarifying questions to ensure transparency and thoroughness of response(s).
 - i. Clarifying questions may include, but not limited to: timeframe, search terms, individual names, dates, etc.
 - b. In some cases, the Audit Liaison will work directly with the Assistant Attorney General to ensure completeness of response(s).
4. **Information Submission and Sharing:** The Audit Liaison is responsible for communicating all information and any follow-up requests with the auditor(s).
 - a. All communication will be documented and when applicable the individual that provided the information related to the request will be copied.
 - b. The Audit Liaison, or designee, will be responsible for maintaining a communication history and staff time expended.

Recommendations 2-1 through 2-7

As indicated above, in an effort to provide a complete response to the findings and recommendations in the Report, NDSCS requested permission to share the Report with the requisite personnel at NDSCS. Having been denied the permission to share the Report, NDSCS is unable to respond to Recommendations 2-1 through 2-7 at this time. When the Report has been made public, NDSCS will work with the appropriate personnel to develop a response to these recommendations.

NDSCS Supplemental Response:

State Auditor Office Recommendation 2-1: We recommend management develop and implement procedures to submit the business plan annually as required by NDCC 52-08-10. We further recommend management follow its stated procedure to obtain approval by the Workforce Training Advisory Board, or if such approval is being obtained, document this action in the board meeting minutes.

NDSCS Response

Currently, NDSCS follows the Procedure Manual for the TrainND Regions requires that a business plan be submitted every two years – NDSCS has been following this schedule. NDSCS is unable to make unilateral changes to the Procedure Manual, as the content of the Procedure Manual is set by the statewide TrainND network. NDSCS will, however, suggest changes to the Procedure Manual to require annual business plans. This suggestion will be submitted to the other three TrainND regions (Bismarck State College, Williston State College and Lake Region State College) for their review and consideration.

Additionally, NDSCS will have the Southeast Workforce Training Advisory Board approve the business plan and document such approval in the meeting minutes of the Board.

NDSCS Action Plan 2-1

What: 2020-2021 Two-year business plan will obtain advisory board approval. NDSCS will request a meeting with statewide TrainND regions and North Dakota University System to consider amending procedure manual to create annual business plans versus biannual business.

How: Board agenda and required action(s)

When: Fall, 2019

Who: Vice President for Workforce Affairs

State Auditor Office Recommendation 2-2: We recommend TrainND update its Annual Report and Performance Accountability Report to include all measurements required under its existing Procedures Manual or update the Procedures Manual to reflect the necessary and appropriate performance measures. We also recommend management consider combining the two reports into one report to avoid duplicating effort.

NDSCS Response

NDSCS will include the requisite metrics when producing its Annual Report and Performance Accountability

Report. To the extent that some of these metrics are no longer useful or wanted, NDSCS will suggest changes to remove those metrics from the Procedure Manual.

NDSCS will also suggest changes to the Procedure Manual to allow for the aforementioned reports to be combined into one report. As indicated in Response 2-1, NDSCS is unable to make unilateral changes to the Procedure Manual, as the content of the Procedure Manual is set by the statewide TrainND network. Therefore, with regard to the suggested changes discussed in this section, NDSCS will submit the changes to the other three TrainND regions for their review and consideration.

NDSCS Action Plan 2-2

What: Update TrainND Procedure Manual
How: NDSCS will request a meeting with statewide TrainND regions and North Dakota University System to review and consider recommendations for TrainND procedure manual.
When: Fall, 2019
Who: Vice President for Workforce Affairs

State Auditor Office Recommendation 2-3: We recommend TrainND present its actual results next to the approved budgets for each fiscal year. We recommend management use its results as a guide in its decision-making process.

NDSCS Response

Presently, NDSCS conducts internal review of results against approved budgets. NDSCS will review and consider aligning reporting to NDUS as recommended in the Report.

Prior to this audit, NDSCS had undertaken measures to address the disparity between budgeted goals and actual outcomes. Specifically, in May of 2018, the Vice President for Workforce Affairs assumed new duties in leading the effort to establish more realistic goals for 2018. Prior to this restructuring, budgeting and goal setting were duties assigned to the former Directors of TrainND. Moving forward, NDSCS will set realistic goals and strive to meet those goals.

NDSCS Action Plan 2-3

What: Actual results align with annual budgets
How: As noted in audit, NDSCS implemented changes in 2018 to address this recommendation. NDSCS will also request a meeting with statewide TrainND regions and North Dakota University System to review and consider recommendations for TrainND procedure manual.
When: Fall, 2019
Who: Vice President for Workforce Affairs

State Auditor Office Recommendation 2-4: We recommend management provide adequate training resources for the staff performing the TrainND SE reporting. The department should develop a procedure document that contains the data to be reported, clear steps on how to calculate the metrics, software reports to run including the report parameters, and any additional steps needed. The document should be reviewed at least annually and updated periodically or as needed. Also, a back-up person should be designated.

NDSCS Response

NDSCS agrees.

NDSCS Action Plan 2-4

What: Training resources for staffing
How: Regular participation with LERN training events and administrative processes
When: Summer, 2019 and annual thereafter
Who: Operations staffing for Workforce Affairs and Administrative Affairs divisions at NDSCS

State Auditor Office Recommendation 2-5: We recommend management utilize the reporting capabilities within the registration software and other software (such as Excel) to correctly capture the data and calculate the metrics for TrainND SE. It may be appropriate to obtain training specific to the software so the functions of the software can be more fully utilized.

NDSCS Response

NDSCS agrees.

NDSCS Action Plan 2-5

What: Registration software annual calculations for external reporting
How: A review of options of current Xen-Direct software options will be conducted with NDSCS department leaders
When: Summer, 2019
Who: NDSCS departments and Vice President for Workforce Affairs

State Auditor Office Recommendation 2-6: We recommend management designate an individual, separate from preparation of external reports, who has knowledge of the metrics and underlying data to perform a detailed review before external reports are published.

NDSCS Response

NDSCS agrees.

NDSCS Action Plan 2-6

What: External reporting processes
How: Administrative procedures were implemented by management in May, 2018 after a division restructuring. The NDSCS Business Office became involved to assist with processing and review of administrative processing. Procedure will be amended to have individual involved to provide separation of external reporting per recommendation.
When: Summer, 2019
Who: NDSCS Business Office and Vice President for Workforce Affairs

State Auditor Office Recommendation 2-7: We recommend management review and update the TrainND procedure manual to provide consistent terminology and clearly defined reporting requirements.

NDSCS Response

NDSCS is unable to make unilateral changes to the Procedure Manual, as the content of the Procedure Manual is set by the statewide TrainND network. NDSCS, will, however, suggest the identified changes to the other three TrainND regions for their review and consideration.

NDSCS Action Plan 2-7

What: TrainND procedure manual
How: NDSCS will request a meeting with statewide TrainND regions and North Dakota University System to review and consider recommendations for TrainND procedure manual.
When: Fall, 2019
Who: Vice President for Workforce Affairs

Other Recommendations

To the extent that this response does not address specific findings and recommendations, it is due to the fact that NDSCS has not been identified as being responsible for those findings or recommendations. NDSCS would refer all questions on such findings and recommendations to the SBHE and/or the NDUS.

Sincerely,

John Richman Ph.D.