City and County of San Francisco

Non-Profit Contracting Task Force

Report to the Board of Supervisors on Resolution No. 835-02

June 26, 2003
EXECUTIVE SUMMARY

On October 26, 2001, the Board of Supervisors created the City Non-profit Contracting Task Force with the passage of Board resolution No. 806-01. This resolution was prompted by the urging of the San Francisco Human Services Network in response to the 2000-2001 Civil Grand Jury report that reviewed City contracting procedures. The report found that the contract systems in place were too decentralized and placed heavy administrative burdens on non-profit organizations, often to the detriment of services to San Francisco’s residents.

The Board of Supervisors created the City Non-Profit Contracting Task Force to review City contracting policies and procedures and to make recommendations to the Board of Supervisors to improve and streamline contracting practices for non-profit health and human services. The Task Force anticipates that some of these recommendations could result in cost-savings to the City and to non-profit service providers.

This report was the result of a major commitment on the part of both the City departments and the non-profit community to reach a mutual understanding of the challenges in the contracting process.

On September 26, 2002, the Task Force submitted a report to the Board of Supervisors that contained a number of recommendations to improve contracting procedures for non-profit human and health services. The report also recommended that the Board of Supervisors extend the Task Force until June 30, 2003 so that an implementation plan for the recommendations could be developed. (Attachment A)

This report contains the implementation plan for the recommendations previously submitted to improve and streamline non-profit contracting of health and human services. The eighteen original recommendations have been reorganized into four sections, containing thirteen objectives:

- Contracting
- Automation and Standardized Forms
- Monitoring
- Other Issues

Each section identifies relevant issues, describes the objective of the recommendation (referencing the original numbering of recommendations) and lists milestones to implement improvements.
A summary of the objectives of the recommendations include:

1. Consolidate contracts, where appropriate, across or within departments.
2. Develop methods to streamline contract approvals and increase automation.
3. Develop and process contract documents early in the cycle to assure timely payment.
4. Create a review/appellate process to implement and oversee substantive changes to standardization.
5. Eliminate unnecessary requirements imposed on contractors.
6. Develop methods to facilitate electronic processing of contracts and payments.
7. Create standardized and simplified contract forms.
9. Coordinate joint program monitoring, whenever possible.
10. Develop standard monitoring protocols, language and definitions to more clearly define contract requirements.
11. Provide training for personnel who monitor contracts to ensure adequate knowledge and understanding of programs and services.
12. Conduct tiered assessments of programs to more efficiently evaluate program performance.
13. Fund annual cost of living increases for non-profit contractors.
CONTRACTING

Issues:

Consolidation of contracts may follow different models. Large departments may consolidate contracts across programs or funding sources (Department of Public Health-DPH, Department of Human Services-DHS, Department of Adult and Aging Services-DAAS). Smaller departments may collaborate (Department of Children, Youth and Families-DCYF and Mayor’s Office of Community Development-MOCD). Consolidation is most practical when services and target populations are similar. Contract consolidation requires concurrent standardization of contract monitoring and reporting.

Objective #1: Consolidate contracts, where appropriate, across or within Departments with a primary or lead entity to administer the overall contract for a non-profit. (Reference CNPCT Recommendation #6)

MILESTONES

1. As contracts are renewed or sooner if appropriate, departments (DPH, DHS, DCYF, MOCD, DAAS) that already have a draft plan to consolidate contracts will:
   - FY 03-04 - Begin to implement plan.
   - FY 04-05 - Implementation will be reviewed and evaluated to determine if plans have achieved consolidation goals.

2. FY 03-04: Departments that do not have a plan to consolidate contracts will:
   - FY 03-04 - Develop plan to consolidate contracts.
   - FY 04-05 - Implement plan.
   - FY 05-06 - Implementation will be reviewed and evaluated to determine if plans have achieved consolidation goals.

Issues:

The process by which the City contracts for professional services with non-profit organizations is slow and burdensome. The current practice often results in multiple, sequential reviews and other inefficiencies. The process also requires multiple submissions of the same documents. In addition, the City’s accounting
system requires upgrading to accommodate the on-line processing of contractors' invoicing and payments.

