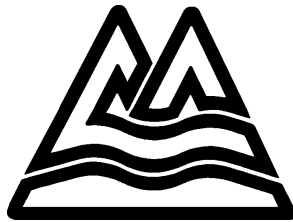


Report of the Contracts Performance Committee

Good Government Benchmark Analysis
Multnomah County, Oregon



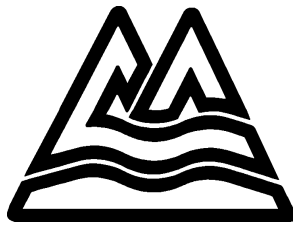
Department of Aging and Disability Services
Department of Community and Family Services
Department of Community Justice
Department of Support Services
Health Department

APRIL 1999

www.co.multnomah.or.us/budget/eru/index.htm

Report of the Contracts Performance Committee

Multnomah County, Oregon



Jim McConnell, Director of the Department of Aging and Disability Services—
Leader of Contracts Performance Committee
Vickie Gates, Director of the Department of Support Services
Jim Carlson, Department of Support Services, Evaluation/Research Unit
Susan Clark, Director of Operations Division, Dept. of Community and Family Svcs.
Tom Fronk, Health Department
Franna Hathaway, County Purchasing Manager, Dept. of Support Services
Sally Kimsey, , Contracts Unit, Health Department
Marianne Metzger, Contracts Unit, Health Department
Bob Robison, Contracts Unit Supervisor, Dept. of Community Justice
Kay Sohl, Director of Technical Assistance for Community Services
Meganne Steele, Budget and Policy Manager, Dept. of Community Justice
Caroline Sullivan, Department of Aging and Disability Services
Barbara Timper, Manager of Contracts and Evaluation Unit, Dept. of Community
and Family Services

April 1999

I. Introduction

The Contracts Performance Committee was formed in July 1998 in response to concerns raised by several agencies that contract with Multnomah County to provide human services. These concerns included:

- 1) Whether the County establishes and **maintains clear and effective contracting and payment procedures**, implemented by a sufficient number of well trained and adequately supervised staff;;
- 2) Whether the County **collects and analyzes consistent data** allowing not only monitoring of individual contracts, but also tracking of clients across providers. This latter is necessary to determine whether purchase of certain services or combinations of services can be associated with any reduction in the need to purchase additional services for individuals;
- 3) Whether the County collects contrasting, conflicting, or irrelevant **outcome measures** rather than significant and valid outcomes.

Following several discussions among the department managers that report directly to County Chair, Beverly Stein (Direct Report Managers), it was decided to charter a workgroup to address concerns raised by contractors starting with the simplest quickest solutions that could be implemented. The charge to the workgroup was to develop a basic list of customer service guidelines for the contracting process and to recommend next steps.

This approach was focused primarily on issue #1 above. It was recognized that larger issues such as how outcome measurements are collected and used could not be completely addressed by service guidelines. There are also important differences between providers who offer County clients a sophisticated range of human services and providers who provide relatively simpler services, which can range from mental health evaluations to home weatherization. The former are usually seen as partners in planning and developing a specialized service system. Development of these specialized services may require a considerable investment to hire and train staff who are knowledgeable about the County's clients, service delivery models, and values. There may be very few providers of such services. And each of these providers may be highly dependent on the County contract as a major funding source. The latter group--providers of relatively simple human services--tend to rely less on the County contract as a primary funding source. They may have more competitors, as their services are more standardized. Simple, competitive procurement is a more realistic contracting model for this latter group of providers. A single set of service

guidelines cannot address differences in how we treat “partners” versus “vendors of specific services.”

Given these limitations, the service guidelines were seen as the first step. Their intent is to provide a foundation for the contracting process. Next steps are required to address the full range of contractor concerns. This report contains both the service guidelines, attached as Appendix 1, as well as recommendations for next steps.

