



THE CITY OF SAN DIEGO

CITIZENS' EQUAL OPPORTUNITY COMMISSION

MEETING MINUTES

Wednesday, October 7, 2015

6:00 – 8:00 p.m.

**City Administration Building
12th Floor Committee Room
202 C Street – 12th Floor
San Diego, CA 92101**

CALL TO ORDER at: 6:02 P.M. by Chair Warner

ROLL CALL:

Laura Warner, Chair

Lan Jefferson

Susan Jester (arrived late)

Monte Jones (arrived late)

Dan Ortiz

Rafael Perez

Cynthia Suero-Gabler

EXCUSED:

Kristine Custodio, Vice Chair

STAFF & GUESTS:

Henry Foster III, Program Manager, Equal Opportunity Contracting

Claudia Abarca, Supervising Management Analyst, Equal Opportunity Contracting

Christian Silva, Senior Management Analyst, Equal Opportunity Contracting

Cheryl Stadille, Associate Management Analyst, Equal Opportunity Contracting

Paz Gomez, Deputy Chief Operating Officer, Infrastructure & Public Works

James Nagelvoort, Director, Public Works

Al Rechany, Deputy Director, Public Works – Contracts

Dave Stucky, Associate Management Analyst, Public Works - Contracts

APPROVAL OF: Meeting Minutes of September 2, 2015 ([Attachment A](#))
Minutes approved unanimously (5/0)

Motion made by Commissioner Jefferson to approve the September 2, 2015 Meeting Minutes, seconded by Commissioner Suero-Gabler. Minutes approved unanimously.

Commissioner Jones and Commissioner Jester introduced themselves for the record.

Meeting Minutes of September 11, 2015 ([Attachment B](#))
Minutes approved unanimously (7/0)

Chair Warner asked for the following revisions to be made to the Planning Session Notes of the September 11, 2015 CEOC Meeting Minutes:

1. Section: Disparity Study

Original Comment: Automated spend tracking vs. tracking S/ELBEs

Revised Comment: Automated spend tracking and tracking S/ELBEs

2. Section: Disparity Study

Original Comment: Budget of Goods & Services vs. Construction

Revised Comment: Annual City anticipated budget for Goods & Services vs. Construction

3. Section: Disparity Study

Original Comment: No specifics of spend breakdown

Revised Comment: No specifics of spend breakdown except annually

4. Section: Disparity Study

Original Comment: Commissioners to look into what a disparity study is & what are the benefits

Revised Comment: Commissioners to look into details of what a disparity study can provide & what are the benefits

5. Section: Data

Original Comment: Internal audit

Revised Comment: Review of internal data results

6. Section: Data

Original Comment: SLBE spend

Revised Comment: SLBE spend is needed

7. Section: Data

Original Comment: Interdepartmental responsibilities for Equal Opportunity

Revised Comment: Identify what are interdepartmental responsibilities for Equal Opportunity

8. Section: Public Outreach

Original Comment: Commissioner training

Revised Comment: Commissioner training about city EO efforts in different departments

Motion made by Commissioner Jones to approve the modified September 11, 2015 Meeting Minutes, seconded by Commissioner Perez. Minutes approved unanimously.

NON AGENDA PUBLIC COMMENT: None.

ACTION ITEMS: Item A: Selection of Chairs for Newly Established Subcommittees

- Commissioner Ortiz requested to join the Data Subcommittee.
- Commissioner Jefferson requested to be removed from the Business & Political Leadership Subcommittee.
- Commissioner Jones requested to join the Business & Political Leadership Subcommittee.

Sub Item A-1: Vote for Chair of Data Subcommittee

Motion made by Commissioner Perez to nominate Vice Chair Custodio as Chair of the Data Subcommittee, seconded by Commissioner Suero-Gabler. Vote 7/0; motion passes unanimously.

Sub Item A-2: Vote for Chair of Business & Political Leadership Subcommittee

Motion made by Commissioner Perez to nominate himself as Chair of the Business & Political Leadership Subcommittee, seconded by Commissioner Ortiz. Vote 7/0; motion passes unanimously.

Sub Item A-3: Vote for Chair of Public Outreach Subcommittee

Motion made by Commissioner Suero-Gabler to nominate herself as Chair of the Public Outreach Subcommittee, seconded by Commissioner Jester. Vote 7/0; motion passes unanimously.

