

FIS 21-087

Informational Late Item



Frank Edelblut
Commissioner

Christine M. Brennan
Deputy Commissioner

STATE OF NEW HAMPSHIRE
DEPARTMENT OF EDUCATION
21 S. Fruit, Suite 20
Concord, NH
603-271-3471

April 13, 2021

The Honorable Ken Weyler, Chairman
Fiscal Committee of the General Court
Office of Legislative Budget Assistant
107 North Main Street
State House, Room 102
Concord, NH 03301

Honorable Members:

Thank you for the opportunity to provide a monthly progress update on the recommendations provided to the bureau in the LBA Performance Audit – Bureau of Vocational Rehabilitation February 2021. The following summary identifies March 2021 accomplishments:

- **Observation: Multiple recommendations apply**
 - The RFP for Internal Control and QA System Development closed on 3/26/2021 with five proposals received. Proposals are currently in the review process.
- **Observation: Multiple recommendations apply**
 - Draft policy on the following areas has been developed and was put to public comment in March. Public comment period ended 3/26/2021. We are currently processing public feedback working to finalize the policy statements.
 - Eligibility Determination
 - Eligibility Determination Extensions
 - Individualized Plans For Employment (IPE)
 - IPE Extensions
 - IPE Amendments
 - Comparable Services And Benefits
 - Purchase Of Goods For Participants
 - Closure
 - Closing A Participant In Rehabilitated Status
 - Ineligibility And Non-Rehabilitated Closure
 - Post-Employment.
- **Observation 34: Improving Monitoring of Cases for Timely Closure**
 - To assist supervisors in monitoring the length of time these cases are open, a report was added the weekly report on 3/12/2021.
- **Observation 46: Improving Records Management**

- Contract was entered into on September 23, 2020 to scan client files into the AWARE system facilitating efficient access to and storage of client records. All open status cases are scanned and being uploaded to AWARE. Closed status cases will require 3 months to finalize scanning at which point they will be uploaded.

We continue to work on activities to address the performance audit recommendations toward resolving outstanding issues as we strive to provide services to individuals with disabilities in the state. Thank you again for this opportunity.

Sincerely,

Lisa Hinson-Hatz

Lisa K. Hinson-Hatz
Director, NH Vocational Rehabilitation

March 2021 Update to Finance Committee

Observation	Topic	Activities	Audit Commitment Date	Anticipated Completion Date	Responsible Staff	Status
1	Governance	RFP released QA 2/25/21	Feb 2022 personnel change	Feb 2022	VR Team	In process
2	Fiscal Management	Ongoing monitoring utilizing control measures	Completed	Completed	DOE BA and Director	Completed
3	Supervisory Review of Eligibility	Disability priority training completed summer 20, signature authority policy in process	December 2021	December 2021 with QA	Ella McAllister, Chantel Hagan	In process
4	Backdated Eligibilities	Guidance completed, no backdating occurring	Completed	Completed	Field Service Administrator (FSA)	Completed
5	Eligibility Done Asap	Guidance completed, monitoring on agency dashboard	Completed	Completed	Field Service Administrator, Policy Staff	Completed
6	Compliance with 60 Day for Elig.	Guidance completed, monitoring on agency dashboard	Completed	Completed	Field Service Administrator, Policy Staff	Completed
7	Ensure Elig. Extensions are Valid	Sups actively work with VRC's on extensions, Policy in public comment period	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
8	Exemptions Consistent with Regs	Sups actively work with VRC's on extensions, Policy in public comment period	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
9	Consistency of Disability Priority Assignments	Training summer 20, follow-up training occurring spring 21	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
10	Improve Guidance on Elig. Docs and Reqmts.	Training summer 20, follow-up training occurring spring 21	July 2021	July 2021	Training staff, FSA, QA team	In process
11	Ensure Elig. Docs Support Determinations	Training summer 20, follow-up training occurring spring 21	None Identified	July 2021	Training staff, FSA, QA team	In process
12	Ensure Ineligible Cases Documented Correctly	Required Sups to complete ineligibility determinations, guidance provided	None Identified	Completed	Training staff, FSA, QA team	Completed
13	Ensure Trial Work is Compliant with Regs	See audit VR reponse, this was a misunderstanding by the audit team, policy in	July 2021	Completed	Training staff, FSA, QA team	Completed
14	Supervisor Review of Plan Development	Policy draft language started, QA work will expand on this area	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
15	Expand Supervisory Review for Certain Cases	Policy draft language started, QA work will expand on this area	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process

16	Ensure Internal Controls for Sup. Review Work	Policy draft language started, QA work will expand on this area	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
17	Improve Timeliness of Plan Development	Guidance April 2020 completed	June 2021	June 2021 and QA work	Training staff, FSA, QA team	Completed
18	Compliant Use of IPE Extension	RSA correspondance on extension allowability	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
19	Ensure Plans are Signed by Customer and Timely	Procedural guidance provided April 2020. DocuSign implementation (May 2020) to ensure plans/amendments get signed	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
20	Clarify Type of Plan to Be Used	Policy draft language started, QA work will expand on this area	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
21	Ensure Plan Goals are Supported	Policy draft language started, QA work will expand on this area	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
22	Ensure Services Help Accomplish the Goal	Policy draft language started, QA work will expand on this area	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
23	Document Comparable Benefits	Policy draft language started, QA work will expand on this area	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
24	Formalize Vehicle Modification Process	Policy team to begin drafting updated language 3/16/21	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
25	Monitor College Cases and Strengthen Policy	Policy draft language started, QA work will expand on this area	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
26	Documentation for Computer Purchases	Policy draft reviewing occurring by Leadership team 3/10/21	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
27	Improve Case Monitoring Efforts	Monthly QA reviews, 4 cases/office	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
28	Evaluate Gaps in Authorization Structure	Reports on retroactive authorizations completed	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
29	Improve Financial Needs Assessment Process (FNA)	Policy draft in process, Customer reimbursements to VR have ceased	September 2021	September 2021 and QA Work	Training staff, FSA, QA team	In process
30	Document FNA Exemptions properly	Policy draft in process	September 2021	September 2021 and QA Work	Training staff, FSA, QA team	In process
31	Improve Vendor Management	Community Rehabilitation Provider VR team will meet and develop plan to accomplish goals	None Identified	None Identified	Training staff, FSA, QA team	Not Started
32	Improve Controls Over Customer Payments	Customer paybacks have ceased, policies in public comment	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
33	New Controls Over Goods Purchased for Customers	Strengthened policies in public comment	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process

