FILE NO. 150190

Petitions and Communications received from February 14, 2015, through February 23, 2015, for reference by the President to Committee considering related matters, or to be ordered filed by the Clerk on March 3, 2015.

Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information will not be redacted.

From J. Leonard, regarding new California marijuana bill. Copy: Each Supervisor. (1)

From Christine Harris, regarding homeless polluting streets. (2)

From Status of Women, regarding FYs 2012-2013 Family Violence Council report. Copy: Each Supervisor. (3)

From Planning, regarding Notice of Availability of and Intent to Adopt a Mitigated Negative Declaration. (4)

From Julianna Agardi, regarding complaint of homeless policies. Copy: Each Supervisor. (5)

From Marc Snyder, regarding Safe Drug Disposal Stewardship program. File No. 141095. Copy: Each Supervisor. (6)

From Sue Vaughan, regarding rate-payer advocate vacant position to the San Francisco Public Utilities Commission. (7)

From Treasurer and Tax Collector, regarding January 2015 Pooled Investment Report. Copy: Each Supervisor. (8)

From Fish and Game, regarding mammal hunting regulations for 2015-2016. Copy: Each Supervisor. (9)

From Controller, regarding an audit of the Department of Public Health controls over billing, collections, and reimbursements. (10)

From Controller, regarding an audit report on the San Francisco Public Utilities Commission's energy sales to the Modesto and Turlock irrigation districts. (11)

From Controller, regarding the FY2013-2014 San Francisco Public Utilities Commission Ratepayer Assurance Scorecard. (12)

From: Board of Supervisors (BOS)
To: BOS-Supervisors
Subject: FW: Pay attention to new CA marijuana bureau bill now in motion as of Feb. 10, 2015

From: SFCannabisPatientsUnion [mailto:sfcannabisunion@zoho.com]
Sent: Sunday, February 15, 2015 4:11 PM
To: Axis of Love SF, Shona Gochenaur
Cc: John Avalos; Karla Gottschalk(Karla); Shambhala Healing Center; sfawareness@gmail.com; Board of Supervisors (BOS); Bert Johnson; Tom.Ammiano@asm.ca.gov; Russell; Michael Clift; Creekside Collective; Clark Sullivan; Campos, David (BOS); feedback@yourcallradio.org; Heather Nichols; Mike Goldman; sfhomeless@gmail.com
Subject: Pay attention to new CA marijuana bureau bill now in motion as of Feb. 10, 2015

HELLO EVERYONE!

This is for anyone concerned about the rights of humans to use any of natures plant gifts for any good purpose, without governmental approval, new state laws, taxes, burdens and other frauds that only serve the Elite and take away local community resources, spaces, cash flows and cannabis operations, for their continued enrichment, at our expense.

This is a bill (like many bills in other states) that seeks to give all kinds of powers and oversight, taxes and more to the Elite in power.

For example, in Minnesota there are only TWO PEOPLE or ENTITIES that are permitted to grow. That means state laws are being misused to further the goals of the elite, which are to evade all responsibility and punishment (and payment of damages) for the government sponsored, corporation enriched Frauds of Cannabis & Hemp Prohibition, Drug Wars and today's new state laws, which are all scams.

In Colorado recently, the burdens of 'legalization' upon cannabis actually harmed the patients, especially those with little or no income, when medical cannabis reached up to $500 per ounce.

Remember, our local collectives in San Francisco have been healing, reducing harm, helping and relaxing thousands of medical cannabis patients (for decades, safely!) in community collectives for between $50 to $200 per ounce for high grade medicine.

ALL OF THESE NEW STATE LAWS SEEK TO DESTROY 10,000 YEARS OF HUMAN USE AND TRADITIONS ASSOCIATED WITH CANNABIS, AS OUR PRE-EXISTING NATURAL AND HUMAN RIGHT TO HAVE, WITHOUT NEED OF GOVERNMENTAL APPROVAL, PERMISSION OR TO ALLOW MAJOR CORPORATE MONOPOLIES =STEAL= CANNABIS AGAIN TO OUR HARM AND AT OUR EXPENSE.

BASTA! Look at this new state law that at first glance is a Re-Vamping of last years AB26, which would have destroyed all of our personal and community and family rights to cannabis in our own collectives.

1

BOTTOM LINE: WHY THEY WANT YOU TO LET THEM PASS STATE LAWS

The elite want you all to BE FORCED TO PAY INTO OBAMACARE which would enable them to bill medicare for your cannabis useage (even if they jack it up with taxes and expenses up to beyond $500 per ounce -- they don't care if taxpayers fund the next series of bad cannabis law frauds they are implementing in California and from coast to coast),
no matter how much it costs.

The entire cannabis situation is a fraud. The only choice is to END ALL PROHIBITIONS, seek damages for cannabis prisoners and taxpayers who funded these frauds since 1934 and insure no state passes laws that infringe upon our pre-existing rights.

The rights we had before the onslaught of their government sponsored 'evil weed' frauds that all taxpayers paid for -- and they used the public to take away cannabis and replace it with man made toxic chemicals, fuels, fabrics, liquor, narcotics, etc. that also KILLED millions of us.

In addition to using violent, militarized rogue police powers and asset seizure drug war grant frauds to take away the home, land, cars, children and liberties of over 50 million americans over the past 80+ years. All of it and Today's New State Laws -- are all part of ongoing taxpayer funded frauds, planned out and conducted by state and federal government agencies and their bankster corporate partners in real estate and mortgage crimes.

Check this out:

http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB266

This is NOT AB26, this is now AB266 -- Read this and tell us if this will result in higher costs for us all and no protection needed since cannabis is safe enough without more bureaus and agencies to steal more local cash flows with.

Cheers!

Oh, we've started a new group called "10,000 Cannabis Patients From Northern California". Join Us Today!

Join The Group 10,000 Cannabis Patients From Northern California here:

https://www.seen.is/group/7921

Join the San Francisco Cannabis Patients' Union here:

https://www.seen.is/group/4423

No matter what you feel personally about cannabis or people who use cannabis, we could be discussing soothing Teas, healing Garlic or any other natural plant that is already safe. Basic herbs, natural medicines and basic food stuff that we all have an absolute right (absent a showing of a great risk or harm) to have.

As a human adult, we have all the rights, powers and benefits of such FREE GIFTS FROM NATURE, to grow, have and use without asking for permissions, paying taxes, fees or mega profit margins to the government or the elite.

STAND UP FOR US ALL NOW AND WE STAND UP FOR YOU TOMORROW.

Send this email to anyone you feel may wish to help stand up for our common natural rights and stop the elite from stealing plants like cannabis from us all, for their maximum, exclusive benefits and profits, to our great loss.

Thank you.

s/J.Leonard
@El Cafetazo Cafe with volunteers and peers working on these issues, right now. We're here from 4pm to 9pm every day working on these research products and need your support. Please donate food, compassionate medicine or your time and effort to HELP US help us all. When no one helps, nothing gets done.

Co-Founder SF Cannabis Patients Union
Co-Founder SFAwareness Group (c) 2007-2015
Former SF Shelter Monitoring Committee Member (for id only)

From: Christine Lynn Harris [christinelynnharris@yahoo.com]
Sent: Monday, February 16, 2015 12:53 PM
To: Lee, Mayor (MYR); Mar, Eric (BOS); Farrell, Mark (BOS); Christensen, Julie (BOS); Board of Supervisors (BOS); Tang, Katy (BOS); BreedStaff (BOS); BreedStaff (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Wiener, Scott; Campos, David (BOS); Avalos, John (BOS); Suhr, Greg (POL)
Cc: abc7news; ABC7 7 ON YOUR SIDE; ACLU Action Anthony D. Romero; ACLU-Mass Info; Lt. Governor; GovenorCA; Gov
Subject: Homelessness Issues

Hello Ladies and Gentlemen, Public Officials,

Thank you all so very much for your time and consideration, it is appreciated. Please forgive my email, but I thought it may be a good time to write/email to communicate about an issue that is growing and evolving into a larger community issue then ever before.

People are leaving so much debris, trash, and human excrements all over our city. There are other issues with the homelessness as well. Albeit I an have enormous amount of compassion for those who do not have a place to call home, but for them to leave all their trash, defecation, and urination all over the city is something that needs to be solved.

With gratitude for all your work, thank you!

Best Wishes,
Christine Harris
San Francisco, CA

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To: BOS-Supervisors
Subject: FW: Release of Family Violence Council Report for 2012-2013
Attachments: Family Violence Council Report Press Release.pdf; Family Violence Council Report FY 2012-13.pdf; highlights of Family Violence Council Report FY12-13.pdf

From: Kandel, Minouche (WOM)
Sent: Tuesday, February 17, 2015 10:50 AM
To: Kandel, Minouche (WOM)
Cc: Murase, Emily (WOM)
Subject: Release of Family Violence Council Report for 2012-2013

Dear Colleagues:

On behalf of the Family Violence Council, the Department on the Status of Women is excited to release the Family Violence Council Report for 2012-13. Attached please find a copy of the report, a highlights sheet, and a press release, copied below:

MEDIA RELEASE **For immediate release:** February 17, 2015

CONTACT: Minouche Kandel, Director of Women's Policy, San Francisco Department on the Status of Women, 415-572-6482, minouche.kandel@sfgov.org

San Francisco Issues Comprehensive Report on Family Violence for Fiscal Years 2012-13

Today, the San Francisco Family Violence Council releases the *2012 and 2013 Comprehensive Report on Family Violence in San Francisco*, which covers data from July 2011-June 2013 from 16 government agencies and various community service providers related to child abuse, domestic violence, and elder abuse. This 4th annual report documents an unprecedented 44 months without any domestic violence related homicides in San Francisco, from May 2010 – January 2014.

For the first time, this report captures data from the Department of Public Health Community Clinics, San Francisco General Hospital, and the Sheriff's Department. Some of the data trends include:

- 161% increase in domestic violence cases brought to trial by the District Attorney's Office;
- 73% increase in the number of domestic violence cases investigated by the Police Department;
- 50% increase in the number of elder abuse convictions by the District Attorney's Office;
- 45% increase in the number of Adult Probation Department domestic violence probation revocations;
- Rates of sexual and dating violence among transgender students in the San Francisco Unified School District which are two to four times higher than in the general student population.

Mayor Edwin Lee shared his strong support for the continued work of the Family Violence Council: "San Francisco is a leader in ensuring fairness, equity, and equal rights for women and girls. The San Francisco Family Violence Council is an important partner in our City's efforts to ensure equality for all by creating benchmarks on collecting, analyzing, and disseminating family violence data, so that we can advance policies that protect women and families against violence at all ages."

The Family Violence Council welcomed two new Chairs for 2015: Katie Albright, Executive Director of the San Francisco Child Abuse Prevention Center, and Shawna Reeves, Director of Elder Abuse Prevention at the Institute on Aging. Together with Beverly Upton, Executive Director of the Domestic Violence Consortium, the Chairs stated jointly: "San Francisco is unique in bringing the issues of child abuse, elder abuse and domestic violence together in its Family Violence Council. We are able to learn and share insights from one another, highlight disparities in how different forms of abuse are handled in our various systems, and develop recommendations for safer families."

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Dr. Emily Murase, Executive Director of the San Francisco Department on the Status of Women, which convenes the quarterly meetings of the Council, added, "This report shines a light on family violence in San Francisco. We can only address the problem if we know its extent. Tracking and analyzing the data equips us with tools to work alongside our community partners to intervene in these intersecting family violence issues."