II. Recommendations to the County Chair and Direct Report Managers

- 1) Accept the Final Report of the Contracting Performance Committee and approve the guidelines as presented.
- 2) Promulgate the guidelines for a June 1, 1999 effective date. The Chair shall include a cover letter to accompany the new guidelines.
- 3) The Chair’s Office shall disseminate the Final Report to the County Commissioners and the County Auditor’s Office.
- 4) Departments shall:
 - a. Disseminate the Guidelines to County staff and providers for the June 1 implementation date;
 - b. Arrange for training on the Guidelines for County and provider staff involved in the contracting process;
 - c. Assign one staff person within the department to oversee implementation;
- 5) Annually review progress in meeting the service guidelines through a survey to be conducted by the Department of Support Services.
- 6) Charter a Contract Policy Team, beginning September 1999, to make recommendations to the Direct Report Managers on the following issues:
 - a. Delineate the County’s principles, values, and overall framework for human service delivery. Within this framework more clearly define the full range of contractor roles—partner vs. provider—and the implications for the contracting process. One issue to address is a contracting approach that would value contractors’ demonstrated ability to provide a service while not precluding new potential providers. This approach should assess organizational capacity to provide service and be responsive to the degree of risk that can be tolerated for each type of service.

- b. Move toward a strategic system-planning process that is not linked to specific RFP development.
 - c. Address contractor concerns regarding data collection and analysis, and countywide evaluation of County programs.
 - d. Promote and recognize provider performance excellence.
- 7) Charter a Contract Process Team, consisting of contract specialists from each department that has human service contracts to continuously improve the quality and consistency of the contract process. The Contract Process Team shall coordinate closely with, and make input to, the Contract Policy Team and should have some overlapping membership. The County Purchasing Manager shall call the first meeting of the Contract Process Team. Work of this group shall include:
- a. Explore options for RFP scoring and RFP evaluator selection. There is concern that the existing processes may be unfair or burdened by excessively strict and limiting rules. RFP scoring and evaluator selection could be improved by better selection and training of evaluators.
 - b. Define County values and goals regarding collaborative responses to RFPs; clearly define collaboration (as opposed to coalitions, prime & subcontractors) in such a way to protect all proposers' rights to respond to RFPs.
 - c. Develop financial documentation methods that maintain sufficient accountability yet reduce red tape. It is time for the County to review various methods and bases for reimbursement and the documentation required for each. Methods developed should be used consistently by all departments.
 - d. Examine the process of determining, updating, and disseminating eligibility determination. Problems with this process are one cause of payment delays to contractors.

III. List of Appendices

Appendix 1: Guidelines for Human Services Contracting

Appendix 2: Input from January 1999 Contractor Interviews

Appendix 3: Input from February 26, 1999 Open Meeting with Contractors

Appendix 1--Multnomah County Human Service Contracting Guidelines

March 18, 1999

PROBLEM STATEMENT	SERVICE GUIDELINES—page 1 of 3	MEASURE
<p>Planning for RFPs</p> <p>It is not clear to contractors how service system planning relates to RFPs (Request for Proposals). Not all proposers feel they have had an adequate chance to participate in planning for the RFP. If they do participate they do not feel their input has made any difference.</p>	<p>1. Each department shall designate which RFPs will go through a planning process and which will not. If there is a planning process the following guidelines apply:</p> <ul style="list-style-type: none"> a. All interested stakeholders are invited to participate in service delivery planning, e.g., systems issues, policy development, and services priorities. b. The decision-making process and authority shall be clearly outlined at the beginning of the planning process. c. The draft assumptions and guiding principles which guide the planning process are stated explicitly, such as: why the service is being contracted; how it relates to the rest of the service system; types of collaboration that will be encouraged; funding or policy mandates; the duration of the contract; and renewal provisions. Assumptions shall include any flexibility or limitations imposed on the department by funding, law, departmental, or Board policy. d. Public input shall be completed at least one week prior to the department forwarding the RFP to Purchasing. e. Actual drafting of the RFP language shall exclude individual contractors to avoid any potential proposer from having an advantage. 	<p>Annual survey of provider satisfaction (Questions 3 & 4) Additional questions to be added to next year's survey.</p>
<p>RFPs and the final contract don't match. If proposers knew during the RFP process the statement of work built into the final contract, they could have prepared a more competitive proposal.</p>	<p>2. RFPs shall specify the degree of flexibility in negotiating the final statement of work. Any significant negotiated change to the proposer's submitted statement of work shall be documented and submitted to the County Purchasing Manager for review prior to contract execution.</p>	<p>Standard will be monitored by the proposed procedure.</p>
<p>RFP Response and Selection</p> <p>Proposers want more contact with and information from program staff while preparing their proposal, but this is limited by the County's desire to give the same information to all proposers.</p>	<p>3. The County routes all RFP questions through the Purchasing Section to ensure that questions are answered without giving any proposer unfair advantage.</p>	<p>Annual survey of provider satisfaction (Questions 6 & 17)</p>
<p>In rating proposals, there is excessive focus on non-substantive detail & steps rather than on overall substance/merit of the proposal.</p>	<p>4. Instructions shall be issued with each RFP that clearly differentiate musts from guidelines in preparing RFP responses. County values and policies, which guide proposal evaluation, shall be included. Evaluation of the RFP responses shall be on program model and overall substance and merit of the proposal.</p>	<p>% of proposals rejected by reason; Annual survey of provider satisfaction (Question 8)</p>
<p>Proposers may be unaware when collaborative proposals are acceptable and encouraged.</p>	<p>5. County RFPs shall allow collaborative proposals unless the department prohibits them for a particular RFP. Specific legal and contractual requirements of collaboration shall be defined in the RFP. In general, collaboration means the involvement of two or more parties to provide an optimal range and integration of services.</p>	<p>Standard is met by current procedure.</p>

