



**ANNUAL REPORT OF THE
CHICAGO PROCUREMENT REFORM
TASK FORCE**

March 1, 2017

EXECUTIVE SUMMARY

The Procurement Reform Task Force (PRTF) was announced in May 2015 and tasked with developing recommendations to make procurement and contract management at the City and its Sister agencies more uniform, efficient and cost effective, while increasing accountability. Co-chaired by City of Chicago CPO Jamie Rhee and Inspector General Joe Ferguson, its goal was to distinguish successful practices, identify areas for improvement and promote a greater level of uniformity across City government and each participating Sister Agency. Participating Sister agencies include o City of Chicago Department of Procurement Services, City Colleges of Chicago, Chicago Housing Authority, Chicago Park District, Chicago Public Schools, Chicago Transit Authority, and the Public Building Commission. A report, issued on November 17, 2015, detailed findings and recommendations intended to further current efforts to ensure that the policies and practices of the City and Sister agencies support competition, efficiency, transparency, integrity, and uniformity in procurement.

On January 13, 2016, an ordinance was passed authorizing an intergovernmental agreement for all Participating Members to work cooperatively to implement recommendations identified in the November 2015 report. Additionally established was a CIO Committee to address necessary improvements in technology and procurement systems. The IGA stipulated that the PRTF will deliver quarterly status report to the Mayor, an annual progress report to City Council and participate in a public hearing of City Council to discuss the Annual Report. In addition, the City's Inspector General will make an annual independent evaluation of progress.

Upon the release of the November 2015 recommendations, the Participating Member agencies worked diligently with their legal counsel and/or boards on the completion and implementation of Immediate Recommendations #1 through #15, as outlined in the 1Q2016 Status Report of the PRTF. The 2Q2016 Status Report focused on the advancement of Mid-Term Recommendations #16 through #27. The recommendations reflect a cross-section of procurement issues that impact both the vendor community and each government agency. The 3Q 2016 Status Report included an implementation checklist reflecting the completion status across each Immediate and Mid-Term Recommendation for each Participating Member.

As of today, the PRTF Member agencies are proud to announce that 11 out of 15 Immediate Recommendations have been implemented. The agencies continue to focus on the advancement of all the Mid-Term Recommendations 16 to 27.

This Annual Report includes a summary and implementation checklist reflecting the completion status across each Immediate and Mid-Term Recommendation for each Participating Member. To view all of the PRTF reports released to date, visit www.cityofchicago.org/prtf.

RECOMMENDATION STATUS UPDATES

The PRTF recommendations, developed in collaboration with the Office of Inspector General, were intended to further current efforts to ensure that the policies and practices of the City and Sister agencies support competition, efficiency, transparency, integrity, and uniformity in procurement. They outline actions to streamline operations, reduce redundancies, and enhance resource management across the City and its Sister Agencies.

The PRTF Members have created programs to increase the pool of bidders on City contracts, incentivize the use of small minority and women-owned businesses, build capacity of local businesses, and encourage the employment of local residents. The PRTF members are working hard to have a local impact at all levels of the procurement and contracting process, developing innovative programs that affect prime contractors, subcontractors and individual residents.

The recommendations have been categorized into Immediate, Mid-Term, and Long-Term Recommendations. This annual report reflects the advancement of the Immediate and Mid-Term Recommendations.

IMMEDIATE RECOMMENDATIONS (1 TO 15)

Recommendation #1	Create a Committee of the Participating Members’ CPOs to rule on certain administrative decisions, address obstacles to coordination, and ensure best practices across the City and its Sister agencies.
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- ✓ Lead Agency: City
- ✓ Recommendation Complete
- ✓ CPO Committee started with Participating Member CPO’s included from the following (7) participating Sister Agencies:
 - City of Chicago Department of Procurement Services (DPS)
 - City Colleges of Chicago (CCC)
 - Chicago Housing Authority (CHA)
 - Chicago Park District (Parks)
 - Chicago Public Schools (CPS)
 - Chicago Transit Authority (CTA)
 - Public Building Commission (PBC)

Recommendation #2	Charge the CPO Committee with addressing the Task Force recommendations, tracking their implementation, and issuing quarterly progress reports.
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- ✓ Lead Agency: City
- ✓ Recommendation Ongoing

In December 2015, the CPO Committee of the PRTF was established. The meeting was hosted at the City of Chicago Department of Procurement Services (DPS) and attended by the CPOs of all Participating Members (CCC, CHA, Parks, CPS, CTA and PBC). The focus of the meeting was to determine an action plan for implementing the recommendations. To ensure ongoing progress towards reporting milestones, the Participating Members have maintained a biweekly meeting schedule. Each Immediate Term recommendation was assigned a lead agency to manage the data collection, analysis, and draft agency consensus/implementation plan.

On January 13, 2016, Chicago City Council passed an ordinance for an intergovernmental agreement for all Participating Members to work cooperatively to implement recommendations

identified in the original report of Findings & Recommendations. Each of the Participating Members have signed off on the IGA and established a similar agreement at their organization.

The IGA and related Sister Agency agreements stipulate that the PRTF will deliver quarterly status reports to the Mayor, an annual progress report to City Council, and participate in a public hearing of City Council to discuss the Annual Report. In addition, the City’s Inspector General will make an annual independent evaluation of progress.

To facilitate the work of the CPO Committee, a PRTF SharePoint site was created as a repository for shared information among all of the Participating Members.

To date there have been three Quarterly Reports completed since the initiation of the Procurement Reform Task Force. To view all of the PRTF reports released to date, including this Annual Report, visit www.cityofchicago.org/prtf.

Recommendation #3	Establish minimum standards by which all Participating Members will publish their anticipated sole source awards, receive public and vendor feedback, and make decisions about whether a solicitation is necessary.
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- ✓ Lead Agency: CTA
- ✓ Recommendation Completed
- ✓ Recommended Policy & Procedure Implemented across (7) participating Sister Agencies

In a survey of the Participating Members, it was determined that only the City and CPS publicly post sole source notices online in advance of any approval of a contract award. Further, only the City and CPS have a review committee that makes a recommendation to its CPO regarding sole source awards.

Requiring that proposed sole source awards be posted online in advance of approval in order to allow vendors the opportunity to comment on whether other vendors can supply the good or service provides the agency with a solid control over the improper use of sole source procurements. Additionally, creating a Non-Competitive Review Committee that reviews the appropriateness of a sole source award would reduce, if not eliminate, the possibility that sole source awards would be improperly awarded.