The *2012 and 2013 Comprehensive Report on Family Violence* is available at the San Francisco Department on the Status of Women website: http://sfgov.org/dosw/family-violence-council

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Minouche Kandel, Esq.
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San Francisco Department on the Status of Women
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San Francisco, CA 94102
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Fax: 415-252-2575
minouche.kandel@sfgov.org

City and County of San Francisco
DEPARTMENT ON THE STATUS OF WOMEN

Emily M. Murase, PhD
Executive Director

Edwin M. Lee
Mayor

MEDIA RELEASE **For immediate release:** February 17, 2015

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25 Van Ness Avenue, Suite 240 | San Francisco, CA 94102 | sfgov.org/dosw | dosw@sfgov.org | 415.252.2570

Comprehensive Report on Family Violence in San Francisco 2012 & 2013

Child Abuse

Domestic Violence

Elder Abuse

Family Violence Council

Addressing Violence throughout the Lifespan

City and County of San Francisco
Department on the Status of Women

Compiled by Kristin Snell & Minouche Kandel

January 2015

Emily M. Murase, PhD
Executive Director

Edwin M. Lee
Mayor

Acknowledgements

Special thanks to the Family Violence Council Tri-Chairs:

- Kathy Baxter, Director, Child Abuse Council at the San Francisco Child Abuse Prevention Center;
- Beverly Upton, Executive Director, San Francisco Domestic Violence Consortium; and
- Talitha Guinn, former Director, Elder Abuse Prevention at the Institute on Aging.

The 2012 and 2013 *Comprehensive Report on Family Violence in San Francisco* would not have been possible without the tremendous effort of Department on the Status of Women graduate policy fellow Kristin Snell, who put her heart and soul into cajoling data from all sectors of San Francisco, and compiled and edited the report. Council Tri-Chairs provided important feedback, and Women's Policy Director Minouche Kandel supervised the production of this report. Policy Fellow Allison Ipsen contributed to the cover design. Also thanks to Dr. Colleen Henry, who shared the results of her unpublished, original research into domestic violence cases at Family and Children's Services.

The Family Violence Council is staffed by the San Francisco Department on the Status of Women, under the supervision of Dr. Emily M. Murase, Executive Director.

Compiled by Kristin Snell, MSW Candidate, UC Berkeley &
Minouche Kandel, Esq., Women's Policy Director
The San Francisco Family Violence Council is administered by the Department on the Status of Women.

Visit http://sfgov.org/dosw/family-violence-council for more information about the Family Violence Council and to download a copy of this report.

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Executive Summary

The 4th *Comprehensive Report on Family Violence in San Francisco* covers two years' worth of data from government agencies and community service providers, from July 1, 2011- June 30, 2013 (Fiscal Years 2011-12 and 2012-13). The report demonstrates the continued prevalence of family violence in San Francisco. The following summarizes the detailed data in this report.

Child Abuse

The Department of Public Health launched a 52-week **Child Abuse Intervention Program** in November 2012, marking a major advance in addressing child abuse. Even though state law mandates that persons convicted of child abuse participate in a 52 week Child Abuse Intervention Program, San Francisco is one of only a few counties in California to establish such a program. The Adult Probation Department also established a first time Child Abuse Unit in FY2011-12.

The opening of the San Francisco **Children's Advocacy Center** in January 2014 represents a momentous accomplishment in San Francisco's efforts to provide a coordinated, holistic response to victims of child abuse. The Children's Advocacy Center provides a calm and safe place for children and families to receive a broad range of trauma-informed services, including high quality pediatric medical care, behavioral health services, case management and other essential services.

Child Abuse	# in FY11-12	% change from FY10-11	# in FY12-13	% change from FY11-12
Department of Emergency Management: 911 Calls	26	N/A[1]	33	27%
Police Department: Cases Received & Assessed	2,959	N/A	5,078	N/A[2]
District Attorney: Cases Received	171	0%	204	19%
District Attorney: Cases Filed	61	-13%	56	-8%
District Attorney Victim Services: Clients Assisted	339	-3%	270	-20%
Adult Probation Department: Child Abuse Unit	30	30%[3]	30	0%
DPH: Child Abuse Intervention Prevention Program	Program launched in November 2012		12	N/A
Child Protective Services Referrals	6,025	1%	6,239	3%
San Francisco Child Abuse Prevention Center TALK Line Calls Received	17,852	-3%	15,691	-12%

Domestic Violence

The number of domestic violence cases has fluctuated over the past two fiscal years: 911 calls increased by 3% in FY2011-12 and FY2012-13, while the District Attorney's Office saw a moderate decrease in the number of domestic violence cases received in both FY2011-12 and FY2012-13. The San Francisco Police Department saw a 15% increase in cases received in

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1 Department of Emergency Management added child abuse call codes midway through FY2010-11, therefore data not applicable for comparison.

2 Increase in cases due to improved Police Department data collection and analysis, and not necessarily due to increased number of cases received.

3 This 30% increase refers to the FY2010-11 Adult Probation Department general supervision cases related to child abuse, prior to the Child Abuse Unit being established.

FY2011-12, which then decreased by 12% in FY2012-13. The caseload for Adult Probation remained relatively steady. There has been a substantial 32% increase in probation revocations over the past five years. Domestic violence shelters provided 30% more bed nights to survivors.

Perhaps the most significant data point was the 32% decrease in the average monthly caseload numbers for the domestic violence advocates at the CalWORKS program, a division of San Francisco's Human Service Agency.

One remarkably hopeful note around domestic violence prevention and intervention efforts during these past two fiscal years is the lack of a single domestic violence related homicide in San Francisco during these years. For 44 months, from May 2010 to January 2014, San Francisco experienced an unprecedented streak without a domestic violence related homicide. This compares with the statewide average of 37.5% of all female homicides, and 47.6% of female homicides where the contributing circumstance is known,[4] attributable to domestic violence. For the first time, this report tracks family violence related homicides in San Francisco.

Domestic Violence	**# in FY11-12**	**% change from FY10-11**	**# in FY12-13**	**% change from FY11-12**
911 Calls	7,719	3%	7,979	3%
Police Department: Cases Received & Assessed	4,560	15%	4,031	-12%
District Attorney: Cases Received	1,856	-10%	1,735	-7%
District Attorney: Cases Filed	496	-17%	478	-4%
District Attorney Victim Services: Clients Assisted	1,137	22%	990	-13%
Adult Probation: General Supervision Statistics	540	1%	522	-3%
Sheriff's Department: RSVP participants referred for Violence Prevention Programming	Data not previously captured		29	N/A
Family Court: Requests for Domestic Violence Restraining Orders	1,258	-8%	1,182	-6%
Department of Public Health: Trauma Recovery Center Clients	738	-3%	742	1%
Child Support Services: Cases with Family Violence	1,611	-6%	1,574	-2%
CalWORKS: Average Monthly Caseload of Domestic Violence Advocates	246	5%	167	-32%
Domestic Violence Crisis Line Calls	32,612	N/A[5]	24,461	N/A[6]
Domestic Violence Shelter Bed Nights	5,228	9%	6,814	30%

Elder Abuse

Data shows an overall increase in the number of elder abuse cases received between FY2011-12 and FY2012-13: Adult Protective Services saw a 9% increase in the number of cases received,

[4] California Department of Justice, *California Homicide Statistics for 2011*, by Kamala D. Harris, Sacramento, CA, 2011, http://oag.ca.gov/sites/all/files/agweb/pdfs/cjsc/publications/homicide/hm11/hm11.pdf).
[5] Previous reports tracked only the crisis calls at hotlines funded by the Department on the Status of Women. To get a more accurate picture, this year's report includes all crisis calls received by the crisis lines, and makes comparison to prior years inapplicable.
[6] Though it appears "Crisis Line Calls" fielded decreased, this change was due to several agencies modifying the way in which they track their service data rather than a reduction in services.

and 911 calls regarding elder abuse rose by 30%. Conversely, the District Attorney's Office saw a modest decrease in the number of cases received in both fiscal years, which mirrors the Elder Abuse Forensic Center trends, whose new cases decreased by approximately 10% each year. However, the District Attorney's Office nearly doubled the number of cases filed, and convictions have increased by 34% from FY2010-11. Requests for restraining orders in elder abuse cases climbed significantly, more than doubling from FY2010-11 to FY2011-12, then remained relatively steady through FY2012-13.

In December 2012, the Institute on Aging partnered with the Center of Excellence on Elder Abuse and Neglect at UC Irvine to release an innovative smartphone application, **368+.** Designed to help California law enforcement respond to abuse of elders and dependent adults, this technology reflects a significant stride in providing first responders tools they can use in the field to provide appropriate response and referrals to victims of elder abuse.

Elder Abuse	**# in FY11-12**	**% change from FY10-11**	**# in FY12-13**	**% change from FY11-12**
911 Calls	100	N/A[7]	130	30%
Police Department: Elder Physical Abuse Cases Received	57	-15%	65	14%
Police Department: Elder Financial Abuse Cases Received	70	N/A[8]	62	-11%
District Attorney: Cases Received	99	-1%	92	-7%
District Attorney: Cases Filed	69	97%	60	-13%
District Attorney Victim Services: Clients Assisted	248	9%	205	-17%
Probate Court: Requests for Elder Abuse Restraining Orders	83	124%	79	-5%
Adult Protective Services: Cases Received	5,924	2%	6,455	9%
Elder Abuse Forensic Center New Cases	40	-9%	36	-10%

[7] Call codes introduced mid-way through FY2010-11, percentage comparison not applicable.

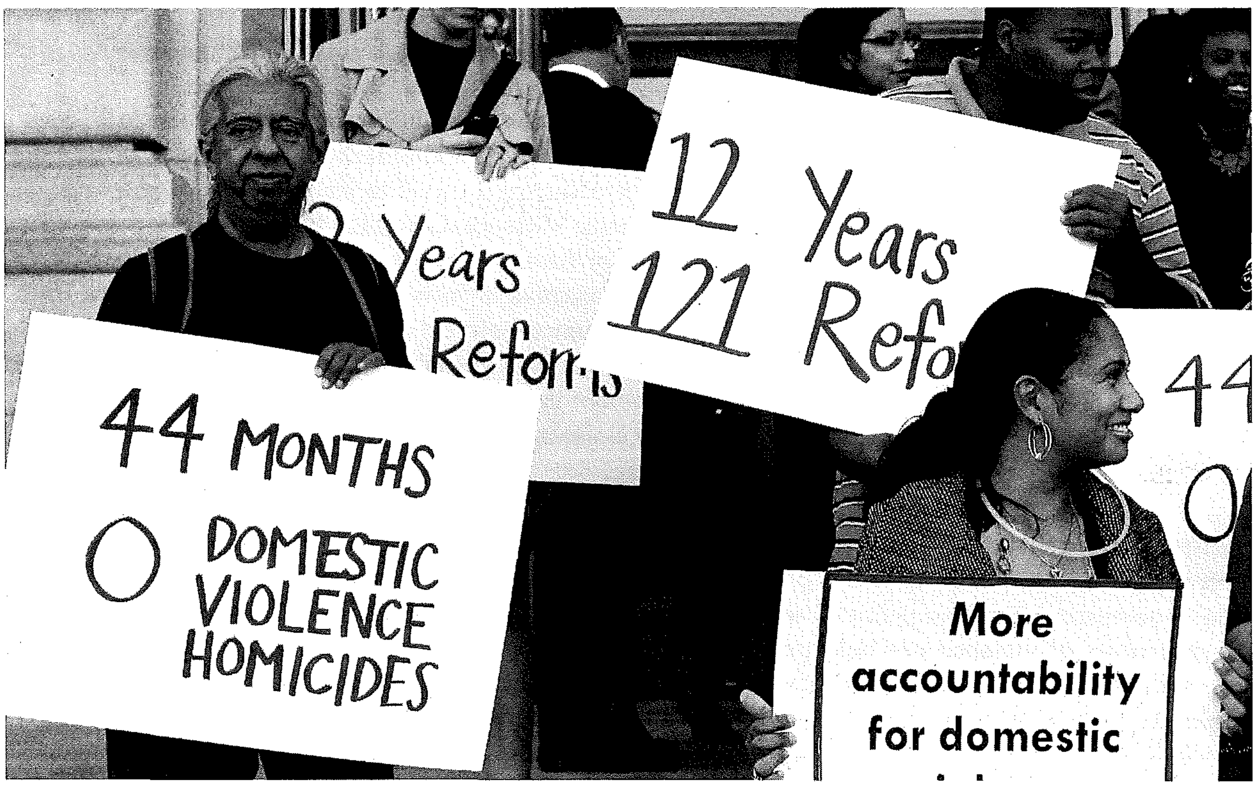
[8] Cases of Elder financial abuse received at SFPD now overseen by SVU Financial Crimes Unit, and were not tracked in the same method as prior years for this report.