PROBLEM STATEMENT	SERVICE GUIDELINES—page 2 of 3	MEASURE
Proposers don't want to submit their administrative qualifications multiple times.	6. The Department of Community and Family Services offers one <u>administrative</u> qualification compliance process (QVSA) for all County human service Class II contracts (Class II = contracts of \$50,000 or more). All Departments use this process to determine proposers' administrative qualifications. Note: <u>Fiscal</u> compliance is still done separately by department. Departments may ask for additional <u>program</u> management information specific to each RFP.	Standard is met by current procedure.
The points which are used to rate RFP responses are not always clearly related to County policy.	7. RFP point assignment shall be clearly related to County policy.	Annual survey of provider satisfaction (No relevant question on 1999 survey)
Contractors don't have adequate time to respond to the RFP.	8. The County shall allow a minimum of 4 weeks to respond to an RFP. As a general rule, more complex RFPs shall allow more than the 4-week minimum. All questions about the RFP must be submitted to the County Purchasing Office no later than 2 weeks before the due date of the proposal. Purchasing must respond to these questions no later than 1 week before the due date of the proposal. If there is a change in RFP specifications, and Purchasing determines that it is substantive, there shall be a minimum of 2 weeks from the time of the change for proposers to alter their proposal.	Annual survey of provider satisfaction (Question 7)
Contract Development There is lack of collaboration in negotiating the contract statement of work. There is not enough time for governing boards of contractors to review and approve the final statement of work.	9. Departments shall allow contractors a reasonable time to negotiate, review, and approve the statement of work and other contract details. The scope of these negotiations shall be within the limits specified by the RFP.	Annual survey of provider satisfaction (No relevant question on 1999 survey)
Contractors are unclear whom they should contact for questions or problem resolution.	10. Each department shall specify a primary person for each contract who is responsible for assuring that contractor problems are resolved. This does not preclude multiple clearly defined points of contact for routine communication.	Annual survey of provider satisfaction (Question 5)
Contracts are not always executed prior to the service start date.	11. All contracts shall be executed prior to the start of services.	Annual survey of provider satisfaction (Question 9)

