MIDWEST RELIABILITY ORGANIZATION

380 St. Peter St, Suite 800
Saint Paul, MN 55102
www.MRO.net
651-855-1760

Non-Public and Confidential
Sent via Align

Engagement Notification

Dear Primary Compliance Contact,

The registered entity or coordinated oversight group you represent has been selected to participate in the Midwest Reliability Organization (MRO) compliance monitoring program. MRO's program is performed in accordance with the North American Electric Reliability Corporation (NERC) Rules of Procedure Appendix 4C (Compliance Monitoring and Enforcement Program), which is based upon identified risks to the Bulk Power System (BPS) and the registered entity's responsibilities regarding these risks. The NERC Reliability Standards and Requirements in scope for this engagement are listed in the Align system. If you participate in NERC's Coordinated Oversight Program, any Affected Regional Entities may also be involved in the proposed engagement.

The notification provided by Align serves as official notice to preserve all documentation related to the engagement. Documentation should be interpreted in the broadest sense to include (by way of illustration and not limitation) all written or graphic matter of every kind whether printed, produced, reproduced, or stored by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original, or reproduction. Examples of documentation may include, but are not limited to, operator logs, recorded voice communications, emails, written correspondence, work orders, inspection records, patrol records, budget information, and any other documents that may be directly or indirectly related to any issue in this matter.

The documents in the table below may be included or referenced in the Align notification depending upon scope and type of engagement (e.g., Compliance Audit or Spot Check).

Document Name / Description	Document Type	Location/Folder Name
Working Papers Entity is required to complete the Working Papers tab in Align for each Requirement	**Required Data Entry**	Align
Information Certification Entity is required to complete the Registered Entity Comments Section of the ANP tab within Align	**Required Data Entry**	Align
OPS Spreadsheet(s) (Scope dependent) For detailed testing workbooks – There will be a separate RFI within Align for gathering information for O&P Requirements	Data Request	Align
CIP Evidence Request Tool Tool for gathering information for CIP Requirements	Data Request	Align
Audit Feedback Survey Worksheet An MS Word version of the post Compliance Audit or Spot Check survey to assist internally with gathering information to complete the on-line survey	Informational	Align

CIP Evidence Request Tool User Guide Provides instructions on completing the CIP Evidence Request Tool	Instructions	NERC and MRO Website
Engagement Scope Contains the standards and requirement related to the compliance engagement	Informational	Align

Notices within Align include pre-engagement instructions and may reference documents that registered entities are required to complete and return to MRO.

Please note that certain documents require completion and are required to be returned by the respective due dates noted within Align or by the engagement team lead.

Based on the registered entity's registrations, compliance history, Inherent Risk Assessment, and Compliance Oversight Plan, the Reliability Standards found in Align will be the focused scope of the engagement. Registered entities are responsible for compliance with all regulatory-approved Reliability Standards and Requirements in effect per registered function at all times. The engagement team is authorized and obligated to expand scope to include any other requirements deemed necessary based on evidence reviewed and the engagement team's collective professional judgment. A scope expansion can occur at any point during the process.

In addition, the scope of the engagement could include a review of Open Enforcement Actions (OEAs), Recommendation(s), or Area(s) of Concern from previous compliance monitoring activities.

If you have questions or comments about the engagement or engagement documentation, please contact MRO (compliance@mro.net).

Respectfully submitted,

MRO Management

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Engagement Instructions and Details

Please note this may be an off-site or on-site engagement.

If off-site, the registered entity team will not be required to be in attendance. However, upon reasonable notice, please have subject matter experts available via teleconference and email to respond to inquiries from the engagement team.

If on-site, an appropriately sized conference room may be required for the introduction and briefing presentations, as well as conference rooms for use by the engagement team for interviews and reviews. Please provide the ability to project information to facilitate presentations and reviews in each conference room.