Recommendations for the Upcoming Year

Each agency participating in the Family Violence Council committed to an objective related to family violence it would implement in 2015, resulting in a record 23 objectives for the upcoming year. These objectives are detailed in the Recommendations section of this report, and are summarized below:

1. Create a Justice and Courage Committee within the Family Violence Council;
2. Advocate for change in federal tracking data in the Minimum Data Set system to capture questions related to elder abuse;
3. Develop a factsheet on family violence to distribute to San Francisco Unified School District;
4. Establish a victim/survivor program within the San Francisco Adult Probation;
5. Seek active involvement of Board of Supervisors in the Family Violence Council;
6. Increase services and trainings, improve mental health access, and develop shared database at Children's Advocacy Center;
7. Amend the Family Violence Council Ordinance to include the Public Defender, the Juvenile Probation Department, the Animal Care and Control Department, and the San Francisco Unified School District as official members;
8. Develop a joint outreach campaign on all forms of family violence including child abuse, domestic violence, and elder abuse; and advocate for increased state funding of Adult Protective Services;
9. Share Department of Child Support Services training with a broader community;
10. Refine violence prevention funding from the Department of Children, Youth & Families to better serve juvenile justice system involved youth;
11. Provide family violence refresher training to Department of Emergency Management staff;
12. Develop a joint protocol between the Police Department and the Family & Children's Services on the handling of child abuse investigations;
13. The Department of Public Health will train staff on trauma informed systems of care and improve its intimate partner violence data collection;
14. The District Attorney's Office will train attorneys on domestic violence and child abuse; develop policies, protocols, and state legislation on elder abuse, and develop protocols for use of the new courthouse dog;
15. The Domestic Violence Consortium will continue its domestic violence court watch program, work on language access with the police department, and continue work with the Adult Probation Department on monitoring Batterer's Intervention Programs;
16. The Elder Abuse Forensic Center will increase attendance at its Multidisciplinary Teams; host experts on consumer law and Medi-Cal, and focus on elder abuse prevention;
17. The Juvenile Probation Department will train its officers and investigate best practices on responding appropriately to commercially, sexually exploited youth;
18. The Mayor's Office will light up City Hall purple annually for domestic violence awareness month in October;
19. The Police Department will create referral cards for cases when a parent is arrested; and finalize policies for updated domestic violence general order and new officer involved general order;
20. The Public Defender's Office will expand its community re-entry program for defendants;

21. The Sheriff's Department will prioritize inmates with domestic violence histories in its in-custody and in community violence prevention and substance abuse recovery programs; provide case managers for persons who are victims of family violence; create new vocational programs for inmates with histories of domestic violence and develop new programs for children of incarcerated parents.
22. The Superior Court will continue to host justice partner meetings.
23. The School District will focus on LGBTQ youth who are disproportionately victims of violence; initiate a young men's health program; evaluate dating violence programming to ensure it address LGBTQ youth; and investigate best practices for supporting unaccompanied minors.



Introduction

The Family Violence Council is pleased to provide the 4th *Comprehensive Report on Family Violence in San Francisco*, covering Fiscal Years 2012 and 2013. Since the report was first released in June 2009, it has expanded to include data from an increasing number of city departments, providing a more nuanced picture of the current status of family violence in San Francisco, and the agencies and services in place to respond to this complex issue. Child abuse, domestic violence, and elder or dependent adult abuse are all forms of family violence and describe abuse that may be physical, sexual, psychological, or economic. Family violence has serious and traumatizing effects on individuals, families, and entire communities, and is defined as a pattern of behavior in any relationship that is used to isolate, neglect, or exercise power and control over an intimate partner, child, elder, or dependent adult.

About the Council

The San Francisco Family Violence Council (Council) was established by local ordinance to increase awareness and understanding of family violence and its consequences; and to recommend programs, policies, and coordination of City services in order to reduce the incidence of family violence in San Francisco. In 2007, San Francisco became the first county to broaden the scope of its Attorney General-mandated Domestic Violence Council to include child abuse and elder abuse along with domestic violence. The Family Violence Council is tri-chaired by three community-based experts in these different forms of family violence and has become a key body in coordinating enhanced communication and collaborative efforts among its many partners. The Council recommends and helps implement family violence-related policy changes to the City and issues this report annually. The current report combines two years' worth of data, as no report was issued in 2013. The report remains the only document that provides a broad view of the statistics and trends related to the full spectrum of family violence in San Francisco.

About this Report

This report fulfills one of Council's priorities - the tracking and analyzing of family violence data. The report provides a snapshot of where and how survivors of violence seek help and how perpetrators of violence are held accountable and monitored. Trends identified in the report serve as an important tool for policy-makers, agencies serving victims and perpetrators of family violence, and community advocates throughout San Francisco. This report summarizes data from July 1, 2011 to June 30, 2013 (FY2011-12 and FY2012-13), and includes information from 11 City public agencies and 25 community-based organizations. The data in this report includes:

- Calls to 911;
- Cases received and investigated by the San Francisco Police Department;
- Child Abuse, Domestic Violence, and Elder Abuse cases at the District Attorney's Office;
- Victims of family violence who received advocacy and support from the District Attorney's Victim Services Division;
- Caseloads of the Adult Probation Department's Domestic Violence Unit;
- Caseloads of the violence prevention programs at the Sheriff's Department;
- Domestic Violence Restraining Order requests and dispositions from Family Court;

- Elder Abuse Restraining Order requests and dispositions from Probate Court;
- Child abuse allegation and substantiation data from Family and Children's Services;
- Elder and dependent adult abuse and neglect data from Adult Protective Services;
- Data on individuals identified as experiencing domestic violence in programs of the Department of Public Health;
- Family Violence caseloads from the Department of Child Support Services;
- CalWORKs Domestic Violence advocate caseloads;
- Child abuse reports and programming on healthy relationships at San Francisco Unified School District;
- Child Abuse community-based support services;
- Domestic Violence community-based support services;
- Elder Abuse community-based support services.

San Francisco recognizes the importance of providing a broad range of access points for survivors of abuse. Our network of public agencies and non-profit providers are all key parts of a system intended to protect and support those who seek help, and to hold accountable those who perpetrate family violence. By understanding how and where residents access family violence-related services, and how service providers meet the needs of survivors and hold perpetrators of abuse accountable, the City is better able to create impactful policies, fund appropriate programs, and keep San Francisco residents safe in their homes.

It is important to note that this report does not provide an unduplicated count of victims of family violence as there is currently no method for tracking an individual from program to program or service to service. For example, it is possible that a survivor of elder abuse could be counted in the Adult Protective Services data, as well as in the 911 call data and the Probate Court Restraining Order data. Therefore, the possibility of the duplicated count of some, or even many, individuals is likely. There can be some measure of linear analysis when examining the criminal justice statistics, as most cases follow a standard path from a 911 emergency call, to a Police Department report, to a case referred to the District Attorney's Office. However, the complexities of family violence, and the many variables involved in these cases, make even this well-defined route prone to twists and turns. Though the report is structured in this order for ease of reading, straight progressions cannot and should not be assumed.

San Francisco's prioritization of responding to family violence manifests in the active involvement of so many City departments and non-profits in the work of the Family Violence Council. This year's report includes a record 23 recommendations for the upcoming year, generated by each department. Through education, collaboration, advocacy, and systems change, the Council aspires to eliminate family violence and make San Francisco a safer place for residents of all ages.

Work of the Council – Major Achievements in Fiscal Years 2012 & 2013

During Fiscal Years 2011-2012 (FY11-12) and 2012-2013 (FY12-13), the Family Violence Council made significant progress towards fulfilling the policy recommendations identified in prior reports or at Family Violence Council meetings.

Increased Data Collection

The Council expanded its data collection as a direct result of Recommendations 1-3 identified in the *2011 Annual Report*. For the first time, the *2012* and *2013 Report* includes:

- The number of family violence related homicides;
- Data from the Sheriff's Department on its domestic violence programs;
- Expanded data from the San Francisco Unified School District on violence prevention programming;
- Expanded data from the Department of Public Health's emergency room at San Francisco General Hospital and outpatient clinics.

Increased Training

The Council also identified increased training and outreach efforts as key priorities in the 2011 Report. Community advocates and subject experts have conducted joint trainings with the Department of Emergency Management 911 dispatchers on the topics of child abuse, domestic violence and elder abuse over the course of the past two years. Additionally, the Victim Services Division of the District Attorney's Office and SafeStart collaborated on training all SafeStart advocates in assisting youth who witness community violence with accessing the state victim compensation program.

Child Abuse Intervention Program

A primary goal of the Council that has been carried out over the past two years has been the development of a child abuse intervention program. Although the California Penal Code requires individuals who have been convicted of child abuse to attend a one-year intervention program, San Francisco, like the majority of California counties, was not in compliance with this law for a number of years. After several years of work by an Intervention Committee, the 52-week Child Abuse Intervention Program launched in November 2012, and has enrolled 12 clients since this time. San Francisco is one of only a handful of counties in California that offer a certified child abuse intervention program.

San Francisco Family Violence Council Members Fiscal Years 2012 & 2013

Agency	Family Violence Council Representative
Adult Probation Department	Chief Wendy Still, Tina Gilbert, Sergio Calizo
Batterer's Intervention Programs	Dr. Antonio Ramirez
Board of Supervisors	Supervisor David Chiu, Catherine Rauschuber
Commission on the Status of Women	Stephanie Simmons, Julie Soo, Nancy Kirshner-Rodriguez, Alicia Gamez
Department of Aging and Adult Services	Teresa Guillen, Anne Hinton
Department of Child Support Services	Dir. Karen Roye, Thomas Wolf
Department of Children, Youth, and Their Families	Veronica Martinez, Jasmine Dawson, James Baird
Department of Emergency Management	Teresa Castora, Lisa Hoffman, Cecile Soto
Department of Public Health	Dr. Leigh Kimburgh, Carol Schulte
District Attorney's Office	Jean Roland, Marshall Khine, Tara Anderson, Marianne Barrett, Maria Bee
Domestic Violence Consortium	Beverly Upton
Human Services Agency	Dan Kelly, Sophia Isom
Juvenile Probation Department*	Chief Allen Nance
Mayor's Office	Paul Henderson, Edwin Lindo
Police Department	Capt. Jason Fox, Capt. Joseph McFadden, Sgt. Antonio Flores, Capt. Antonio Parra, Sgt. Arturo Stellini, Commander John Loftus, Lt. Michelle Jean
Public Defender's Office*	Simin Shamji
San Francisco Child Abuse Prevention Council	Kathy Baxter
San Francisco Consortium for Elder Abuse Prevention	Mary Twomey, Talitha Guinn
San Francisco Unified School District*	Ilsa Bertolini/Laurie Vargas
Sheriff's Department	Sunny Schwartz, Delia Ginorio
Superior Court	Judge Ronald Albers, Judge Kathleen Kelly

**These agencies participate in the Council but are not designated members in the Ordinance, San Francisco Administrative Code Article XIX SEC. 5. 190-3*

Family Violence-Related Homicides

For the *2012 and 2013 Report*, we have begun collecting data on the number of homicides in San Francisco related to child abuse, domestic violence, or elder abuse as well as demographic information on gender, age, and race/ethnicity of the victims. There were no family violence-related homicides committed during FY2011-12 or FY2012-13.

Family Violence-related Homicide Statistics		
	FY11-12	FY12-13
Child Abuse Homicides	0	0
Domestic Violence Homicides	0	0
Elder Abuse Homicides	0	0
Total	**0**	**0**

Criminal Justice Agencies

Department of Emergency Management

The San Francisco Department of Emergency Management houses the Division of Emergency Communications, which receives approximately 3,000 calls every day.[9] Department of Emergency Management dispatchers use scripts to determine which of the 35 family violence-related call codes to assign each 911 call. A preliminary question asks callers the identity of and relationship to the perpetrator, and if the caller indicates a spouse or partner is involved, the dispatcher uses one of the 14 domestic violence call codes. If the caller indicates a family member or caregiver of a child, an elder, or a dependent adult is involved, the dispatcher uses one of the 18 elder abuse or 3 child abuse call codes. Dispatchers ask additional questions to clarify the type of family violence incident that is happening and determine which specific code to assign to the call.