PROBLEM STATEMENT	SERVICE GUIDELINES—page 3 of 3	MEASURE
<p>Contract Implementation Basic assumptions and requirements of the contract are not clear to contractors.</p>	<p>12. Contracts shall include reference to all basic assumptions and requirements pertaining to both parties of the contract, e.g. reporting requirements, matching, advances, consequences of over and under provision of service, coming in under budget.</p>	<p>Annual survey of provider satisfaction (Question 10)</p>
<p>Various County staff may enter into verbal agreements with contractors regarding operational details. Other County staff may not be aware of and honor these agreements.</p>	<p>13. Each department shall establish systems to record, confirm and internally share verbal agreements made with contractors.</p>	<p>Annual survey of provider satisfaction (No relevant question on 1999 survey)</p>
<p>Contractors may receive insufficient notice to adapt their budget when the County makes policy and funding decisions which change client referral patterns</p>	<p>14. The County shall notify Contractors before implementing policy and funding decisions that change client referral patterns.</p>	<p>Annual survey of provider satisfaction (No relevant question on 1999 survey)</p>
<p>Basis for Payment The County is inconsistent in the way it determines payment standards, e.g., lump sum vs. per unit service.</p>	<p>15. Flexibility in payment methods is desirable to allow the fairest and most appropriate payment method to be used. Departments shall clearly specify in each RFP the method of payment such as flat rate, fee-for-service, or achievement of specified outcomes. Fee-for-service contracts may set specified target outcomes but failure to reach those targets may not be used to withhold payment for services delivered.</p>	<p>Annual survey of provider satisfaction (No relevant question on 1999 survey)</p>
<p>The timeliness and predictability of reimbursement varies.</p>	<p>16. The County or its agent shall make payment within 30 calendar days of billing submission if documentation is complete. Contractors shall be notified of any deficiencies in billing documentation within 10 days of submission.</p>	<p>Annual survey of provider satisfaction (Question 11)</p>
<p>Contract Monitoring The County does not consider provider's existing reporting requirements and does not try to minimize additional unique requirements.</p>	<p>17. The County shall, when possible, accept reports used by other funders or will negotiate use of reporting formats or data elements prepared for other funders. The County's intent is to eliminate unnecessary redundancy between departments and other major funders such as United Way and the State.</p>	<p>Annual survey of provider satisfaction (Questions 12 & 16)</p>
<p>The County does not share data submitted with providers.</p>	<p>18. Data submitted by a contractor, and which is routinely summarized into contract monitoring reports, shall be shared with that contractor. A contractor's proprietary information shall not be shared with other contractors.</p>	<p>Annual survey of provider satisfaction (Question 13)</p>
<p>Data submitted by contractors is not used.</p>	<p>19. The County shall inform providers how data is used in management and evaluation of programs.</p>	<p>Annual survey of provider satisfaction (Question 14)</p>
<p>Contractor's management staff and executive director may not be aware when the County has concerns about contract performance.</p>	<p>20. Department staff shall communicate serious concerns about contract performance to both the chief executive officer and program manager of the contracting agency.</p>	<p>Annual survey of provider satisfaction (No relevant question on 1999 survey)</p>

Appendix 2: Input from January 1999 Contractor Interviews

Memorandum

Date: May 14, 1999

To: Contracts Performance Committee

From: Kay Sohl

Subject: **Provider Interviews and Potential Additional Guidelines**

Overview:

I interviewed Executive Directors, Program Managers, and Fiscal Directors from 12 of the 14 nonprofit providers identified by the Committee. Providers praised the effort to improve contracting relationships, and most felt that the proposed Contracting Guidelines addressed many of the most difficult problems they have confronted in their relationships with Multnomah County. The most frequently praised guidelines were:

- All contracts shall be executed prior to the start of services (#14)
- Each department shall specify a primary liaison for each contract who is responsible for assuring that contractor problems are resolved (#13)

While most contractors felt that County implementation of the guidelines would resolve many of the problems which they have experienced, ten of the twelve contractors interviewed expressed **concern with the guideline addressing pre-planning for RFPs** and how planning is translated into the actual RFP which is issued (#1).

Over half also expressed the desire to see **additional time provided for response to RFPs** beyond the standards expressed in Guideline 8. All agreed that implementing Guideline 10 would constitute an improvement but many urged the County actively address the question of delays in issuing RFPs and to work to extend the response period, particularly for RFPs which require or encourage multi-party collaboration.

Half of the contractors expressed concern about the County's **methods of communicating about problems with contractor performance**. I have included a proposed guideline to address their concerns.