Therefore, it is the recommendation of the CPO Committee that each of the Participating Members begin to post their proposed sole source procurements online and create a Non-Competitive Review Committee. It is further recommended that the Participating Members follow the procedures outlined below:

Policy

All sole source procurements (Sole Source) will require a Justification for Non-Competitive Procurement Application (Application) and approval by the Non-Competitive Review Committee (NCRC) prior to award.

All proposed Applications will be posted on the Agency’s public website for a period of three (3) weeks. During this period, the public will be invited to comment and/or object and make a substantive claim that the procurement is not a Sole Source.

All public comments and/or objections will be provided to the NCRC. The NCRC will take into consideration the justification and supporting documents from the using department requesting the Non-Competitive Award, as well as the justification of the vendor and all public comments when reaching its decision. If the NCRC approves the Application, then the Procurement Department will prepare a Sole Source contract for the vendor and route the recommendation for

approval. If the NCRC rejects the Application, then the Application will be returned to the user department for a resubmission as a competitive procurement.

Procedures

1. User departments must create a request/requisition and submit a complete justification package to be considered by the NCRC.

User departments should be highly cognizant that the entire sole source process may take 8 to 12 months and should prepare accordingly; the fact that an existing contract is about to expire is not sufficient justification for approval by the NCRC.

2. Justification packages must include, at a minimum, the following requirements:
 - Application
 - Justification detailing the rationale and necessity for the procurement as well as the estimated cost and term of the agreement/contract
 - Signed funding memo (if applicable)
 - Scope of work
 - Complete, written justification from the vendor (on vendor letterhead) detailing the reasons why they are considered the exclusive and unique provider solely capable of supplying the goods/services
 - Required Compliance plan
 - Insurance Certificate, if applicable
 - Ownership Disclosure
 - List of user department's personnel participating in the NCRC meeting
 - If applicable, a current and valid price quotation for the goods and/or services, on the vendor's letterhead
 - Any applicable grant agreements or other benchmark information the user department deems relevant to its request
3. Applications will be publicly posted on agency website for a minimum of three (3) weeks.
4. If there are public objections and/or comments, those objections/comments will be forwarded to the NCRC to be considered as part of their review.
5. After a minimum of three (3) weeks, the Application is removed from the Agency's website.
6. NCRC convenes to review and approve or reject the Application.
7. Approved Applications are scanned to Agency's internet site.
8. Rejected Applications are returned to the user department for resubmission as a competitive procurement.
9. A copy of the approved justification package will be forwarded to the appropriate Procurement personnel for processing.

Recommendation #4	Hire or secure pro bono services from a law firm to: (a) Identify contract provisions that could be subject to standardization across Participating Members' templates, and draft uniform contract templates incorporating the required terms of the Participating Members, including contract duration and number of renewals and (b) Where appropriate, standardize solicitation documents issued by Participating Members and the documents required in response.
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- ✓ Lead Agency: City
- ✓ Recommendation Ongoing

Pro bono services have been secured from Clark Hill PLC to identify contract provisions that could be subject to standardization across Participating Members' templates, and draft uniform

contract templates incorporating the required terms of the Participating Members, including contract duration and number of renewals.

All Participating Members provided Clark Hill with their boilerplate construction, commodities, and/or professional services contract templates. Clark Hill has completed standardized commodities and professional services Master templates.

In addition to the master templates, Clark Hill is developing “Additional Provisions” templates for each of the Participating Members to incorporate those provisions that are specific to a Participating Member and should not or cannot be included in the master templates. These templates will supplement the master templates; both types of templates will be formatted so that material can be easily removed, depending on what is needed for a particular contract. Significant progress has been made on all of the Additional Provisions templates, many of which are also complete.

Clark Hill’s current focus is on completing the construction Master template. Circulation of the Master templates as well as any completed Additional Provisions templates to the Participating Members for review and comment is expected to occur in the coming months.

Recommendation #5	Charge the Chicago Government IT Coordination Committee (ITCC), which consists of the CIOs of the Participating Members, with identifying the procurement-related systems that can be shared and developed jointly and developing a schedule for implementation.
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- ✓ Lead Agency: ITCC
- ✓ Recommendation Ongoing

Working through the ITCC, the Participating Member CIOs completed a full inventory of all procurement-related systems in each agency, organized by function. This inventory serves as the basis to develop procurement IT collaboration opportunities and that work will begin as soon as CCC and CTA are able to identify new representatives for the ITCC. Any IT procurement collaboration opportunities will also be informed by the new processes and policies defined by the CPO working group.

Recommendation #6	Post all contracts, vendors, and subcontractors on agency websites in a user-friendly and searchable format.
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- ✓ Lead Agency: CCC
- ✓ Implemented across (7) Participating Members. All participating members are now posting contracts in some form. The user-friendly and searchable component will come online with the implementation of Recommendation #7.

The City, Chicago Park District, and Chicago Housing Authority utilize the City’s contract web portal to link to individual contract portals. Chicago Public Schools and the Public Building Commission have directly outward-facing contracts site. Long term initiatives include a uniform web portal, which will have all contracts available from all Participating Members. This long-term initiative is being managed by the ITCC. To fulfill the short-term recommendation, City Colleges has developed a web portal for recent Board-approved contracts to be publicly accessible and searchable. Chicago Transit Authority will utilize the Regional Transit Authority (RTA) portal to post contracts until the consolidated web portal is available.

Recommendation #7	Create an easily accessible website for vendors and the public that provides a single location for: all of the Participating Members' current procurement opportunity listings and other procurement-related information such as the buying plan, notices of award, and prequalified pools; a list of all debarred vendors; and all current contract and vendor databases.
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- ✓ Lead Agency: ITCC
- ✓ Recommendation Ongoing

The ITCC, working through the CPS web development team, completed development of a Procurement Reform Task Force website, which has been reviewed with staff from all agencies. That new website will be ready to launch in 2017 once feedback is received from the CPOs and any work stemming from that feedback is completed.

Recommendation #8	Establish minimum disclosure requirements for subcontractors and require posting subcontractor information online.
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- ✓ Lead Agency: CHA
- ✓ Recommendation Completed.
- ✓ Requirements established across (7) participating Sister Agencies

The Participating Members' current disclosure requirements were assembled and reviewed. All Participating Members have the same or similar solicitation documents, including the Economic Disclosure Statement, Contractor's Affidavit, and M/W/DBE Compliance Schedules requesting primes and subcontractors to disclose subcontractor information such as ownership information, financial information, number of years in business, and delinquencies.