911 Family Violence Calls by Type
FY2010-2013

Call Type	Description	FY10-11		FY11-12		FY12-13	
		#	%	#	%	#	%
DOMESTIC VIOLENCE CALLS							
418DV	Fight or Dispute - No Weapons Used	4,039	54%	4,193	54%	4,370	55%
240DV	Assault/Battery (includes unwanted physical contact)	2,758	37%	2,798	36%	2,826	36%
650DV	Threats (written, verbal, or recorded)	296	4%	298	4%	272	3%
594DV	Vandalism/Malicious Mischief (property damage only)	106	1%	93	1%	106	1%
245DV	Aggravated Assault (severe injuries or objects used to injure)	73	1%	81	1%	109	1%
222DV	Armed Assailant – Knife	68	1%	62	1%	70	1%
602DV	Break-In	56	1%	64	1%	63	1%
416DV	Civil Standby (officer takes a person to retrieve belongings)	46	1%	45	1%	41	1%
419DV	Fight or Dispute – Weapons Used	20	<1%	22	0%	25	<1%
219DV	Stabbing	18	<1%	23	0%	10	<1%
100DV	DV Alarm given	17	<1%	0	0%	0	0%
221DV	Armed Assailant – Gun	11	<1%	14	<1%	19	<1%
910DV	Well-Being Check (often at the request of another individual)	2	<1%	13	<1%	10	<1%
646DV	Stalking	0	0%	13	<1%	58	1%
	Miscellaneous DV Codes	0	0%	0	0%	0	0%
Total Domestic Violence Calls		**7,510**		**7,719**		**7,979**	

[9] San Francisco Department of Emergency Management Annual Report Fiscal Year 2012-2013. Retrieved April 21, 2014 from http://sfdem.org/modules/showdocument.aspx?documentid=2045.

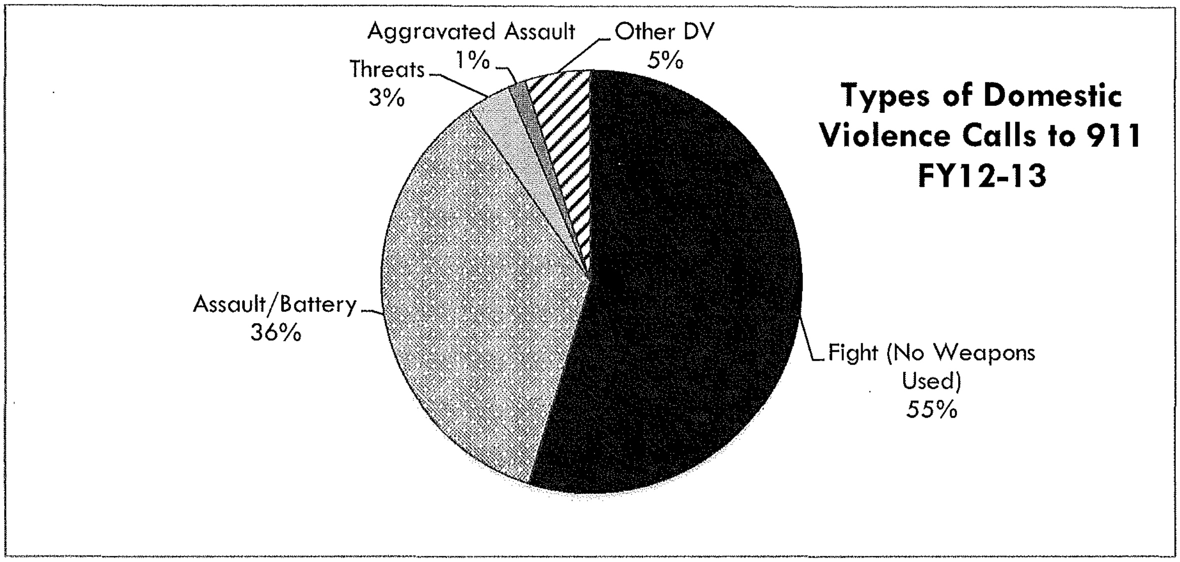
911 Family Violence Calls by Type FY2010-2013							
Call Type	Description	FY10-11		FY11-12		FY12-13	
		#	%	#	%	#	%
CHILD ABUSE CALLS							
240CA	Assault/Battery (includes any unwanted physical contact)	21	91%	17	65%	29	88%
910CA	Well-Being Check (often at the request of another individual)	2	9%	6	23%	4	12%
245CA	Aggravated Assault (severe injuries or objects used to injure)	0	0%	3	12%	0	0%
	Total Child Abuse Calls	**23**[10]		**26**		**33**	
ELDER ABUSE CALLS							
368EA	Elder Abuse	30	59%	48	48%	55	55%
240EA	Assault/Battery	7	13%	21	21%	36	36%
470EA	Fraud	5	10%	11	11%	17	17%
910EA	Well-Being Check	4	8%	7	7%	10	10%
488EA	Petty Theft	2	4%	3	3%	4	4%
650EA	Threats	2	4%	2	2%	4	4%
418EA	Fight or Dispute – No Weapons Used	1	2%	6	6%	4	4%
100EA	Alarm (given to a victim to alert 911)	0	0%	0	0%	0	0%
211EA	Robbery	0	0%	0	0%	0	0%
212EA	Strong-Arm Robbery	0	0%	1	1%	0	0%
213EA	Purse snatch	0	0%	0	0%	0	0%
219EA	Stabbing	0	0%	0	0%	0	0%
221EA	Armed Assailant – Gun	0	0%	0	0%	0	0%
222EA	Armed Assailant – Knife	0	0%	0	0%	0	0%
245EA	Aggravated Assault (severe injuries or objects used to injure)	0	0%	1	1%	0	0%
419EA	Fight or Dispute – Weapons Used	0	0%	0	0%	0	0%
487EA	Grand Theft	0	0%	0	0%	0	0%
646EA	Stalking	0	0%	0	0%	0	0%
	Total Elder Abuse Calls	**51**[11]		**100**		**130**	
	Total Family Violence Calls (Calls Coded with DV, CA, EA)	**7,584**		**7,845**		**8,142**	

When stalking calls are included, the number of calls has increased by 30% over the past five fiscal years, ranging from 6,583 in FY07-08, to 8,535 calls in FY2012-13.

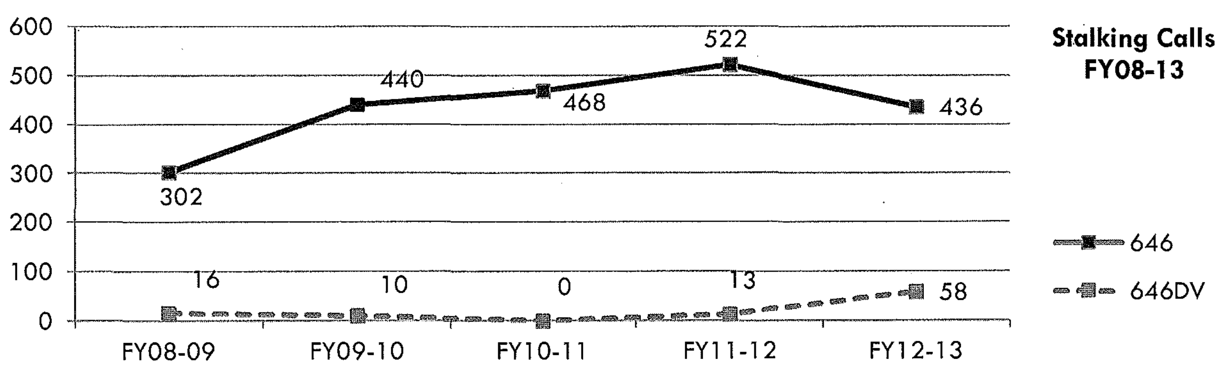
[10] Call codes introduced February 2011; represent data captured from Feb-June 2011 for FY2010-11.
[11] Call codes introduced February 2011; represent data captured from Feb-June 2011 for FY2010-11.

Domestic Violence

In FY2012-13, 911 dispatchers received 7,979 domestic violence-related calls. This marks the fifth year of an increase in domestic violence calls to 911. As noted earlier, it is difficult to gauge whether the increase reflects increased awareness / willingness to report domestic violence, or an actual increase in the incidence of domestic violence. Of these calls, 55% were coded 418DV indicating a fight or dispute with no weapons involved. This percentage is consistent with the prior five years in which 418DV calls accounted for more than half of all DV-coded calls. The second most frequent type of domestic violence incident reported was assault and battery (240DV), which accounted for 36% of DV-coded calls. Of the remaining 10%, one third (3%) were coded as threats with the remaining 7% dispersed among 10 other domestic violence incident types.



There were 58 calls coded as domestic violence stalking (646DV) in FY2012-13, up from 0 calls coded as domestic violence stalking in FY2010-11, and 13 calls coded as domestic violence stalking in FY2011-12. This increase may represent better understanding of when to use the domestic violence stalking code. The non-domestic violence stalking code (646) continues to be frequently used, though the number of calls coded decreased by 17% from FY2011-12 to FY2012-13.

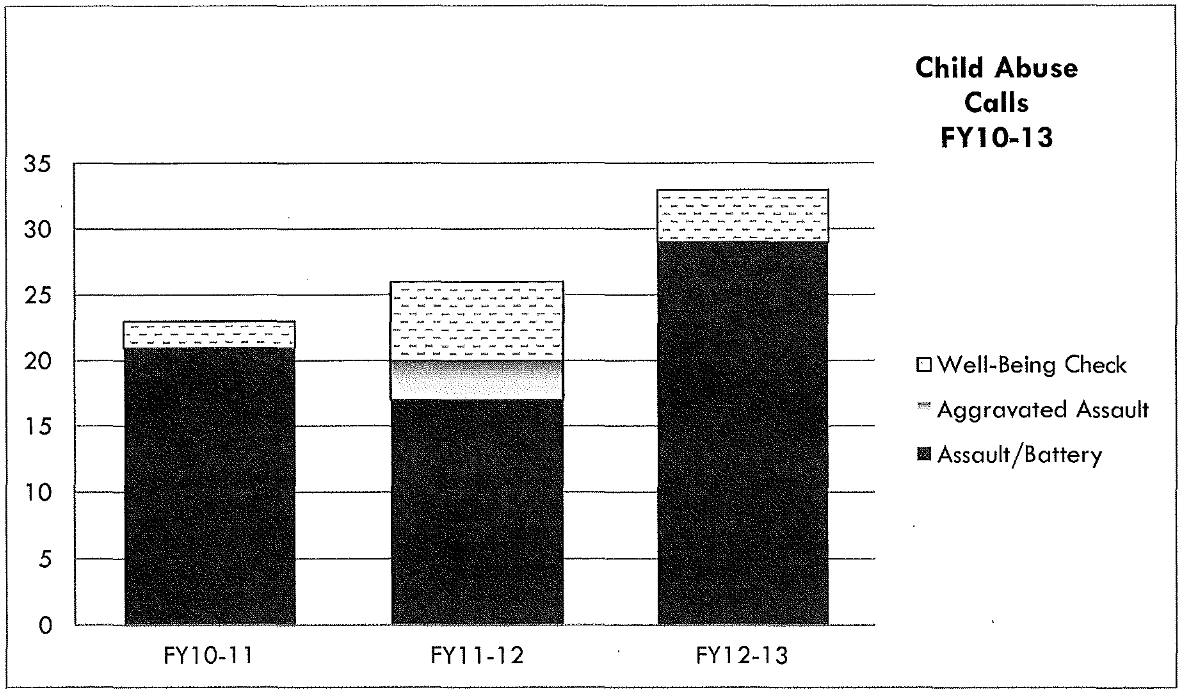


Though stalking is often a component of domestic violence cases, the code assigned to each call represents the most severe aspect of that particular call. For example, if a caller reports elements of stalking but also reports an assault, the call will be coded as 240DV- Assault/Battery to indicate an assault. Due to this method of coding, it is unclear how many serious domestic violence cases also contain elements of stalking. In addition, though a call may be coded as stalking without the DV indicator, responding officers may receive additional information at the scene that will lead them to refer those cases to the San Francisco Police Department's Domestic Violence Response Unit.

