

CITY OF ALBANY

Office of Audit and Control

Performance Audit of the Minority- and Women- Owned Business Enterprise & Labor Utilization Programs

**Audit Report
September 2012**

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PREFACE

The Office of Audit and Control exists to provide oversight, transparency and public accountability as a means to improve City services. This performance audit is a part of that function.

When the Office of Audit and Control takes on an audit client and, absent evidence of misconduct, that client addresses the audit's findings; it is our commitment to support and encourage their use of the audit process to improve their operations.

This audit was conducted with the full cooperation of the Office of Equal Opportunity and Fair Housing and the Acting Commissioner has committed to addressing its findings.

The proper use of the audit findings in these circumstances is to provide for oversight of the resulting changes and as the basis for informed public policy discussions.

Given that the Office of Equal Opportunity and Fair Housing has given their full cooperation, it would be unfair and damaging to the audit process for this audit's findings to be used for political gain. As such, the Office of Audit and Control will view the political use of this audit's findings as detrimental to our mission.

We thank the Office of Equal Opportunity and Fair Housing for their cooperation and commitment.

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Executive Summary

This report presents the results of the audit of the City's Minority- and Women-owned Business Enterprise (MWBE) and Minority and Women Labor Utilization Plan (MWLUP) programs (the Program). The City Code charges the MWBE Program with ensuring that Minority- and Women-owned businesses have the maximum opportunity to participate in the performance of the City's construction and construction-related contracts. It also sets goals for female and minority labor utilization for these same projects.

MWBE programs hold the potential to spur economic development in disadvantaged communities and populations. MWBE firms are able to use these programs to gain important experience working on government projects.

Regardless of the economic impacts, once such programs are in place, it is important that they be well administered because poor administration can generate tensions between disadvantaged communities and city government. A poorly run program can easily be pointed to as evidence of a lack of concern for minority and women's issues.

The audit team found that the Program is doing a good job of encouraging MWBE participation and there is reasonable assurance that the Program is achieving its MWBE goals. Furthermore, feedback about the Program from the MWBE firms and the contracting City departments was entirely positive.

Despite these achievements, the Program is not adequately tracking labor utilization rates and its reporting to the Common Council is inconsistent and incomplete. Additionally, key information required by the Program's policies was absent from some of the project files.

This audit concludes that the central challenge facing the Program is a lack of timely and complete paperwork submissions from contractors and other departments. Without the proper reports and their information, Program staff cannot effectively or efficiently track and improve contractor performance or overall program performance. It is the Program's responsibility to enforce contractor compliance with its policies.

The central challenge facing the Program is the lack of timely and complete paperwork submissions from contractors and other city departments.

The Program can improve its procedures to increase the likelihood of receiving the right information in a timely fashion.

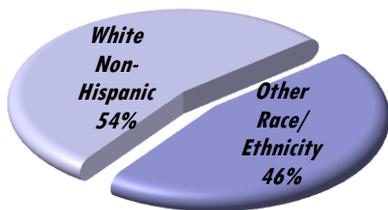
Background

This audit of the City's Minority- and Women-owned Business Enterprise (MWBE) and Minority and Women Labor Utilization Plan (MWLUP) programs (the Program) was scheduled as part of OAC's 2012 Audit Plan.

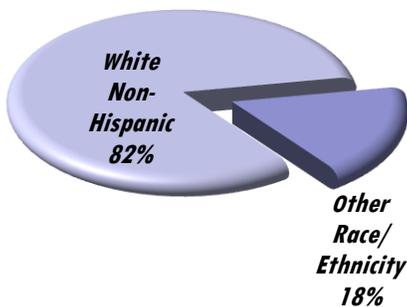
The MWBE and MWLUP programs are established in City Code Article II under the city's EEO/Human Rights Commission. The Code charges the MWBE Program with ensuring that Minority- and Women-owned businesses have the maximum opportunity to participate in the performance of construction and construction related contracts let by the City, its agencies and its authorities. While the Code does not spell out the purpose for the MWLUP Program, such programs exist to ensure women and minority labor is utilized to the fullest extent possible.

The City's EEO/Human Rights Commission Office, with a staff of two and a 2011 budget of \$133,056, implements and oversees the MWBE and MWLUP programs. The Program's Compliance Coordinator position, created by City code, carries out the City's MWBE program while the Program's Program Assistant oversees the City's internal EEO hiring and outreach functions.