The CPO Committee recommended that Participating Members include uniform minimum language in solicitation documents and flow down contract provisions requiring contractors to certify that neither they have violated, nor do they have any knowledge of their subcontractors having violated, any state, federal, or local laws, rules or regulations or any City or Sister Agency code or policy and have not been subject to any debarment, suspension, or other disciplinary action by any government agency.

Additionally, if at any time the contractor becomes aware of such information, it must immediately disclose it to the Agency. Participating Members can choose to go beyond the minimum language if they wish or if they are required to do so by their governing rules and regulations. Further, this uniform minimum disclosure language must be posted online in the solicitation documents and contracts of the City and Sister agencies.

The key deliverable for this recommendation is new, standard certification language to be added to specific solicitation documents and contracts utilized by the Participating Members. The language is as follows:

The Contractor certifies to the best of its knowledge and belief that it, its principals and any subcontractors used in the performance of this contract, meet the Agency requirements and have not violated any City or Sister Agency policy, codes, state, federal, or local laws, rules or regulations and have not been subject to any debarment, suspension or other disciplinary action by any government agency. Additionally, if at any time the contractor becomes aware of such information, it must immediately disclose it to the Agency.

The Participating Members will include the above language to solicitation templates and documents; specifically, the EDS, Contractor's Affidavit, and Compliance Schedules.

Recommendation #9	Establish minimum standards for conducting due diligence of vendors before entering into a contract.
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- ✓ Lead Agency: City
- ✓ Recommendation Completed.
- ✓ All agencies have agreed to perform minimum uniform due diligence of vendors before entering into a contract.

All Participating Members’ Economic Disclosure Statements (EDS) were compared to assess where they differed. It was determined that the only differences in self-certification requirements – whether in a Participating Member’s EDS, Ethics Code, or contract language – are based on the differing statutory requirements governing each Participating Member.

Each Participating Member also shared the additional due diligence it performs on a vendor before contracting with that vendor. In addition to the self-certification relied on in the EDS, each Participating Member performs a check of its own debarment list, at minimum. Many of the Participating Members also check federal and state no-contracting lists and whether a firm is in good standing with the Secretary of State. Only the City performs an internet search background check on vendors and checks whether a vendor owes debt to the City. In addition, Participating Members can have access to the debt check databases (IRIS and ARMS) so that they can determine whether a vendor owes debt to the City and notify that vendor of the nature of the debt and that it should be paid.

The CPO Committee recommended that all Participating Members perform the following proposed minimum due diligence of vendors before entering into a contract:

- Check federal, state, City, and Sister agencies’ no-contracting or debarment lists;
- Check whether the vendor is registered and in good standing with the Illinois Secretary of State;
- Check whether the vendor owes a debt to the City; and
- Perform a search engine background check.

Recommendation #10	Establish uniform rules governing resolicitation of contracts due to significant changes in scope or value.
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- ✓ Lead Agency: CTA
- ✓ Recommendation Completed
- ✓ Implemented across (7) participating Sister Agencies

Many of the Participating Members lack written rules prohibiting significant modification of a contract, limiting the amount of time a contract can be extended, and/or increasing the value of a contract. Pursuant to the recommendation, all Participating Members have agreed to adopt the following policies regarding contract changes:

- All Change Orders and Contract Amendments shall be within the general scope of the contract and cannot represent cardinal changes to the contract. A cardinal change is a major deviation from the original purpose of the work or the intended method of achievement, or a revision of contract work so extensive, significant or cumulative that, in effect, the contractor is required to perform very different work from that described in the original contract. The procurement administrator shall review and verify that the changed work is not a cardinal change to the contract. In the event the change will be a cardinal change to the contract, the work must be publicly solicited as a separate contract and cannot be undertaken as a change

- to a current contract.
- Additional time and/or funding:
 1. To the extent that the vendor agrees to maintain current contract terms, conditions and pricing:
 - a. Contracts that require additional time and funding. To avoid any gaps in service or materials the contract term shall not be extended more than one calendar year and additional funding shall not exceed 50% of the original contract value.
 - b. Contracts that require additional funding, but not time, due to unanticipated increased usage, can increase funding, as needed, to meet the original term of the contract; however, under no circumstances can this increase exceed 50% of the original contact value.
 - c. Contracts that require additional time, but not funding, can be extended for a period of time commensurate with the remaining funding, however, under no circumstances can the extension exceed 1 year.

Recommendation #11	Evaluate the consistency of MBE/WBE/DBE certifications accepted by Participating Members.
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- ✓ Lead Agency: PBC
- ✓ Recommendation Completed
- ✓ Evaluation completed across (7) participating Sister Agencies

All Participating Members accept certifications from a variety of agencies, with some accepting certifications from agencies that others do not. These certifying agencies utilize different criteria for certification. Because each agency accepts a different set of certifications, utilization numbers cannot be aggregated across Participating Members.

All Participating Members provided the list of all the certifications they accept for MBE, WBE, and DBE credit. Members expressed the goal to maximize minority, women, and disadvantaged participation, while balancing the need to ensure local businesses are utilized and preserve the integrity of participation programs with a rigorous certification process.

Each Participating Member also shared the process required to change the certifications accepted by their respective Boards or Agencies.

In order to determine next steps, the CPO Committee is tasking all Participating Members to conduct an analysis on participation credit that is received for firms that are certified by agencies outside of the City of Chicago and Cook County. Once this analysis is completed, a coordinated approach will be developed to determine which certifying agencies' certifications the Participating Members will accept for MBE, WBE, and DBE credit.

Recommendation #12	Implement the uniform criteria and processes for evaluating Good Faith Efforts regarding requests for waivers for MBE/WBE/DBE goals that are currently being developed and will be recommended by the Government Procurement Compliance Forum
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- ✓ Lead Agency: PBC
- ✓ Recommendation Completed
- ✓ Implemented across (7) participating Sister Agencies

All Participating Members utilize contract-specific MBE/WBE/DBE goals. In order to show that a bidder/respondent has documented and made good faith efforts in meeting the contract goals, the bidder/respondent must present a MBE/WBE/DBE compliance plan (Schedule D) demonstrating how they plan to meet these goals. A Schedule D outlines the MBE/WBE/DBE plan for the contract. If a bidder/respondent claims that they cannot meet the goals, they must document their good faith efforts in seeking to meet the goals.