Child Abuse

In February 2011, the Department of Emergency Management and the Police Department instituted three new child abuse call codes:

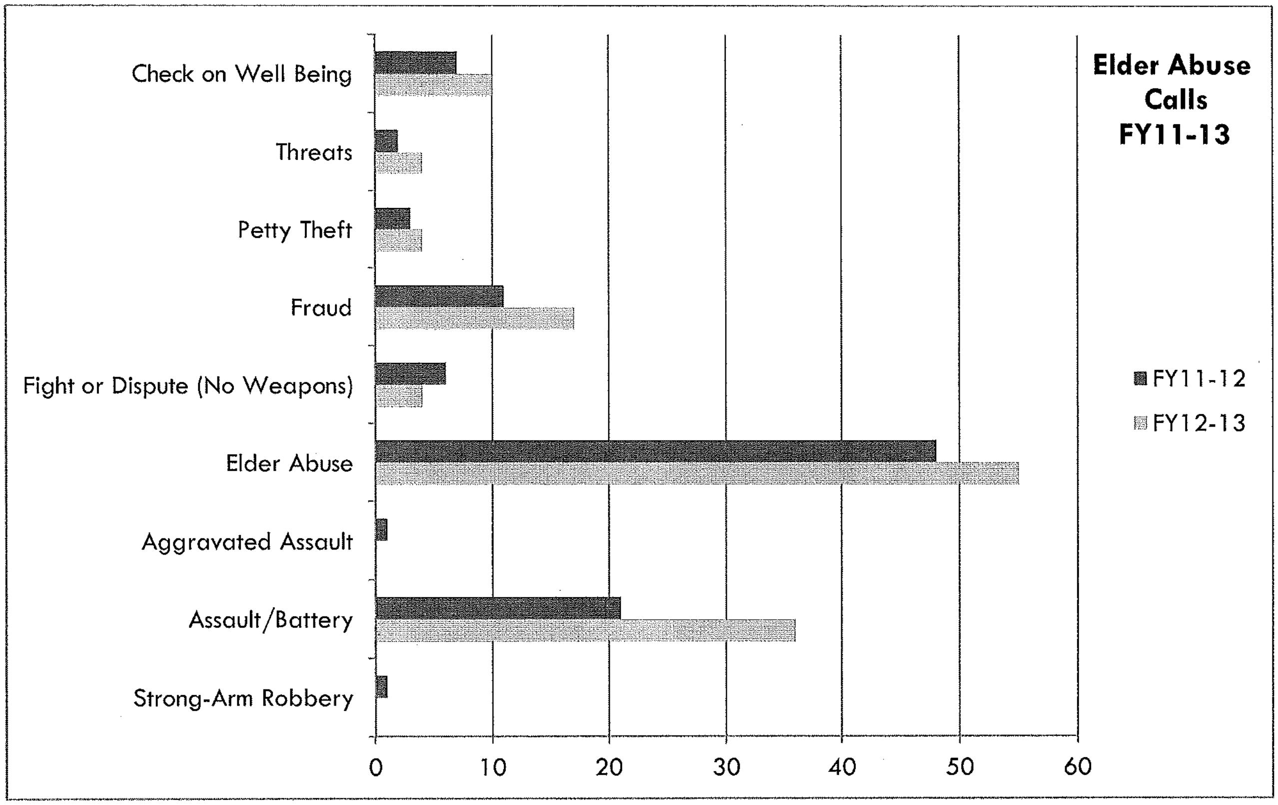
- 240CA - Assault/Battery (includes any unwanted physical contact)
- 245CA - Aggravated Assault (severe injuries or objects used to injure)
- 910CA - Well-Being Check (often at the request of another individual)



In the first four-and-a-half months after introducing these call codes, Department of Emergency Management received 23 calls coded for child abuse, the majority (91%) for assault or battery. Total child abuse calls decline appreciably in FY2011-12 (26), when compared to year-to-date calls from FY2010-11. Sixty-five percent of calls in FY2011-12 were Child Abuse-coded assault or battery, a significant decrease from the prior fiscal year. This number increased by 71% to 29 calls received for assault or battery against a child in FY2012-13. There were 33 calls reporting child abuse made to Department of Emergency Management in FY2012-13, representing a 27% increase from FY2011-12. Distinguishing these calls from domestic violence calls allows the Department of Emergency Management and the Police Department to capture a more accurate picture of the frequency and type of child abuse incidents in San Francisco that they are called to respond to. It is worth noting that because Family and Children's Services, commonly known as Child Protective Services, is well-known within the community, the vast majority of child abuse calls go to Child Protective Services directly. The Child Protective Services hotline receives over 5,000 referrals of possible child abuse or neglect each year.

Elder Abuse

In February 2011, Department of Emergency Management and the Police Department instituted 18 new elder abuse call codes to better differentiate between the various child and elder abuse 911 call types. The introduction of new codes specific to child abuse and elder abuse has been an important step in refining the criminal justice response to victims of violence who seek help. Though the majority of reports for these crimes go directly to Child Protective Services and Adult Protective Services, 911 does receive calls related to these incidents as well. Coding these as such allows the number of calls to be tracked over time, and provides a better understanding of the scope and rate of these incidents as reported to the police. These codes also serve to better inform officers in the field who are responding to these calls.



In FY2012-13, Department of Emergency Management received a total of 130 reports of elder abuse across these 18 call codes, which represents an increase of 30% over the 100 total calls in FY2011-12. The most frequently used call codes in FY2012-13 were elder abuse (42%); assault/battery (27%) and fraud (13%).

Family Violence and Stalking Calls by Neighborhood Police Stations

Though family violence occurs in all cultures, socioeconomic brackets, and City neighborhoods, clear trends emerge when 911 calls are examined by the Police Department station districts that respond to calls. As in previous years, the Bayview and Ingleside Stations received the most calls, and the distribution of responses across district stations remained similar to that of the previous five years.

District Unit Responses to 911 Family Violence and Stalking Calls FY2010-2013

District	FY10-11		FY11-12		FY12-13	
	#	%	#	%	#	%
Bayview	1,299	16%	1,314	16%	1,191	14%
Ingleside	1,125	14%	1,173	14%	1,277	15%
Mission	996	12%	1,048	13%	1,098	13%
Southern	949	12%	996	12%	1,046	12%
Northern	900	11%	1,011	12%	1,040	12%
Taraval	721	9%	747	9%	824	10%
Central	610	8%	648	8%	619	7%
Tenderloin	578	7%	551	7%	589	7%
Richmond	431	5%	401	5%	401	5%
Park	398	5%	422	5%	430	5%
Daly City[12]	20	<1%	26	<1%	20	<1%
Total	**8,027**		**8,337**		**8,535**	

[12] Dispatchers may refer a call to Daly City if an incident occurs on or over the City's southern boundary, or if a suspect is known to have traveled into Daly City.

San Francisco Police Department

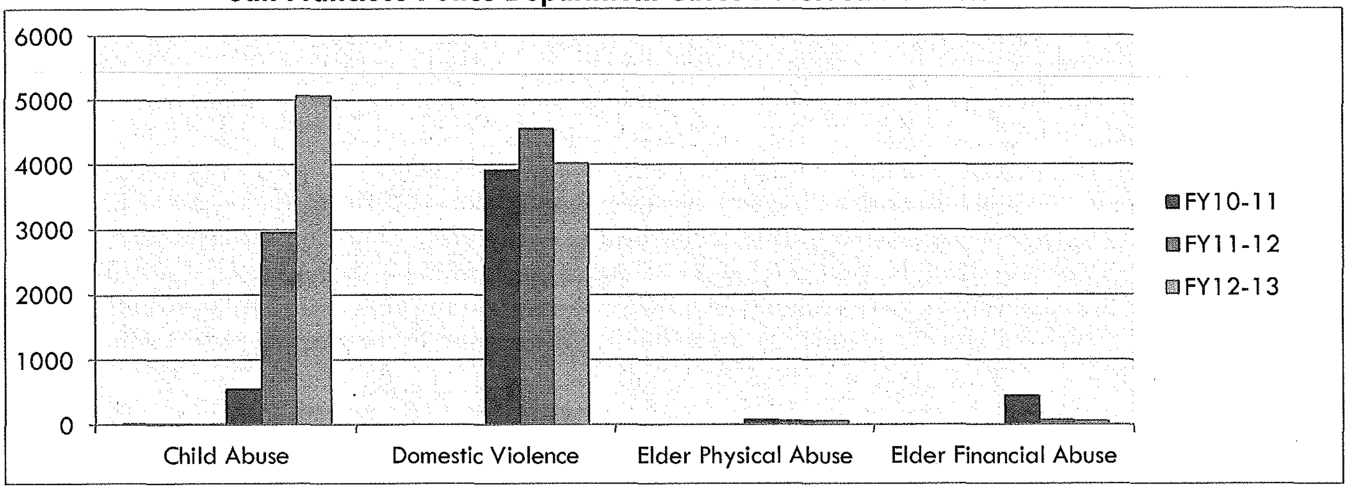
The San Francisco **Police Department Special Victims Unit** reviews and investigates felony family violence cases. The Department of Emergency Management may receive multiple calls to 911 for the same incident, or callers may call back to cancel a request for assistance, which explains the drop in numbers from 911 calls to cases received and investigated by the Police Department. In October 2011, the Police Department restructured certain investigative functions, including making significant changes to the organization of the Special Victims Unit. In FY2012-13, the Special Victims Unit had a staff of 66 individuals, including: one Captain; three Lieutenants; 39 Inspectors; nine Police Officers; three Police Services Aides; and six Interns.

The Special Victims Unit has become a more cohesive unit, which includes a Domestic Violence Section, a Child Abuse Section, a Sex Crimes Section, and an Elder Abuse and Financial Crimes Section. Under this new structure, all inspectors and officers working in the Special Victims Unit are cross-trained in the special skills and techniques necessary for investigating all types of cases that fall under the purview of the Special Victims Unit. Special Victims Unit inspectors are all trained to investigate child abuse cases, elder abuse cases, and domestic violence cases, so that there is always a qualified individual available to respond to these cases. Though the inspectors may not be exclusively assigned to domestic violence cases, for example, there is still a Domestic Violence Section with a Lieutenant responsible for overseeing the investigation of all domestic violence cases, regardless of which individual inspectors and officers are actually assigned to these cases. Under this structure, the SVU Elder Abuse and Financial Crimes Section investigates elder and dependent adult physical abuse cases, financial abuse cases, as well as all fraud-related crimes in the City and County of San Francisco.

San Francisco Police Department Family Violence Statistics FY 2010-2013

Child Abuse	FY10-11	FY11-12	FY12-13
Cases Received and Assessed	545	2,959	5,078
Cases Investigated by Child Abuse Unit	492	130	204
Percent Investigated by Child Abuse Unit	90%	4%	4%
Domestic Violence	**FY10-11**	**FY11-12**	**FY12-13**
Cases Received and Assessed	3,922	4,560	4,031
Misdemeanor Arrests Referred to DA's Office	529	444	348
Cases Investigated by Special Victims Unit	1,538	3,129	2,655
Percent Investigated by Special Victims Unit	45%	69%	66%
Elder Physical Abuse	**FY10-11**	**FY11-12**	**FY12-13**
Cases Received and Assessed	67	57	65
Cases Investigated by Special Victims Unit	39	30	37
Percent Investigated by Special Victims Unit	58%	53%	57%
Elder Financial Abuse	**FY10-11**	**FY11-12**	**FY12-13**
Cases Received and Assessed	445	70	62
Cases Investigated by Financial Crimes Unit	167	36	27
Percent Investigated by Financial Crimes Unit	38%	51%	44%

San Francisco Police Department Cases Received 2010-2013



Special Victims Unit - Child Abuse Section

The Special Victims Unit Child Abuse Section handles all felony child abuse cases and all felony sexual assault crimes committed against children under the age of 18. In FY2012-13, the Unit received and assessed 5,078 cases. This substantial increase in cases received and assessed over the past two fiscal years can be accounted for due to a variety of factors. Most significantly, in 2011 SFPD began using the new Crime Data Warehouse (CDW) online records and management system, which has allowed for better tracking of incident reporting city-wide, better coding of incidents and routing to appropriate units for follow up, and significantly more accurate record keeping. Additionally, legal protocols around mandated reporting have resulted in an increase in both the number and kind of referrals SFPD gets from city government and community-based agencies. Not all of these cases meet the Special Victims Unit's criteria for investigation.