34	Improve Monitoring for Timely Closure	Policy draft in public comment. Once implemented a report to be developed to	March 2021	March 2021 and QA work	Training staff, FSA, QA team	In process
35	Improve Employment Verification	Policy draft in public comment	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
36	Ensure All Doc for Closure are in Case	Policy draft in public comment	June 2021	June 2021 and QA work	Training staff, FSA, QA team	In process
37	Ensure Closure Reasons are Documented Correctly	In July 2020 implemented supervisor to close cases ineligible, October 2020 renamed closure codes to be more easily identifiable	December 2021	December 2021 with QA	Training staff, FSA, QA team	In process
38	Ensure Compliance with Post-Employment Services	Policy draft in public comment. Added PES time to weekly supervisor report	December 2021	December 2021 with QA	Ella McAllister, Chantel Hagan, Chris Semonelli	In process
39	Update Administrative Rules	Rules to State Board 4/8/2021 for initial proposal. Work to continue, December 2020	July 2021 upon JLCAR approval	July 2021	Lisa Hinson-Hatz, Amanda Phelps	In process
40	Improve Policies and Procedures	First round of policy changes in public comment; policy workgroup to continue	Ongoing	December 2021	Ella McAllister, Chantel Hagan	In process
41	Standardized Waiver Development	Policy draft in process	December 2021	December 2021	Ella McAllister, Chantel Hagan	In process
42	Review Signature Authority Structure	Policy draft in process	December 2021	December 2021	Ella McAllister, Chantel Hagan	In process
43	Clarify Counselor Performance Expectations	Leadership to engage with QA Technical Assitance center	December 2021	December 2021	Training staff, FSA, QA team	In process
44	Develop Strategic Training Program	Counselors utilize a new learning mangmenet system to compliment month long new	December 2021	December 2021	Ella McAllister, Chantel Hagan	In process
45	Ensure Accurate Data	RFP released QA 2/25/21	December 2021	December 2021 with QA	Training staff, FSA, QA team	In process
46	Improve Records Management	In December 2020, secured a contract with to convert paper files to electronic to assist in record mangement	June 2021	June 2021	Chris Semonelli	In process

New Hampshire Liquor Commission
 Division of Enforcement and Licensing
 Performance Audit
 Corrective Action Plan
 April 14, 2021

Completion Status:	
Open	* 31 34
Partial	** 44 45
Substantial	*** 9 17
Full	**** 91 99 52%
Total Action Items	<u>175</u>

Key: **Bold text** – Changes since last update
 Gray text – Completed Items

Performance Audit
Audit Period: FY 2018 – FY 2019
(Jul 1, 2017 – Jun 30, 2019)

Obs #	Observation Title	Recommendations	Action Item	Due Date	Completion Status	Comments
Management						
1	Improve the Operating Environment and Organizational Culture	Commission management improve Division operating environment and organizational culture; ensure culture supports effective management control; develop a relevant strategy and plans; determine the most efficient way to ensure effective control; ensure uncontrolled processes and practices are adequately controlled; ensure existing controls are effective; objectively determine whether obtaining national law enforcement agency accreditation will	1) Review 2020-2025 Strategic Plan: a) ensure goals align with statutory duties b) develop measurable outcomes/objectives to enable performance to be assessed c) identify risks that could impede achievement of objectives d) develop, document and implement controls to mitigate those risks	1) Mar 2022	**	
			2) Formal Internal Audit Unit to systematize process of ongoing review, assessment and reporting	2) Aug 2021	**	Reallocating a position from section currently dedicated to inventory-based audit and adding (reclassifying) a position to establish the program

		<p>efficiently and effectively enhance Division- wide management controls and help ensure expected outcomes are achieved; and ensure Division management demonstrates the importance of controls.</p> <p>Division management improve the environment and culture; refine an environment and culture supportive of effective management control; develop formal, comprehensive controls; pursue accreditation only if it is objectively demonstrated to be the most efficient means to implement, operate, and monitor an effective system of management control that produces expected outcomes; develop comprehensive standard operating procedures (SOP); and develop strategy, plans, and measures to ensure effective control and achievement of expected outcomes.</p>	<p>3) Written, objective justification for CALEA accreditation for the Division</p>	<p>3) Complete</p>	<p>****</p>	
			<p>4) SOPs a) Review/revise SOPs for consistency with statutes and rules b) Further review/revise following Strategy/Plan (see (1) above) to ensure SOPs align with objectives</p>	<p>4a) Jul 2021 b) Jun 2022</p>	<p>*** *</p>	<p>All SOPs being reviewed as part of CALEA accreditation process (see A-114 Accreditation Maintenance)</p>

2	Improve Controls Over Strategic Management and Planning	<p>Commission management improve strategy and planning; develop a risk-based, data-informed strategy and supporting plans to ensure expected outcomes are achieved; include measurable goals, objectives, targets, and timelines; ensure the Division implements complimentary strategies and plans; incorporate timely resolution of current and prior audit findings; monitor performance; and publicly report on performance and achievement of expected outcomes.</p> <p>Division management improve strategy and plans; develop a strategy and plans to operationalize Commission strategy and plans; fully implement updated planning SOPs; ensure subordinate elements conform to strategy, plans, and SOPs; tie staff performance measures to</p>	<p>1) Review 2020-2025 Strategic Plan to:</p> <p>a) ensure goals align with statutory duties</p> <p>b) develop measurable outcomes/objectives to enable performance to be assessed</p> <p>c) identify risks that could impede achievement of objectives</p> <p>d) develop, document and implement controls to mitigate those risks</p>	Mar 2022	**	
			<p>2) Formal Internal Audit Unit to systematize process of ongoing review, assessment and reporting</p>	Aug 2021	**	Reallocating a position from section currently dedicated to inventory-based audit and adding (reclassifying) a position to establish the program
			<p>3) Ensure personnel performance evaluations incorporate objectives</p>	Mar 2022	**	Design complete. Implement over course of year as employees become due for evaluation.
			<p>4) Monitor and report publicly on performance</p>	Jun 2021	***	Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees

		organizational performance; and monitor and report publicly on performance and achievement of expected outcomes.				<p>10-15 days after month-end per statute). Post monthly activity report and survey results to website. Remediation Plan sent to DAS Mar. 18, 2021 for posting on TransparentNH in accordance with Exec. Order 2014-03 (expect DoIT to post mid-April); subsequent semiannual status updates. Report monthly to Fiscal Committee. Report quarterly to legislature (N.H.H. Jour., p.32 (Jan. 3, 2018) (see also Action Item (2) of Obs. 38).</p>
3	Improve Controls Over Risk Management	Commission management improve risk management; develop a comprehensive risk management policy and processes tied to strategy and plans; implement, monitor, and refine SOPs; develop risk tolerances; recognize, evaluate, and effectively respond to risks affecting achievement of	1) Review 2020-2025 Strategic Plan to: a) ensure goals align with statutory duties b) develop measurable outcomes/objectives to enable performance to be assessed c) identify risks that could impede achievement of objectives d) develop, document and implement controls to mitigate those risks	Mar 2022	**	

		<p>expected outcomes; and regularly reviews and addresses changing risks.</p> <p>Division management improve risk management; adapt and implement the Commission's risk management policies and practices; develop holistic strategic, operational, and tactical risk management SOPs and ensure other SOPs manage risk; and discontinue relying on informal, qualitative, intuition-based, tactical level risk management.</p>	<p>2) Develop and implement risk management policy</p>	Mar 2022	*	
			<p>3) Formal Internal Audit Unit to systematize process of ongoing review, assessment and reporting</p>	Aug 2021	**	
4	Develop a System of Control to Ensure Timely and Durable Remediation of Audit Findings	<p>Commission management improve remediation of prior audit findings; improve transparency; comply with Executive Orders to post remedial action plans and semiannual progress reports for each audit; develop and implement policy and procedures to durably remediate audit findings; and incorporate audit</p>	<p>1) Formal Internal Audit Unit to systematize process of ongoing review, assessment and reporting</p>	Aug 2021	**	
			<p>2) Report on plan and remediation of audit findings</p>	Ongoing	***	<p>Remediation Plan sent to DAS Mar. 18, 2021 for posting on TransparentNH in accordance with Exec. Order 2014-03 (expect DoIT to post mid-April); subsequent semiannual status updates. Report</p>