Sub Item A-4: Vote for Chair of Ad Hoc Annual Report Subcommittee

Motion made by Commissioner Jones to elect Commissioner Jefferson as Chair of the Ad Hoc Annual Report Subcommittee, seconded by Commissioner Suero-Gabler. Vote 7/0; motion passes unanimously.

- The newly established subcommittees consist of the following members:

Data	Business & Political Leadership	Public Outreach	Ad Hoc Annual Report
Kristine Custodio (Chair) Susan Jester Dan Ortiz Cynthia Suero-Gabler	Kristine Custodio Monte Jones Rafael Perez (Chair) Laura Warner	Lan Jefferson Cynthia Suero-Gabler (Chair)	Kristine Custodio Lan Jefferson (Chair)

DISCUSSION ITEMS: Item A: Follow-Up Letter to Mayor & City Council from Commission addressing recommendations in previous correspondence ([dated 3/4/15](#)) ([Attachment C](#))

- Chair Warner stated that this is an informational item, as it is a follow up to an earlier request for a written response.
- Commissioner Jefferson noted that Item #3 of the draft letter was previously discussed in the Bidding & Contracting Subcommittee. The subcommittee wanted to inform the Mayor and City Council of challenges that were continually occurring in addition to requests for improvements. Commissioner Jefferson asked if this should be added to the draft.
- Chair Warner stated that for purposes of this letter, the existing information is fine. For any other communications, the Commission would need to come up with updated information.
- Commissioner Jefferson asked if the list of ongoing challenges should be provided monthly or quarterly?
- Chair Warner stated that any challenges provided to commissioners by consultants, contractors, or vendors and variances through discussions with other professional colleagues should be compiled and provided on a monthly basis.
- Commissioner Jefferson asked if the Commission would want to include this in the letter?
- Chair Warner stated that she would like to keep the letter as-is so that the Commission would not need to vote on this. Any new issues such as issues discussed during the retreat would be addressed in a new letter.
- Commissioner Perez provided clarification stating City Council members were copied on previous correspondence.

DISCUSSION ITEMS: Item B: Status of SDMC § 26.16 Change to Include Women and Disabled Veterans to CEOC Purview

- Chair Warner asked Mr. Foster to provide a status update regarding the Commission's request to include Women and Disabled Veterans in SDMC §26.16.
- Mr. Foster stated staff received an email from the City Attorney's Office regarding this item and was requested by the City Attorney's Office to read the following statement into the record:

“In drafting the proposed amendments to the composition of the CEOC, the City Attorney's Office revisited the language of the ordinance in its entirety. During that review process, the City Attorney's Office discovered legal concerns regarding whether or not it is lawful to consider protected characteristics such as race, sex, color, ethnicity, or national origin in appointing members to the CEOC. These issues will be discussed in a public memo issued by the City Attorney's Office.”

- Commissioner Jones indicated protected classes already exist in the composition of the Commission.
- Commissioner Jefferson indicated the revisions were requested by the Commission to bring the Municipal Code up to date with 2015.
- Commissioner Perez asked if a disparity study was conducted and the results indicated a disparity in regards to under-represented classes would this address City Attorney's concerns?
- Mr. Foster stated he would have to defer the question to the City Attorney's Office.
- Chair Warner asked if it is the intent of City Attorney's Office to get rid of Citizens' Equal Opportunity Commission?
- Mr. Foster stated he is not in a position to respond on behalf of City Attorney's Office. The statement previously provided is the only information staff has at this time.
- Commissioner Jefferson recommended that the Commission draft a response to the City Attorney's Office.
- Chair Warner stated that if the City Attorney's Office would like to address the Commission, the City Attorney's Office should provide concerns in writing so the Commission can respond in writing
- Commissioner Jones stated that because the City Attorney's Office took the time to address the Commission's previous concerns in writing, they should take time to draft a written response for the Commission.
- Commissioner Jefferson asked if the statement read was addressed to the Commission.