Five of the contractors interviewed expressed concern about the **tracking and honoring of verbal agreements made between the contractor and County program staff** during the course of the contract. I have included a proposed guideline to address this issue below.

Finally, several contractors provided disturbing examples of what appear to be **questionable practices in the rating of RFPs**, either perceived pressure from County staff for raters to change their ratings, or in one instance, an apparent staff decision to delete a rater's scores based on disagreement with the rater's perceptions. I am unclear whether these issues lie within the purview of this committee, and consequently have not developed a proposed guideline to address these concerns.

Proposed Guideline on Documentation of Verbal Agreements:

Problem Statement:

County staff enter into verbal agreements with contractors regarding data collection, data submission, reporting format, service delivery methods, service priorities, etc. These agreements are not documented and subsequently become sources of conflict when other County staff are unaware of the agreements and treat mutually agreed upon performance as unacceptable either in relation to requirements stated in the written contract or in relation to the staff member's perception of unstated requirements.

Proposed Guideline:

Each department shall establish systems to record verbal agreements made with contractors regarding contract performance, data collection, reporting format and requirements etc.

Proposed Guideline on Communication of Performance Problems:

Problem Statement:

Some contractors report that they have experienced department staff telling other contractors or others in the community that a contractor is performing inadequately without communicating this concern directly to the contractor. A variation on this concern was expressed by larger agency contractors who reported that County department staff may be expressing concerns about contract performance to the contractor's program staff but not communicating serious concerns to the contractor's management staff/ executive director.

Proposed Guideline:

Department staff will communicate serious concerns about contract performance to the chief administrative officer of the contracting agency.

Concerns with Preplanning for RFPs

Ten of the twelve contractors interviewed expressed serious concerns with preplanning for RFPs and felt the proposed guideline did not adequately address the problems which they had experienced. Their concerns included:

- Confusion among department staff about what the goal of the planning process is, particularly in relation to which funds will or will not be included in the RFP for which planning is undertaken. Providers who have attended multiple meetings for preplanning report that the message from department staff keeps changing thus frustrating development of coherent plans.
- A perception that preplanning is manipulated to reach results which have been predetermined by County staff.

Half of the contractors expressed the perception that the underlying problem for many of the most frustrating preplanning processes is that department staff are attempting to use the preplanning process and the actual RFPs to address performance problems with existing contractors. They believe that department staff are avoiding challenging poor performance directly with contractors, and instead, attempting to make it impossible for contractors who they perceive as poor performers to obtain funds through the new RFPs.

Contractors Interviewed:

Advanced Behavioral Health
Boys and Girls Aid Society
DePaul Treatment Center, Inc.
Janus Youth Programs
Native American Rehabilitation Association
Oregon Council for Hispanic Advancement
Portland House of Umoja
Portland Impact
Self Enhancement Inc.
Urban League
Volunteers of America

Appendix 3: County Contractors Input to Draft Guidelines

Open Meeting and Written Comments -Summary 3/8/99

Prepared by Kamala Bremer, Independent Contractor

This is a summary of comments from the 2/26/99 Open Meeting, and written comments received by March 5. Comments raised more than once are edited or combined to streamline presentation, using where possible a contractor's own words.

PLANNING FOR RFPs

Guideline #1: Selected RFPs should go through a planning process.

- **a. Interested Stakeholders**
 - May be easier to involve diverse stakeholders including service recipients in an annual program planning process than in planning for each RFP.
 - Use smaller, facilitated meetings to be sensitive to cultural issues of various groups
- **b. Decision Process**
 - Define timeline for planning, and from the end of planning to when the RFP is to be issued
 - The more collaboration needed to deliver the service, the more critical planning effort.
 - The people doing the planning not knowledgeable about issue prior to RFP planning
- **c. Assumptions:**
 - State the overall goal, value that the service guidelines are intended to address.
 - Avoid specifying a service model; give **rational** if changing from an existing service model.
 - Adopt existing quality service standards: other County department's or industry standards.
 - Need for standards around the planning process which speak to use of data,
- **e. Drafting RFP language**
 - Why can't we design the questions during planning? How is that a conflict?