		<p>resolution processes into strategy and plans.</p> <p>Division management improve remediation of prior audit findings; develop a strategy and resourced, time-phased plan to timely remediate audit findings; monitor remediation to ensure effectiveness and durability; and publicly report on plan execution</p>				monthly to Fiscal Committee.
5	Improve Controls Over Check and Cash Management	<p>Commission management durably remediate deficiencies in cash and check processing; centralize payment processing; segregate business office and operational duties; and implement an SOP compliant with statute and State policy.</p> <p>Division management develop and improve a single Division-wide cash and check handling SOP compliant with statute, State policy, and revised Commission SOP.</p>	1) Revise and implement SOP compliant with statute and state policy	Complete	****	A-143 Payment Control
			2) Implement centralized payment processing procedures	Sep 2021	**	Evaluating work flow; gathering data during high check volume periods to determine resource needs and reallocate resources based on data evaluation

6	Improve Controls Over the Statutory and Regulatory Framework	<p>Commission management improve controls over the statutory and regulatory framework; seek legislative changes to simplify the statutory framework; develop and implement a simplified regulatory framework; ensure the Division suggests changes to statute and requests changes to rules; develop a controlling SOP; monitor compliance; and periodically report on performance.</p> <p>Division management improve controls over the statutory and regulatory framework; include a relevant element in strategy and plans; review practices and internal forms; identify and recommend changes to simplify the statutory and regulatory framework; implement simplified statutes, rules, SOPs, procedures and internal forms; and periodically report on performance</p>	1) Review/revise SOPs for compliance with statute and rule	Complete	****	A-144 Compliance Accountability Response Team, O-161 Public Information
			2) Update rules	Liq 1100s Liq 700s Liq 900s Liq 500s Liq 600s	**** **** *** ** *	Completed 12/27/19 Completed 9/23/20 In JLCAR process In drafting stage Beginning drafting
			3) Draft/implement SOP for periodic review of statutes, rules and practices	Oct 2021	*	
			4) Consider and recommend legislation to simplify regulatory framework	Dec 2023	*	
			5) Periodic reporting on performance	Jun 2021 Complete	****	<p>Monthly Activity Reports for Jan 2021 and Feb 2021 posted to website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees 10-15 days after month-end per statute).</p> <p>Monthly activity reports – begin posting on website Jun 2021; See O-161 Public Information, S-107 Crime Analyst</p>

7	Improve Compliance With the Administrative Procedure Act (APA)	<p>Commission management comply with the APA; develop, implement, and monitor an SOP to ensure <i>Act</i> compliance; discontinue ad hoc rulemaking; ensure declaratory rulings and other general requirements binding on the public are adopted in rules; ensure external forms comply with the <i>Act</i> and corresponding rules; and adopt required rules.</p>	<p>Draft/implement SOP to govern internal rulemaking procedures, including:</p> <ul style="list-style-type: none"> a) regular, periodic review of SOP and practices relative to rules and statute b) requesting legal unit to initiate rulemaking c) processing external requests for rulemaking d) declaratory rulings 	Oct 2021	**	
		<p>Division management ensure practice complies with laws and rules; discontinue ad hoc rule-making; develop and implement SOPs to ensure <i>Act</i> compliance; ensure organizational culture focuses on statutory compliance; review and identify practices affecting the public, and seek to codify them into properly adopted rules and external forms; review and minimize the external forms inventory; and monitor compliance and</p>	<p>Develop/implement training on rules to prevent ad hoc rulemaking</p>	Sep 2021	**	Rules training is outlined and in development

		periodically report on performance				
8	Improve Controls Over Internal Procedure Documents	Division management improve management of SOPs; develop a relevant strategy and plans; ensure procedural documents are needed, accurate, internally and externally consistent, and conform to law and rules; ensure operations rely on SOPs; ensure the SOP managing policy and procedure ensures compliance, efficiency, consistency, accuracy, and effectiveness of SOPs; ensure forms are codified in SOPs; and divest the Division from unneeded procedural documents and forms	Draft/implement managing SOP for periodic review of SOPs, including: a) alignment with strategy/plan objectives b) compliance with statute and rules	Dec 2021	*	
9	Improve Controls Over the Division's Organizational Structure	Commission management improve control over the Division's organization; develop related rules; and either provide formal delegations of Commission authority exercised by staff or retain authority the	1) Analyze, including risk assessment, of Division organizational structure	Mar 2022	*	Component of Action Item (1) of Obs. 1
			2) Update organizational rules	Jun 2022	*	

		Commission does not wish to delegate Division management improve controls over its organization; conduct analyses and risk assessments to optimize its organization; periodically publish accurate organizational charts; rationalize, implement, and timely update SOPs and supplemental job descriptions (SJD); and ensure conformity to delegations of Commission authority	3) Ensure delegations of authority formally documented	Complete	****	
			4) SOP to document organization and authority	Complete	****	A-101 Agency Role and Authority, A-102 Agency Structure, P-260 Performance Evaluations, P-201 Job Descriptions and Classification, P-259 Personnel Early Warning System
10	Ensure Proper Control	Commission management exercise oversight of Division performance in ensuring proper control Division management ensure proper control; implement a performance management system tied to proper control; develop a resourced, time- phased plan to ensure control outcomes; revise SOPs, including performance measurement requirements in contracts and grants; and monitor	1) Update/implement controlling Strategy and Plan	Mar 2022	**	See Action Item (1) of Obs. 1
			2) Revise SOPs as necessary based on updated outcomes in Strategy/Plan	Jul 2022	*	
			3) Develop/implement SOP for grants and contract management	Complete	****	S-112 Grant Management
			4) Regularly monitor and report on outcomes	Jun 2021 Complete	****	Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-

		and regularly report on proper control outcomes				day lag because fees and reports due from licensees 10-15 days after month-end per statute). See O-161 Public Information, S-107 Crime Analyst
11	Optimize Profitability	Commission management exercise oversight of Division performance and optimization of profitability. Division management optimize profitability; implement a performance management system tied to optimization of profitability; develop a resourced, time-phased plan to reengineer operations to assure optimization of profitability; revise SOPs; and monitor and regularly report optimization of profitability.	1) Strategy/Plan – ensure performance criteria and outcomes for profit optimization	Mar 2022	**	
			2) Revise SOPs in accordance with updated strategy/plan	Jul 2022	*	
			3) Regularly monitor and report	Jun 2021 Complete	****	Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees 10-15 days after month-end per statute). See O-161 Public Information, S-107 Crime Analyst; Annual revenue report (internal)
12	Provide Good Customer Service	Commission management exercise oversight of Division performance and provision of good customer service Division management provide good customer	1) Strategy/Plan – ensure performance criteria and outcomes for customer service	Mar 2022	**	
			2) Revise SOPs in accordance with updated strategy/plan	Jul 2022	*	