All Participating Members worked to craft language and checklists to use in the contracting process. Members worked on various drafts and received input from numerous stakeholders, from the federal government to local assist agencies.

A template checklist was developed in order to guide Participating Members regarding what they should consider as part of good faith efforts. This list is not exclusive or exhaustive but is a useful resource and will be considered the minimum standard for Participating Members to evaluate good faith efforts. Additionally, a good faith efforts Vendor Guide was created in order for the vendor community to understand the contract requirements. Participating Members will be able to use this Vendor Guide as a useful tool for bidders/respondents and outreach efforts.

Some of these key actions to demonstrate a bidder’s good faith efforts include:

- Soliciting through reasonable and available means at least 50% of MBEs and WBEs certified in the anticipated scopes of subcontracting of the contract
- Must solicit MBEs and WBEs at least seven (7) days prior to the date bids are due
- Take appropriate steps to follow up initial solicitations with interested MBEs or WBEs
- Advertise the contract opportunities in media and other venues oriented toward MBEs and WBEs
- Provide interested MBEs or WBEs with adequate information about the plans, specifications, and requirements of the contract in a timely manner
- Negotiate in good faith with interested MBEs or WBEs that have submitted bids
- Not reject MBEs or WBEs as being unqualified without sound reasons based on a thorough investigation of their capabilities
- Make efforts to assist interested MBEs or WBEs in obtaining bonding, lines of credit, or insurance
- Make efforts to assist interested MBEs or WBEs in obtaining necessary equipment, supplies, materials, or related assistance or services
- Effectively use the services of the City; minority or women community organizations; minority or women assistance groups and other organizations to provide assistance in the recruitment and placement of MBEs or WBEs

Participating Members intend to incorporate the items from the template checklist into their contracts regarding good faith efforts.

Recommendation #13	Require a written, publicly posted protest process for each Participating Member.
<ul style="list-style-type: none"> ✓ Lead Agency: CCC ✓ Recommendation Completed ✓ Implemented across (7) participating Sister Agencies 	

Protest processes are a tool of accountability in government procurement. They provide the opportunity for a stakeholder in the procurement process to raise allegations of irregularities or violations that may have tainted the process, and they give agencies another avenue to ensure integrity and transparency in their purchasing.

The majority of Participating Members have an established protest process, but three Participating Members did not have a written process, handling concerns on a case-by-case basis. As to those Participating Members that have an established process, there is considerable overlap, but details and deadlines may vary.

In-depth research was completed via a Participating Member survey by the CPO Committee, which identified the key elements of the bid protest process:

- Protests allowed – Pre-evaluation, Bid Result
- Pre-Bid Protest Timing
- Evaluation Protest Timing
- Bid Results Timing
- Adjudicator Role
- Pre-Bid Protest Actions
- Pre-Award Protest Actions
- Adjudication Decision Actions
- Timing of Interested Party Conference
- Timing of Final Determination Following Protest

Following discussion as to how these elements could be made uniform for the Bid Protest Process, all on the CPO Committee agreed to standardize to align with the City’s terms and policy approach. The terms are summarized here:

Bid Protest Actions	Term
Protests Allowed - Pre-Bid, Evaluation, Bid Result	All
Pre-Bid Protest Timing	5 working days
Evaluation Protest Timing	10 working days
Bid Results Timing	10 working days
Adjudicator Role	CPO
Pre-Bid Protest Actions	Postponement
Pre-Award Protest Actions	Suspension
Adjudication Decision Actions	Corrective
Timing of Interested Party Conference	Any time before final determination
Timing of Final Determination Following Protest	30 working days after last submission made

With the exception of the Chicago Transit Authority (CTA), which has a Federal requirement for final review, all Participating Members will adopt the uniform terms and develop or update internal policies to document the process. Some Participating Members may require Board approval.

Recommendation #14	Examine whether Participating Members should support a change in state law to eliminate the newspaper notice requirement for contract solicitations.
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- ✓ Lead Agency: CPD
- ✓ Recommendation Completed
- ✓ Examination & analysis completed across (7) participating Sister Agencies

Since most, if not all, of the Participating Members have been advertising in the newspapers for many decades, a shift away from newspaper advertising would require a considerable marketing effort for a few years to properly inform the vendor community of this change in purchasing operations.

Resource needs for such a project will require IT, marketing, and procurement personnel from the City and Sister agencies, all of which are being dedicated to what the CPO Committee believes are more impactful initiatives. The CPO Committee’s current recommendation is to continue to advertise in local newspapers.

Recommendation #15	Establish a process for information-sharing and collaboration among Participating Members on personnel matters such as professional development efforts and recruitment.
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- ✓ Lead Agency: CPS
- ✓ Recommendation Ongoing.
- ✓ Evaluation completed across (7) participating Sister Agencies.

The CPO Committee is determining the most effective way for all agencies to share the following information regarding personnel matters:

- Job descriptions for the different positions
- List of open positions to facilitate more transfer one Sister Agency to another
- List of all upcoming trainings planned for each Participating Member to offer the possibility for other employees to participate

The Chicago Public schools drafted a document titled, “Information Sharing and Use of SharePoint,” for CPO Committee review and comment. Implementation will include gathering data from each agency as outlined in the document and organizational information noted in the appendices section. Below is the content provided within the “Information Sharing and Use of SharePoint” document provided to the PRTF participating members.

- Purpose = Define and standardize the procedures for PTRF members on personnel matters including but not limited to professional development and recruitment.
- Scope = All Participating Members will provide, at a minimum, link to web site, organizational chart, job descriptions, open positions, and on-going training.
- Role of Agency CPO – responsible for review of content and submission
- Definitions and Acronyms
- Policies & Procedures

MID-TERM RECOMMENDATIONS (16 TO 27)

Recommendation #16	Establish uniform standards based on best practices for approval of noncompetitive awards, including small purchase, emergency, and sole source.
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- ✓ Lead Agency: CTA
- ✓ Recommendation Ongoing

The PRTF recommended the establishment of uniform practices across agencies, where permitted by law, for the approval process of noncompetitive awards, including small purchases, emergency contracts and sole source contracts. Currently some Participating Members have processes in place for the above approvals; however more uniformity across the Participating Members should be established in an effort to create more efficiency. Noncompetitive awards are necessary in certain situations or due to the specialized nature of the products or services required. In order to create a streamlined process and maneuverability among agencies, approval processes should be aligned to the extent permitted by law.