City of Albany 2010 Population



Capital District 2010 Population



Program Importance

Effective MWBE and MWLUP programs can have direct economic benefits for the City of Albany. While there is no guarantee that the beneficiaries of the programs will be Albany residents, the demographic concentration of minorities in the City of Albany (over 40% of the population), make the odds much higher. Additionally, Census data shows that minorities and women in the Capital Region are significantly more likely to live in poverty.

MWBE programs hold the potential to act as an incubator for small disadvantaged businesses. MWBE firms can use the program to gain important experience working on government projects to build portfolios that can showcase their capabilities, establish relationships with larger contractors, and grow more competitive.

Regardless of the economic impacts, once such programs are in place, it is important that they be well administered because poor administration can generate tensions between disadvantaged communities and city government. A poorly run program can easily

be pointed to as evidence of a lack of concern for minority and women's issues.

Program Requirements & Procedures

The City's MWBE & MWLUP Programs are required by City Code to:

- *Maintain a central directory of MWBE firms for bid notification, referrals and for negotiating contracts and subcontracts with construction projects;*
- *Identify MWBE firms capable of engaging successfully in a competitive bid process for the procurement of construction and construction-related projects;*
- *Discontinue and disqualify contractors and subcontractors when violations of policy and performance agreements occur;*
- *Report to Common Council bi-annually as to the attainment of the Program's goals;*
- *Strive to attain a minority and women labor utilization rate of 17.8% of hours worked.*

In addition, through an administrative policy the City adopted a minority and women-owned business participation goal of 7.5% of total contract dollars spent.

The MWBE Program currently maintains the City's central directory of over 60 qualified MWBE firms eligible to participate in the program. The directory contains MWBE firms qualified to work in many specialties and Program staff seek to fill in gaps or short-comings in the list. The Program has also recently begun to fast-track the application process for firms already on New York State's list of eligible MWBE businesses.

MWBE Program staff takes part in, and at many times facilitates, regular information sharing and networking events to disseminate information about contracting opportunities with the City. Such events are also to get local actors together, from different levels of business and government, to network and build relationships.

The Compliance Coordinator acts as a mediator when issues arise between prime contractors and MWBE subcontractors on projects tracked by the Program.

For significant instances of contractor noncompliance, sanctions are the Program's primary tool. Contractors that fail to comply with City regulation can be restricted from participating in the City's

The Program goals:

- **MWBE participation of 7.5% of construction related dollars spent**
- **MW Labor Utilization of 17.8% of construction related hours worked**

contracting process for a period of time, or banned completely from further participation.

The City's current MWBE goal is for 7.5% of all combined monies spent on construction and construction related projects are to be paid to minority and/or women owned and operated firms. The City's MWLUP goal is for 17.8% of the hours worked on each project are to be performed by women and/or minority workers.

In instances where compliance cannot be reached, and the prime contractor is deemed by the Program to have made a "good faith effort" to achieve compliance, the Program can issue a waiver.

Alternatively, the Program staff can identify areas of the contract that may be excluded from the City's goals. For example, consider a contract that contains the purchase of a large piece of equipment and the labor-intensive process of installation. Should no MWBE firm be identified that sells the equipment, the cost of the equipment purchase could be exempt from the City's goals and the Program would focus on achieving MWBE and MWLUP goals on the installation alone.

Tracking Compliance

Tracking and encouraging MWBE & MWLUP compliance requires regular and timely paperwork submissions. Contractors are required to submit a MWBE Subcontracting Report monthly, which details payments made to minority- and women-owned subcontractors for the month. Both contractors and subcontractors are required to submit monthly MWLUP reports as well as supporting documentation in the form of certified payroll reports.

When the Program receives the required paperwork complete and on time, it is able to closely monitor MWBE subcontractor participation and the progress being made toward a project's goals. This allows Program staff to take a proactive stance when it notices potential shortfalls in goal achievement. Phone calls can be made, questions can be asked, and issues can be handled as they arise.

When a contractor submits project paperwork directly to a department there can be a significant lag-time before it is received by MWBE Program staff. Department Engineers need to verify that projects are meeting technical specifications. The City departments

also need to review the projects and ensure they are progressing on schedule and on budget. If site inspections are being performed on projects, the sign-off from those staff members may also be needed. During these processes, information vital to tracking and correcting MWBE compliance may sit for several days to weeks before getting to Program staff, and during this time the project is moving closer to completion.

