

**LOUIS J. GIRAUDO**

50 Francisco Street, Suite 235, San Francisco, CA 94133

January 10, 2020

San Francisco Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, room 244  
San Francisco, CA 94102

Re: 2018 annual compliance findings for CPMC Development Agreement

Dear President Yee and Members of the Board of Supervisors:

Section 8.2.2 of the CPMC Development Agreement (DA) with the City and County of San Francisco identifies me as a “third party monitor”, charged with reviewing the City’s annual compliance findings and presenting to the Board of Supervisors my agreement or disagreement with the City’s findings. I have received and reviewed the Certificate of Compliance, dated December 13, 2019, from Planning Director John Rahaim and Deputy Director Naveena Bobba, MD. The following are my comments on that document:

- 1. 1,500 MEDI-CAL MANAGED CARE BENEFICIARIES IN THE TENDERLOIN:** CPMC is required to provide care to up to 1,500 Medi-Cal beneficiaries coming from a partnership with a Tenderloin-based management services organization or independent physician association that has the ability to contract with Medi-Cal managed care if one such partner became available before December 31, 2015. Although a partner did not become available, in August 2015, CPMC began a partnership with NEMS and St. Anthony’s Medical Clinic that provides a pathway to serve Tenderloin residents. As of 2019, 173 beneficiaries were enrolled. CPMC has funded St. Anthony’s Clinic to do outreach in the community and to dining room clients. Additionally, CPMC partners with NEMS to serve Medi-Cal patients and through four other Tenderloin primary care providers in the NEMS network CPMC cares for over 2,666 patients that reside in zip codes 94102, 94103 and 94109. Through partnerships with NEMS and St. Anthony’s CPMC has exceeded the commitment to serve 1,500 lives in the Tenderloin. I encourage CPMC to continue to partner with St. Anthony’s Medical Clinic on outreach and enrollment efforts and to ensure patients through the additional NEMS Tenderloin serving providers continue to have access to CPMC facilities.
- 2. MISSION BERNAL AND VAN NESS AND GEARY HOSPITALS:** I understand that CPMC has made improved efforts to engage in dialogue with community stakeholders. I encourage

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them to continue this activity and to reach outside of historical partners, especially as it relates to development of CPMC's Centers of Excellence for Community Health and Senior Health.

3. **CULTURALLY AND LINGUISTICALLY APPROPRIATE SERVICES (CLAS) STANDARDS:** CPMC is in compliance with national CLAS standards; however, stakeholders including the City have raised concerns regarding whether culturally and linguistically appropriate care is provided in all CPMC services. CPMC is technically compliant with CLAS standards and has provided requested patient and staff demographic data to the city. I encourage CPMC to continue to provide additional information and analysis in future reports to demonstrate excellence in appropriate cultural and linguistic access across all of its campuses.
4. **SERVICE AGREEMENTS WITH CHINESE HOSPITAL:** The DA requires that CPMC provide services in a manner generally consistent with existing service agreements. CPMC is compliant with this obligation and has added additional service contracts with Chinese Hospital since the DA Effective Date. While concerns were raised over rate increases as contract negotiations began for renewal in 2020, I understand CPMC and Chinese Hospital have come to agreement on the renewals and have current contracts in place.
5. **SUBACUTE CARE SERVICES:** The DA required CPMC to work with the City to develop specific proposals to provide subacute care services. This requirement was completed in February 2016, but community stakeholders raised significant concerns about and the closure of the subacute unit in late 2017 and the lack of citywide access to subacute beds. CPMC has since agreed to continue caring for current SNF and subacute patients within their system in San Francisco. I understand CPMC is actively participating in dialogue lead by the Department of Public Health and community stakeholders on this critical issue and I encourage them to continue to do so.
6. **HIRING GOALS AND GOOD FAITH EFFORTS:** Scarcity of local apprentices in various trades was a challenge again for CPMC in 2018, as it was in 2017 and 2016. CPMC fell slightly short of the 30 percent hour requirement for local journey and apprentice level workers for construction activities, as well as short of the 50 percent new entry-level union apprentice. Although CPMC fell short on these two construction hiring goals, they did meet the other 5 construction hiring goals and demonstrated good faith efforts to meet these two goals. Additionally, CPMC met its operational (non-construction) entry level hiring goal in 2018. I encourage CPMC to continue to demonstrate good faith efforts to meet the operational hiring goals.
7. **LOCAL BUSINESS ENTERPRISES:** CPMC has exceeded its commitment to make a good faith effort to award at least 14 percent of the cost of all contracts for their construction projects to local business enterprises. I commend CPMC for their efforts around this commitment and meeting 16 percent in 2018.

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I do believe that there is some confusion with respect to the Medical and Tenderloin lives issue. I would suggest that CPMC seek out the coalition members most familiar with the Tenderloin concerns to make sure that the responsibility of care for the poor and underserved is reviewed against the spirit and the letter of the D.A.. There are deadlines to be met. With the many issues the City is facing today around homeless and poverty it is essential that an honest effort is made to be in compliance with respect to our collective responsibility to the poor and underserved.

I agree with Director Rahaim and Deputy Director Bobba that CPMC has met the burden of compliance with the requirements of the DA and its obligations. While some remaining issues from previous years remain, CPMC has also exceeded their obligations in several areas. I would suggest that members of the Board of Supervisors continue to be aware in the coming years of CPMC's performance in the areas noted above.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'L' followed by a horizontal line and a small flourish.

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Louis J. Giraud