It should be noted that the establishment of minimum standards of sole source procurements was determined as part of Immediate Recommendation #3.

The Chicago Transit Authority has distributed a draft process related to “Emergency Procurement”. It is recommended to the Participating Members to incorporate the following policies regarding Small Purchases:

All Small Purchase procurements shall only be used for the procurement of goods or services when the procurement falls within the established Small Purchase threshold of \$_____ to \$_____ to be determined by the Agency pursuant to their controlling statutes.

Buyers shall not use Small Purchase procedures when the procurement is estimated to exceed the Small Purchase threshold. A Buyer shall not attempt to circumvent the process for procuring goods and services in excess of the established threshold by splitting a procurement totaling more than the Small Purchase threshold into several purchases.

For each purchase within the established Small Purchase threshold, the Buyer shall solicit quotations from a reasonable number of sources including, when possible, at least one DBE/MBE/WBE to promote competition to the maximum extent practicable.

1. The Buyer shall consider the following factors when deciding how many quotations will be solicited:
 - a. The nature of the item or service to be purchased and whether it is highly competitive and readily available in several makes or brands, or has limited sources;
 - b. Information obtained in making recent purchases of the same or similar item;
 - c. The urgency of the proposed purchase;
 - d. The dollar value of the proposed purchase; and
 - e. Past experience concerning specific Vendor prices.

2. Generally, solicitation of at least three sources should be considered to promote competition to the maximum extent practicable. If practical, price quotes should be solicited from two sources not included in the previous solicitation.

- a. If the Buyer determines that the best interest of the Agency indicates that quotations should be obtained from more than three sources, the Buyer may require the solicitation of additional quotations.
- b. A Small Purchase may be limited to one source if the Buyer determines, in writing, that there is only one available source in accordance with these Regulations.
- c. A Buyer may solicit phone price quotations. However, a Buyer shall use a written solicitation in the following circumstances:
 - i. When a large number of line items is included in a single proposed procurement;
 - ii. When obtaining phone quotations is not considered economical or practical; or
 - iii. When extensive specifications are involved.
- d. The Buyer shall establish and maintain records of phone price quotations and include these records in the purchase file. The records shall consist of the names of the suppliers contacted and the prices and other terms and conditions quoted by each to the degree the Agency does not provide and/or require certain terms and conditions.
- e. The Buyer may limit written records of solicitations to notes or abstracts to show prices, delivery, references to printed price lists used, the Vendor or Vendors contacted, and other pertinent data.
 - i. The Buyer shall maximize competition for Small Purchases and shall not limit solicitations to suppliers of well-known and widely distributed makes or brands, or solicit on a personal preference basis.

Recommendation #17	Develop a common electronic Economic Disclosure Statement system that: allows for the submission of uniform information for all Participating Members' vendors and subcontractors; integrates disclosures and certifications into Participating Members' procurement databases; automates conflict checks and due diligence; and can be updated in real time.
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- ✓ Lead Agency: ITCC
- ✓ Recommendation Ongoing

A basic design for a common Economic Disclosure Statement system has been documented that would support all agencies. This initiative will be reviewed as a priority in the City's 2018 budget process.

Recommendation #18	Establish a process for the use of joint pre-qualified vendor pools that recognizes the different statutory requirements applicable to Participating Members.
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- ✓ Lead Agency: City
- ✓ Recommendation Ongoing.
- ✓ Data collection and analysis continues.

The PRTF found that Participating Members dedicated significant resources cumulatively on procurement administration, a portion of which was spent on duplication of effort. One such area is each Participating Members' use of separate pre-qualified pools of vendors.

DPS has gathered the following data from each agency: processes and procedures for establishing pre-qualified vendor pools, statutory requirements that control the establishment and use of vendor pools and list of current pre-qualified vendor pools, including scopes and duration.

A vendor pool excel spreadsheet has been collected from the following participating members:

- City of Chicago
- City Colleges of Chicago
- Chicago Housing Authority
- Chicago Park District
- Chicago Public Schools
- Chicago Transit Authority
- Public Building Commission

The next steps will include reviewing and comparing the current pre-qualified vendor pools used by each Participating Member, determining which pre-qualified vendor pools are appropriate candidates to become joint pools and establishing a process that the agencies should be using in creating joint pre-qualified vendor pools.

This is expected to increase the quality of vendors the agencies contract with, and increase efficiency by eliminating duplicative efforts.

Below is a snapshot of the excel worksheet and the data that is being collected from each participating member:

PO Description	Purchase Order Contract Type	# Of Contracts in Vendor Pool	Total Value in Contracts	Purchase Order Amount Limit	Specification Number	Start Date	End Date
CATEGORY A							
ARCHITECTURE / ENGINEERING							
PRO SERV CONSULTING							
CATEGORY B							
COMMODITIES							
DEMOLITION							
FINANCIAL CONSULTING / AUDITS ETC.							
ROOFING							
VEHICLE / HEAVY EQUIPMENT							
WORK SERVICES / FACILITIES MAINT.							
POOL CATEGORY		# OF POOLS					
Category A							
1	Architecture / Engineering						
2	Pro-Serv. Consulting						
Category B							
1	Commodities						
2	Demolition						
3	Financial Consulting / Audits, etc.						
4	Roofing						
5	Vehicles / Heavy Equipment						
6	Work Serv. (Facilities Maint.)						
		Total # of Pools					

Recommendation #19	Develop best practices for routine audits of procurement functions and contract awards, and evaluate use of shared services to perform this function.
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- ✓ Lead Agency: City
- ✓ Recommendation Ongoing.
- ✓ Data collection and analysis continues.

The PRTF found that there is inconsistency among Participating Members regarding the performance of internal audits of procurement functions and contract compliance. To maintain the integrity of the procurement and compliance monitoring process, best practices for routine audits of these functions should be developed. This is also a potential area for increased efficiency through the use of shared services to perform such audits.

The City is collecting the following data from each Participating Member: detailed descriptions of any audits they or third parties perform on their procurement functions and contract awards.

Next steps include:

- Reviewing and comparing the current auditing practices, if any, of each agency
- Determining best practices for routine audits
- Determining how the agencies can use shared services, if at all, to perform such audits

The goal is to develop best practices for routine audits of procurement functions and contract awards, which should include guidance on how to perform audits cost-effectively. This is expected to increase integrity, uniformity, efficiency, and accountability in procurement and improve contractor compliance.