Documents received in week seven of an eight week project offer limited time for Program staff to take action. Should those documents point to shortfalls in MWBE or MWLUP participation, there would be little-to-no time left for staff to work with contractors to bring up their participation numbers. What should be a proactive monitoring activity, working with contractors to ward off issues before they flare-up, can be reduced to a reactive activity, focusing on putting out fires and salvaging what participation is possible.

Scope, Objectives and Methodology

Scope

The scope of this audit encompassed the City of Albany's Minority- and Women-owned Business Enterprise (MWBE) & Minority and Women Labor Utilization Plan (MWLUP) programs from January, 2010 through March 29, 2012.

Objectives

The objective of the audit was to determine whether the Program's current policies & procedures are adequate to achieve Program objectives by:

1. Determining the City's effectiveness in meeting MWBE and MWLUP regulatory requirements.
2. Determining the City's effectiveness in meeting MWBE and MWLUP goals as set by law or administrative policy.

These audit objectives address two important facets of the MWBE and MWLUP programs and contracting processes.

One: Is the City currently performing the tasks as required by existing regulations?

Two: Is the City meeting or exceeding the participation goals set forth by law or administrative policy?

This Audit's Core Questions:

- ***Is the City performing the tasks as required by existing regulations?***
- ***Is the City meeting or exceeding the participation goals set forth by law or administrative policy?***

Methodology

This performance audit was conducted in accordance with generally accepted government auditing standards (GAGAS) issued by the U.S. Government Accountability Office (GAO.) Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions.

The overall audit methodology consisted of the following:

- Identifying the compliance requirements for the City's MWBE & MWLUP programs.
- Collecting, reviewing and evaluating Program data, documentation and files.
- Conducting meetings and interviews with personnel from the Program, as well as from other City Departments that have a role in the City's MWBE & MWLUP contracting processes.
- Quantifying the City's level of success in reaching or exceeding the goals of the MWBE & MWLUP programs.

Objective 1 Methodology: In order to determine the City's effectiveness in meeting MWBE and MWLUP regulatory requirements,

The audit team reviewed Federal, State and City laws and regulations regarding MWBE and MWLUP programs to determine which, if any, regulations the City is required to comply with.

After researching and compiling a list of regulations and requirements, OAC reviewed the City's contracts, and their funding sources, to determine which of the City's contracts are required to comply with the various regulations.

The audit team then compared the requirements with the Program records to determine whether the requirements are being met.

Objective 2 Methodology: In order to determine the City's effectiveness in meeting MWBE and MWLUP goals as set by law or administrative policy,

The audit team reviewed the Program's contract files, invoice packets, reports and other records in an effort to quantify the City's level of MWBE and MWLUP goal achievement.

Information essential to determining MWLUP compliance was absent from the Program's files. Program policy requires contractors and subcontractors to submit certified payroll reports monthly along with MWLUP participation reports. OAC found that, in some cases, this required documentation was not on file.

In response to gaps in the MWBE paperwork submitted by contractors, the Compliance Officer overcomes this challenge by verbally attaining information on payments made to MWBE subcontractors to verify contractor compliance.

To verify MWBE goal compliance, OAC staff chose a number of construction projects and made phone calls to the MWBE subcontractors reported to have participated. During these calls, OAC verified that the MWBE firms worked the projects in question and the amount of payment received. Feedback was also taken on the City's program.

Due to contract handling process delays the audit team was unable to fully achieve this objective.

Audit Results

The Program is not yet tracking the labor utilization rates or submitting timely and complete biannual reports.

Program staff is doing a good job of encouraging program participation and there is reasonable assurance that the Program is achieving its MWBE goals. However, it is not yet tracking the program's labor utilization rates or submitting timely and complete biannual reports. Additionally, key information required by Program policy and procedures was absent from some of the project files.

While the Program successfully identifies the contractors' MWBE goal attainment its method of verifying and tracking that attainment is inefficient. Program staff calls each MWBE firm to verify and collect information regarding their participation on projects. They are forced to do this because of the lack of complete paperwork received by the office. This issue of timely, comprehensive paperwork receipt is the core challenge the Program faces.

MWBE and MWLUP paperwork is usually submitted directly to the departments with the contractor's invoices for payment. At the departmental level, the approval process for those submissions can, appropriately, take a significant amount of time. If the Program's paperwork is not forwarded immediately to the Program office it often arrives too late for proactive action to be taken to address compliance issues.