- Mr. Foster indicated the statement was received via email. Staff reminded the Commission that, Deputy Chief Operating Officer Ron Villa previously provided a written memorandum indicating that this item will be brought forth to the Commission in December 2015.
- Commissioner Jester asked Mr. Foster to reread the entire statement to the Commission.
- Commissioner Jester asked if the correspondence from the City Attorney's Office was in response to something the Commission asked for.
- Chair Warner indicated that the Commission has been trying to have women and disabled veterans added to the Municipal Code as protected classes as indicated in the Civil Rights Act of 1964. The Commission requested for the two mentioned classes to be added to the Commission's purview. The update to the Municipal Code was previously targeted for October. The Commission received correspondence from Deputy Chief Operating Officer Ron Villa that this item would be brought before the Commission in December 2015.
- Chair Warner noted that the City Attorney's Office may be indicating that protected classes are illegal to be considered by the City.
- Mr. Foster reread the statement from the City Attorney's Office to the Commission as requested by Commissioner Jester.
- Chair Warner asked what criteria would the City use for the selection of new Commissioners?
- Commissioner Suero-Gabler indicated that the statement seemed to defeat the purpose of why the Commission exists.
- Commissioner Jones recommended that the issue should be reviewed by the Business & Political Leadership and Public Outreach Subcommittees. Commissioner Jones indicated that this is the second issue the City Attorney's Office has expressed concerns with regarding the Commission.
- Commissioner Ortiz concurred with Commissioner Jones regarding the approach of this issue.
- Commissioner Jester asked what is the Chair's interpretation of this issue?
- Chair Warner stated that according to the City Attorney the CEOC would be precluded from selecting members from being on Commission based on any particular class of people.
- Commissioner Jester asked isn't this what the CEOC is supposed to be about?
- Chair Warner stated the purpose of the commission is to encourage underrepresented groups to participate in contracting with the City.
- Commissioner Jester asked is it underrepresented groups or protected classes?
- Commissioner Jones indicated that protected classes and unrepresented groups go hand in hand.

- Chair Warner stated that based on participation levels, protected classes are not participating fully in contracting with the City and should be targeted as groups that need to be represented.
- Commissioner Jester asked is there a mission statement or purpose that is legally described for this Commission to exist? If so, does it use that language?
- Chair Warner stated the Commission would need to understand what legal finding the City Attorney's Office has found that undermines the code, as this has been in place for over 20 years.
- Chair Warner asked is there a new state law that has come out that undermines the ability to have a commission that has underrepresented groups?
- Commissioner Perez asked was a disparity study conducted in the past?
- Chair Warner stated that a disparity study had been conducted previously.
- Commissioner Perez asked if the previous disparity study indicated deficiencies, were they not sufficient to be incorporated into the Municipal Code?
- Mr. Foster stated that he would have to defer the Commission's questions to the City Attorney's Office. At last year's retreat, information regarding the last disparity study conducted was provided to the Commission. The disparity study was found to be insufficient by the City Attorney's Office.
- Commissioner Perez confirmed that the Commission was provided a legal opinion from 1997 regarding the use of a disparity study at last year's retreat.
- Chair Warner recommended for subcommittees to review this issue and to send requests & questions to staff for response.
- Commissioner Jones asked are the Commission's meeting minutes posted on the City website?
- Mr. Foster indicated that meeting minutes are posted on the website.

DISCUSSION ITEMS: Item C: [Purchasing & Contracting Staffing Memorandum \(dated 7/16/15\)](#)

- Mr. Foster indicated at the last meeting that questions from the Commission would need to be submitted in writing to staff. Staff received questions from Commissioners and they were forwarded to the Human Resources Department. The Human Resources Department is actively working to answer the Commission's questions and will be distributed accordingly when they are available.
- Commissioner Jefferson stated that the information requested regarding process for recruitment is time sensitive if there is a selection being made.

- Chair Warner provided clarification and stated the Commission asked what the timing was for recruitment of a new director. The memorandum previously provided indicated the search would be completed in 2016.
- Commissioner Jefferson stated that the Commission wanted to find out what the process is for recruitment. This could occur before the Commission receives information.
- Mr. Foster reminded the Commission that an email was distributed to the Commission with links to the City Charter and Administrative Regulations from the City website outlining the recruitment and termination process for unclassified employees. Hard copies were also provided to the Commission at the previous meeting. A job solicitation was posted on the City website on the "Employment Opportunities" page.
- Chair Warner recommended for commissioners to review the information provided and to send any questions to staff for response.