Recommendation #20	Require each Participating Member to create a comprehensive procurement manual for its staff that is user-friendly and available to the public.
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- ✓ Lead Agency: CCC
- ✓ Recommendation Ongoing

The PRTF found that the comprehensiveness and specificity of the Participating Members' procurement policies varies significantly.

The key steps in this recommendation process include the review and comparisons of the current processes/procedures used by each Participating Member, a discussion of consistency in requirements and what is needed to adjust existing manuals and the posting of manuals online for public view.

The City Colleges of Chicago has completed the analysis of CTA's robust Procurement Manual. This has led to the conclusion that while custom-tailored, CTA has the most comprehensive procurement manual. The procurement manuals from Participating Members (CCC, CPS, CHA, DPS, Parks, and PBC,) contain some of the elements from the provided list, but could benefit from the addition of the following key components.

- Procurement Standards and/or Procurement Policy including ethics/ code of conduct
- Procurement Goals/ Mission Statement
- A matrix or guideline which outlines "who may authorize and execute contracts" including the amount thresholds
- Glossary of procurement terms
- Outline of the different procurements e.g. Sole source, RFP, RFQ, Sealed Bids, Joint Procurement, Emergency Procurement

- Contract Administration delegation of duties (post-award)
- Contract Amendments Procedure
- Procurement Process- Summarize the life cycle of a procurement at the agency
- Debarred Contractors Criteria
- Bid Protests
- FOIA Requests Procedure
- Procurement Laws and respective board rules and regulations e.g. 30 ILCS 500/, (65 ILCS 5/) Illinois Municipal Code.

Going forward each Participating Member will provide their current procurement policy manual for review and discussion. Upon agreement, each Participating Member will adjust their guides for consistency.

The goal of this recommendation is for each Participating Member to develop a comprehensive procurement policy manual that covers consistent aspects of the procurement process and clearly lays out agency requirements.

Recommendation #21	Codify and provide training to Participating Members' employees on procurement rules and regulations, including appropriate authority, prohibited communications, and reporting obligations.
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- ✓ Lead Agency: City
- ✓ Recommendation Ongoing.
- ✓ The City has begun scheduling various training program sessions with the Sister Agencies and its members. The implementation of this recommendation will remain ongoing, as training sessions will continue.

The PRTF found that all Participating Members stated that communications regarding active procurements are to be limited and generally flow through the procurement office; however, these rules are not clearly codified and disseminated at every agency. In addition, it found that not all employees and contractors of Participating Members have a clear obligation to report violations of law in procurement and contracting to their respective Offices of Inspector General. A clear set of rules and regulations for employees to follow and refer to is important to maintain the integrity of the procurement process. Agencies should ensure that such information is communicated to their employees.

The goal is to establish and provide training on procurement rules and regulations so that employees know what is required of them. This is expected to increase the integrity of and accountability in the procurement process. This process has already begun with the Participating Members sharing information about internal staff training sessions. For example, DPS hosted two trial attorneys from the U.S. Department of Justice, who gave a presentation outlining their experiences regarding criminal antitrust matters, including bid rigging, price fixing, market allocation, and related federal crimes. As part of the presentation, they spent time instructing attendees on how to spot and also prevent contractors from engaging in fraud. All Participating Members sent staff to this training.

Recommendation #22	Develop universal programming for vendor outreach and training.
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- ✓ Lead Agency: City
- ✓ Recommendation Ongoing.
- ✓ The City has begun scheduling various training program sessions with the Sister Agencies and its members. The implementation of this recommendation will remain ongoing, as training sessions will continue.

The PRTF found that the majority of Participating Members do not provide any workshops or training to potential vendors. Vendor outreach and training is an integral part of increasing the number and quality of vendors and their bids. This is also a potential area for increased efficiency and uniformity through the use of shared services to provide such programming. The City has an extensive workshop and outreach program and has already begun spearheading joint outreach efforts, such as the annual Vendor Fair, which includes all of the Sister agencies, the State, and the County.

The City has implemented this Recommendation via the following methods:

- The creation of a Universal Outreach Calendar via the PRTF SharePoint site where the CPO Participating Members all have access.
- This calendar includes City outreach events and workshops, outreach events hosted by the Participating Members.
- The City is promoting Participating Member outreach events via the DPS Alert Email Newsletter, which reaches 10,000 subscribers, email distribution on the Certification & Compliance (C2) system, and social media.
- Additionally, Development of vendor outreach and training was established in 2017. A new workshop was created with the various Sister Agencies. “Doing Business with Sister Agencies”. This recommendation will remain ongoing as workshops will continue.

CITY OF CHICAGO
DPS DEPARTMENT OF PROCUREMENT SERVICES
 2017 WORKSHOP SCHEDULE

121 N. LaSalle Street | City Hall, Room 806
 Bid & Bond, Room 103 | (312) 744-4900
 WWW.CITYOFCHICAGO.ORG/DPS

●●● NEW IN 2017 ●●●
 DPS workshops will be broadcast on our YouTube Channel, www.youtube.com/ChicagoDPS

How to Complete an Online Economic Disclosure Statement (EDS)
 MAR. 8 • JUN. 7 • SEPT. 6 • DEC. 6
 Workshop Time: 3:15 PM – 4:15 PM | 30 N. LaSalle, 6th Floor, CDOT Computer Lab

An Economic Disclosure Statement (EDS) is required of all bidders seeking to do business with the City of Chicago. Through the EDS, applicants make disclosures required by State law and City ordinances and certify to compliance with various laws and ordinances. This hands-on workshop will go over the proper way to fill out an EDS and how to submit via the online portal application.

Doing Business with Sister Agencies
 APR. 5 | CPS & CCC • JUL. 5 | PBC & CHA • Oct 4 | CPD & CTA
 Workshop Time: 3:15 PM – 4:15 PM | 121 N. LaSalle, 11th Floor, Room 1103

Want to learn about contracting opportunities beyond the City of Chicago? This workshop is designed to outline the role and responsibilities of how to do business with the City of Chicago's six sister agencies: Chicago Public Schools (CPS), City Colleges of Chicago (CCC), Public Building Commission (PBC), Chicago Housing Authority (CHA), Chicago Park District (CPD) and Chicago Transit Authority (CTA). Please note the guest speakers for each session.