During interviews, the staff in related departments understood the basics of the MWBE and MWLUP programs, the pre-award duties and goals thereof. They also understood what paperwork is required by the Program after the contract is let. What they were not keenly aware of was the time-sensitive nature of MWBE and MWLUP contractor reporting.

The MWBE firms contacted during the audit all provided positive feedback about the program.

One contractor said that in conversations with another local municipality, they used the City of Albany as an example of a good MWBE program.

While all staff interviewed expressed interest in smoothing the MWBE paperwork-handling process, many expressed the desire to look at the contract process within their departments as a whole, to examine and identify ways to stream-line their processes and reduce processing and handling time. The departments are to be commended for taking the initiative to look into making positive changes to their contracting processes.

When contacted, the feedback from MWBE firms was all positive. The City's MWBE Program, as well as the Compliance Coordinator received multiple compliments. One contractor said that in a conversation with another local municipality, they used the City of Albany as an example of a good MWBE program.

Observations:

The following observations are not findings, but do contain recommendations that could benefit the MWBE and MWLUP Programs.

Observation 1: The Program does not have a standardized and documented "good faith effort" policy.

The 2010 disparity study, *The State of Minority- and Woman- Owned Business Enterprise: Evidence from New York* by NERA Economic Consulting shows that there are still disparities among gender and racial demographics in the number of New York businesses. The study makes several program recommendations to the State that could be beneficial if adopted by the City of Albany.

The NERA report states that a more focused approach is required regarding “good faith efforts” made by prime contractors. NERA suggests that “uniform standards for demonstrating good faith efforts must be adopted” so that bidders and staff have clear guidelines about when good faith efforts have been met. Good faith efforts made to meet goals should also be documented when waivers are granted.

Program staff say they have already begun the process of reviewing the City’s MWBE and MWLUP waiver process and is working on a system of standards to quantify “good faith effort”.

Obs. 1 Recommendation: Continue working to standardize the City’s “good faith effort” policy

Observation 2: The City’s MWBE participation goal (7.5%) was set years ago and may need updating.

Program staff and Corporation Council have said that the City’s 7.5% MWBE participation goal was set using a disparity study of New York’s minority businesses years ago. Now that the new disparity study is available, it may be time to revise the City’s MWBE goals.

Obs. 2 Recommendation: Review the City’s MWBE participation goals and revise/update them as needed.

Observation 3: MWBE firms cannot count their own participation toward the City’s MWBE goals.

Among the report’s recommendations NERA “recommend that the State allow M/WBEs to count their own participation toward the contract goal” as “[t]his permits the firms to grow and enhance their capabilities. It also mirrors the practice in the USDOT DBE program.”

Obs. 3 Recommendation: Consider allowing MWBE firms to count their own participation toward contract goals in cases in which they are the prime contractor.

Observation 4: The City's MWBE and MWLUP programs are not represented on the City's website.

The City's website does not contain information regarding the MWBE and MWLUP programs, nor are the MWBE or MWLUP forms available for download through the website.

Placing MWBE and MWLUP information and forms on the City website would make compliance easier for contractors.

The lack of an online presence limits the visibility of the Programs and ignores a method of easily communicating the Programs' missions, goals and achievements to contractors, MWBE firms, and the City's citizenry.

Obs. 4 Recommendation: Work with the appropriate staff to get MWBE & MWLUP information added to the City's website. Consider adding the proper forms that are required monthly, and their instruction to the site so that contractors can be directed there. Consider utilizing some form of electronic submission for monthly paperwork to make it easier for contractors to get the forms to the Program in a timely fashion.

Audit Findings:

Finding 1: Some required paperwork was found not to have arrived in the Program in a timely fashion.

In order to effectively coordinate compliance with the MWBE and MWLUP programs, Program staff needs to receive contractor reports in time to facilitate corrective action if compliance is not being achieved.

Many monthly utilization reports and certified payroll reports were found to have arrived in the Program well after the reporting deadline.

Contractors, at times, are not submitting their paperwork in a timely fashion. In some cases, contractors hold off on submitting their monthly reports until they submit an invoice requesting payment.

Most MWBE and MWLUP reports are submitted directly to the contracting departments and not to the Program. Staff members from those City departments have not always been aware of the time sensitive nature of tracking and monitoring MWBE and MWLUP compliance. As a result, the departments often wait until after their own approval processes are complete to send the paperwork to the MWBE Program.