**Objective #2:** Develop methods for streamlining contract approvals including: a) central depository of documents for compliance; b) on-line approval capability; and c) consolidation of documents. Establish a procedure to acknowledge compliance status with basic City requirements for non-profit organizations. Increase automation when possible, including establishing on-line (user friendly) reporting forms with instructions for use. *(Reference CNPCT Recommendation #2,7,8,17)*

**MILESTONES**

1. **During FY 2003-04,** the Department of Telecommunications and Information will establish an intranet-based system for use by all City departments that contract with non-profits. The Office of Contract Administration (OCA) will develop a standard list of compliance documents (501c3 letter, Board list, audit, IRS 990 form, insurance certificates, etc.) that will be available on the system, to include only one insurance certificate to indemnify the City & County of San Francisco as additional insured. Contractors will submit one set of compliance documents for all City contracts to the Office of Contract Administration for posting to the intranet system. The OCA working with contracting departments will assure that all documents are posted within 2 weeks of receipt.

2. **By the beginning of FY 2004-05,** all compliance documents for non-profit contractors will be in the system, and departments will use the system whenever it is necessary to check for required documents. Contractors will also be responsible for submitting updated documents to the OCA for timely posting to the system.

3. **By mid-year in FY 2003-04,** the Controller will establish policies and procedures for electronic signatures to permit on-line submissions and approvals of required documents. The Controller will explore the feasibility of electronic fund transfers to facilitate payments directly to contractors' bank accounts.

4. **During FY 2004-05,** individual departments will develop their own systems for on-line submissions and approvals following the policies established by the Controller *(Best Practices: the Department of Children, Youth and Families, Department of Public Health's COOL system).*
5. Once the financial accounting systems have been upgraded, on-line approvals and electronic fund transfers will be implemented. No specific date set for this milestone.

Issues:

Delays in payments generally result from one of two issues: contract certification and invoice processing. The major delays are generally tied to the grant acceptance process and contract certification procedures. Additionally, the Board of Supervisors’ procedures to accept funds create delays.

Objective #3: Develop and process documents early in the cycle to assure timely payment for ongoing services. *(Reference CNPCT Recommendation #10)*

**MILESTONES**

1. The Board of Supervisors should expedite the approval of ”accept and expend” resolutions using the Consent Calendar when notified that a Department has applied for grants for health and human services.

2. By the middle of FY 03-04 - Departments to review internal processes to determine systematic delays in contract processes. The goal of departmental reviews is to speed and streamline the contract process and contract payments to ensure that contracts are certified by the start date of the contract and paid in a timely fashion.

3. In the second half of FY 03-04 - Departments will begin to implement policies, procedures and accountability mechanisms to streamline or speed internal contract processes and payments either based on their internal review or using models of other departments.

   - The DHS model uses multi-year contracts and staggers contract renewals so all contracts are not renewed in the same year. DHS prepares contracts before the fiscal year begins by including fiscal year appropriations in contract modifications prepared mid-fiscal year.

   - The DPH model of contingency contracts was presented to the Task Force as a way to streamline the contract process. DPH is currently piloting a proposal that builds in a contingency amount into contract budgets that will allow flexibility to anticipate funding changes that are tied to the funding cycle.
4. FY04-05: Departments will have completed or made significant progress toward implementation of new streamlining of contract certification.

Issues:

Historically, the various City departments which contract for health and human services have developed their procedures and practices for contracting, monitoring and invoicing independently of each other. This decentralized process has not supported departments to collaborate nor to discover or replicate "best practices" and to standardize systems Citywide. The implementation plan recommended by this Task Force will require consistent effort to achieve and maintain its purpose. There is a need for a centralized oversight, review and appellate process to ensure that the Board-approved implementation remains current and effective.

Objective #4: Create a review/appellate process to implement and oversee substantive changes to standardized requirements. (Reference CNPCT Recommendation #9)

MILESTONES

1. FY 03-04: The Office of Contract Administration/Department of Administrative Services will be responsible to periodically convene a panel to advise the Board of Supervisors. The panel can also be convened at the request of either City Departments or a non-profit contractor. The purpose of the panel is to review, approve or resolve departmental proposals for substantive changes to standardized policies recommended by the Task Force, and any grievances that are unresolved at the Department-level regarding issues related to the standardized procedures.

   - The panel will meet on an ad hoc basis, and not less than one time per year. The panel will be composed of an odd number of people with at least 2 representatives of City health and human service departments and at least 2 representatives from non-profit contracting agencies recommended by the San Francisco Human Services Network.

