



Status Report Submission Cover Letter

September 16, 2025

Kerri L. Hunter, CPA, CFE
State Auditor
Colorado Office of the State Auditor
1525 Sherman St., 7th Floor
Denver, CO 80203

Dear Auditor Hunter:

In response to your request, we have prepared the attached status report on the implementation status of audit recommendations contained in the Measurement Standards Program Audit. The report provides a brief explanation of the actions taken by the Department of Agriculture to implement each recommendation.

If you have any questions about this status report and the Department's efforts to implement the audit recommendations, please contact Mark Gallegos at 303-869-9091 or marka.gallegos@state.co.us.

Sincerely,

Kate Greenberg
Commissioner
Colorado Department of Agriculture



Audit Recommendation Status Report

Audit Name:	Measurement Standards Program
Audit Number:	2360P
Agency:	Department of Agriculture
Date of Status Report:	October 2025

Section I: Summary				
Rec. Number	Response from Audit Report	Original Implementation Date	Current Implementation Status	Current Implementation Date
1A	Agree	January 2025	Partially Implemented	July 2026
1B	Agree	July 2026	Partially Implemented	July 2026
1C	Agree	December 2024	Implemented	July 2025
2A	Agree	January 2025	Implemented	August 2025
2B	Agree	April 2025	Implemented	July 2025
2C	Agree	January 2025	Implemented	January 2025
2D	Agree	April 2025	Partially Implemented	May 2026
3A	Agree	January 2025	Implemented	June 2025
3B	Agree	July 2025	Implemented	January 2025
3C	Agree	July 2025	Implemented	August 2025
4	Agree	January 2025	Implemented	January 2025

Section II: Narrative Detail

Recommendation 1A

The Department of Agriculture (Department)—in order to better manage the Measurement Standards Program (Program) and the priorities and workloads of inspectors, and ensure compliance with statutory requirements related to annually-required inspections—should improve the accuracy, completeness, and reliability of the inspection, enforcement, and complaint data for the Program. This should include:

- A. Developing and implementing controls within its information system to improve the quality and accuracy of data in its information system and training staff on inspection data requirements and controls. This may involve developing system controls that require inspectors to complete certain fields, including the total number of devices licensed, the number of devices tested, and the type of violation identified, as well as having data field checks in inspection forms and records, such as checks to ensure the number of devices tested matches the number of devices licensed.

Current Implementation Status	Partially Implemented
Current Implementation Date	July 2026
Status Update Narrative	<p>The program began to develop, update, and implement Standard Operating Procedures (SOPs) for each type of inspection performed, trained each SOP during the winter in-person inspector training, and began to conduct internal audits to improve the quality and accuracy of data in its current information system. The Program SOPs require inspectors to complete certain fields, including:</p> <ul style="list-style-type: none"> • the total number of devices licensed, • the number of devices tested, and • the type of violation identified, • as well as data field checks in inspection forms and records, • such as checks to ensure the number of devices tested matches the number of devices licensed. <p>Full implementation of controls within the information system cannot be completed until the new system is in place. This is expected to be done by July 2026.</p>

Recommendation 1B

The Department of Agriculture (Department)—in order to better manage the Measurement Standards Program (Program) and the priorities and workloads of inspectors, and ensure compliance with statutory requirements related to annually-required inspections—should improve the accuracy, completeness, and reliability of the inspection, enforcement, and complaint data for the Program. This should include:

- B. Ensuring its information system can generate accurate reports, such as the number of licensed businesses and which devices are in and out of compliance at a given time.

Current Implementation Status	Partially Implemented
Current Implementation Date	July 2026
Status Update Narrative	<p>The Program developed Standard Operating Procedures (SOPs) referenced in 1A to instruct inspectors how to properly complete inspection reports based on the outcome of the inspection and test, required fields to select that apply to the inspection being completed, and instructions for the review and follow-up process by management for the completed inspection reports.</p> <p>The inspection and management staff were trained in these processes within its current information system to improve the accuracy, completeness, and reliability of the inspection, enforcement, and complaint data for the Program. An all-inspector training was conducted on April 22, 2025, to train on the changes to the SOPs. Inspectors are confirming the number of scales in use corresponds with the number disclosed in the license application.</p> <p>The Division is working to replace the current information system with an updated licensing, inspection, and investigations system. The Measurement Standards Program and the Department's OIT project managers have mapped program needs and wants to meet all program requirements, including those outlined in the audit findings. A draft solicitation proposal for a new system is being worked on. An anticipated date for implementation of the new system is July 2026.</p>