		service; implement a performance management system tied to a customer service strategy; develop a resourced, time-phased plan to reengineer operations to assure provision of good customer service; revise SOPs; collect comprehensive customer satisfaction data; and monitor and regularly report on customer service quality	3) Collect customer satisfaction data	Complete (ongoing)	****	Nov 2020 – Implemented customer satisfaction surveys
			4) Regularly monitor and report	Jun 2021 Complete	****	Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees 10-15 days after month-end per statute). Monthly activity reports include survey results – begin posting on website Jun 2021; See also A-137 Training Seminars, A-141 Spec. Serv. Unit Community Involvement, A-140 Direct Shipper Program, A-139 Monthly Taxes and Auditing Unit
13	Improve Controls Over Personnel Management	Commission management ensure the Division develops controls over personnel management to achieve expected outcomes and annually evaluate the Director Division management improve management of personnel performance; develop a related strategy and plans;	1) Develop/implement SOPs for performance management and evaluations	Complete	****	A-101 Agency Role and Authority, A-102 Agency Structure, P-260 Performance Evaluations, P-201 Job Descriptions and Classification
			2) Ensure personnel performance evaluations incorporate objectives	Mar 2022	**	Design complete. Implement over course of year as employees become due for evaluation.

		ensure staff receive required performance evaluations; hold staff accountable for performance; revise SOPs and SJDs; and conduct analyses to determine optimal staff allocations, including the ratio of sworn to unsworn staff, and reallocate staff accordingly	3) Review staff allocation	Mar 2022	**	Component of Action Item (1) from Obs. 1; Staff reallocated to address audit report findings.
			4) Review and revise SJDs	Mar 2022	**	
14	Improve Controls Over External Communications	Commission management improve external knowledge management; report externally on operations biennially; comply with executive orders and report on audit remediation routinely; and ensure reliable, comprehensive operational information is regularly reported externally Division management improve external knowledge management; develop strategy and plans; conform to statute, executive orders, agreements, and other external communication requirements;	1) External reporting a) Audit remediation pursuant to Executive Order 2014-03 b) Plan for audit remediation to Joint Fiscal Committee c) quarterly reports to legislature on enforcement activity at unlicensed establishments	a) Mar 2021 Plan Posting Complete (ongoing) b) Complete (ongoing) c) Jun 2021 (ongoing)	*** **** **	a) Remediation Plan sent to DAS Mar. 18, 2021 for posting on TransparentNH in accordance with Exec. Order 2014-03 (expect DoIT to post mid-April). Post plan Mar 2021; subsequent semiannual status updates b) Plan complete (Mar 2021); Report monthly to Fiscal Committee c) Report quarterly to legislature (N.H.H. Jour., p.32 (Jan. 3, 2018)) (see also Action Item (2) of Obs. 38).
			2) Strategy/Plan review – incorporate external reporting requirements	Mar 2022	**	See Action Item (1) of Obs. 1

		implement and monitor SOPs; develop and implement quarterly external reporting on enforcement activity at unlicensed establishments and provide it to the General Court; and obtain feedback from relevant stakeholders and the general public, using it to refine operations				
15	Improve Controls Over Internal Communications	Division management improve internal knowledge management; develop strategy and plans; optimize internal communications and supporting information technology (IT) systems; improve efficiency and effectiveness of internal communications, intelligence, and analysis; discontinue collection of data not supporting outcome achievement; develop comprehensive SOPs; and base decision-making on reliable data and objective analytics	Strategy/Plan – a) incorporate internal knowledge management b) review and revise	Complete Mar 2022	**** *	Strategic Plan 2020-2025 incorporates internal communications – will also reevaluate as part of Action Item (1) of Obs. 1
			Evaluate/optimize IT systems to identify ways to optimize	Ongoing	**	See S-107 Data Analyst. Policy includes the recommendations and we have hired personnel into this role.

16	Improve Controls Over Records Management	Commission management provide adequate oversight and SOPs to ensure Division records management practices efficiently comply with law	Draft/implement process for Commission review and approval of Division SOPs	Sep 2021	**	
		Division management improve records management; comply with recordkeeping requirements and ensure adequate and proper documentation of the Division's functions, policies, decisions, procedures, and essential transactions; develop a strategy and plans; rationalize operations and inventory records to ensure each process is monitored; discontinue recordkeeping practices without a purpose; develop comprehensive SOPs; implement controls to ensure data reliability; and once revised controls consistently produce reliable records, establish a date after which data can be relied upon for decision-making	Draft/implement recordkeeping SOP	Complete	****	A-110 Records and Field Reporting Management

17	Improve Controls Over Information Technology Systems Management	<p>Commission management ensure Division IT systems management efficiently and effectively helps achieve expected outcomes</p> <p>Division management improve IT system management; develop long- and short-term strategies and plans to efficiently and effectively automate business practices; integrate disparate databases and records into existing records management systems; develop comprehensive SOPs to adequately control systems, their use, and data quality; ensure data quality standards are continuously met; and train employees and monitor performance</p>	Draft/implement Division information technology plan	Mar 2022	**	
Licensing						
18	Improve Controls Over the Licensing Function	Commission management assess risk to determine how licensing requirements can achieve expected outcomes; seek legislative changes to	<p>1) Strategy/Plan –</p> <p>a) risk assessment of licensing requirements relative to expected outcomes</p> <p>b) develop/implement controls to mitigate risks</p>	Mar 2022	*	

		the licensing construct; monitor Division licensing operations; and revise rules to reflect statute, comprehensively reflect requirements, and do not add undue complexity	2) Update/implement comprehensive SOPs	Complete	****	
			3) Revise rules to reflect statutes and simplify practices	Complete	****	Licensing rules (Liq 700), including applications/forms, completely rewritten and adopted, eff. 9/23/20
		Division management improve controls over licensing; develop strategy and plans; develop comprehensive SOPs; involve non-licensing sections in licensing process only when necessary and efficient; simplify practices; tie employee performance to goals, objectives, and targets; and periodically report on performance	4) Consider legislative change to simply framework	Dec 2023	*	
			5) Ensure personnel performance evaluations incorporate objectives	Mar 2022	**	Design complete. Implement over course of year as employees become due for evaluation.
			6) Periodically report on performance	Jun 2021 Complete	****	Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees 10-15 days after month-end per statute). Monthly activity report updated and will begin posting on website; weekly activity report (internal) established to document data on inspections; annual revenue report (internal)