   - This panel will also oversee the implementation of the Task Force recommendations. Substantive changes are defined as those that significantly alter the standardized procedures contained in this report.
• Office of Contract Administration is responsible for submitting an annual report from the panel to the Board of Supervisors.

2. FY 03-04: City departments that contract with non-profit providers for health and human services will establish a formal grievance procedure for contractors to address contracting issues that have not been resolved administratively by other departmental remedies.

3. FY 04-05: All City departments that contract with non-profit providers for health and human services will incorporate the grievance procedure into their contract boilerplate during this fiscal year.

4. FY 04-05 - Board of Supervisors to review the progress in implementing the goals of the Task Force and a report from the review panel through public hearings held twice per year or other forms of inquiry, as determined by the Board of Supervisors.

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**Issues:**

Over the years, commissions, regulatory bodies and departmental staff have created additional requirements for all contractors based on isolated issues or problems. These subjective requirements are often unnecessary and burdensome, creating contract delays.

**Objective #5:** Eliminate unnecessary requirements imposed on all contractors based on isolated incidents. Requirements should adhere to all applicable Federal, State, and Local ordinances and policies. *(Reference CNPCT Recommendation #3)*

**MILESTONES**

1. FY03-04: All City departments will review their policies to ensure that unnecessary requirements that exceed funding source requirements will not be arbitrarily imposed on non-profit contractors and are consistent with current funding or compliance requirements.
AUTOMATION & STANDARDIZED FORMS

Issues:

Current City contracting procedures rely mostly on hard copy documentation. The use of electronic documentation would streamline the contract process by reducing the volume of hard copy documentation. Electronic process will also facilitate timely processing of contract documents.

Objective #6: Develop electronic submission for all reporting functions (programmatic and fiscal) to include electronic fund transfers. *(Reference CNPCT Recommendation #16)*

**MILESTONES**

1. FY 03-04 - Departments to review contract processes to determine areas that would benefit from electronic processes for reporting, monitoring and payment.
   - Best Practices - The Department of Children, Youth and Families uses a contracting system that incorporates electronic processes.
   - Best Practices - The Department of Human Services accepts electronic invoices via FAX or email.
   - Best Practices - The Department of Health has begun using an on-line contracting system (COOL).

2. Office of Contract Administration/Administrative Services to facilitate electronic contracting processes that would benefit City departments.
   - FY 03-04 - Review City’s purchasing/contracting system (APDICS) or other contracting procedures to facilitate the integration of electronic processes into OCA contracting procedures whenever possible.
   - FY 03-04 - Facilitate the implementation of the DPH on-line contracting system (COOL) to automate contract processing between DPH and OCA. This will facilitate timely processing of contracts and streamline the contract certification process.
3. Controller’s Office to develop policies to facilitate electronic invoicing.
   - FY 03-04 - Review and revise accounting and post-audit procedures to facilitate electronic processes whenever possible.
   - Future date to be determined - When upgrading the City’s accounting system (FAMIS) consider systems that will facilitate electronic processes across City departments. New systems should interface or support departmental contracting systems that process invoices and payments whenever possible.

**Issues:**

Contract forms used by City departments are not standardized and are often redundant in content. As a result, contractors are required to report the same information in a variety of formats, which is time-consuming and inefficient.

**Objective #7:** Create a standard and simplified set of forms that: a) do not duplicate data from one section to another; b) are consistent, simplified, and non-duplicative; c) allows contractors to provide all needed data in a standardized format for all departments; and d) reflects the minimum requirements of the funding source. *(Reference CNPCT Recommendation #18)*

**MILESTONES**

1. FY03-04: DPH will complete standardization of and processes for electronic submission of: (1) Exhibit A Narratives, (2) Exhibit B Budget Pages, (3) Invoices, and (4) Monitoring Protocols, within and among CBHS, the AIDS Office, HUH and, where possible, the CHN.
2. FY04-05: OCA will convene a meeting of appropriate City departments (DHS, DAAS, DCYF, MOCD, etc.) to review DPH model forms and propose areas to standardize where possible and feasible.
3. FY05-06: The resulting forms will be standardized across departments.
MONITORING

Issues:

Accounting requirements for non-profit providers are not standardized across City departments. The Task Force recommends that the Controller develop minimum accounting standards for non-profits to ensure the City’s requirements are met.