Registered entities are to complete and provide the following items in response to this notification:

1. <u>The Working Papers tab in Align:</u>
    a. In the Compliance Narrative section, provide a detailed narrative that explains how your organization is compliant with each Requirement. In the narrative, please include examples of **internal controls** used to meet the objective of the Requirement (e.g., “Maximo is used to manage timeframes”). Please note, the documentation and evidence provided should be sufficiently detailed and completed such that an experienced third-party reviewer can reach the same conclusions as the original engagement team. The narrative should identify the evidence provided for each Requirement by title/file name, date, revision number, and page or section numbers. Please explain in detail how the evidence demonstrates compliance with the Requirement.
    b. Subject matter experts must be identified for each Standard and Requirement.
    c. Supporting evidence must be documented as such:
        i. In the Compliance Narrative **OR** Registered Entity Evidence of Compliance table, list all critical evidence and documents by the Requirement number the evidence supports. For each piece of evidence or document, please provide:
            1. the file name;
            2. the document title;
            3. the date and version (revision) number of the document;
            4. and the applicable page number(s) and section(s) that support compliance

    For all procedural documents, provide the current document revision used during the engagement period specified with the date it came into effect. **NOTE:** “Critical evidence and documents” is the documentation that you believe supports reasonable assurance of compliance (e.g., process/procedure documents for the Requirement.) There is not an expectation that every item submitted in the Secure Evidence Locker (SEL) be provided in the narrative.

2. Within Align, completion of "Registered Entity Comments" section under the "ANP" tab of the engagement is required.

3. Submit all evidence in the appropriate SEL and reference the ID for the engagement provided within the corresponding Requests for Information. **NOTE**: The NERC SEL system inspects the uploaded files to check for malware or viruses. If you attempt to upload files with unacceptable file types (i.e., executables or zip files), the system will prevent the upload and show an error. Examples of unacceptable file types are provided in the SEL interface and include the following: ZIP, ZIPX, SIT, GZ, TAR, RAR, ARJ, 7Z, and 7ZX.

MRO provides the Compliance Audit period as described in Appendix 4C of the Rules of Procedure as a reference period for compliance engagements. MRO also provides a monitoring period to indicate the initial focus for the compliance monitoring tool selected (e.g., Compliance Audit, Spot Check, etc.). However, the monitoring period does not limit the engagement team from examining all necessary evidence to establish an entity's compliance during the Compliance Audit period.

As needed, to increase efficiencies for the staff involved, MRO may request additional information prior to the engagement, including procedures, data, contracts, delegation agreements, etc., or other materials deemed necessary to gain perspective.

The evidence / information / documents provided by registered entities must be marked in accordance with Section 1500 of the NERC Rules of Procedure if the registered entity is seeking to protect confidential information. Document the status clearly on every page of the document. An example for critical energy infrastructure information (CEII) would be to mark the document "Confidential, CEII" to properly prevent inadvertent disclosure. Registered entities have an obligation to properly identify and mark confidential information.

NERC's SEL provides a secure method for managing and storing Compliance Monitoring and Enforcement Program data. The SEL requires **registered entities** to retain all of the evidence related to the engagement. The evidence is to be unaltered, retained, and easily retrievable by registered entities for five (5) years after the closing date of the engagement in accordance with retention requirements described in Appendix 4C of the NERC Rules of Procedure. No evidence will be retained for any extended period by MRO for those Requirements within the scope of a compliance monitoring tool. **Registered entities** are obligated to complete and return the required forms, documents, and supporting evidence via the SEL by dates indicated within Align. Please use your existing ERO Portal username and password to access the SEL. A SEL folder will be created for this engagement upon initial submittal of evidence, data, or documents.

Please notify the engagement team lead when each SEL submittal has been done. Note that **registered entities** are required to retain copies of all support documents and submitted evidence.

A Word version of the NERC Registered Entity Post Audit Feedback Survey has been added as an RFI for internal use by registered entity's personnel to coordinate the information needed to provide feedback to NERC and MRO. MRO is always interested in improving our process and would appreciate your feedback.

MRO and NERC take this feedback seriously, and every feedback survey will be reviewed to help assess the performance of MRO's compliance monitoring activities. MRO encourages registered entities to participate in the post audit survey. Registered entities are not to use the Word version form for submission of the survey and are requested to submit feedback to NERC via the electronic form.