19	Improve Controls Over Initial Licensing	Commission management improve initial licensing processes; simplify requirements; ensure requirements are codified in rule; develop rules for multiyear licenses; and ensure forms and guidance are correctly cited and adopted in rules	1) Improve initial licensing process: a) rules to codify and simplify requirements b) forms in rules c) online application process	Complete	****	Licensing rules (Liq 700), including simplifying requirements, new forms, and online application process, completely rewritten and adopted, eff. 9/23/20
			2) Draft/implement comprehensive SOPs	Complete	****	A-119 Licensing Help Desk; A-125 Licensing Procedures; A-143 Payment Control Security
		Division management improve initial licensing processes; develop strategy and plans; optimize practices, including development of an online application process; discontinue ineffective practices; implement a comprehensive SOP; ensure practices include statutory and rule-based requirements; include multiyear licenses; optimize the utility of the existing licensing database management system; and measure and report on performance	3a) Utilize M-Lo to control automatic payments for license fees b) Plan for new RMS system to integrate with M-Lo	a) Complete b) Mar 2022	**** **	
			4) Measure performance	Complete	****	Implemented customer satisfaction surveys for all new and renewal license applicants. Survey data included in monthly activity report.
		5) Periodic reporting	Jun 2021 Complete	****	Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees 10-15 days after month-end per statute). Monthly activity report updated and will begin posting on website; weekly activity report (internal) established	

						to document data on inspections; annual revenue report (internal)
20	Improve Controls Over Incomplete Annual License Applications	Division management improve controls over incomplete annual license applications; rationalization practices with statute and rules; revise the SOP and supporting forms; document all decisions; and consistently process pending applications	Draft/implement procedure for handling incomplete applications in SOP	Complete	****	A-125 Licensing Procedures
21	Improve Controls Over Short-Duration Licenses	Commission management comply with statute and review, approve, or deny short-duration applications Division management improve short-duration license application processes; ensure timely notification to applicants; develop a comprehensive SOP; ensure consistent processing and documentation; and conduct examinations of licensees	1) Update rules	Complete	****	Liq 700s rewritten and adopted, eff. 9/23/20
			2) Automate licensing process	Complete	****	Implemented electronic filing and online renewal process
			3) Draft/implement comprehensive SOPs	Complete	****	A-125 Licensing Procedures A-126 Premise Inspections
22	Improve Controls Over Required Training	Commission management revise rules to accurately reflect statute and contain all training	1) Update rules	Complete	****	Liq 700s rewritten, including training requirements, and adopted, eff. 9/23/20

		requirements imposed on licensees Division management improve required training practices; improve SOPs; revise SJDs to reflect all training responsibilities and performance measures; establish a relationship between training efforts and desired outcomes; understand trends between course failures and violations; establish return on investment for required training; obtain customer feedback; and monitor compliance	2) Draft/implement comprehensive SOPs	Complete	****	A-125 Licensing Procedures A-137 Facilitation of Training Seminars A-141 Special Services Unit/ Community Involvement
			3) Revise training specialist SJDs	Complete	****	Implemented new SJDs
			4) Obtain customer feedback	Complete	****	Nov 2020 - Implemented surveys to all persons who attend training
23	Improve Controls Over Seasonal Licenses	Division management determine whether seasonal licensure is cost beneficial when compared to alternatives, such as discontinuing the practice; seek necessary statutory and regulatory changes; ensure seasonal licensing inspection practices are risk-based and data-informed; focus seasonal licensing processes on	Determine effectiveness/whether to continue seasonal licenses	Complete	****	Seasonal lic. provide opportunity for businesses in tourist communities to focus operations on peak seasons - will continue to offer (six month duration license)
			Revise/implement SOPs	Complete	****	A-125 Licensing Procedures

		compliance and achieving expected outcomes; implement refined SOPs; and improve efficiency				
24	Improve Controls Over License Renewals	<p>The Commission improve controls over license renewals; comply with statute and review, approve, or deny renewal applications; ensure renewing applicants comply with law and rules; and revise rules</p> <p>Division management improve license renewal processes; ensure practices reflect statute and rule, and achieve outcomes; develop a comprehensive licensing SOP; establish performance targets; develop strategy and plans; ensure statutory and rule requirements are met; maximize the value of the existing licensing database management system; ensure renewal licenses are processed timely and consistently; and regularly solicit input from licensees and stakeholders</p>	1) Update rules	Complete	****	Lic 700 revised and adopted, eff. 9/23/20
			2) Automate renewal process	Complete	****	Implemented automated renewal notifications and online renewals
			3) Draft/implement SOP	Complete	****	A-125 Licensing Procedures
			4) Maximize use of database	Complete	****	Licensees upload necessary documents into license management database (MLO)
			5) Conduct surveys of licensees and stakeholders	Complete	****	Survey results reviewed and reported weekly on website

25	Improve Controls Over Annual License Expiration	Division management improve management of license expirations; ensure compliance with statute and rule; develop SOPs; ensure licensing and enforcement staff timely communicate; ensure data accuracy; and monitor and report on performance	1) Update rules	Complete	****	Liq 700 adopted, eff. 9/23/20
			2) Develop/implement SOPs to ensure compliance with statute and rule	Complete	****	A-125 Licensing Procedures
			3) Periodic reporting	Complete	****	Monthly “did not renew” list; monthly activity report; annual revenue report
26	Improve Controls Over Licensing-Related Petitions	Commission management revise and monitor licensing-related petition rules and ensure it approves or denies petitions Division management improve management of petitions; discontinue informal approvals; develop strategy and plans to optimize practices; develop comprehensive SOPs; and ensure examinations are carried out or unenforced requirements are discontinued	1) Delegation from Chairman to Director of Enforcement to approve petitions	Complete	****	
			2) Develop/implement SOPs	Complete	****	A-125 Licensing Procedures
			3) Develop document to assist licensees with requesting authorization to use another area	Complete	****	On website
Direct Shipper						
27	Improve Controls Over the Direct Shipper Program	Commission management monitor Direct Shipper Program (Program) operations	1) Update/amend rules governing Direct Shipper program (Liq 1100)	Complete	****	Liq 1100 rules updated and adopted, eff. 12/27/19

		and develop comprehensive Program rules	2) Develop/implement strategy, goals and measurable objectives	Dec 2021	**	See also Action Item (1) of Obs. 1.
		Division management improve Program controls; develop strategy and plans; develop goals, objectives, and targets; develop comprehensive SOPs; measure performance; tie employee performance to Program performance; and periodically report on performance	3) Document control processes in SOPs	Complete	****	A-140 Direct Shipping Procedures
			4) Ensure personnel performance evaluations incorporate objectives	March 2022	**	Design complete. Implement over course of year as employees become due for evaluation.
			5) Periodically report on performance	Jun 2021 Complete	****	Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees 10-15 days after month-end per statute). Monthly direct shipper report (internal data dashboard) – incorporate data into monthly activity report. Annual revenue report (internal).
28	Ensure Proper Control of Directly Shipped Alcoholic Beverages		Commission management ensure proper control of direct shipments; amend rules; consider seeking amendment to statute to remove the 90 day unauthorized direct shipper limitation for unpermitted entities directly shipping into	1) Document control processes in SOPs	Complete	****
		2) Review processes and amend as necessary to improve efficiency and effectiveness, including: a) potential for automation b) sanctions and prosecutions c) illegal shipments		Sep 2022	**	Following implementation of NextGen, plan for automating to standardize and enable cross reference of carrier and direct shipper reports