DISCUSSION ITEMS: Item D: Correspondence from the Office of the City Attorney (dated 9/30/15) ([Attachment D](#))

- Chair Warner explained that correspondence was received from the City Attorney's Office in response to concerns from the Commission regarding information released to the public pertaining to termination of at-will employees. Chair Warner noted that the main concern of the City Attorney's Office is that the Commission cannot surmise what happened.
- Mr. Foster clarified that the written response from the City Attorney was in response to Chair Warner's question in regards to the previous CEOC meeting, what specifically the City Attorney was here for, and what they were advising the commission on.
- Commissioner Ortiz stated that the Commission understands what the City Attorney's Office is saying, but is not answering the Commission's question regarding what action will be taken if an employee of the City's personnel information is released.
- Mr. Foster stated that staff received questions from Chair Warner, Vice Chair Custodio, and Commissioner Suero-Gabler. The City Attorney's Office responded to Chair Warner's question. The answer Commissioner Ortiz is looking for will be answered by the Human Resources Department as previously indicated.
- Chair Warner asked what happens to an employee who divulges information regarding another employee's termination?
- Commissioner Ortiz asked if so, what is the process? Would an investigation take place?
- Commissioner Jester stated that all of the hypothetical questions from the Commission came about as a result of the public comment at two separate meetings; this was not anything that the Commission devised.

- Commissioner Jones asked if the public continues to bring up this issue, the Commission cannot take action, correct?
- Mr. Foster reminded the commissioners that the Commission's duties outlined in the Municipal Code are to advise the Mayor, City Council, and other agencies. It is very important that the Commission stays within those parameters as set forth. As far as conversations of specific personnel matters –all Commissioners' were previously in agreement that those are confidential matters and should be handled accordingly. Questions received by staff were sent to Human Resources for response. Staff is still waiting for a response.
- Commissioner Suero-Gabler asked what is the Human Resources Department's timeline for a response?
- Mr. Foster stated that staff does not have a timeline. Staff has spoken with the Director and the department is working on a response.
- Commissioner Ortiz acknowledged that he wanted to make sure the record reflects that the Commission is not privileged to confidential information and that the Commission has no information pertaining to personnel matters. The discussion in previous meetings was based on a member of public speaking on topic and asking questions of the Commission based on a newspaper article.
- Chair Warner asked each of the commissioners to state if they had any confidential information about Mr. Gakunga's termination from City staff that they used when discussing the termination.
- Commissioner Jester stated that she read an article from the Voice of San Diego and may have heard something on the radio or possibly saw something on television.
- Commissioner Ortiz stated the only information he had was the Voice of San Diego article and the statement from public during previous meetings.
- Commissioner Jones stated he read the Voice of San Diego article and the memorandum that came out from City staff, which contained no confidential information nor did it contain the individual's name.
- Chair Warner stated that the only information she had regarding this issue was from the Voice of San Diego and the public testimony by Ms. Rosalind Winstead.
- Commissioner Suero-Gabler stated she only knew of the issue from reading the Voice of San Diego article.
- Commissioner Perez stated he read the article in the Voice of San Diego and heard the public comment in previous meetings.
- Commissioner Jefferson stated she received some personal phone calls about what was written by the Voice of San Diego and heard the public comment.
- Commissioner Jones stressed the importance of quality notes regarding this issue.

- Commissioner Jester stated that the Commission has no desire to know nor has any confidential personnel information. The only question raised by the Commission was regarding what the policies of Human Resources are.
- Commissioner Jones noted that although there is no indirect connection between the Commission and employee information, because the Purchasing & Contracting Director's position has an impact on this Commission. The article in the Voice of San Diego refers to the City's internal audit and the SAP program, which has a direct impact on the Commission and should be of concern. The Commission's progress may be delayed as a result of high turnover.
- Commissioner Jefferson stated that she and other commissioners felt that the conduct of the Deputy City Attorney was inappropriate as he gave the Commission a warning.