San Francisco Police Department Child Abuse Statistics FY2010-2013

Child Abuse	FY10-11	FY11-12	FY12-13
Cases Received and Assessed	545[13]	2,959	5,078
Cases Investigated by Child Abuse Unit	492	130	204
Percent Investigated by Child Abuse Unit	90%	4%	4%

From FY2010-2011 to FY2011-2012, there was a significant decrease in the number of cases investigated. This was due to a decrease in staff assigned to investigate these types of cases. During this time, the District Attorney's Office took over the investigation of a number of these cases.

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[13] The number of cases received, assessed, and investigated by the Child Abuse Unit in FY2010-11 include cases of felony sexual assault committed against children under 18, regardless of the identity of the perpetrator. In previous years, the numbers of cases received, assessed, and investigated did not include those cases in which the assault was committed against children between 14 and 17 years of age by adult strangers and non-family members.

Special Victims Unit – Domestic Violence Section
The Special Victims Unit Domestic Violence Section investigates all felony arrest cases involving abuse committed against any person, including minors, by a current or former spouse, cohabitant, dating partner, fiancé, or person with a child in common, and includes cases of same sex relationships.

The **Domestic Violence Response Section** includes one Assignment Officer, an inspector who is responsible for reviewing 350 to 400 incident reports each month, compiling statistics for the Section, and running background searches on all the suspects involved in the cases. The Assignment Officer reviews all reports, checking suspects for probation and parole status. If the suspect is found to be on probation or parole, the Assignment Officer notifies the appropriate agency.

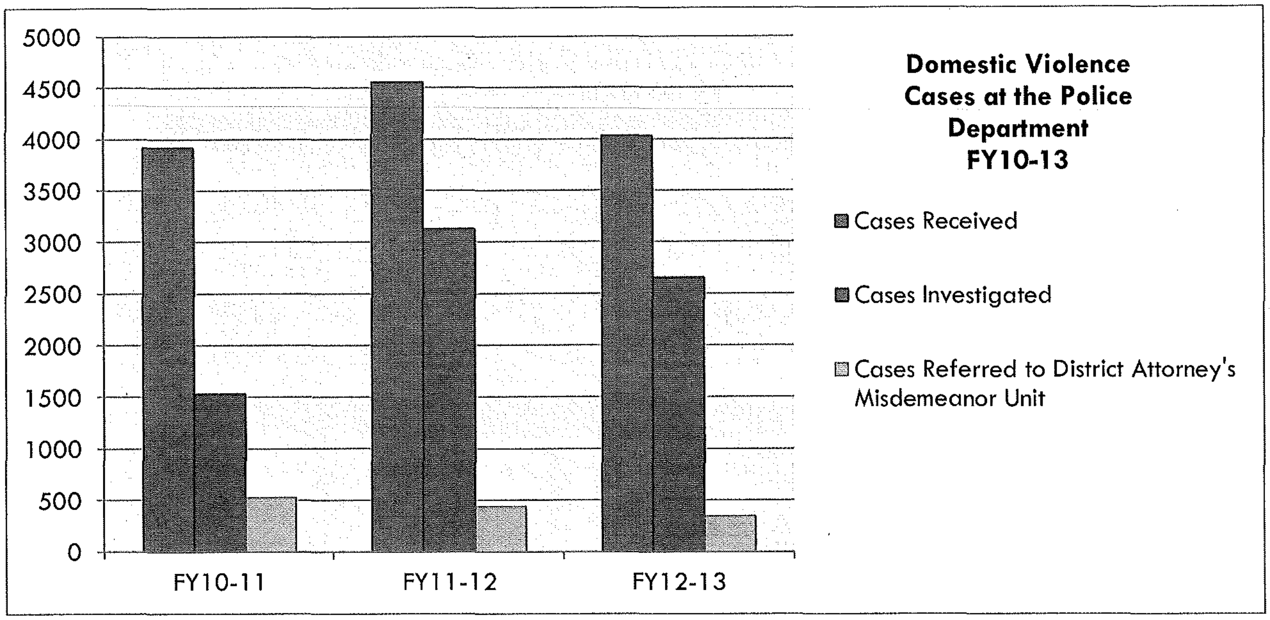
An investigation consists of interviews with the victim, witnesses, and suspects. Inspectors seek to corroborate evidence in an attempt to bring an unbiased case to the District Attorney's Office. Inspectors also collect evidence and do computer background checks on all parties involved. The Police Department sends all misdemeanor arrest cases directly to the District Attorney's Office. Misdemeanor cases are only assigned for investigation when a victim specifically requests that an unassigned misdemeanor case receive warrant consideration. Because all felony arrest reports are time-sensitive and must be presented to the District Attorney's Office within 48 hours, if the case meets the criteria for active investigation, it is immediately assigned to an inspector who conducts a thorough investigation. The case is then presented to the District Attorney's Office for warrant consideration or formal charging if the suspect is already in custody. In non-arrest cases that are not assigned for investigation, the Assignment Officer calls every victim in an attempt to advise him or her about follow-up procedures and referrals. Special Victims Unit inspectors attempt to contact all victims in every domestic violence and stalking case.

In FY2012-13, the Special Victims Unit received and assessed 4,031 domestic violence cases. Of the cases received, 2,655 were assigned to Special Victims Unit inspectors for active investigation, and 348 were directed to the District Attorney's Misdemeanor Unit for assignment and investigation by that agency.

The Special Victims Unit averaged close to 4,000 cases in FY2010-11 and FY2012-13 with a slight spike to 4,560 in FY 2011-12. The percentage of cases investigated has increased steadily in the last three years, ranging from 45% in FY2010-11 to 66% investigated in FY2012-13.

San Francisco Police Department Domestic Violence Statistics FY2010-2013

Domestic Violence	FY10-11	FY11-12	FY12-13
Cases Received and Assessed	3,922	4,560	4,031
Misdemeanor Arrests Referred to District Attorney's Office	529	444	348
Cases Investigated by Special Victims Unit	1,538	3,129	2,655
Percent Investigated by Special Victims Unit	45%	69%	66%



In addition to the responsibilities outlined above, one inspector oversees the U-Visa program, which assists immigrants who are victims of domestic violence in obtaining visas available for certain victims of crime. In addition to their daily caseload, Special Victims Unit inspectors teach Continued Professional Training at the San Francisco Police Academy, and also provide trainings at hospitals, schools, businesses, and advocacy groups. Special Victims Unit investigators are assigned until 6:00PM, and after business hours they are rotated to work "on-call." On-call investigators are available to respond directly to the scene of a domestic violence or stalking incident at any time of the day if the incident meets the call-out criteria.

Two domestic violence advocates from La Casa de las Madres have been assigned to work at the Special Victims Unit Domestic Violence Section located at the Hall of Justice. The advocates assist victims with shelter and numerous other services. SafeStart has one staff member who receives and reviews all cases where there is a child age six or younger who has been exposed to domestic violence. The SafeStart staff person contacts each family and offers services by members of the SafeStart Collaborative. The Special Victims Unit also works closely with the District Attorney's Office Victim Services and Adult Protective Services to ensure victims receive the support services they require.

Special Victims Unit - Elder Abuse and the Financial Crimes Section

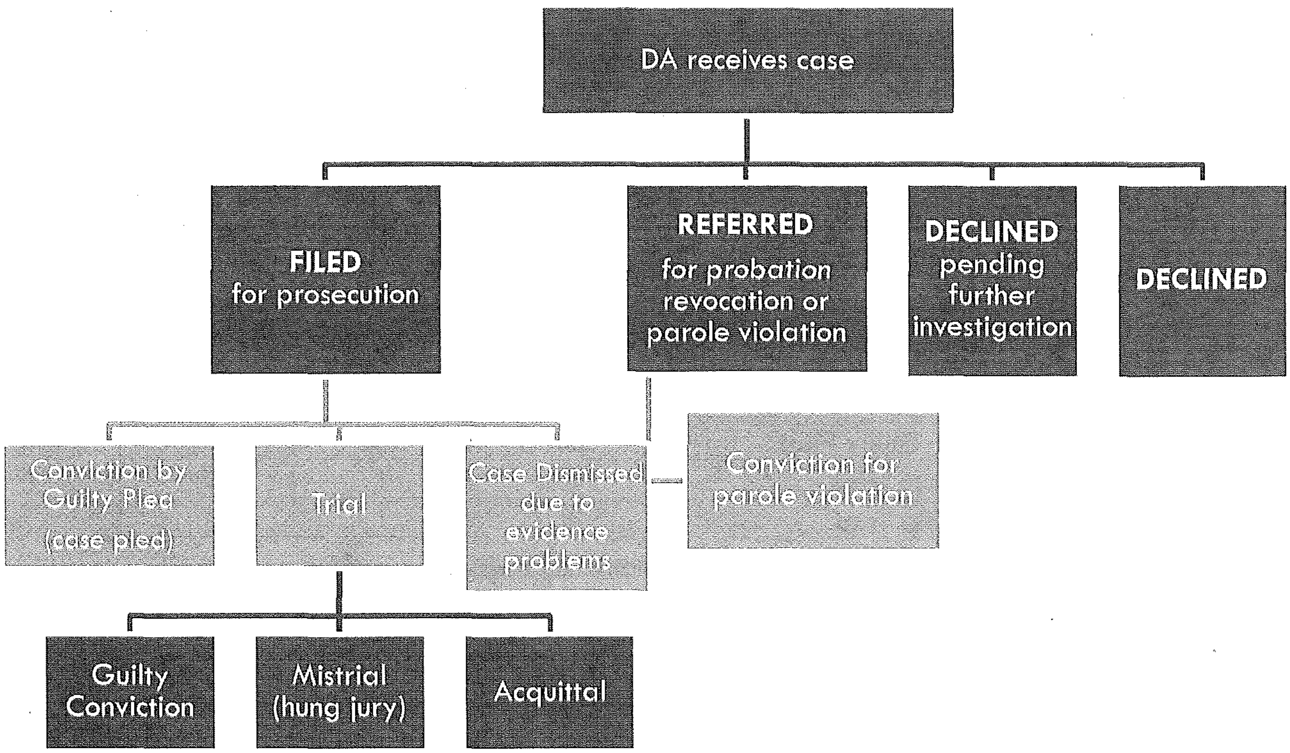
The Elder Abuse and Financial Crimes Section oversees elder and dependent adult physical abuse and financial abuse cases, as well as all fraud-related crimes. All financial and physical abuse reports with an elder or dependent adult victim are forwarded to Adult Protective Services as well. The figures captured for FY2011-12 and FY2012-13 represent only a portion of all elder abuse financial cases investigated, due to changes in the way data was collected and captured during this period.

In FY2012-13, the Section received and assessed 65 cases of physical elder or dependent abuse, a 12% increase from the 57 received in FY2011-12. Elder financial abuse cases saw an appreciable decline in FY2012-13, with SFPD receiving 11% fewer reports than in FY2011-12.

San Francisco Police Department Elder Abuse Statistics FY 2010-2013			
Elder Physical Abuse	FY10-11	FY11-12	FY12-13
Cases Received and Assessed	67	57	65
Cases Investigated by the Special Victims Unit	39	30	37
Percent Investigated by the Special Victims Unit	58%	53%	57%
Elder Financial Abuse	FY10-11	FY11-12	FY12-13
Cases Received and Assessed	445	70	62
Cases Investigated by Financial Crimes Unit/ Special Victims Unit	167	36	27
Percent Investigated by Financial Crimes Unit/ Special Victims Unit	38%	51%	44%

Office of the District Attorney

The District Attorney's Office (DA) oversees the prosecution of family violence crimes and has four units to oversee those cases: the **Child Assault Unit**, the **Domestic Violence Unit**, the **Elder Abuse Unit**, and the **Special Prosecutions Unit**, which handles elder financial abuse cases. Cases received and accepted by the District Attorney's Office will generally move through the following stages:



Once received by the DA's Office, a case is generally filed for prosecution, referred for probation revocation or parole violation, or declined. A case may be declined in order to conduct further investigation due to an uncooperative witness, insufficient evidence, or other reasons. This is consistent with other counties and depends on whether cases received were screened prior to submission to the DA's Office.