Objective #8: Establish accounting standards for non-profits. *(Reference CNPCT Recommendation #4)*

MILESTONES

1. FY 03-04: Controller’s Office to complete:
   a. *Finance Guide for City Contractors*. Guide will include recommendation that all CBO’s have an annual independent audit. The guide will set accounting standards that are acceptable to all City departments.

2. FY 03-04: Controller to distribute *Finance Guide for City Contractors* to Departments to assist in the process of standardizing fiscal monitoring in the City.

3. FY 03-04: Departments should adopt above report as part of fiscal monitoring procedures.

Issues:

The primary purpose of non-profit program monitoring is to ensure that the City and County of San Francisco, on behalf of its taxpayers and State and Federal funders, has been fiscally prudent with the use of available funds to improve the health and well being of its residents. The system of program and fiscal monitoring is slow and cumbersome, often resulting in assessment and feedback occurring too late in the contract year to be meaningful. Timely monitoring that incorporates as many City perspectives as possible will support the ultimate goal of ensuring quality services to San Francisco’s residents.

Objective #9: Whenever possible, coordinate one joint program monitoring visit per year per program by a lead City department. Departments will provide timely
written notice of at least 14 days as well as a timely written report back within 30 days, if possible, but not beyond 90 days. Fiscal site visits should utilize other City department visits within a twelve-month period. (Reference CNPCT Recommendation #11)

**MILESTONES**

1. **FY03-04:** Departments will prove timely written notice of at least 14 days prior to the monitoring visit date as well as a timely written report back on the results of the monitoring visit back contractor within 30 days, if possible, but not beyond 90 days. If the program report is not completed within 30 days, then the department conducting the monitoring will issue a notice indicating that the program report was not completed as scheduled.

2. **FY03-04:** Office of Contracts Administration develops a centralized system for access to real-time information by contractor, by dept, by contact name and number, and logs date of departmental program and fiscal monitoring to facilitate joint program and fiscal monitoring.

3. **FY03-04,** departments will waive or modify site-monitoring reviews if audits or site monitoring by other regulatory agencies address and meet/exceed the department’s site monitoring review objectives. (Recommendation #5 incorporated)

4. **FY04-05:** Departments will utilize this system by the commencement of the FY04-05.

5. **FY04-05:** Departments will have access to and use other departments’ programmatic and fiscal monitoring reports reviews of the agency and may accept the review of other departments.

**Issues:**

Contractors have experienced inconsistencies in the monitoring process with a focus on evaluating means rather than ends, or criteria that were not developed in advance and mutually agreed upon when the service commenced. Service providers have not always been included in deliberations about evaluation criteria, resulting in assessments based on unrealistic, irrelevant or unachievable outcomes. In some cases, contract and civil service programs providing the same services have been evaluated differently.
Objective #10: Develop standard monitoring protocol, language and definitions in advance with providers for purposes of improving process and service outcomes that are clearly defined in contracts. These protocols should be distributed during the contract negotiation process. (Reference CNPCT Recommendation #12)

MILESTONES

1. During FY 2003-04, each department (and divisions within departments) will work with representative groups of providers to develop standards of care or service for each type of service the department provides, whether through City or contract programs. Departments will coordinate standards of care with other departments as appropriate. These standards of care will include minimum expectations, goals and guidelines for each service, and once completed, will be submitted to the department’s policy body (commission, planning council, etc.) for approval by June 30, 2004.

2. During FY03-04: Each City department will adopt as a fiscal monitoring guideline the standards developed by the Controller’s Office (See Recommendation #4, Milestone #2 - Finance Guidelines for City Contractors).

3. During FY 2003-04, each department will work with providers to develop standard program monitoring protocols that focus exclusively on assessment of the contract’s deliverables and outcome objectives, and adherence to the standards of care for that service.

4. The accounting standards, standards of care, and program monitoring protocols will be distributed to all service programs (City or contract) with the contract/interdepartmental MOU documents for FY 2004-05, and these standards and protocols will constitute the criteria for evaluation in program and fiscal monitoring of City and contract programs during FY 2004-05.

5. During FY 2004-05, Departments that provide health and human services will meet to develop agreement on one standard program monitoring protocol for all contracted or City-staffed human services that focus on evaluation of a program’s deliverables, outcomes and adherence to standards of care.
Issues:

Monitoring review practices are not standard between or within departments. City departments need to provide a clear and consistent level of supervision and adequate training and/or standard practices to ensure that staff who monitor contracts are qualified. There are no formal procedures to solicit feedback from agencies on the monitoring relationship.

