ATTACHMENT E: Compliance

The Gang Reduction and Youth Development (GRYD) program maintains robust procedures to ensure program and contract compliance. The GRYD team extends through several branches, consisting of fiscal, programmatic, contractual, and grant functions to ensure fiduciary and programmatic oversight of each contract.

Contract Compliance

I.   Overview

MOCS regularly monitors contractors to ensure all aspects of the contract are met. It utilizes various resources to monitor contractors. They are as follows:

1. City Contracts,

2. Approved Budgets,

3. Encumbrance,

4. Monitoring, and

5. Fiscal Policy Manual.

II.   Detailed Description

A.   City Contracts

Each fiscal year, GRYD releases approximately 40-50 contracts which are procured and approved by the City Attorney's Office. The scope of work, as well as the terms and conditions, are carefully drafted to provide clarity and help manage expectations for both the City and contractors. To highlight a few, contracts encompass the following: client descriptions, payment structure, reporting and record keeping requirements, subcontracting, and rules governing defaults and contract termination.

B.   Encumbrance

Per City rules, an employee or officer of the City may not obligate the City to make payment for goods, services, or for any other purpose, until it has been determined that funds are actually available in the proper account for the specific purpose. An encumbering document causes funds to be reserved to pay for contractual obligations chargeable to an appropriation and ensures that funds are available when payments become due.

C.   Approved Budgets

GRYD maintains detailed budgets for each contract; working collaboratively with contractors to ensure costs are allowable and modifications do not exceed the scope of services. To highlight a few, budgets encompass the following: detailed line items and narratives, personnel costs, contractual services, capital costs, and participant related costs.

D.   Monitoring

Monitoring is an important function of both the programmatic, and fiscal aspect of the GRYD program. GRYD has established several internal controls to ensure said compliance. They are as follows:

1. Budgets: Budgets and subsequent budget modifications contain budget forms and narratives explaining and justifying the costs which are aimed to fulfill the GRYD model of practice; i.e programmatic and fiscal requirements.
2. Monthly Invoice/Expenditure Reports: Each month, contractors are required to submit invoices detailing a breakdown of costs. Invoices are very detailed as they provide support documentation for each cost. The GRYD fiscal, and program teams are charged with reviewing each cost and validating costs for both fiscal and programmatic compliance. The invoices are reviewed, audited and reconciled monthly.
3. Expenditure Reports: Monthly invoices/expenditure reports are used to reconcile and monitor spending in accordance with program goals and objectives.
4. Quarterly Monitoring and Spending Reports: GRYD conducts quarterly monitoring. Ensuring that both fiscal and programmatic goals are met regularly. Contractors are required to submit spending plans for subsequent quarters. Collaboratively, GRYD and contractors work together to ensure common goals are met.
5. Semi-Annual Fiscal Reviews: GRYD conducts semi-annual fiscal reviews which provide assessments of quarterly spending, timeliness of invoice/expenditure reports, and disallowed expenses.
6. Site Visits: Contractor site visits are conducted regularly to discuss fiscal concerns. Contractors which fall short of established target expenditures, who are consistently tardy with invoice/expenditure submissions, or carry large disallowed cost balances are given corrective action plans.
7. Corrective Action Plans: Program and fiscal staff assist contractors to develop corrective action plans which seek to address fiscal deficiencies and build contractor capacity to meet contractual obligations.

E.   Fiscal Policy Manual

The fiscal policy manual serves as a fiscal guide to GRYD contractors. It outlines fiscal monitoring procedures to maintain contractor engagement, spending, and program targets are achieved, and also to ensure that expenditures comply with Generally Accepted Accounting Principles and the City rules guiding contractual agreements.

To highlight a few, Fiscal Policy Manual areas: budget & modifications, monthly submission of invoices/expenditure reporting requirements, invoices/expenditure reporting, payment and reconciliation of cash advances, cost reimbursements, quarterly spending, and monitoring.

Program Compliance:

I.   <u>GRYD Handbook</u>

The GRYD Intervention and Prevention Policies and Procedures Handbooks details the delivery of services under GRYD Incidence Response, Prevention Clients, Intervention Clients, administration of the assessment tools, and requirements related to participation in the evaluation of GRYD services such as on-going data collection using the GRYD Database. The Handbook provides clear expectations and guidance in Prevention and Intervention expectations. Additionally, GRYD Intervention and Prevention contracts specify the number of participants that must be served, and the types of activities that must be completed by the GRYD Contractors.

Each client that enrolls in GRYD Service must complete the following:

> <u>GRYD Intervention</u>:
> - 1 Family Meeting
> - 2 Individual Meetings
> - 1 Team Meeting
>
> <u>GRYD Prevention</u>:
> - 2 Family Meetings
> - 1 Individual Meetings
> - 1 Team Meeting

III.   Performance Feedback Reports

GRYD created the Performance Feedback Report outlining contractor performance- as it pertains to contractual obligations. The report is divided into three (3) key areas:

1. Programmatic Compliance,
2. Database Compliance, and
3. Community Engagement.

Data metrics are extracted from the Efforts to Outcome (ETO) database. These reports are submitted to the agencies for their review, and collaboration.

The performance feedback report provides an overview of the following information:

> **A.   Programmatic Compliance**
>
> 1. <u>Active Clients:</u> Includes participants who are currently receiving services
> 2. <u>Intake of assessment (YSET or SET)</u>: Including both missing and completed assessments.
> 3. <u>Reassessment Process</u>: This includes all pending participants that have not completed the reassessment process. The reassessment process is important to assess if the participant needs additional services.

4. <u>Proactive Peacekeeping Activities (Intervention Only)</u>: This includes the number of activities the contractor has completed in the areas of violence interruption and community activities
5. <u>Participant Engagement (Prevention Only)</u>: This includes all the Youth Development Activities that participants have completed during their cycle of programming.

B. Database Compliance

1. <u>Over 90 days</u>: Includes participants with over 90 days since case manager logged an activity
2. <u>New Referrals</u>: Includes current referrals that may still in the process of enrolling and should be reviewed
3. <u>Active Clients</u>: Includes active participants who were dismissed incorrectly from the program

C. Community Engagement

1. <u>Completed Community Educational Campaigns (CECs)</u>: Includes all the CECs completed in the Fiscal Year.
2. <u>Monthly GRYD/LAPD Partnership Meeting</u>: Includes whether or not the contractor participates in monthly GRYD/LAPD partnership meetings.
3. <u>Summer Night Lights Participation</u>: Includes all SNL Supportive Efforts throughout the Fiscal Year.
4. <u>Parent Thank you (Prevention Only)</u>: Evaluates whether Prevention contractors completed the annual parent 'thank you' as detailed in the Prevention Policies and Procedures Handbook.

III. <u>Technical Assistance Meetings</u>

GRYD Regional Program Managers (RPM) provide ongoing technical assistance meetings to each Contractor on a monthly basis to coach each contractor on adherence to GRYD Models of Services, and compliance. Said meetings are intended to assess administration procedures, youth participant tracking and evaluation, and ongoing data.