		the State; and clarify whether New Hampshire-based licensees and international-based entities should be allowed to directly ship to consumers. Division management ensure the Program properly controls direct shipments; automate controls processes; prosecute noncompliant entities when necessary in concert with the Department of Justice; and ensure all carriers provide monthly reports on direct shipments and comply with requirements	3) Update/amend rules governing Direct Shipper program (Liq 1100)	Complete	****	Liq 1100 rules updated and adopted, eff. 12/27/19
			4) Consider legislative changes: a) 90 day limitation on shipping from unpermitted entities b) NH and international entities	Dec 2021	*	
			5) Establish training for direct shippers and carriers	Complete	****	Implemented and available on website
29	Establish Proper Control Over Pack and Ship Entities	Division management ensure pack and ship entities are permitted or licensed	Draft rules governing fulfillment houses (pack and ship entities)	Complete	****	Rules requiring reporting from fulfillment houses (Liq 1103.03) adopted, eff. 12/27/19
30	Improve Controls Over Direct Shipments to Licensees	Commission management improve controls over direct shipments to licensees, determine which division should manage licensee direct	1) Amend rules to clarify management of direct shipments	Complete	****	Rules amended to reflect Enforcement Division manages licensee requests and approval process for direct shipments (Liq 1106) adopted, eff. 12/27/19

		<p>shipments, and revise rules</p> <p>Management of the responsible division develop and implement a rule-compliant SOP; ensure comprehensive analysis of licensee and permittee compliance; simplify recordkeeping; and create performance and consistency measures</p>	<p>2) Comprehensive SOPs:</p> <p>a) document permitting controls, recordkeeping, performance measures</p> <p>b) provide for comprehensive analysis of permittee compliance</p>	<p>a) Complete</p> <p>b) Jun 2021 Complete</p>	<p>****</p> <p>****</p>	<p>a) A-140 Direct Shipping Procedures</p> <p>b) Monthly direct shipper report (internal data dashboard) complete. Incorporate data into monthly activity report – will begin posting on website Jun 2021. Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees 10-15 days after month-end per statute).</p>
31	Improve Controls Over Permitting	<p>Commission management improve permitting controls; comply with statute and timely render permitting decisions; develop comprehensive rules; and seek amendment to statute to allow multiyear permits</p> <p>Division management improve permitting processes; comply with statute and rules; develop permitting timeliness, consistency,</p>	<p>1) Comprehensive SOPs</p> <p>a) document permitting controls, recordkeeping, performance measures (including timeliness, consistency)</p> <p>b) provide for comprehensive analysis of permittee compliance</p>	<p>a) Complete</p> <p>b) Jun 2021 Complete</p>	<p>****</p> <p>****</p>	<p>a) A-140 Direct Shipping Procedures</p> <p>b) Monthly direct shipper report (internal data dashboard) complete. Incorporate data into monthly activity report – will begin posting on website Jun 2021. Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports</p>

		and disciplinary processes in SOPs; collect reliable data; and monitor and periodically report on compliance with requirements				due from licensees 10-15 days after month-end per statute).
			2) Consider legislative change for multiyear permits	Dec 2021	*	
			3) Periodically report on performance	Jun 2021 Complete	***	Monthly direct shipper report (internal data dashboard) complete. Incorporate data into monthly activity report – will begin posting on website Jun 2021. Annual revenue report (internal). Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees 10-15 days after month-end per statute).
32	Improve Controls to optimize Profitability of the Direct Shipper Program	Commission management optimize Program profitability; amend rules to require adequate data be submitted; evaluate whether directly shipped products are offered in State liquor stores; restrict direct shipment of products sold in State liquor stores; and seek	1) Amend rules to require adequate data from permittees	Complete	****	Rules Liq 1100 amended to tighten monthly reporting requirements by permittees and adopted, eff. 12/27/19
			2) Comprehensive SOPs, including a) fines for noncompliance; b) ensure all entities pay required taxes; c) accepting and processing payments	Complete	****	A-140 Direct Shipping Procedures; A-143 Payment Control Security

		amendment to statute to allow direct shippers to file taxes annually and change rules to reflect revised statute	3) Strategy/Plan – ensure it incorporates profit optimization for Direct Shipper program	Dec 2021	*	See also Action Item (1) of Obs. 1
		Division management optimize Program profitability; develop strategy and plans; automate control processes; discontinue monthly requirements that are not cost effective; develop and implement SOPs; require all carriers provide monthly reports; and ensure all taxes are filed and examined	4) Consider legislation to allow direct shippers to file taxes annually	Dec 2021	**	
Examinations						
33	Improve Controls Over the Examination Function	Commission management ensure examinations efficiently and effectively achieve expected outcomes and develop and implement rules covering all examination activities Division management improve examination-related controls; include examinations in strategy and plans; develop	1) Develop rules to govern examinations (Liq 500)	Mar 2022	**	Rules being drafted.
			2) Draft/implement SOP to control selection, scheduling, examining, review and recordkeeping	Complete	****	A-139 Audit Department Procedure
			3) Ensure personnel performance evaluations incorporate objectives	Mar 2022	**	Design complete. Implement over course of year as employees become due for evaluation.

		related goals, objectives, and targets; implement SOPs compliant with statute and rules; ensure recordkeeping practices comply with statute; tie employee performance to examination goals, objectives, and targets; and periodically report on performance	4) Periodic reporting	Jun 2021 Complete	****	Monthly audit statistics (internal); monthly activity report (will begin posting publicly on website); annual revenue report (internal). Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees 10-15 days after month-end per statute).
34	Improve Controls Over Examinations to Ensure Proper Control	Division management ensure examination practices ensure proper control of alcoholic beverages; include examination priorities, frequency, and requirements into strategy and plans; ensure all license types comply with examination-related statutory and regulatory requirements; comply with recordkeeping requirements; and develop and implement SOPs	Draft/implement SOP to control selection, scheduling, examining, review and recordkeeping	Complete	****	A-139 Audit Department Procedure
35	Improve Controls Over Product, Package, and	Commission management determine whether product, packaging, and	1) Develop and implement SOPs	Complete	****	

	Container Approvals	<p>container approvals contributed to achieving expected outcomes; seek legislative changes to remove insufficiently beneficial requirements from statute and remove related requirements from Division practice; seek legislative changes to add consistency to beneficial requirements; rationalize and combine duplicative processes; require all alcoholic beverages undergo approvals; require fees for all approvals or eliminate beer festival registration fees; and implement related rules</p> <p>Division management improve controls of product, package, and container approvals; develop strategy and plans; ensure processes comply with statute and rules; and implement SOPs</p>	<p>2) Standardize forms to improve efficiencies around review and approval process</p>	<p>Mar 2022 Complete</p>	<p>****</p>	<p>All product approval forms have been standardized, increasing efficiency of approval process (decreased processing time of each request from 35 min. to 17 min). Note: Further enhancement to automate process will be developed following completion of the NextGen project.</p>
			<p>3) Consider legislative change</p>	<p>Dec 2021</p>	<p>**</p>	<p>Possibly will request legislative change to establish a fee for requesting product or packaging approvals.</p>
36	Improve Controls Over Examinations to Optimize Profitability	<p>Commission management optimize examination function profitability; assess risks; seek amendment to statute to eliminate</p>	<p>1) Strategy/Plan – conduct risk assessment and establish outcome measures around profitability and efficiencies</p>	<p>Mar 2022</p>	<p>*</p>	<p>See Action Item (1) of Obs. 1</p>