DISCUSSION ITEMS: Item E: Review Summary of Goals from Retreat

- Chair Warner briefly summarized the goals set at the September 11 retreat for Fiscal Year 2016-2017. Chair Warner noted that the Commission would like to continue to see improvements in data collected, improve relationships with the business & political community, and inform & educate the public about the CEOC's mission.
- Chair Warner also noted that the Commission would continue to push for a disparity study, make recommendations for improvements in the contracting process, and look for new opportunities to improve business opportunities for small contractors through training, mentoring and other strategies. Part of this process would include benchmarking other agencies' equal opportunity contracting programs, developing a political strategy to support the Commission's efforts, and to review interdepartmental responsibilities for equal opportunity.
- Chair Warner provided an overview of the newly established subcommittees, consisting of the following:

Data	Business & Political Leadership	Public Outreach	Ad Hoc Annual Report
Kristine Custodio (Chair) Susan Jester Dan Ortiz Cynthia Suero-Gabler	Kristine Custodio Monte Jones Rafael Perez (Chair) Laura Warner	Lan Jefferson Cynthia Suero-Gabler (Chair)	Kristine Custodio Lan Jefferson (Chair)

PRESENTATION: James Nagelvoort, Director, Public Works Department

- Recommended Changes to Contractor Prequalification Program (Part II) ([Attachment E](#))
- Mr. Nagelvoort & Mr. Rechany provided the Commission with a brief overview of the presentation given during the previous month's meeting and presented draft recommendations of improvements to the prequalification program.

- Mr. Nagelvoort stated that Public Works will be organizing construction industry workshops to review the recommended changes and receive community input prior to bringing the recommendations before the Mayor for direct input. Mr. Nagelvoort noted that the recommended changes will go before the Infrastructure Committee prior to City Council. Mr. Nagelvoort also stated that the recommendations of changing the debarment requirements of the Municipal Code in the presentation give a progressive or disciplinary process for Field Division construction performance evaluations would also require Council action.
- Chair Warner noted that more frequent field evaluations are a good idea
- Chair Warner asked if the Public Works Department has sufficient staffing levels for more frequent field evaluations, or will the department need more staff? Will additional staff be needed for new training for the contracting community on how to work with the City?
- Mr. Nagelvoort stated that field engineers are already required to do evaluations. Public works indicated they do need to start doing the field evaluations more frequently. The Public Works Department was given more staffing and management is working to fill those positions. Mr. Nagelvoort also noted that four quarterly meetings are held with certified SLBE/ELBE firms; training could be included as part of these events.
- Chair Warner asked if the Public Works Department heard any concerns from small contractors in regards to the costs of getting audited financials and any other related items?
- Mr. Stucky noted that over the course of the year, the Public Works Department has received comments from contractors. Staff has learned that a compiled financial statement is of little value in representing the true financial strength of a contractor.
- Chair Warner asked if compiled financial statements are accepted at any size of firm?
- Mr. Stucky stated that the City will accept financial statements for SLBE/ELBE prequalification applications as long as they are prepared by an independent accountant. In this case SLBE/ELBE firms will be capped at \$500K.
- Chair Warner noted that payment is an issue for both the City and for contractors. Chair Warner also noted that it seems the City's inability to make payments on time and for contractors to be able to withstand non-payment for long periods of time are issues.
- Chair Warner asked if there are any steps being taken to improve the payment process?
- Mr. Nagelvoort stated that the City does track this information. About 80% of contractors are paid within 30 days of invoice submittal. Mr. Nagelvoort reminded the commission that in business of contracting, contracts are structured to require an enormous amount of capital at start of a project. Awarding bodies are looking for contractors to complete work and pass testing prior to paying for services. If contractors are overextending themselves, they find themselves overspending, unable to make payroll, and unable to pay subcontractors & vendors. The California Public Works Code requires payment within 30 days. The City will pay through invoices for non-disputed work and non-change order work.