Recommendation 1C	
<p>The Department of Agriculture (Department)—in order to better manage the Measurement Standards Program (Program) and the priorities and workloads of inspectors, and ensure compliance with statutory requirements related to annually-required inspections—should improve the accuracy, completeness, and reliability of the inspection, enforcement, and complaint data for the Program. This should include:</p> <p>C. Creating and implementing written policies and procedures for the supervisory review of inspection reports that include how and when inspection reports should be reviewed. This may include developing a system feature that can identify which inspection reports have and have not been reviewed.</p>	
Current Implementation Status	Implemented
Current Implementation Date	July 2025
Status Update Narrative	The Division established and implemented a Standard Operating Procedure (SOP) that addresses the program-level review of inspection reports, including how and when inspection reports

	should be reviewed. Program managers were trained on the procedures and implemented the policies utilizing the report tracking document created in July 2024.
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Recommendation 2A	
<p>The Department of Agriculture (Department) should ensure that it conducts licensed measuring device and price verification inspections to meet statutory requirements and associated national standards by:</p> <p>A. Establishing a method for tracking each licensed business, whether the business’ devices were tested each year, and any measuring devices that failed inspection.</p>	
Current Implementation Status	Implemented
Current Implementation Date	August 2025
Status Update Narrative	<p>The program established and implemented a Standard Operating Procedure (SOP) for data management outlining the existing procedures to track licensees, if the licensees and associated devices have been inspected, and documenting the outcome, which includes whether a device failed inspection. All staff working with the Program have been trained on the SOP. Since January 2025, reviews have been conducted by the program manager, Technical Services Section Chief, and the Field Programs Section Chief to ensure inspection staff are adhering to the outlined SOP, which was finalized in August 2025. The Data Management SOP utilizes AgLicense and other tracking databases for:</p> <ul style="list-style-type: none"> • Review of device outcomes • Routinely failed devices • Devices that must be removed from service permanently • Violations for failed inspections • Other regulatory actions to track <p>As a new information system is implemented, the Department will ensure the system can meet the tracking and reporting requirements. All SOPs will be updated accordingly as the new system is implemented.</p>

Recommendation 2B

The Department of Agriculture (Department) should ensure that it conducts licensed measuring device and price verification inspections to meet statutory requirements and associated national standards by:

- B. Establishing policies and procedures related to how inspectors should prioritize weights and measures inspections to ensure that inspectors can inspect all weights and measures devices annually, with an emphasis on prioritizing the inspection of scales that are overdue for inspection or that failed their last inspection.

Current Implementation Status	Implemented
Current Implementation Date	July 2025
Status Update Narrative	The program established policies and procedures related to how inspectors should prioritize weights and measures inspections to ensure that inspectors can inspect all weights and measures devices annually, with an emphasis on prioritizing the inspection of scales that are overdue for inspection or that failed their last inspection. Inspection and Consumer Services (ICS) Inspection Staff will be trained in person on the updated policies and procedures during the November/December 2025 ICS inspector training.

Recommendation 2C

The Department of Agriculture (Department) should ensure that it conducts licensed measuring device and price verification inspections to meet statutory requirements and associated national standards by:

- C. Establishing policies and procedures for price verification inspections that include how many price inspections should be conducted annually, how inspectors should prioritize price verification inspections based on risk in relation to other inspections, and how to conduct price verification inspections.

Current Implementation Status	Implemented
Current Implementation Date	January 2025
Status Update Narrative	The program established policies and procedures for price verification inspections that include how many price inspections should be conducted annually, how inspectors should prioritize price verification inspections based on risk in relation to other inspections, and how to conduct price verification inspections.

Recommendation 2D

The Department of Agriculture (Department) should ensure that it conducts licensed measuring device and price verification inspections to meet statutory requirements and associated national standards by:

- D. Assessing the resources needed to meet the statutory requirements of inspecting each licensed measuring device annually and to protect consumers against price violations, which would include assessing inspector’s workload and how prioritization of inspections developed under Parts A and B affects resources or assignments as needed. Based on the results of this assessment, the Division should determine the best way to fulfill its inspection responsibilities, which could include requesting additional resources or pursuing statutory changes to revise the annual inspection requirement for licensed measuring devices and allow the Division to schedule inspections using a risk-based approach.

Current Implementation Status

Partially Implemented

Current Implementation Date

May 2026

Status Update Narrative

The program assessed the necessary resources needed to complete 52 weeks of work using the Division's Territory Calculator, which considered all assigned inspections for each inspector along with their respective programs. For the price verification inspections assignments, it was estimated that each multiple inspector would conduct an average of two inspections per month, while each large-scale inspector would complete one inspection per month. The Territory Calculator helps ensure that the program fulfills the statutory requirement of inspecting each licensed measuring device annually and safeguarding consumers against price violations. Additionally, it assesses the inspectors' workloads across all programs and examines how the prioritization of inspections outlined in Parts A and B impacts resource allocation and assignments as needed.

This assessment resulted in realigning job duties among the work leads and splitting a hard-to-fill multiple inspector territory in Southwest Colorado into two hybrid inspector positions. The two hybrid positions were created with one multiple inspector position and one fruit and vegetable inspector position to create two multiple inspector positions. These positions complete weights and measures inspections and fruit and vegetable inspections.