MRO Engagement Team

Note: The engagement will be conducted by all or some of the team members provided in the engagement team biography. All audit team members have executed confidentiality agreements or acknowledgements. Registered entities may object to any member of the engagement team on grounds of a conflict of interest or the existence of other circumstances that could interfere with the team member's impartial performance of their duties. Registered entities' objections to engagement team members cannot generically preclude participation of team members or FERC/NERC representation on any engagement. However, registered entity objections regarding participation by specific individuals will be evaluated based on the merits of the objections raised. Registered entities may formally submit an objection to engagement team lead or MRO. **Any such objections must be provided in writing or via Align to MRO no later than thirty (30) days prior to the scheduled start of a Compliance Audit. For Spot Checks, any such objections must be submitted to MRO by the later of (i) five (5) business days before the documents, data, and information being requested by MRO is submitted and (ii) five (5) business days after the registered entity is notified of the personnel on the Spot Check team.**

Team Member Biographies

Julie R. Sikes
Compliance Monitoring Manager, O&P

Julie Sikes joined MRO in June 2008 as a Principal Compliance Associate. She transitioned to the role of Compliance Monitoring Manager, Operations and Planning, in January 2020.

Ms. Sikes joined the MRO compliance team after having worked for five years with Midwest ISO-St. Paul. While at Midwest ISO, she held the positions of Reliability Coordinator, Regional Generation Dispatcher and Senior Scheduler. Preceding her career at Midwest ISO, Ms. Sikes worked for Xcel Energy/Northern States Power for five years as a System Operator and Scheduler in Energy Marketing and Gas Operations.

Ms. Sikes is from Minneapolis, Minnesota and received her bachelor's degree from the University of Minnesota and is a NERC certified for System Operator at the Reliability Coordinator level.

E-mail: julie.sikes@mro.net

Jessica N. Syring
Compliance Monitoring Manager, CIP

Jessica Syring joined MRO in December 2015 as a CIP Compliance Engineer. She transitioned to the role of Compliance Monitoring Manager, CIP, in January 2020.

Ms. Syring joined the MRO compliance team after working for more than nine years for Open Systems International, Inc. (OSI). While at OSI she assisted with EMS SCADA server system design, implementation, training, testing and commissioning. She also assisted with technical troubleshooting of power system critical issues as well as upgrading systems with vendor software.

Ms. Syring is a graduate of the University of Minnesota, with a Bachelor of Science degree in Computer Engineering.

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Robert F. Quinlan
Principal Compliance Engineer, CIP

Robert Quinlan joined MRO in February 2018 as a CIP Compliance Engineer. He transitioned to the role of Senior Compliance Engineer in January 2020.

Mr. Quinlan joined the MRO compliance team after working nearly 10 years for OSI where he served as Senior Project Engineer, responsible for the design and commissioning of SCADA EMS projects. He also led an independent team of engineers in reviewing project systems to ensure quality standards were being met.

Mr. Quinlan is a graduate of Michigan State University, with a Bachelor of Science degree in Electrical Engineering.

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Samuel S. Zewdie
Principal Compliance Engineer, O&P

Samuel Zewdie joined MRO in September 2013 as a Staff Engineer and became a Compliance Engineer in May 2018. Mr. Zewdie transitioned to the role of Senior Compliance Engineer in January 2020 and in 2023 was promoted to Principal Compliance Engineer.

Prior to joining MRO, Mr. Zewdie worked for MAPPCOR as a Transmission Planning Engineer. While at MAPPCOR, he worked on regional assessments, planning studies, voltage stability studies, transfer studies, and design of the UFLS program for the MAPP region. Mr. Zewdie also briefly worked for Great River Energy where he focused on substation bus bar analysis, PSS/E model building and areal planning.

Mr. Zewdie is a graduate of the University of Minnesota with both Bachelor of Science and Master of Science degrees in Electrical Engineering with a minor in Industrial Engineering. He is a registered professional engineer (PE) in the state of Minnesota and member of Eta Kappa Nu - HKN (National EE Honor Society) and IEEE.

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Larry A. Johnson
Principal Compliance Auditor, CIP

Larry Johnson joined MRO in July 2018 as a Senior CIP Compliance Auditor. He transitioned to the role of Principal Compliance Auditor in January 2020.