Objective #11: Provide training for all personnel who monitor programs to ensure adequate knowledge and understanding of programs and services. In addition, training for new personnel will be provided prior to conducting any monitoring reviews. Establish a mechanism for annual feedback from contractors. *(Reference CNPCT Recommendation #13)*

MILESTONES

1. FY 03-04: Commencing in this fiscal year, all staff who are responsible for programmatic monitoring will schedule and attend an on-site program orientation with each agency to be monitored in order to more fully understand programs and services.

2. During FY 03-04: Each City department will develop a training program for department staff and community members who monitor programs (programmatic or fiscal, on-site or off-site review) in order to ensure adequate knowledge of monitoring protocol, including previously negotiated criteria for contract evaluation and any new protocols that result from this report. This training program will be implemented in FY04-05 and annually thereafter.

3. FY 03-04: Each City department will establish a procedure to solicit formal feedback from contracting agencies on the relationship with the department as it relates to both the monitoring process and the ongoing coordination of services. This procedure will include a written report submitted annually to the appropriate commission or body on the outcomes and actions the department deems appropriate to correct any identified problems or concerns.
Issues:

Monitoring is an integral part of the contractual relationship between City government and non-profit agencies. The fundamental purposes of monitoring are to ensure fiscal and programmatic accountability and compliance and to achieve the highest level of services through partnership between both parties. However, programs that consistently meet high standards of performance in all contract objectives may not require as extensive reviews as new programs or those programs that may need more support. Tiered assessments will allow City resources and staff to focus on programs that need assistance to meet their objectives. The Tiered Assessment Tool is designed to create incentives for contractors to aim for higher or improved ratings.

Objective #12: Conduct Tiered Assessment of programs or agencies by auditing or monitoring the agency in an appropriate fashion including but not limited to performance, financial stability, staff turnover, leadership, contract longevity, organizational capacity and audit findings with the goal of implementing tiered monitoring. Coordinate citywide response for agencies requiring technical assistance and create a formal methodology to identify technical resources within departments. (Reference CNPCT Recommendations #12, #14, #15)

MILESTONES

1. FY03-04: During this fiscal year, Office of Contract Administration will convene a working group of City departments to develop a Tiered Assessment Tool to facilitate the implementation of multi-tiered monitoring.

A significant portion of the Tiered Assessment Tool will be based on information provided by each contractor. This assessment will cover areas such as:

- Agency Leadership: e.g. Longevity of Board and Executive Staff, Capacity of Board,
- Experience: e.g. Length of contract provision and years of experience in service categories.
- Performance: e.g. Previous outcomes, program monitoring results, timely reporting
- Management Disclosure: e.g. Report of audit findings, lawsuits,
- Financial Management: Independent audit, unaudited financial statements, 990 Tax Form,
2. FY03-04: Those programs with consistently high performance will participate in a minimized monitoring process. Those programs with moderate performance will participate in a standard monitoring process. Those programs with lower performance will participate in a more extensive monitoring process designed to provide additional technical assistance to support program improvement.

3. FY03-04: City departments will conduct an internal assessment of technical resources, including personnel with special qualifications or trainings, models of best practices, and funds for technical assistance grants. This assessment will be useful in the allocation of departmental resources that could be better utilized to improve services.

4. FY03-04: Each City department will utilize the Tiered Assessment Tool to conduct an annual evaluation of each program based on their contract requirements. This evaluation, as demonstrated by submitted documentation or other assessments, will be posted on the OCA website to provide all departments with information on contractor performance.

5. FY04-05: During this fiscal year, departments will implement tiered monitoring of programs based on past performance. In the event that an assessment identifies challenges faced by the program/agency, all appropriate departments will coordinate a citywide response to provide technical assistance with the goal of stabilizing and improving services.
OTHER ISSUES

Issues:
There is a significant disparity in wages between workers employed by the City and those working for non-profit organizations in comparable positions. This wage disparity increases each year when non-profits do not receive the increases City workers receive. Community-based agencies are adversely impacted as a result of this wage disparity limiting their ability to recruit and retain employees, threatening the quality and continuity of care to clients. In addition, the City often fails to adequately fund contractors for the increasing cost of doing business provided by non-profit contractors.