- Chair Warner asked for disputed work, does the City pay on the non-disputed portion?
- Mr. Nagelvoort stated that the City does pay on non-disputed portions of work. SAP does require that the contractors modify invoices to reflect the agreed upon portion before processing. Some contractors are unwilling to update their invoices.
- Chair Warner asked if invoice revisions push out payment for another 30 days?
- Mr. Nagelvoort stated that invoices are paid after 30 days based on the date of the invoice.
- Chair Warner asked if invoices are revised, how does the payment process work?
- Mr. Nagelvoort stated that the Resident Engineer does not have the authority to cross out line items on an invoice. The contractor will need to reissue the invoice with the amount agreed upon for non-disputed work. Invoices for non-disputed work are paid 30 days from date of the revised invoice.
- Chair Warner noted that training will be great for some smaller or newer firms that do not have the staffing to comply with contract compliance requirements or knowledge of public contracting processes.
- Commissioner Jefferson stated that she liked the improvements and enhancements. As discussed previously in the Bidding & Contracting Subcommittee, the Commission wants the small business community to know when changes occur, which will come about in the proposed training.
- Chair Warner asked when will the Commission have a chance to respond to the written description of the code change?
- Mr. Nagelvoort stated that proposals have been presented to the City Attorney. Once reasonable support and cooperation of the industry is received, the Municipal Code changes will be drafted. In the presentation, a date for implementation of the changes was not provided, as the City does not know how long it will take at this time.
- Chair Warner noted the importance of public workshops and encouraged commissioners to attend and hear the community's concerns.
- Commissioner Jones asked Mr. Nagelvoort to explain more about the proposed mandatory training.
- Mr. Nagelvoort stated that the Public Works Department would need to confirm that this training could be made mandatory. The training will be geared towards brand new contractors who have never done work for the City. The training, conducted by the City's construction management team, will review how to go over contract documents, the contractor's responsibilities for storm water requirements, safety, traffic permits, working hours, right of way, project management, and other related topics.
- Commissioner Jones asked if this will be part of prequalification?

- Mr. Nagelvoort stated that if the City is allowed to do this, it will be part of the prequalification recommendations.
- Commissioner Jones asked if I am a prime and I miss the mandatory training, does this disqualify me from prequalification?
- Mr. Nagelvoort noted that there were previous cases where contractors did not plan ahead and didn't attend training.
- Commissioner Jones asked if prequalification applies to subcontractors.
- Mr. Nagelvoort stated that prequalification is not for subcontractors, only for prime contractors.
- Commissioner Jones asked during the mandatory training, how much time will be spent on understanding invoicing?
- Mr. Nagelvoort stated that the topics discussed are all proposed and a time frame has not been established. The Public Works Department envisions spending about an hour on this topic.
- Commissioner Perez recommended having a guest speaker present at the training that has done business with the City for several years, as the City cannot advise on how to run a business.
- Mr. Nagelvoort concurred with Commissioner Perez. Mr. Nagelvoort stated that the City could identify other organizations who offer training on how to run a business for contractors who are interested. Mr. Nagelvoort also noted that this could be risky as contractors could place blame on the City for bad advice.
- Commissioner Jones asked if there a check-off list that a prime is given to ensure they have met all of the requirements of the contract?
- Mr. Nagelvoort stated this would not be given to contractors during the training, but would be covered at the pre-construction conference after a contract is awarded. Every contract has a pre-construction conference, which includes other entities that may be involved with or affected by the project.

STAFF UPDATES: Christian Silva, Senior Contract Compliance Officer, Equal Opportunity Contracting ([Attachment F](#))

- Equal Opportunity Contracting (EOC) Program Update
- Mr. Silva provided an update on the SLBE program, contracting updates, training sessions and outreach updates.
- Chair Warner requested the following:
 - Staff to note who the primary host was for the event listing in the EOC Program Update.

- Chair Warner asked:
 - Can gender be indicated in the SLBE application summary report?
- Mr. Silva informed Chair Warner that this information is already provided by staff in the application matrix.
- Commissioner Suero-Gabler noted that she was interested in attending some of the upcoming events.
- Commissioner Suero-Gabler asked:
 - When event details are determined, will the Commission be notified?
- Mr. Silva stated that staff will provide this information to the Commission as they become available.

CHAIR ANNOUNCEMENTS: None.

SUBCOMMITTEE REPORTS:

- Chair Warner advised the newly selected subcommittee chairs to coordinate new phone bridge dates and times with staff.

Motion made by Commissioner Jones to adjourn the meeting, seconded by Commissioner Ortiz.

ADJOURNMENT: 7:22 P.M.

NEXT MEETING: November 4, 2015

MATERIALS PROVIDED:

- [Attachment A](#) – September 2, 2015 Meeting Minutes
- [Attachment B](#) – September 11, 2015 Meeting Minutes (Revised)
- [Attachment C](#) – Follow Up-Letter to Mayor & City Council from Commission addressing recommendations in previous correspondence
- [Attachment D](#) - Correspondence from the Office of the City Attorney (dated 9/30/15)
- [Attachment E](#) - Recommended Changes to Contractor Prequalification Program (Part II)
- [Attachment F](#) – EOC Program Update