Based on the results of this assessment, the Division also determined the best way to fulfill its inspection responsibilities include pursuing rule changes to clarify the annual inspection requirement for licensed measuring devices. This will allow the Division to schedule inspections using a risk-based approach. The program is currently drafting proposed language changes in the rule for review by the Department and Agriculture Commission. The proposed rule change is anticipated to be in effect by May 2026.

Recommendation 3A

The Department of Agriculture (Department) should strengthen its enforcement processes to help ensure that licensed measuring devices and prices comply with requirements by establishing policies and procedures that provide guidance on:

- A. What information related to violations should be included in inspection reports to support any enforcement actions taken and establish a process for management review of inspection reports.

Current Implementation Status	Implemented
Current Implementation Date	June 2025
Status Update Narrative	<p>Weights and Measures Standard Operating Procedures (SOPs) were updated to include the proper procedures of an inspection, clarified how to properly report violations, and how to determine proper follow-up actions based on those violations. An all-inspector training was conducted on April 22, 2025 to train on the changes to the SOPs. Audit forms for internal auditing were created in November of 2024, with trial audits being conducted from November 2024 through March 2025. Audit forms were corrected, and procedures were put in place to define how an internal audit is conducted. ICS began trial internal audits in November 2024 and moved to full-scale internal audits of field staff on multiple programs, with a focus on weights and measures, in June 2025.</p> <p>Internal audits were designed to help the Inspection and Consumer Services (ICS) division establish a system to ensure inspection staff are accurately completing inspections. Audit forms were created utilizing current SOPs to develop questions that address all aspects of a proper inspection. Inspection staff are assessed with a “Meets Expectations” or “Needs Improvement”. Upon completion of the audit, a score is calculated, with 80% needed to pass. A flow chart was created to guide auditors and management with the next steps based on the audit outcome.</p>

Recommendation 3B

The Department of Agriculture (Department) should strengthen its enforcement processes to help ensure that licensed measuring devices and prices comply with requirements by establishing policies and procedures that provide guidance on:

- B. How and when civil penalties should be issued and the amount of penalties that should be assessed, and guidelines on how the severity of violations informs the process.

Current Implementation Status	Implemented
Current Implementation Date	January 2025

Status Update Narrative	The Technical Services Section Chief and Weights and Measures Program Manager developed a Standard Operating Procedure (SOP) and enforcement matrix for scale inspection failures, price verification inspection failures, package test inspection failures, and enforcement regarding device service providers and certified weighers. The program manager has used these guidelines since January 2025 to issue civil penalties.
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Recommendation 3C	
<p>The Department of Agriculture (Department) should strengthen its enforcement processes to help ensure that licensed measuring devices and prices comply with requirements by establishing policies and procedures that provide guidance on:</p> <p>C. Obtaining, tracking, and verifying service reports submitted by device service providers or businesses when scales are serviced, implementing requirements for businesses to report when they repair a scale themselves, and conducting outreach efforts for service providers and businesses on these reporting requirements.</p>	
Current Implementation Status	Implemented
Current Implementation Date	August 2025
Status Update Narrative	<p>A Device Service Provider Town Hall was held on March 31st, 2025. This town hall was recorded and uploaded to the weights and measures webpage under Device Service Providers. The program will continue to provide outreach and education to device service providers on a regular basis.</p> <p>The program also created an In-Service Report Procedures Standard Operating Procedure (SOP). The In-Service Report Procedures SOP applies to Inspection and Consumer Services (ICS) staff responsible for receiving, tracking, filing, and responding to In-Service Reports for both commercially and non-commercially used devices submitted by the Measurement Standards Program from licensed Device Service Providers. It also covers ICS staff handling phone calls and written correspondence from businesses or individuals who are initiating the use of commercially used devices themselves.</p> <p>The program receives In-Service Reports by email submitted from the Device Service Provider. The program manager reviews the report to ensure all requirements are met prior to forwarding it to the administrative assistant to upload to the licensee account. For devices placed into service by the licensee, the licensee must send an email affirming the device is accurate. The program manager retains the email, and a note is added to the licensee account.</p>

	<p>The program is working with the Colorado Office of Information Technology (OIT) team to develop a tracking mechanism in a new licensing system to ensure the program can track tagged devices that are either returned or removed from service.</p>
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Recommendation 4	
<p>The Department of Agriculture (Department) should strengthen the Measurement Standards Program’s complaint handling process to help protect consumers by implementing policies and procedures on how to document incoming complaints and complaint inspections, when and how to respond to complaints, and when to initiate an investigation.</p>	
Current Implementation Status	Implemented
Current Implementation Date	January 2025
Status Update Narrative	<p>A complaint Standard Operating Procedure (SOP) was created in November 2024 and formalized in January 2025. This SOP has been utilized by the Weights and Measures Program since January of 2025. This SOP addresses how complaints are received, who receives the complaints, who reviews the complaints, who determines if the complaint is valid, follow-up actions, and any enforcement actions from the complaints. The SOP also includes follow-up actions with the complainant.</p>