The data included in the following charts refers to the specific fiscal year, and cases pled or brought to trial during a specified fiscal year may or may not have been filed during that same time period. Similarly, trial convictions may be achieved for cases filed or trials initiated during a prior year. For example, a case may be received and filed in FY2012-13, but that case may not be concluded, either through plea bargain, trial, or dismissal, until a subsequent year.

Office of the District Attorney Family Violence Statistics FY2010-2013			
Child Assault Unit	FY10-11	FY11-12	FY12-13
Cases Received	170	171	204
Cases Filed	70	61	56
Convictions By Guilty Plea*	45	23	25
Cases Brought to Trial	7	3	1
Convictions After Trial	4	1	1
Domestic Violence Unit	FY10-11	FY11-12	FY12-13
Cases Received	2,066	1856	1735
Cases Filed	597	496	478
Convictions By Guilty Plea*	502	462	371
Cases Brought to Trial	18	41	47
Convictions After Trial	13	21	24
Elder Abuse Unit	FY10-11	FY11-12	FY12-13
Cases Received	100	99	92
Cases Filed	35	69	60
Convictions by Guilty Plea*	29	43	44
Cases Brought to Trial	2	1	2
Convictions After Trial	1	1	1

****Conviction by guilty plea includes convictions obtained by plea or probation violation.***

Child Assault Unit

The District Attorney's Child Assault Unit prosecutes felony cases of physical or sexual assault against children, child endangerment, human trafficking of children, and cases involving child pornography. The Child Assault Unit continued its upward trend of cases received with 204 cases received in FY2012-13. Of these cases, 27% (or 56) were filed for prosecution, compared with 41% in FY2010-11.

The Child Assault Unit works in conjunction with San Francisco General Hospital, Family and Children's Services, and the San Francisco Police Department by participating in multi-disciplinary interviews, conducted by the Child and Adolescent Support and Advocacy Resource Center (CASARC). These multi-disciplinary interviews provide a coordinated forensic investigation and response to children abused or children exposed to violence in San Francisco.

Domestic Violence Unit

The District Attorney's Domestic Violence Unit prosecutes felony and misdemeanor domestic violence cases, as well as cases of stalking. In previous years, the domestic violence figures included stalking cases. This year, those figures have been separated out, though there is crossover because some stalking cases are also domestic violence-related.

After peaking in FY2010-11 at 2,066 cases, the Domestic Violence Unit received a total of 1,856 domestic violence and stalking cases in FY2011-12, which decreased to 1,735 in FY2012-13. In FY 2012-13, The District Attorney's Office filed 478 domestic violence cases (29% of cases received), and obtained 395 convictions by plea or trial, for an 83% conviction rate overall. The number of cases tried in FY2011-12 and FY2012-13 doubled over the numbers in FY2009-10 and FY2010-11. The upward trend in cases brought to trial in FY2011-12 and FY2012-13 is indicative of the staunch efforts on the part of the District Attorney's Office to put together robust cases that will result in convictions for these offenders. Of the cases that went to trial in FY2011-12 and FY2012-13, the conviction rate was 51%.

As mentioned above, the Domestic Violence Unit also handles all stalking cases whether or not they are related to domestic violence. The District Attorney's Office received 54 stalking cases in FY2012-13, and filed 67% of the cases. One stalking case was referred for parole violation or probation revocation, and 20 received guilty convictions by way of a guilty plea bargain. Two stalking cases were brought to trial during FY2012-13, and both cases resulted in convictions.

Office of the District Attorney Domestic Violence Unit Statistics FY2012-13

	Domestic Violence Cases	Stalking Cases	Total Cases
Cases Received	1681	54	1735
Cases Filed	442	36	478
Cases Referred for Probation / Parole violation	140	1	141
Convictions By Guilty Plea (Cases Pled)	175	20	195
Convictions by Guilty Plea (Cases Violated on Probation)	176	N/A	176
Cases Brought to Trial	45	2	47
Convictions After Trial	22	2	24

Elder Abuse Unit

The District Attorney's Elder Abuse Unit prosecutes elder and dependent adult abuse cases and is separated into two units. One unit prosecutes elder or dependent adult physical abuse and is overseen by the Domestic Violence Unit's Managing Attorney, and the second unit prosecutes elder or dependent adult financial abuse cases and is overseen by the Special Prosecutions Unit. While the number of cases received in FY2011-12 and FY2012-13 remained relatively stable over the prior year, the number of elder abuse cases filed rose significantly. In FY2011-12, the District Attorney's Office almost doubled the numbers in the prior year by filing 69 cases and maintained a similar number in FY2012-13 (60). The number of elder abuse convictions increased by 50% from 30 cases in FY2010-11 to 45 cases in FY2012-13.

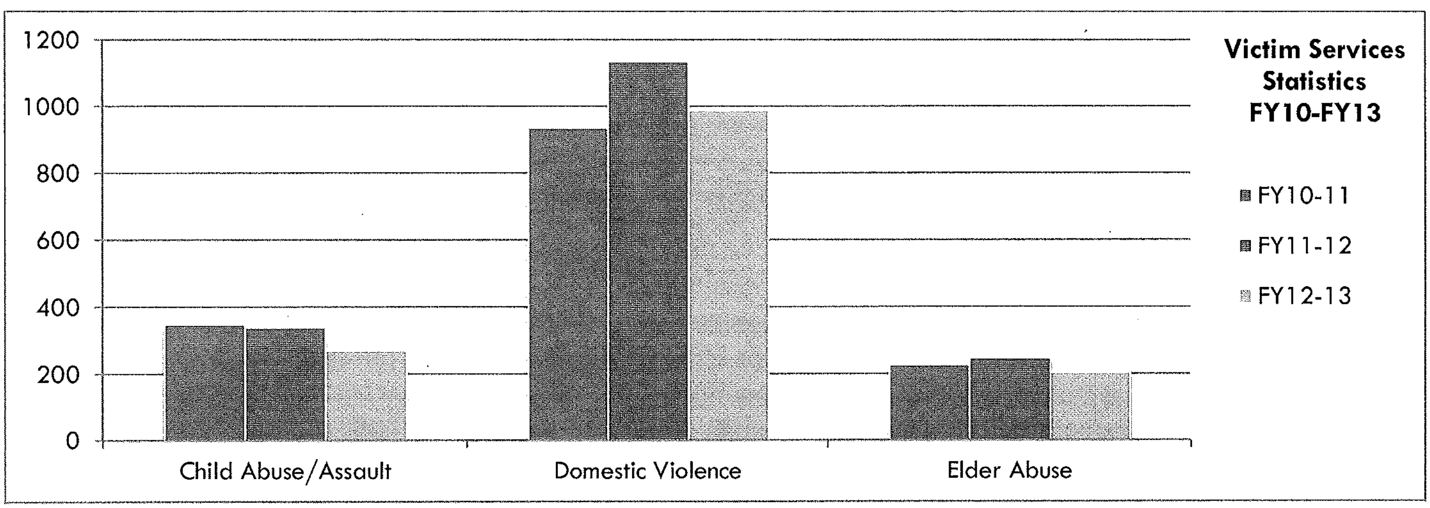
Victim Services Division

The District Attorney's Victim Services Division provides comprehensive advocacy and support to victims and witnesses of crime. Trained advocates help these individuals navigate the criminal justice system by assisting with crisis intervention, Victim Compensation Program claims, court escort, case status, transportation, resources, referrals, and more. The Victim Services Division has 14 trained advocates to assist victims of crime, with three specializing in child sexual assault and physical abuse cases, two specializing in elder abuse cases, and two specializing in sexual assault cases. All advocates are trained in domestic violence dynamics, and each is assigned between 40 and 50 new cases per month, in addition to any ongoing cases that remain open. Services are offered not only to victims whose cases have been charged, but also to victims whose cases have not and will not be charged.

To be eligible for compensation, a person must be a victim of a qualifying crime involving physical injury, or threat of physical injury or death. For certain crimes, emotional injury alone is all that needs to be shown. Certain family members or other loved ones who suffer an economic loss resulting from an injury to, or death of, a victim of a crime may also be eligible for compensation. There is no requirement that the suspect be apprehended or the case charged by the District Attorney's Office to be eligible.

Generally, victims must report the crime to the police, sheriff, child protective services, or some other law enforcement agency. However, mental health and medical records may be sufficient in cases involving domestic violence, human trafficking, and crimes against children. Applicants/victims must cooperate with law enforcement during the investigation and prosecution of the crime, and cannot have participated in or been involved in committing the crime.

During FY2012-13, Victim Services provided support and services to victims and witnesses in 1,604 family violence cases[14] with 70% of clients seen for domestic violence or child witnessing domestic violence, 17% for child abuse, and 13% for elder abuse cases.



As in past years, the majority of Victim Services clients were seen for domestic violence cases. In FY2012-13, this included 990 domestic violence cases, and 139 child witness to domestic violence cases. Of the 270 child abuse cases that received services, 76% (206 cases) were for sexual assault and 24% (64 cases) were for physical abuse.

[14] The number of clients served is not a unique count of individuals receiving Victim Services. For example, if an individual is a victim of three crimes in FY12-11 and receives Victim Services following each incident, he or she would be captured three times in the data for that fiscal year.

The following tables highlight demographic data of clients served in both FY2011-12 and FY2012-13. These data show that for these two fiscal years, the majority of clients were female (78%) and represented the following race: Latino/a (30%), African American (25%), White (25%) and Asian (15%). The data also shows that most clients were between the ages of 18-64 (70%) followed by 0-17 (17%).

Office of the District Attorney Victim Services Division
Family Violence Statistics
FY2011-2012

Gender	Child Abuse	Child Witness DV	Domestic Violence	Elder Abuse	Total
Female	279	82	982	146	1489
Male	60	101	155	102	418
Transgender	0	0	0	0	0
Unknown	0	0	0	0	0
Total	**339**	**183**	**1,137**	**248**	**1,907**

Race	Child Abuse	Child Witness DV	Domestic Violence	Elder Abuse	Total
White	58	24	295	80	432
Latino/a	166	75	329	15	416
African American	75	45	325	19	372
Asian	25	15	129	119	211
Unknown	7	13	27	5	38
Other	5	8	14	5	22
Filipino	3	3	13	5	16
Indian	0	0	4	0	6
Cambodian	0	0	1	0	0
Total	**339**	**183**	**1,137**	**248**	**1,907**

Age	Child Abuse	Child Witness DV	Domestic Violence	Elder Abuse	Total
0-17	156	167	2	1	326
18-64	160	4	1,114	47	1,325
65+	0	0	0	179	179
Unknown	23	12	21	21	77
Total	**339**	**183**	**1,137**	**248**	**1,907**

Office of the District Attorney Victim Services Division
Family Violence Statistics
FY2012-13

Gender	Child Abuse	Child Witness DV	Domestic Violence	Elder Abuse	Total
Female	198	62	853	125	1238
Male	72	77	137	80	317
Transgender	0	0	0	0	0
Unknown	0	0	0	0	0
Total	**270**	**139**	**990**	**205**	**1,604**

Race	Child Abuse	Child Witness DV	Domestic Violence	Elder Abuse	Total
White	55	14	276	59	404
Latino/a	114	58	280	16	468
African American	63	54	284	23	424
Asian	26	7	110	96	239
Unknown	4	3	23	3	33
Other	7	1	5	0	13
Filipino	0	2	7	7	16
Cambodian	0	0	1	0	1
Indian	0	0	4	1	5
Total	**270**	**139**	**990**	**205**	**1,604**

Age	Child Abuse	Child Witness DV	Domestic Violence	Elder Abuse	Total
0-17	121	137	3	1	262
18-64	128	1	975	31	1,135
65+	0	0	0	162	162
Unknown	21	1	12	11	45
Total	**270**	**139**	**990**	**205**	**1,604**

Child Abuse

Child abuse case clients include individuals who have experienced either physical abuse or sexual assault as a child. The majority of child abuse cases were for sexual assault (206), in which 86% of clients were female. Child abuse case clients were most frequently Latino/a (45%), followed by African American (24%), and White (15%).