Due to these problems, contractor compliance issues may not be recognized until it is too late to take corrective action. Additionally, limited staff resources are spent tracking down and obtaining missing information.

To alleviate these issues, stricter controls over the process need to be in place. The Program should require contractors to submit their monthly MWBE and MWLUP information directly to the Program's Compliance Officer when they are due. This should be a separate activity, independent of contractor submissions of invoices to City departments for their review. This will provide the Program more time to monitor compliance and intervene early when issues are identified.

Invoicing and MWBE reporting are separate activities with separate schedules.

Contractors should submit their MWBE and MWLUP reports directly to the Compliance Officer instead of submitting them with their invoices.

Recommendation 1: Require contractors to submit all Program reports and required documentation directly to the Program's Compliance Officer. Ensure that City Departments are aware of this change and require them to immediately forward any submissions they receive from contractors in error.

Recommendation 2: Develop and implement a procedure for the Compliance Officer to alert staff in the accounts payable process when a contractor fails to submit the required information. Staff can place a hold on that contractor's invoices until the information is received.

Recommendation 3: Communicate, on an ongoing basis, the importance of timely paperwork submission to contractors. Closely track submissions deadlines and follow up with contractors when deadlines are missed.

Finding 2: The Program is not consistently receiving the paperwork and information needed to track, verify and report on MWLUP goal achievement.

MWLUP reports and certified payroll reports are missing from some of the Program's project files, while some of the submissions that are received do not provide adequate information.

The City Code directs contractors working on City projects to "[s]trive to attain a minority and women labor utilization plan of 17.8%" of hours worked on a project. The Program is responsible for tracking and reporting on these goals yet the information required to do so often does not arrive as needed. As a result, the MWLUP program's

goal attainment is unknown and is not being fully reported to Common Council, as required.

In some instances, the missing paperwork is due to contractors failing to submit it. In other cases the paperwork bypassed the MWBE Program and went through the payment process without the Program's knowledge.

Contractors report on MWLUP goals when they submit their monthly Minority and Women Labor Utilization Reports to the City. Contractor submitted certified payroll reports are used to verify the information on the monthly MWLUP Reports. To be useful for the City's purposes certified payroll submissions must contain racial and gender demographic information. This information is not always present on certified payroll reports.

Without the proper reports, and their information, Program staff cannot effectively or efficiently track contractor performance, or overall program performance. This has resulted in a lack of tracking and reporting of contractor and program compliance and goals.

Recommendation 1, explained above, will address occurrences in which contractors submit their paperwork late, or fail to submit their paperwork at all. That recommendation will also remove the contracting departments from the MWBE and MWLUP compliance process, alleviating the associated issues.

Recommendation 4: Require contractors to submit certified payroll reports with racial and gender demographics. Communicate to contractors the importance and purpose of the certified payroll submissions.

Recommendation 5: Closely track all pertinent reported information to provide adequate oversight of project and program performance. Use the information attained to report to the Common Council on MWLUP participation and goal achievement.

Recommendation 6: Revise the Program forms and their instructions to ensure better compliance and the inclusion of all required information.

By closely tracking Contractor's reports, the Program staff can avoid the inefficient task of trying to collect goal attainment information after the projects are complete.

Finding 3: Report(s) to Common Council have not been submitted biannually as required by the City Code and do not include all required elements.

Regular reporting allows City leaders to assess the overall success of the programs, address any problem issues that arise, and ensure the City and its administration are held accountable for program performance.

City Code § 48-14, Minority Business Enterprise Standards, section E, states that “[t]he Albany MWBE Officer shall biannually submit a written report to the Common Council on or before April 1 and October 1 of each year”.

For the time period encompassed by the scope of this audit the required number of reports to Common Council were not submitted as per City Code.

If the previous recommendations are implemented, the Compliance Officer should have goal-attainment information readily available for the biannual reports.

The absence of important information from submitted (and not submitted) MWBE and MWLUP contractor reports makes reporting on program performance difficult and sometimes impossible. After enacting the previously mentioned recommendations, proper monitoring and reporting should become much easier.

The most recent report to Common Council only identified an estimate of economic and employment opportunities for minorities. Specific information on goal achievement at the programmatic and project level would improve upon the reporting. If the prior recommendations are implemented, the Compliance Officer will have this information readily available. The addition of that information would give Common Council and City administrators a better view of the programs and would easier highly both problem issues and Program successes.