Prior to joining MRO, Mr. Johnson worked for ALLETE/Minnesota Power for over 30 years in Duluth, Minnesota. He held various IT-related positions as a Computer Programmer on the Energy Management System, a Network and Systems Administrator, Information Technology Security Analyst, and Lead Information Systems Auditor. Mr. Johnson has led several compliance initiatives, such as NERC CIP and HIPAA, has taught evening computer and security related courses for Wisconsin Indianhead Technical College, and has presented at several national security conferences like CSI, EEI, InfoSec World and IT Security World plus local events on various compliance, security, and SCADA related topics. He maintains CISSP, CISA, and CSSA certifications and is a member of the local IIA, InfraGard, ISACA, ISSA and OWASP Minnesota chapters.

Mr. Johnson is a graduate of the University of Minnesota – Duluth with a Bachelor of Applied Science degree in Industrial Electronics Technology with a minor in Mathematics.

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Jeremy L. Mattke
Principal Compliance Engineer, O&P

Jeremy Mattke joined MRO in January 2019 as a Compliance Engineer. He transitioned to the role of Principal Compliance Engineer in January 2020.

Prior to joining MRO, Mr. Mattke worked in Power Systems Development with Open Systems International. He has over eleven years of experience in electric management systems (EMS) software design and implementation. He developed for and later managed the EMS team focusing on state estimation, contingency analysis and optimal power flow. Mr. Mattke also worked at Excel Engineering for three years, providing Arc Flash studies for industrial sites.

Mr. Mattke earned a Bachelor of Science degree in Computer Engineering at the University of Minnesota and a Master of Science degree in Electrical Engineering with emphasis on Power Systems at Michigan Technological University. Mr. Mattke is a licensed professional engineer (PE) in the state of Minnesota.

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Richard F. Samec
Principal Compliance Engineer, O&P

Richard Samec rejoined MRO in January 2020 as Principal Compliance Engineer and Auditor in Operations and Planning, after holding the position of Senior Compliance Engineer at MRO from October 2015 through April 2018, where he was an auditor in both CIP and O&P.

Prior to joining MRO, Mr. Samec had a combined 14 years of experience as an Electrical Engineer and Senior Project Manager in the areas of Capacity Planning, Substation Engineering, Metering, SCADA, and CapX2020 Regional Transmission Development. Mr. Samec also had a combined nine years of experience as an Electrical Engineer and Consulting Engineer, overseeing the design and construction of electrical facilities associated with pipeline facilities, including stations and terminals.

Mr. Samec attended the University of North Dakota, where he earned a Bachelor of Science degree in Electrical Engineering in 1991. Mr. Samec is also a registered professional engineer (PE) in the state of Minnesota.

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Elliot E. Weishaar
Compliance Engineer, CIP

Elliot Weishaar joined MRO in January 2020 as a CIP Compliance Engineer. He joined the MRO compliance team after working approximately four years for OSI. While at OSI, he served as a Project Engineer responsible for the design and commissioning of SCADA EMS projects. He also became a subject matter expert in communication products, which involved assisting other engineers design and troubleshoot communication system components within SCADA EMS systems.

Mr. Weishaar is a graduate of the University of Wisconsin – Stout, with a Bachelor of Science degree in Engineering Technology – Electrical concentration with a minor in Business Administration.

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Joel Z. Liu
Senior Compliance Engineer, O&P

Joel Liu joined MRO in January 2021 as a Compliance Engineer III. He joined the MRO compliance team after having worked with Guidehouse as a managing consultant for one year. Preceding his career at Guidehouse, Mr. Liu worked at Midcontinent Independent System Operator (MISO) for 4 years. While at MISO he held the positions of Outage Coordination Engineer and Transmission Security Planning Engineer. Mr. Liu also has four years of experience working as an Electrical Engineer and Project Manager prior to joining MISO.

Mr. Liu earned his Bachelor of Science degree in Electrical Engineering at Shanghai University and Master of Science degree in Electrical Engineering with emphasis on Power Systems at the University of Arkansas in Little Rock.

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Hyder A. Memon
Principal Compliance Engineer, O&P

Hyder Memon joined MRO in March 2021 as a Principal Compliance Engineer. Prior to joining MRO, he worked for different consulting companies as a design engineer and project engineer. He started his career with an electric utility supply company (in Pakistan) as a Distribution Design Engineer and then transitioned to major consulting companies in Canada and the USA (e.g., Stantec, Worley Parsons and NV5). He also worked with OSI as a Senior Substation Engineer in the Distribution Management System group. His last role with NV5 was as a Project Engineer where he led several substation design projects. Mr. Memon has 21 years of hands on experience designing substations and power system protection.