Guideline #2: RFPs should specify contract negotiation guidelines.

- This guideline doesn't address the problem, that the RFP doesn't match the final contract. The "boiler plate" in the contract often doesn't match either planning or RFP. Add a guideline to address how the requirements carry through from planning to the RFP, then to the contract
- The RFP should include all the information that is relevant for the provider to make a decision about applying to provide the service.

Other Issues:

A. Departments should have a “big picture” planning process prior to planning RFPs.

- Good planning should happen prior to the RFP process. Departments should have an overall “big picture” plan, with service recipient, community involvement, and Dept. head involvement. This would specify what services are needed and what RFPs would be needed to procure services.
- Adopt a mission statement and values covering the entire RFP and contracting process.

B. General Procurement Requirements and Process

There may be other approaches to use that are better suited to human services than competitive RFPs, which are seen as too time consuming and complex. State of Oregon Services for Children and Families and City of Portland were cited as having different models that work well for human services.

RFP RESPONSE & SELECTION

Guideline #3: Route RFP Questions through Purchasing.

- Routing through purchasing is a ponderous route and takes a lot of time. Staff who attend contractor meetings need to know the answers to questions.
- We need more time after receiving answers to incorporate into our proposal.

Guideline #4: Differentiate musts from guidelines; evaluate on model, substance, and merit.

- County RFPs are too long and complex. The County should develop a process that uses less contractor time to prepare responses.

Guideline #5: Allow collaborative proposals and define any parameters.

- Planning for collaboration should occur up front, with technical support available during that time.
- Collaboration is hindered by “sub-contracting language” in RFP and by current process.
- Longer timelines are needed for proposals requiring collaboration: 6 to 8 weeks.

Guideline #6: DCFS QVSA process.

Does a contractor have to do this for each department?

Guideline #8: Four-week minimum to respond to an RFP; other timelines.

- Time to respond should vary based on complexity of proposal; for those that are complex or require collaboration, should allow 6 to 8 weeks.
- Having short timelines to respond favors large agencies.
- If there is a substantive change in the RFP, need to allow enough time to change the response.
- Allow enough time to answer/ change the “bugs” in RFP before proposals are due.
- The RFP is often late getting released from the County; having our staff who have other duties available to write the RFP without a clear timeline is a problem.
- Deadline issues are critical. We might want to compete but must determine if we can win it. And at what cost? We may have a good proposal, but it is too expensive to apply.

Other Issues:

A. Procurement Requirements and Process

- The process seems to have been changing – been getting more “humanistic”
- Completing a response is prohibitively expensive for small emerging non-profit.
- Depending on what department you work with, the experience varies; there was some negative input received about specific departments.

C. Scorers/ Raters

- Add a guideline on scoring: Scorer qualifications, selection; predisposition to a specific outcome; assurance of objectivity,

D. Selection

- How do you ensure if provider can deliver what they say they can? RFP looks good, but how to evaluate if they can do it? How do you use the contractor’s past experience in the rating process?

CONTRACT DEVELOPMENT

Guideline #9: Reasonable time to negotiate and develop contract.

- Needs to be clear and predictable; but contracts are often late, with no time left for negotiations.
- What is the process for negotiation: how much is up for negotiation (much of the contract is boiler
- Set out clear goals and outcomes in preparing the RFP; gives more flexible to provider, less negotiation required, less ambiguity
- Requirements keep increasing, but no money is provided to do requirements; this includes reporting requirements, new monitoring (like cultural competency), and compliance recording.

Guideline #10: Primary Liaison specified.

- Different messages given by different people, we get inconsistent answers.
- Have multiple contracts; County needs better communication, coordination, consistent message
- Is one person responsible for program, fiscal and data performance? Is this really best?
- Liaisons should be fiscal-to-fiscal, and program-to-program (going to the expert is OK with group)
- Too much turnover in our assigned contract manager; takes too much time to train and get each new person up to speed; seems to be no value on stability/ expertise of these relationships.

Guideline #11: All contracts executed prior to start of work.

- We are expected to operate and provide services without a contract, or without receiving funds.
- County cycles do not coordinate with contractor cycle; our ability to plan is hampered.
- Consequences: what happens if a contract is not done on time? Do people go without services?