Recommendation 7: Create and submit the biannual reports as required by City Code § 48-14. Include MWBE and MWLUP goal attainment information at both the programmatic and project level.

APPENDIX 1-A

Management Response



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JOHN J. REILLY
CORPORATION COUNSEL

To: Hon. Leif Engstrom, Chief City Auditor
From: Acting Commissioner, Tara B. Wells, Esq.
Date: October 1, 2012
RE: Response to Performance Audit of the Minority- and Women-Owned Business Enterprise & Labor Utilization Programs

In accordance with the Albany City Charter, the Office of Audit and Control (OAC) conducted a performance audit of the City of Albany Minority and Women-owned Business Enterprise (MWBE) & Minority and Women Labor Utilization Programs (MWLUP).

The audit recognized the progress that has been made by the Office of Equal Employment Opportunity and Fair Housing (hereinafter "Office"), in conducting outreach, educating stakeholders and ensuring the participation of MWBE's on City let construction and construction related projects. The Audit also points out that feedback about the Program from MWBE firms and other City Departments was entirely positive. While it is evident that the Program is doing well in these key areas, the audit did identify that the central challenge facing the Program is a lack of timely and complete paperwork submissions from the contractors and other departments and without proper reporting the Program staff cannot effectively track and improve contractor performance or overall program performance.

In that regard, the Office offers the following responses to the Office of Audit and Control's three findings:

I. Finding #1

Some required paperwork was found not to have arrived in the Program in a timely fashion.

Response

The Office concurs with this finding. The Office acknowledges that in order to coordinate compliance it needs to receive contractor reports in a more timely fashion.

One of the biggest challenges facing the Office is that monthly utilization reports and certified payrolls are often received near the end or upon completion of a project, thus making corrective action difficult.

Over the next twelve (12) months, the Office will continue to work towards training the various City Departments and contractors regarding the City's MWBE AND MWLUP goals and the importance of timely reporting. Additionally, the Office will make sure that more information about the City's MWBE and MWLUP Programs are more readily available at the City Clerk's Office and the City's website.

The Office will further stress the importance of requiring all contractors to submit timely invoices, with all proper documentation, at the conclusion of every month. All bid manuals will include language to put all prospective bidders on notice that no invoices will be paid unless a duplicate copy is sent to the Program's Compliance Officer. No invoice should be approved until compliance is confirmed by the Compliance Officer. Finally, the Office will develop a system which alerts all staff involved in the accounts payable process as to which contracts have an approved MWBE and MWLUP component to assist in ensuring that the compliance is confirmed prior to payment.

II. Finding #2

The Program is not consistently receiving the paperwork and information needed to track, verify and report on MWLUP goal achievement.

Response

The Office concurs with this finding. As stated in the response to finding #1 above, the Office acknowledges that in order to coordinate compliance it needs to receive contractor reports in a more timely fashion. Again, the biggest challenge facing the Office is that monthly utilization reports and certified payrolls are often received near the end or upon completion of a project, thus making corrective action difficult.

The Office would like to reiterate that it will take the same corrective actions as stated above in the response to finding #1. Within the next six (6) months, the Office will streamline its reporting forms to make it easier for contractors and City staff to report and compile the data being presented in the forms. In addition, the Office will continue to exercise its enforcement powers under the City Code for those contractors who fail to report timely or come in compliance with the City's goals. Finally, the Office believes that faster availability of information from contractors will enable the Office to submit its reports to the Common Council in a more timely fashion.

III. Finding #3

Report(s) to the Common Council have not been submitted biannually as required by the City Code and do not include all required elements.

Response

The Office concurs with this finding. As a result of the delay in information being received by the Office, it has been difficult to submit reports to the Common Council in accordance with the time frames mandated by City Code. Upon implementation of the changes outlined in the previous responses, it should become easier to meet the reporting requirements in a more timely fashion. Further, the reports will be able to include actual empirical data regarding subcontracting and utilization. The ability to highlight true percentages for participation will show the success of the program.

IV. Conclusion

The Office is confident that by implementing the performance audit recommendations regarding reporting requirements, updating program documents, and clearly communicating procedural changes and program expectations to staff and contractors, it will enhance the quality of the Program and its ability to monitor compliance activities.

The EEO/Human Rights Office would like to thank you and your staff for your effort to ensure this process was conducted in a professional and timely manner.