Mr. Memon attended Quaid-e-Awam University of Engineering Sciences and Technology in Pakistan and earned his Bachelor of Engineering in Electrical. He is a licensed professional engineer (PE) in Minnesota and Canada (Presently Alberta Province).

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Sanja Trajkovska
Senior Compliance Engineer, O&P

Sanja Trajkovska joined MRO in February 2022 as a Senior Compliance Engineer. Prior to joining MRO, she worked for Ulteig for 10 years as a substation design engineer. While at Ulteig, she was a project technical lead and discipline lead for substation projects for various utility and renewable energy clients. She primarily focused on protection and control design and also has experience in communication, metering and project management.

Prior to joining Ulteig, Ms. Trajkovska had internship and co-op experiences at the Xcel Energy Monticello and Prairie Island Nuclear Generating Plants.

Ms. Trajkovska is a graduate of St. Cloud State University, with a Bachelor of Science degree in Electrical Engineering. She is also a licensed professional engineer (PE) in the states of Minnesota, Wisconsin, Iowa, South Dakota and Texas.

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Chris Pecore
Senior Compliance Auditor, CIP

Chris Pecore joined MRO in March 2022 as a Senior CIP Compliance Auditor. Prior to joining MRO, he spent two years as a Substation CIP Compliance Engineer at Xcel Energy, with duties such as vulnerability assessments, design control implementations, and fieldwork compliance oversight. He also spent eight years as a Senior Nuclear Oversight Auditor at Prairie Island Nuclear Generating Plant, conducting internal regulatory audits on Engineering, Security, Emergency Planning, and many other functional areas. Prior to that, Mr. Pecore spent 10 years as a submarine nuclear propulsion plant operator in the U.S. Navy. He has also spent the last 12 years as the Senior Enlisted Leader of the Minneapolis Naval Sea Systems Engineering (NAVSEA) unit in the U.S. Navy Reserves.

Mr. Pecore attended Thomas Edison State University and received his Bachelor of Science in Nuclear Engineering Technology and his Masters in Information Systems Management with a focus on Cybersecurity.

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Joshua W. Hebert
Senior Compliance Engineer/Auditor, O&P

Joshua Hebert joined MRO in June 2022 as a Senior Compliance Engineer/Auditor. He joined the MRO compliance team after having worked for nine years with Great River Energy (GRE). While at GRE, he held the positions of Load Management Specialist, responsible for registration and curtailment of load modifying resources during system emergencies or high demand scenarios, Transmission Operator, and Balancing Authority. Prior to GRE, Mr. Hebert worked for Corn Belt Power as an Auxiliary Operator. He currently teaches Business, Energy Management, and NERC CEH training courses as an Adjunct Professor.

Mr. Hebert received his bachelor's degree from Bismarck State College in Energy Management and a Masters of Business Administration from St. Mary's University of Minnesota. Mr. Hebert received and maintains his NERC certification at the Reliability Coordinator level.

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Karen E. Yoder
Principal Compliance Auditor, CIP

Karen Yoder joined MRO in November 2022 as a Principal Compliance Engineer/Auditor in CIP. She joined the MRO compliance team with over 24 years in the electric utility industry and 17 years of NERC Compliance experience. Prior to joining MRO, Ms. Yoder worked for FirstEnergy as a SME in the Corporate NERC Compliance Dept., where she also held various positions in IT Infrastructure, Real Time Systems, Internal Auditing, and was the CIP Implementation Project Manager for UA1200 and CIP v1. In addition, she has worked at American Electric Power as a Transmission Reliability Compliance Specialist and independently as a NERC Compliance Consultant. Ms. Yoder also has prior ERO Enterprise experience as a CIP Auditor for ReliabilityFirst and as a CIP Enforcement Specialist at SERC.

Ms. Yoder is a graduate of the University of Akron, with a Bachelor of Science in Technical Education and a Certificate in Network Technology. She is certified in Risk and Information Systems Control (CRISC) and a Certified Information Systems Auditor (CISA).

