## LOUIS J. GIRAUDO

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

April 4, 2017

John Rahaim Director of Planning San Francisco Planning Department 1650 Mission Street, Suite 400 San Francisco, CA 94102

## Re: 2015 annual compliance findings for CPMC Development Agreement

Dear President Breed 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. Ihave received and reviewed the Certificate of Compliance, dated March 1, 2017, from Planning Director John Rahaim and Health Director Barbara Garcia. The following are my comments on that document:

I am in agreement with Directors Rahaim and Garcia that CPMC has met the burden of compliance with the requirements of the DA, and in some cases exceeded its obligations. They note remaining issues from the 2014 Certificate of Compliance, my comments on those items and 2015 Certificate of Compliance are included below. I would suggest that members of the Board of Supervisors continue to be aware in the coming years of CPMC's performance in the following areas:

- 1. 2015 BASELINE CHARITY CARE SHORTFALL: CPMC fell short of the 2014 obligation, but the two-year rolling average provision in the Development Agreement allows CPMC to make up this shortfall in 2015. I am pleased to see that CPMC not only made up the shortfall, but exceeded the 2015 target. In particular, CPMC's new partnerships with community clinics and the Department of Public Health have fostered the ability to meet and exceed the goals.
- 2. MEDI-CAL MANAGED CARE BENEFICIARIES IN THE TENDERLOIN: CPMC is required to provide care to 1,500 Medi-Cal beneficiaries coming from a new partnership with a Tenderloin-based management services organization (MSO) or independent physician association (IPA) that has the ability to contract with Medi-Cal managed care by December 31, 2015. As noted in the letter from the Directors, in August 2015, CPMC began a partnership with NEMS and St. Anthony's Medical Clinic that provides a pathway to serve Tenderloin residents. CPMC has also invested in

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the long term sustainability of St. Anthony's Medical Clinic, a vital resource to the Tenderloin community. While I appreciate that 125 beneficiaries were enrolled in the new partnership at the time the compliance letter was written, I encourage CPMC to continue to partner with St. Anthony's Medical Clinic on outreach and enrollment so that the full 1,500 Tenderloin residents are enrolled and have access to CPMC services.

- **3.** CULTURALLY AND LINGUISTICALLY APPROPRIATE SERVICES {CLAS} STANDARDS: CPMC is in compliance with national CLAS standards, however I understand that some questions persist about their Diabetes Service line. I am pleased to see CPMC working with DPH on a review and the progress they have made in hiring additional bilingual staff. I agree that CPMC is in compliance but I encourage them to continue to work with DPH on improving cultural and linguistic appropriateness of CPMC services and look forward to the updates CPMC provides in their 2016 Compliance Report.
- **4. COMMUNITY ENGAGEMENT:** I do understand that CPMC has made additional efforts to engage in dialogue with community stakeholders and encourage them to continue this activity and to reach outside of historical partners.
- 5. HIRING GOALS AND GOOD FAITH EFFORTS: CPMC met its 2015 obligation for local workforce hiring for construction activities but did not meet its hiring goal for 50 percent new entry-level apprentice referrals through the system because of availability shortages in local apprentice trade workers. In addition, CPMC met its hiring goal for its operations activities in 2015, and was able to overcome a hiring deficiency from the 2014 annual hiring target.

I am happy to confirm that CPMC has made significant progress to meet all material commitments and continues to invest in building community relationships and demonstrating good faith effort to meet the full intent of the Development Agreement.

Sincerely,

Louis J. Giraudo