Objective #13:
Develop and fund a plan to address wage inequities between City employees and non-profit employees. Fully fund departments for the inflationary costs associated with doing business with non-profit contractors for their personnel and operating expenses.

MILESTONES

1. During FY03-04: Begin a dialog between the non-profit community and the City to fully understand the issues related to on-going wage disparity and develop a plan to address these issues.

2. During FY 04-05: Provide adequate funding for cost of living increases (COLA) for personnel for non-profit contractors equal to the salary increase for comparable City positions, regardless of funding source. Continue to fund COLA’s each year for non-profit contractors equivalent to the percentage increase in civil service salaries.

3. During FY 04-05: Provide departments with adequate funding for inflationary costs of doing business for non-profit contractors for administrative and operating expenses. This standard should be maintained in all future years.
CONCLUSIONS

The Task Force hopes that this report will serve as a guide for the Board of Supervisors to monitor the implementation of these objectives. Milestones identified in this report were designed to lay out the timelines necessary to improve contracting policies and procedures. The successful implementation of the objectives contained in this report depends upon even greater collaboration between the City departments and non-profit contractors.

Task Force members would like to thank the Board of Supervisors for the opportunity to review and develop recommendations to improve and streamline contracting procedures. Membership on the Task Force provided an opportunity for non-profit contractors and City staff to meet and mutually agree upon improvements that will benefit both non-profit contractors and City departments. What characterized the work of this Task Force is the spirit of cooperation between department and non-profit representatives as partners in this process to improve the City’s relationship with its contractors.
Report to the Board of Supervisors  
City Non-Profit Contracting Task Force

The following members of the Task Force hereby present this report to the Board of Supervisors of the City and County of San Francisco:

City Departments

Judith A. Blackwell, Co-Chair  
Director  
Office of Contract Administration

Eugene Coleman  
Deputy Director  
Mayor's Office of Community Development

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Non-Profit Agencies

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Sandy Mori  
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Kimochi, Inc.

Jonathan Vernick,  
Executive Director  
Baker Places, Inc.

June 26, 2003
City Non-profit Contracting Task Force Recommendations to the Board,

September 26, 2002

1. Extend the Task Force expiration date for six months, while also enabling all members to designate representatives to explore these issues in greater detail, and to develop an implementation plan.

2. Establish a procedure to acknowledge compliance status with basic City requirements for non-profit organizations.

3. Ensure that contractual and grant requirements imposed on non-profits be the minimum requirements set by the funding source. Additional requirements should only be added by Board of Supervisors policy.

4. Establish accounting principles for non-profits.

5. Waive site-monitoring reviews if audits or site monitoring by other regulatory agencies address the department's site monitoring review objectives.

6. Consolidate contracts, where appropriate, from various departments into a primary or lead department to administer the overall contract for a non-profit.

7. Develop methods for streamlining and contract approvals including: a) central depository of documents for compliance; b) on-line approval capability; and c) consolidation of documents.

8. Increase automation where possible.

9. Create a review/appeal process for substantive changes to standardized requirements.

10. Develop and process documents early in the cycle to assure timely payment for ongoing services.

11. Whenever possible, coordinate one joint program monitoring visit per year per contract by a lead City department. Departments will provide timely written notice of 14 days as well as a timely written report back within 30 days, if possible, but not beyond 90 days. Fiscal site visits should utilize other City department visits within a twelve-month period.

12. Develop standard monitoring protocol, language and definitions in advance with providers for purposes of improving contracts to be distributed at the time of contract execution.
13. Provide training for monitors to ensure adequate knowledge and understanding of program and services prior to monitoring.

14. Coordinate Citywide response for agencies requiring technical assistance and create a formal methodology to identify technical resources within departments.

15. Conduct risk assessment of programs or agencies by auditing or monitoring the agency in an appropriate fashion including but not limited to performance, financial stability, staff turnover, leadership, contract longevity, and audit findings, with the goal of implementing tiered monitoring based on risks.

16. Develop electronic submission for all reporting functions (programmatic and fiscal) to include electronic fund transfers.

17. Establish on-line (user-friendly) reporting forms with instructions for use.

18. Create a standard and simplified set of forms that: a) do not duplicate data from one section to another; b) are consistent, simplified, and non-duplicative; c) allows contractors to provide all needed data in a standardized format for all departments; and d) reflects the minimum requirements of the funding source.