Working with Assist Agencies
 MAR. 29 • JUN. 21 • NOV. 8
 Workshop Time: 3:15 PM – 4:15 PM | 121 N. LaSalle, 11th Floor, Room 1103

City of Chicago Assist Agencies are comprised of not-for-profit agencies and/or chambers of commerce that represent the interests of small, minority and/or women owned businesses within the Chicago's diverse communities. They offer many resources to help business at every stage of their growth cycle as well as connect prime contractors with certified firms for subcontracting opportunities. This workshop will outline the role and responsibilities of an Assist Agency. Please note agencies will vary each session. Visit www.cityofchicago.org/dpsvents for the latest schedule updates.

The following items are also in process to help achieve outreach and training collaboration:

- Leverage existing technology by inviting Participating Members to utilize DPS Bid & Bond Room livestreaming capability to broadcast their workshop offerings.

As we merge listings of these vendor resources and programs, the Committee will examine where there are overlap and gaps, and how the Participating Members can combine and streamline these programs to offer the best and most efficient vendor outreach and training.

Recommendation #23	Develop uniform, minimum contract close-out procedures for use by all Participating Members.
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- ✓ Lead Agency: PBC
- ✓ Recommendation Ongoing

The Public Building Commission submitted a draft checklist for review and comments to the PRTF participating members. This checklist may be used as a guide for agencies when closing out contracts. The final FAQ/Tips Guide are being finalized.

The Participating Members’ contract close-out processes vary, ranging from some with no established process to others that have significant requirements. The PBC has taken the lead to

assemble, review, and formalize a close out process at the end of a contract term. The Participating Members will review current policies and procedures for contract close out, and evaluate key criteria to determine workable and meaningful uniform, minimum contract close-out procedures.

A template checklist was developed in order to guide Participating Members regarding minimum steps to complete when closing out contracts. All Participating Members’ worked together to craft language for a checklist template to use in the contract closeout process. Members worked on various drafts in order to include various types of contacts and/or procurement processes.

Participating Members will be able to use this checklist as a base to ensure specific agency requirements are included. The Contract Closeout Checklist includes contract time frame, advertising dates, award amounts, evaluator information, legal analysis, financial analysis, term, extensions available, signatures needed, insurance requirements, website posting, MBE/WBE/DBE/ACDBE/BEPD information, and Board Reports.

The ongoing effort to work on providing contractors with standardized contract language will allow the CPO Committee to work in concert with this initiative to develop procedures that will be concise and cohesive.

Recommendation #24	Develop minimum standards for project managers and other on-site review personnel to ensure vendor compliance.
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- ✓ Lead Agency: PBC
- ✓ Recommendation Ongoing

All Participating Members conduct various types of site visits for their respective projects. Additionally, Participating Members used a variety of tools to conduct site visits (i.e. compliance software, payroll software, or Microsoft fillable forms). Following discussions regarding these varying methods, the CPO Committee recommended that Participating Members include uniform language and questions when conducting on-site interviews to ensure enforcement is fair, uniform, and effective.

A Site Visit guide that includes tips and frequently asked questions was developed in order for Participating Members to set minimum standards for project managers and other on-site review personnel to ensure vendor compliance. All Participating Members worked together to craft language for this guide. Members use various methods to record site visits; therefore the guide will allow all members to use the guide using their respective recording mechanisms.

The guide includes:

- why site visits are important;
- goals of conducting site visits;
- tips to remember during and after site visits
- frequently asked questions during site visits
- what to do when staffer records visit
- verifying site visit information

Members will use the guide and create their respective forms. The guide can also be used to train staff conducting site visits.

In addition, the PBC submitted a draft of “Frequently Asked Questions” and “Tips for On-site Personnel” to the PRTF Participating Members for review and comment. These may be used as a guide for staff monitoring compliance on-site.

Recommendation #25	Establish a process for information-sharing among Participating Members regarding poor performance, noncompliance, or wrongdoing of a vendor.
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- ✓ Lead Agency: CPD
- ✓ Recommendation Ongoing

The PRTF found that outside of placement on a debarment list, Participating Members have no formal mechanism to share documented information regarding a vendor’s poor performance, noncompliance, or wrongdoing.

The Chicago Park District has taken the lead to establish a communication process that will actively share vendor information to Participating Members. The information to be provided may include remedies to cure, defaults, noncompliance with contract requirements and goals, debarment, and similar issues or findings. Different types of communication for vendor information-sharing will be explored and implemented. This could include email alerts and other forms of effective electronic communication.

Recommendation #26	Seek to establish reciprocal debarment among Participating Members through the use of a debarment review board or another mechanism as permitted by law.
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- ✓ Lead Agency: CHA
- ✓ Recommendation Ongoing

The CPO Committee found that Participating Members generally maintain their own debarment lists and some have automatic reciprocity. Participating Members also consult each other's lists during a verification process as well as check debarment lists of other government entities.

The CHA took the lead to establish reciprocal debarment language for all of the participating members as permitted by law. CHA reviewed the debarment policies of the Participating Members, and found that some include automatic debarment reciprocity language but are not specific as to the causes of debarment. The review looked at whether or not this or similar language would limit the individual or firm’s right to due process that would normally be afforded them.

CHA also researched other government agency debarment review boards, including the Mississippi Personal Service Contract Review Board, Cuyahoga County Appeal Board and the LA County Contractor Hearing Board and gathered information on the functions of these debarment review boards.

CHA completed its review of debarment policies of the City and Sister agencies for reciprocity language and its research on the debarment review boards of other state and local government agencies.

The recommendation of the CPO Committee is that the Participating Members which do not currently follow a reciprocal debarment process include (add or replace existing) language in its debarment policy or procedures that allows, but does not require, limited automatic debarment if a Participating Member has already debarred the individual or firm for cause, including for criminal offenses and violations of federal or state statutes. The automatic reciprocal debarment is limited in that Participating Members reserve the right to proceed with their own process in cases

where an individual or firm has been debarred for other reasons. CHA provided language to the PRTF for Participating Members to utilize in their debarment policies and/or procedures to address automatic reciprocal debarment.

Recommendation #27	Establish uniform practices, where permitted by law, to expand preferences for local vendors and support a workforce development or similar contract award preference.
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- ✓ Lead Agency: CPS
- ✓ Recommendation Complete
- ✓ Evaluation completed across (7) participating Sister Agencies, County and State Agencies

The CPO Committee found that only the City and PBC apply preference for local vendors and labor in their procurements and no Participating Member provides credit for employing graduates of workforce development programs.