	<p>unenforced requirements and adjust the beverage tax rate; monitor and regularly report on revenues; develop risk-based rules; remove unenforced requirements from rules requirements; change tax filing dates to correspond to other Commission and State tax filing dates; and consider whether other State agencies could more efficiently collect alcoholic beverage-related taxes instead developing a Commission-unique online tax collection system</p> <p>Division management optimize examination function profitability; automate licensee tax filing, payment, and examining processes; discontinue monthly filing requirements and migrate smaller entities to less frequent filings and examinations; and develop policies and procedures to provide</p>	2) Update rules, including simplifying reporting/filing requirements	Dec 2021	**	Rules being drafted (Liq 500)
		3) Automate examination and tax filing process	Sep 2022	**	Following implementation of NextGen, plan for automating to standardize process
		4) Consider legislation regarding beverage tax rate and filing requirements	Dec 2021	**	

		quality control of examinations				
Enforcement						
37	Improve Controls Over the Enforcement Function	<p>Commission management improve enforcement function controls; monitor Division enforcement operations to ensure expected outcomes are achieved; and develop comprehensive enforcement rules</p> <p>Division management improve enforcement controls; demonstrate enforcement operations achieve expected outcomes; develop goals, objectives, and targets tied to expected outcomes; develop comprehensive SOPs; measure performance; manage data and employee performance; and periodically report on performance</p>	1) Strategy/Plan: a) ensure goals align with statutory duties b) ensure goals are supported by measurable outcomes/objectives to enable performance to be assessed c) identify risks that could impede achievement of objectives d) develop, document and implement controls to mitigate those risks	Mar 2022	*	
			2) Formal Internal Audit Unit to systematize process of ongoing review, assessment and reporting	Aug 2021	**	
			3) Update rules	Liq 1100s Liq 700s Liq 900s Liq 500s Liq 600s	***** ***** *** ** *	Completed 12/27/19 Completed 9/23/20 In JLCAR process In drafting stage Beginning drafting
			4) Draft/implement comprehensive SOPs	Complete	*****	A-101 Agency Role and Authority; A-102 Agency Structure; O-419 Administrative Action; A-145 Complaint Processing Procedures; A-126 Premise Inspections; A-121 Report Writing Procedures
			5) Measure performance	Complete	*****	Supervisors – weekly review of investigator activity;

						Weekly activity reports; Monthly open case list review; Monthly activity report; Investigator annual evaluations; Annual review by unit of goals/objectives
			6) Periodically report on performance	Jun 2021	***	Monthly reports – will begin posting on website. Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees 10-15 days after month-end per statute). Quarterly reports to legislature (see Obs. 38)
38	Discontinue Extra-jurisdictional and Ineffective Enforcement Actions	The Commission revise rules to accommodate activities that are within the scope of <i>Alcoholic Beverages</i> and demonstrated to be cost effective Division management constrain enforcement activity to that allowed by statute and rule; migrate extra-jurisdictional activities to a law enforcement agency; implement comprehensive controls properly constrained to reflect the Division's	1) Implement comprehensive SOPs tied to statutes and rules	Complete	****	A-101 Agency Role and Authority A-102 Agency Structure O-419 Administrative Action A-145 Complaint Processing Procedures A-126 Premise Inspections A-121 Report Writing Procedures A-125 Licensing Procedures A-139 Audit Department A-140 Direct Shipping Procedures A-144 Compliance Accountability Response Team
			2) Report quarterly as provided in House Journal, p. 32 (Jan. 3, 2018)	Jun 2021	**	<u>House Journal</u> : HB 555-L, relative to the enforcement authority of the liquor investigators. INEXPEDIENT TO LEGISLATE.

		role as a regulatory agency; refine SOPs covering all enforcement activity to ensure compliance with rule; refine performance measures; and develop, implement, monitor, and refine a system to monitor extra-jurisdictional activity and quarterly report to the Legislature				Rep. John Hunt for Commerce and Consumer Affairs. The bill as introduced attempted to limit the enforcement authority of liquor investigators to licensed businesses where liquor is lawfully sold, stored, distributed or manufactured. Since some enforcement may be necessary at an unlicensed establishment and may also be in support of other law enforcement, the committee voted for Inexpedient to Legislate. However, during the work sessions, the issue of “mission creep” came up, and whether the Division of Enforcement and Licensing was going beyond its’ purpose. As a result, the division has agreed to report all enforcement activities on non-licensed premises on a quarterly basis. Vote 13-1.
39	Discontinue Elective Training, Education, and Outreach Without Demonstrated Benefits	Commission management revise rules to reflect all requirements and procedures available for training, education, and outreach efforts found to be cost- beneficial and produce expected outcomes Division management improve control of extra- jurisdictional training, education, and	1) Update rules for licensee training requirements	Complete	****	Liq 700s amended, including training requirements, and adopted, eff. 9/23/20
			2) Conduct cost-benefit assessment of extra-jurisdictional training and outreach	Mar 2022	**	
			3) Strategy/Plan – incorporate training and outreach outcomes for programs	Mar 2022	**	

		outreach efforts; divest from training, education, and outreach efforts not found to be cost-beneficial and produce expected outcomes; include all retained efforts in strategy and plan; measure the effectiveness; develop and implement comprehensive SOPs; optimize efficiency and effectiveness; consider establishing training for direct shipper permittees and carriers; and comply with statute, rule, and SOPs	4) Establish periodic reporting	Mar 2022	**	
			5) Establish training for direct shippers and carriers	Complete	****	Implemented and available on website
			6) Develop/implement comprehensive SOPs	Complete	****	A-137 Facilitation of Training Seminars; S-110 Community Policing; A-141 Special Services/Community involvement
40	Improve Controls Over Preventing Unlicensed or Unpermitted Activity	Commission management implement comprehensive, risk-based rules to detect and control unlicensed and unpermitted activity Division management improve controls over unlicensed and unpermitted activity; assess the risk of unlicensed and unpermitted activity; facilitate rule development; monitor for and prevent	1) Develop/implement rules for unlicensed activity	Jan 2023	*	
			2) Assess risk and monitor for unlicensed activity	Complete	****	Weekly and Monthly Reporting of Complaints of unlicensed and unpermitted activity; Monthly Direct Shipping Statistics Report
			3) Monitor for and prevent unlicensed activity	Complete	****	Verification, monitoring and complaint processes: A-140 Direct shipper procedures, monthly direct shipping statistics report, A-126 Premise Inspections, A-