CONTRACT IMPLEMENTATION

Guideline #12: Contracts reference all requirements.

- If goals and measurements clear in RFP – then contracts won't need to be so prescriptive
- It is very important to have clear statement of expectations prior to monitoring
- Reporting requirements need to be more specific and related to service areas – could be an exhibit
- Amend: Language that would describe what County will provide (e.g. technical assistance).
- Amend: Contracts shall reference all basic requirements for both County and Contractor.
- Add standard: Not enough to have requirements in the contract – face-to-face meeting is needed to clarify intent/answer questions. Could be group meeting or individual depending on contract.

Guideline #13: Record and confirm verbal agreements.

- If you have a large contract (multiple users) need to establish who would be responsible for clarifying /documenting verbal agreements.
- This guideline does not address the problem statement – just because it's in writing doesn't mean everyone understands; it requires good communication, ongoing discussion about expectations.

- Amend: The procedure for documenting and communicating verbal agreements should be spelled out in writing.

BASIS FOR PAYMENT

Guideline # 15: Appropriate payment method specified in RFP.

- The County should not require a line item budget of money spent on fee-for-service contracts; this requirement raises administrative costs.
- County should not set payment basis on assumption that contractor will pay contractor's employees less than County employees, and should allow for cost of living increases.
- There should be consistency and clarification or requirements for documentation needed for payment on cost reimbursement.
- Don't require agencies to have a single audit plus be required to submit fiscal documentation.
- Contracts should state if hours or dollars should be rounded up or down, and at what break point.
- Any changes in documentation requirements need to be negotiated by the County and the Agency.

Guideline # 16: Payment made within 30 days. Deficiencies in billing noted in 10 days.

- If the contractor is not notified of a deficiency in billing document within 10 days, then what? The process should be developed.
- If the County arranges for another business/agency to do the billing, that business must follow the same guidelines. Contracted plan administrators cited several problems with long delays on payments. Should hold plan administrators accountable to same 30 day standard.
- The County should notify contracting agencies prior to a) changes in fee or service payment rates and b) amount of payment due to changes in number of clients in the program.
- County's computerized eligibility systems should be consistently updated so that claims are not incorrectly denied; wrongly denied claims should be promptly paid.

CONTRACT MONITORING

Guideline # 17: Accept reports from other funders; eliminate redundancy.

- Has not been the case so far, but good idea; why reinvent every year with more paper?

Guideline # 18: Data shared back with contractor, except proprietary information.

- What does it mean? (need to reword the 1st sentence)

Guideline # 19: Inform providers how data will be used.

- (no comments specifically to this item)

Guideline # 20: Communicate serious concerns about performance to CEO.

- Director and Program manager should both hear about an issue before it gets serious.
- Follow-up letters to the Director are needed to track resolution or non-resolution.

Other Issues:

A. Monitoring Process:

- Contract monitoring not clear, what you're being monitored on, no up front accountability measures subject to personal whim
- The contracting process varies by department/division. Standards should be applied consistently.
- Contract monitoring is nonexistent; staff do not visit, or when they do, don't provide a report.
- The program staff of the County should visit the site at least once a year to see what they're buying. There should also be a maximum number of visits – no more than twice a year. If issues
- Would like timely, shared, useful monitoring – not an adversarial relationship, more collaborative
- Directives regarding monitoring should be written, not verbal, and be considered collaboratively as to reasonableness, deadlines, problem resolution
- New requirements for reporting shouldn't be added without compensating contractor for added cost of compliance.
- need to examine how to evaluate programs, link performance to outcomes/ benchmarks.

B. Data Management:

- Contractor's information technology capacity limits our response to County requirements; RFP should allow for purchase of necessary hardware/ software.
- City/County should have standardized e-mail, and common standards for office technology.
- Data systems don't measure whether the problem (that the RFP was issued to solve) is being solved; need to look at impact of the services.
- If we have to submit reams of data let's make it useful and collaborative; too often the data is lost and we have to resubmit; too often no useful information is produced or disseminated.