All Sister Agency practices of providing local preference and support for workforce development were surveyed, reviewed and evaluated. Additionally, the survey was extended to include county and state agencies as well as vendors.

Preference is limited by the Illinois State Constitution and or by Federal funding guidelines with the exception of the City, which operates under Home Rule Authority.

It is the recommendation of CPO Committee, that there would need to be a change in State laws in order to establish uniform practices across the agencies.

LONG-TERM RECOMMENDATIONS (28 TO 31)

28	Implement a universal procurement system that serves as a single point of entry for posting and responding to all Participating Members’ procurement opportunities, and as a central repository for all contract and vendor information.
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29	Identify compliance functions that can be shared among Participating Members, including MBE/WBE compliance activities, and establish a joint compliance field team.
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30	Secure a <i>pro bono</i> study regarding the financial impact of the City’s risk shifting contractual provisions.
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31	Evaluate the benefits of center-led or consolidated procurement among the Participating Members.
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Attachment A: PRTF Implementation Spreadsheet

Legend / Key:

- GREEN = Implemented/Completed
- RED = Not Implemented/Incomplete

RECOMMENDATION		DPS	CPS	CTA	CHA	CCC	CPD	PBC
IMMEDIATE RECOMMENDATIONS								
1	Create a Committee of the Participating Members' CPOs to rule on certain administrative decisions, address obstacles to coordination, and ensure best practices across the City and its sister agencies.	City						
2	Charge the CPO Committee with addressing the Task Force recommendations, tracking their implementation, and issuing quarterly progress reports.	City						
3	Establish minimum standards by which all Participating Members will publish their anticipated sole source awards, receive public and vendor feedback, and make decisions about whether a solicitation is necessary.	CTA						
4	Hire or secure pro bono services from a law firm to: (a) Identify contract provisions that could be subject to standardization across Participating Members' templates, and draft uniform contract templates incorporating the required terms of the Participating Members, including contract duration and number of renewals and (b) Where appropriate, standardize solicitation documents issued by Participating Members and the documents required in response.	City	The PRTF's pro bono partner, Clark Hill, has completed standardized commodities and professional services Master templates. Significant progress has been made on all of the Additional Provisions templates, many of which are also complete. Clark Hill's current focus is on completing the construction Master template. Circulation of the Master templates as well as any completed Additional Provisions templates to the Participating Members for review and comment is expected to occur within the next month.					
5	Charge the Chicago Government IT Coordination Committee, which consists of the CIOs of the Participating Members, with identifying the procurement-related systems that can be shared and developed jointly and developing a schedule for implementation.	ITCC	Ongoing, responsible party = DoIT.					
6	Post all contracts, vendors, and subcontractors on agency websites in a user-friendly and searchable format.	CCC						
7	Create an easily accessible website for vendors and the public that provides a single location for: all of the Participating Members' current procurement opportunity listings and other procurement-related information such as the buying plan, notices of award, and prequalified pools; a list of all debarred vendors; and all current contract and vendor databases.	ITCC	Ongoing, responsible party = DoIT.					
8	Establish minimum disclosure requirements for subcontractors and require posting subcontractor information online.	CHA						
9	Establish minimum standards for conducting due diligence of vendors before entering into a contract.	City						
10	Establish uniform rules governing resolicitation of contracts due to significant changes in scope or value.	CTA						
11	Evaluate the consistency of MBE/WBE/DBE certifications accepted by Participating Members.	PBC						
12	Implement the uniform criteria and processes for evaluating Good Faith Efforts regarding requests for waivers for MBE/WBE/DBE goals that are currently being developed and will be recommended by the Government Procurement Compliance Forum	PBC						
13	Require a written, publicly posted protest process for each Participating Member.	CCC						
14	Examine whether Participating Members should support a change in state law to eliminate the newspaper notice requirement for contract solicitations.	CPD						
15	Establish a process for information-sharing and collaboration among Participating Members on personnel matters such as professional development efforts and recruitment.	CPS	Recommendation: Ongoing. Evaluation completed across (7) participating Sister Agencies. The Chicago Public schools has uploaded a document titled, "Information Sharing and Use of SharePoint," to the PRTF SharePoint website for CPO participating members reviews and comments.					
MID-TERM RECOMMENDATIONS								

RECOMMENDATION		DPS	CPS	CTA	CHA	CCC	CPD	PBC
16	Establish uniform standards based on best practices for approval of noncompetitive awards, including small purchase, emergency, and sole source.	CTA						
17	Develop a common electronic Economic Disclosure Statement system that allows for the submission of uniform information for all Participating Members' vendors and subcontractors; integrates disclosures and certifications into Participating Members' procurement databases; automates conflict checks and due diligence; and can be updated in real time.	ITCC						
18	Establish a process for the use of joint pre-qualified vendor pools that recognizes the different statutory requirements applicable to Participating Members.	City						
19	Develop best practices for routine audits of procurement functions and contract awards, and evaluate use of shared services to perform this function.	City						
20	Require each Participating Member to create a comprehensive procurement manual for its staff that is user-friendly and available to the public.	CCC						
21	Codify and provide training to Participating Members' employees on procurement rules and regulations, including appropriate authority, prohibited communications, and reporting obligations.	City						
22	Develop universal programming for vendor outreach and training.	City						
23	Develop uniform, minimum contract close-out procedures for use by all Participating Members.	PBC						
24	Develop minimum standards for project managers and other on-site review personnel to ensure vendor compliance.	PBC						
25	Establish a process for information-sharing among Participating Members regarding poor performance, noncompliance, or wrongdoing of a vendor.	CPD						
26	Seek to establish reciprocal debarment among Participating Members through the use of a debarment review board or another mechanism as permitted by law.	CHA						
27	Establish uniform practices, where permitted by law, to expand preferences for local vendors and support a workforce development or similar contract award preference.	CPS						
28	Implement a universal procurement system that serves as a single point of entry for posting and responding to all Participating Members' procurement opportunities, and as a central repository for all contract and vendor information.	TBD	-	-	-	-	-	-
29	Identify compliance functions that can be shared among Participating Members, including MBE/WBE compliance activities, and establish a joint compliance field team.	TBD	-	-	-	-	-	-
30	Secure a <i>pro bono</i> study regarding the financial impact of the City's risk shifting contractual provisions.	TBD	-	-	-	-	-	-
31	Evaluate the benefits of center-led or consolidated procurement among the Participating Members.	TBD	-	-	-	-	-	-