		unlicensed and unpermitted activity; remedy noncompliance and levy sanctions; implement SOPs to implement rules; undertake comprehensive outreach; and improve knowledge management systems to ensure unlicensed and unpermitted activity is prevented, identified, investigated, sanctioned, and discontinued				144 Complaint Processing Procedures
			4) Levy sanctions to remedy noncompliance	Ongoing	***	Sanctions established in A-140 Direct Shipping Procedures O-419 Administrative Action
			5) Improve knowledge management systems	Dec 2021	**	IMC flow chart –to standardize data entry; data entry reviewed on a weekly basis for consistency; Reviewing records management systems to consolidate data systems
41	Develop Controls Over Adulteration and Misbranding	Commission management develop controls, a holistic strategy, and rules addressing adulteration and misbranding. If rationalization of requirements is not possible through rules, seek necessary Legislative changes to control adulteration and misbranding Division management improve control over adulteration and misbranding; develop a strategy and plans; rationalize all package, container, and product approval requirements	1) Strategy/Plan – develop goals and objectives	Mar 2022	*	
			2) Draft/implement rules	Jan 2023	*	
			3) Develop/implement SOPs	Complete	****	A-126 Premise Inspections O-419 Administrative Action A-144 Complaint Processing Procedures A-140 Direct Shipping A-139 Audit Department A-125 Licensing Procedures
			4) Develop performance measures	Complete	****	Weekly Activity Reports Monthly Activity Reports

		in statute with adulteration and misbranding requirements in rules and practice; determine which substances, licensees, and permittees should be subject to such requirements; develop and implement goals, objectives, targets, and performance measures; and develop SOPs				
42	Improve Controls Over Premise Inspections	Commission develop comprehensive premise inspection rules Division management improve premise inspection controls; regularly conduct premise inspections of all licensees; conduct risk assessments to inform premise inspections; develop and implement performance goals, objectives, and targets; develop comprehensive, risk-based, SOPs; refine, implement, and monitor performance standards; rationalize investigators and examiners duties; improve data entry procedures; undertake comprehensive data	1) Develop rules regarding premise inspections	Jan 2023	*	
			2) Implement improved controls: a) Strategy/Plan – incorporate objectives regarding premise inspections b) implement SOP to standardize premise inspection timing, parameters of review, data gathering and documentation c) periodically review data and performance	a) Mar 2022 b) Complete c) Complete	* **** ****	a) See Action Item (1) of Obs. 1 b) A-126 Premise Inspections c) Supervisors – weekly review data for investigator premise inspections; Weekly activity report; Monthly activity report

		collection; and monitor and report on performance	3) Periodic reporting	Complete	****	Weekly activity report; Monthly activity report; Website COVID-19 dashboard
43	Improve Controls Over Compliance Checks	Commission management develop comprehensive compliance check rules Division management ensure compliance checks assure proper control; conduct risk assessments to inform compliance checks; include compliance checks in strategies and plans, develop and implement goals, objectives, targets, and performance measures over compliance check processes; implement rule compliant SOPs; measure performance; and standardize compliance check data entry	1) Strategy/Plan – risk assessment on compliance checks and document expected outcomes	Mar 2022	*	See Action Item (1) of Obs. 1
			2) Develop rules to govern compliance checks	Jan 2023	*	
			3) Develop/implement SOPs to standardize procedures, data gathering and documentation	Complete	****	A-130 Compliance Checks
			4) Regularly measure performance	Complete	****	Compliance checks data included in monthly activity report; collect and report data for grants
			5) Standardize data entry	Complete	****	IMC flow chart –to standardize data entry; data entry reviewed on a weekly basis for consistency
44	Improve Controls Over Complaint Management	Commission management develop and implement complaint-related rules Division management improve complaint management; develop and implement a rule-compliant SOP;	1) Develop rules for filing and addressing complaints	Jan 2023	*	
			2) Draft and implement SOP, including timeliness, data collection and reporting	Complete	****	A-145 Complaint Processing; A-121 Report Writing Procedures

		incorporate complaint data into intelligence production; timely investigate complaints; and publicly report on complaint resolution	3) Periodic reporting	Jun 2021 Monthly Rpt Complete Jan 2022 Ann Rpt	***	Monthly activity report includes complaint data for Licensees– will be posted on website. Monthly Activity Reports for Jan 2021 and Feb 2021 on website. Mar 2021 report will post early May 2021 (approximately 45-day lag because fees and reports due from licensees 10-15 days after month-end per statute). Annual report includes complaint data for Division personnel – will begin posting on website.
45	Comply With and Improve Regulatory and Procedural Construct Over Investigations and Sanctions	Commission management improve the investigative and sanctions framework; develop a comprehensive, risk-based enforcement policy; establish specific determinate penalties; clarify what sanctions require Commission approval; monitor practice to ensure proper rule implementation; assign points to all violations or consider abandoning the concept; and monitor	1a) Conduct risk assessment of impact of Title XIII violation on ability to achieve statutory duties and related objectives b) revise enforcement policy based on risk assessment and implement necessary rule changes	Mar 2022	*	Component of Action Item (1) of Obs. 1
			2) Legal Unit develop and provide training to prevent ad hoc rulemaking	Sep 2021	*	
			3) Develop/implement comprehensive SOPs	Complete	****	O-149 Administrative Action; A-145 Complaint Processing; A-121 Report Writing Procedures

		<p>performance and ensure consistency</p> <p>Division management ensure proper investigation and prosecution of noncompliance; follow statute and rules; discontinue ad hoc rulemaking; develop and implement comprehensive SOPs; measure performance and ensure consistency; and consolidate and streamline information systems</p>	4) Measure performance, including consistency	Complete	****	<p>Monthly activity report; IMC flow chart to standardize data entry; data entry reviewed on a weekly basis for consistency; Reviewing records management systems to consolidate data systems</p>
46	Improve Controls Over Investigations	<p>Commission comply with statute and develop comprehensive rules regulating the mode and manner of all investigations</p> <p>Division management improve investigative controls; develop and implement comprehensive, rule-compliant SOPs; develop goals, objectives, targets, and performance measures; rationalize investigative activities; ensure all noncompliance identified is referred to investigators; ensure</p>	1) Consider/develop/ implement rules	Jan 2023	*	
			2) Develop/implement comprehensive SOPs	Complete	****	<p>A-145 Complaint Processing; A-121 Report Writing Procedures; A-139 Audit Dept (provides for referral to investigators); A-125 Licensing Unit (provides for referral to investigators)</p>
			3) Consolidate information systems	Dec 2021	**	<p>Reviewing records management systems to consolidate data systems</p>

		timely investigations; and consolidate disparate information systems				
47	Improve Consistency in Levying Sanctions	Commission management ensure sanctions are consistently issued Division management improve sanctions- related processes, ensure investigators are the Commission's sanctioning agents, discontinue the practice of non-investigators issuing sanctions, develop and implement comprehensive SOPs, measure performance, evaluate whether sanctions achieve outcomes and are levied consistently, create a single licensee record, and control data quality	1) Develop/implement SOPs on issuing sanctions	Complete	****	A-125 Licensing Unit; A-139 Audit department; O-419 Administrative Sanction
			2) Discontinue practice of allowing non-sworn staff to issue sanctions	Complete	****	
			3) Measure performance, including consistency of sanctions	Complete	****	Monthly Activity Report
			4) Streamline IT systems to improve data quality	Dec 2021	**	Reviewing records management systems to consolidate data systems; IMC flow chart –to standardize data entry; data entry reviewed on a weekly basis for consistency;