



City of Dillingham – Administrative Response Report

Subject: Corrective Actions Following Internal Access Review (Cosgrove Report)

Prepared by: Daniel E. Decker Sr., City Manager

Date: June 5, 2025

Purpose of Report

This report outlines the corrective actions implemented and underway in response to the findings presented in the April 7, 2025 Cosgrove Investigation Report. While the report identified serious concerns regarding improper access to city systems by individuals not employed by the City, and raised potential ethics violations stemming from those actions, the administration's focus remains on implementing meaningful, structured reforms across all departments. These reforms are designed not only to strengthen internal security, reinforce ethical safeguards, and ensure full compliance with policy—but also to prevent such breaches from occurring again or to significantly mitigate the risk should similar issues arise in the future.

Corrective Actions Completed

1. System Access & Security Reconfiguration

- SharePoint permissions and cloud access settings have been reviewed and updated to limit access to internal administrative folders to authorized personnel only.
- Role-based access controls have been partially implemented, with further refinements underway to align user permissions with operational roles.
- Multi-factor authentication is in place for key administrative systems and will be expanded across departments in phases to ensure broader security coverage.
- Routine monitoring of access logs has begun, with plans to formalize scheduled reviews in the coming fiscal year.

2. Procurement Training & Oversight

- Conducting citywide procurement training, with specific guidance on:
 - Dillingham Municipal Code Title 4 purchasing policies
 - Sourcewell utilization procedures
 - Proper documentation and approval protocols
- Finance and administrative teams are working closely to flag inconsistencies before they reach payment.

3. Staff Empowerment & Ethical Safeguards

- All staff have been instructed that they are not to carry out directives they believe to be unethical, regardless of the source.



- Employees have been reminded that policy adherence overrides hierarchy when legality or ethics are at issue.
- These expectations have been reinforced through direct meetings and verbal briefings.

Ongoing and Planned Actions

1. IT Audit & Monitoring Expansion

- Exploring options for an external IT audit in FY26 to assess system vulnerability and establish a recurring review cycle.
- Internal SOPs are being updated to support scheduled checks of system access logs and procurement authorizations.

2. Training Continuity & Role Clarity

- Annual refresher trainings are being institutionalized for both staff and department heads covering:
 - Procurement protocols
 - Ethical conduct
 - Confidentiality standards
- City Council orientation will now include a clearer explanation of **DMC Title 2**, including administrative boundaries and responsibilities.

3. Policy Integration

- Revisions to procurement procedures are in progress, incorporating:
 - Role-specific access policies
 - Procurement workflows
 - Ethics escalation processes

Conclusion

The City of Dillingham has taken meaningful steps to strengthen its internal controls, train its personnel, and ensure clear ethical boundaries are enforced. These actions, while responsive to the Cosgrove findings, are also part of a broader commitment to improve government accountability and public trust.

Through these efforts, we are laying the foundation for a resilient, policy-driven organization that upholds the highest standards of service and integrity.