E-mail: karen.yoder@mro.net

Margaret Wilson
Principal Compliance Auditor, CIP

Margaret Wilson joined MRO in February 2023 as a Principal CIP Compliance Engineer/Auditor. Prior to joining MRO, she worked at ReliabilityFirst as a Senior Technical Auditor (CIP). With over 22 years of electrical industry experience, Ms. Wilson's background includes managing utility security operations and regulatory compliance programs at both small and large-scale organizations. In addition to operations, Ms. Wilson has also worked in Information technology, supporting real-time systems and technology projects in a variety of environments. She has been involved in implementing enterprise-level asset management, change management/ITIL ticketing, Governance Risk and Compliance, and Identity Access Management systems.

Ms. Wilson has participated actively in industry trade organizations, including the North American Transmission Forum (NATF). As the Chair of the NATF Security Practices Group, she led projects on documenting best practices for risk and governance, compliance implementation guidance, and technical program development.

Ms. Wilson holds both Bachelor of Science and Master of Science degrees in Geology, from Kent State University.

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Jenjira Knernschield
Compliance Engineer/Auditor, CIP

Jenjira 'Jenny' Knernschield joined MRO in September 2023 as a CIP Compliance Engineer/Auditor.

Ms. Knernschield has over 8 years of experience in the electric utility industry. Prior to joining MRO, Ms. Knernschield worked at Old Dominion Electric Cooperative (ODEC), a G&T electric cooperative operating on behalf of its member cooperatives and customers throughout Virginia, Maryland, and Delaware. She began as ODEC's NERC Compliance Specialist, responsible for directing the CIP and O&P programs, overseeing compliance efforts, and serving as PCC to the ERO. She continued those responsibilities as Regulatory and Compliance Counsel, while also managing ODEC's regulatory and enforcement engagements with state and federal agencies, including FERC. Ms. Knernschield is licensed to practice law in D.C. and Maryland.

Ms. Knernschield earned her Juris Doctor (JD) and Master of Energy Regulation and Law (MERL) from Vermont Law School in South Royalton, Vt., as well as her Bachelor of Science (BS) in Agriculture from the University of Missouri in Columbia, Mo.

Observer Biographies

William Steiner
Director of Compliance Monitoring

Bill Steiner joined MRO in February 2013 as a Risk Assessment and Mitigation Principal Engineer and was promoted to Director of Risk Assessment and Mitigation in October of 2018 and then to Director of Compliance in June of 2023.

Mr. Steiner has over 35 years of experience working with electric utilities. Prior to working at MRO, he worked for seven years at Siemens Energy Automation as an advanced EMS applications Global Software Development Manager and Project Manager for large EMS installation. Prior to Siemens, Mr. Steiner served seven years as the Manager of the Xcel Energy EMS and three years at Open System International as System Engineering Manager during the early development of the Monarch EMS platform. Prior to this EMS experience, Mr. Steiner had seven years of experience working in Transmission Planning at Washington Water Power (Avista Corporation) and three years in Distribution Engineering at the Public Service Company of New Hampshire.

Mr. Steiner graduated from Drexel University in 1987 with a Bachelor of Science degree in Electrical Engineering, specializing in Power and Machines. He also holds CISSP and PMI certifications.

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Kendra Buesgens
Compliance Monitoring Coordinator

Kendra Buesgens joined MRO in January 2021 as the Risk Assessment and Mitigation (RAM) Administrator and transitioned into the role of Compliance Monitoring Coordinator in January 2023. She joined the RAM team after working in the healthcare and behavioral health fields for eight years.

Ms. Buesgens is a licensed alcohol and drug counselor (LADC) in the state of Minnesota. Her main focus was adult patient care in residential and outpatient settings, providing care to those struggling with mental health and substance abuse. With this, Ms. Buesgens obtained knowledge of process and procedure of confidential legal documents and state and government oversight.

Ms. Buesgens received a Bachelor of Science degree in Psychology and Chemical Dependency from St. Cloud State University.

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Michelle L. Olson
Compliance Monitoring Administrator

Michelle Olson joined MRO in November 2020 as a Compliance Monitoring Administrator. She joined the MRO compliance team after working a year for Robert Half as a temporary HR assistant at MRO.

While working in HR, Ms. Olson was responsible for employee information management, HR communication, scheduling interviews, and assisted in the onboarding of new employees.

Ms. Olson attended St. Olaf College in Northfield, Minnesota where she earned a Bachler of Arts degree in Sociology and Anthropology.

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