Individuals can apply for and receive services as an adult for child abuse or assault they have experienced previously as a minor under the age of 18. It may also be the case that a child abuse or assault crime was committed in previous years and the victim seeks services later in life, or that a case is charged and more past victims are revealed during the investigation process. For these reasons, and because Victim Services clients can continue to receive services after their case has concluded, should it be charged, it is not uncommon for child abuse clients to be over 17 years of age. In cases of child physical abuse, 56% of clients were between the ages of 0 and 17 years, 37% were between the ages of 18 and 64, and 7% were of unknown age.

Office of the District Attorney Victim Services Division
Child Abuse Statistics
FY2012-13

Age	Child Physical Abuse	Child Sexual Assault	Total
0-17	29	92	121
18-64	32	96	128
65+	0	0	0
Unknown	3	18	21
Total	**64**	**206**	**270**

Domestic Violence

Domestic violence clients include individuals who have experienced domestic violence, including childhood exposure to domestic violence, or stalking. In FY2012-13, 81% of domestic violence clients were female. In cases of domestic violence, the majority of clients were female, while in cases of child exposure to domestic violence, the majority of clients were male. Domestic violence clients were most frequently African American (30%), Latino/a (30%), or White (26%).

Elder Abuse

Elder abuse case counts include cases of dependent adult abuse as well. In FY2012-13, elder abuse cases involved 61% female clients and 39% male clients, and the majority (79%) were over the age of 65. Nearly half of elder abuse clients identified as Asian (47%), followed by 29% identifying as White.

Adult Probation Department

The San Francisco Adult Probation Department supervises individuals convicted of domestic violence as they complete the requirements of probation. As of June 2013, the Adult Probation Department Domestic Violence Unit was supervising 522 individuals, a decrease of 9.6% from June 2012.

Adult Probation Department Domestic Violence Unit FY2010-2013			
	FY10-11	FY11-12	FY12-13
Total Cases at Year-End	535	540	522
Total New Intakes during Year	268	297	252
Completions	122	79	88
Revocations	42	58	61
Certified Batterers Intervention Programs	7	11	10
Domestic Violence Unit Staffing	10	10	10

When a person convicted of domestic violence is referred to Adult Probation Department for supervision, they are automatically referred to a 52-week batterer's intervention program, run by a community agency and certified by Adult Probation Department. If a probationer fails to attend the batterer's intervention program or commits a crime that violates their probation, a bench warrant is issued and Adult Probation Department begins a procedure to revoke probation. Probation revocations increased by 45% in the past two fiscal years. The following were certified batterer's intervention programs in San Francisco as of the end of Fiscal Year 2013:[15]

1. Antolino Family Wellness Center, Inc.[16]
2. John Hamel and Associates
3. Men in Progress
4. moMENtum
5. Programa de hombres contra la violencia intrafamiliar (P.O.C.O.V.I.)
6. San Francisco Bay Counseling
7. Startrac
8. SWAP/PREP (SF Sheriff's Department)
9. Violence Intervention Program (V.I.P.)
10. Womanalive

The Adult Probation Department created a **Batterer's Intervention Program Audit Team** in 2012 to complete an extensive audit of all batterer's intervention programs, and to provide critical feedback and recommendations for programs to ensure adherence to state law and the Adult Probation Department's Standards for Batterers Intervention Programs. The review covered four areas: (1) Facility; (2) Program and agency accountability; (3) Facilitator and

[15] After June 30, 2013, Adult Probation Department certified three new batterer's intervention programs: Adult Probation's CASC (Community Assessment and Services Center), San Francisco Veteran's Administration Medical Center At Ease, and Pathways Institute.

[16] Antolino was decertified in November 2013.

staff accountability, including records and maintenance; and (4) Recommendations and remedies for compliance.

At the start of the audit, there were 11 certified Batterer Intervention Programs in San Francisco. One program was decertified during the process, leaving ten certified batterer's intervention programs. The review team visited approximately 30 group sessions and provided the Chief Probation Officer with an audit report.

At the end of the FY2012-2013, the Domestic Violence Unit had a staff of nine Deputy Probation Officers, one Domestic Violence Court officer, and one Supervising Probation Officer. During the year, Deputy Probation Officers handled an average of 58 cases, down from 67 cases per officer in FY2011-12.

In September 2010, the Adult Probation Department received a federal grant to address the increasing number of domestic violence cases in the Bayview neighborhood, which was home to 14% of the Domestic Violence Unit probationers. The department used evidence-based practices to design a victim-centered supervision model and a 40:1 probationer to officer ratio. The grant period ended September 30, 2013. The Mayor's Office funded the continuation of this position to enable Adult Probation Department to continue to support the reduced caseload, and its successful approach of the victim-centered supervision model.

In November 2012, Adult Probation Department established an endangered child specific caseload, which is supervised in the Domestic Violence Unit. When an individual convicted of child abuse is referred to Adult Probation Department, he or she is directed to a **Child Abuse Intervention Program**, a 52-week program run by the Department of Public Health at the Community Justice Center through the Violence Intervention Program. This innovative program was also launched in November 2012, and is one of very few certified child abuse programs in the state. Child Abuse Intervention Program complies with the current California Penal Code Section 273.1 relating to the treatment of court ordered child abuse offenders. The program is certified by the Adult Probation Department. As with domestic violence cases, a bench warrant is issued if a probationer who is on probation for a child abuse related crime commits a crime that violates his or her probation and Adult Probation Department initiates the Motion to Revoke Probation. As of June 2013, 30 clients were being supervised on the child abuse-specific caseload. Sixty-four percent of cases are misdemeanor and 36% are felony. Adult Probation Department will provide more information on the success rate of clients on the new child abuse caseload and Child Abuse Intervention Program in future reports.

Following up on a recommendation of the *2011 Family Violence Report*, Adult Probation Department established an **advisory team of domestic violence intervention and prevention experts** to assist in the development and implementation of an Adult Probation Department Victim Service Program. These representatives include the Survivor Restoration Director from the San Francisco Sheriff's Department, the Director of Victim Services from the District Attorney's Office, the Director of the Domestic Violence Consortium, and the Division Director and Supervisor from Adult Probation Department's Investigations Unit. Survivors of violence will soon join this advisory team. The objective of the proposed Adult Probation Department Victim Service Program is to provide comprehensive gender specific, trauma informed services to victims of violent crimes perpetrated by those currently on probation within the Adult Probation Department.

San Francisco Sheriff's Department

On the recommendation of the Family Violence Council in the *2011 Report*, the San Francisco Sheriff's Department provided data on three innovative programs related to family violence that it currently operates through its Custody and Community Programs Divisions: the Resolve to Stop the Violence Project, an in-custody program; the out of custody violence prevention program, and the Survivor Restoration Program for victims.

The **Resolve to Stop the Violence Project (RSVP)** is a survivor-centered program for in-custody offenders based on a restorative justice model. The mission of RSVP is to bring together all those harmed by crime, including victims, communities, and offenders. RSVP is driven by victim restoration, offender accountability, and community involvement. The goals of the program include empowering victims of violence, reducing recidivism among violent offenders, and restoring individuals and communities through community involvement and support in order to prevent future violence. Currently, 22 percent of the RSVP participants are in custody for a family violence related offense.

The Sheriff's Department utilizes the Manalive Violence Prevention Program curriculum both in the jails and at community-based sites. Manalive utilizes a male-role violence reeducation curriculum, which emphasizes:

- Raising awareness of the belief systems that promote violence;
- Teaching that violence is learned behavior which can be unlearned. Offenders can choose alternatives to violence;
- Improving communication skills;
- Empathy for victims and their families – each week offenders and survivors of violent crime participate in Victim Impact sessions, frank discussions about the consequences of violence for victims;
- Accountability and the need to make positive contributions to the community;
- Understanding, taking responsibility for, and working to repair the harm done.

San Francisco Sheriff's Department Resolve to Stop the Violence Project In-Custody Statistics	
	FY12-13
Total Participants	139
Participants with Domestic Violence charges	29
Participants With Elder Abuse charges	1
Participants With Child Abuse charges	1
Participants on Parole	18

San Francisco Sheriff's Department Out of Custody Community Program (Manalive)	
	FY12-13
Total Clients	186
New Clients	29
Clients Exiting	150
Clients referred from RSVP jail program	23

The **Sheriff Department's Survivor Restoration Program (SRP)** is a component of the RSVP whose focus is to support survivors through their own process of restoration and empowerment, while providing opportunities for them to contribute to the development, implementation, and evaluation of all RSVP components. To this end, SRP offers direct services to the survivors of the violent offenders participating in RSVP's Offender Restoration component.

San Francisco Sheriff's Department
Survivor Restoration Program Statistics

	FY12-13
New Clients	276
Ongoing Clients	1,589[17]
Total U-Visas Obtained	56
Political Asylum Granted	4
Permanent Residence Granted	10
Graduated from Empowerment Program	44

California State Victim Information and Notification Everyday System (VINE)
In August 2013, as part of the Sheriff Department's effort to enhance its customer service information system, it inaugurated the California State Victim Information and Notification Everyday System (VINE). This allows victims of crimes in San Francisco to receive email or telephone notifications of offenders' custody status in California jails and prisons. This free and anonymous service allows victims to be notified within 30 minutes when an offender is released from custody and within eight hours if an inmate is transferred to another facility. Knowing this information can help alleviate a victim's uncertainty or concern about an offender's status.

[17] These cases vary from a weekly phone call check to on-going long term critical cases from previous years.

Public Defender's Office

The Public Defender's Office in San Francisco utilizes a "holistic model" of indigent defense services, focusing not only on legal representation, but also on helping clients address the root causes of problems that may have led to their arrest. The Public Defender recognizes that contact with the criminal justice system offers a rare moment in which to address an individual's needs, including those beyond the realm of the legal system. By taking advantage of the unique relationship as a counselor to the client, public defenders can refer individuals to services for addiction, mental illness and unemployment, thereby providing alternatives to incarceration that promise better client, family, and community outcomes through decreased recidivism and healthier reentry into communities.

San Francisco Deputy Public Defenders are trained in evidence-based practices and understand the wide range of service needs of their clients. They are effective advocates for the use of alternative sentencing strategies and equally well versed in the legal issues and advocacy techniques required in the criminal justice process. Deputy Public Defenders are also responsible for designing alternative sentencing strategies and identifying clients who are eligible for collaborative courts and other evidence based programs aimed at improving social and legal outcomes.

Coordination with Existing Reentry Programs

Deputy Public Defenders work closely with the office's existing reentry programs and coordinate its efforts with other criminal justice agencies and community partners. The Public Defender's Reentry Unit provides an innovative blend of legal, social and practical support through its Clean Slate and Social Work components. The Reentry Unit's social workers provide high quality clinical work and advocacy, effectively placing hundreds of individuals in treatment, housing and other services each year with the goal of improving legal outcomes and reducing recidivism. Reentry Social Workers conduct psycho-social assessments that delve into historical circumstances, family history, previous treatment, and long-term medical and mental health issues. The Reentry Social Workers have extensive knowledge of San Francisco social services and treatment networks as well as deep relationships with community based services staff and directors to which they connect their clients.

Children of Incarcerated Parents Program

Public Defender clients in the county jail avail themselves to the services of the Children of Incarcerated Parents Program, which is part of the office's Reentry Unit. The goals of these services are to insulate children from the risks associated with parental incarceration, maintain family bonds through the period of incarceration, and improve the ability of clients to participate in family life upon their release. The Children of Incarcerated Parents Program staff works with clients, their families, deputy public defenders, Human Services Agency, Child Support Services, Family Court, and a network of community-based treatment providers to respond to the needs of incarcerated parents and their families. The staff is uniquely positioned to address family needs that are created when a parent is taken into custody. Services provided include addressing the urgent needs of children, setting up contact visitation, assisting clients with family court issues, child support, reunification plans, connecting clients with Child Protective Services case managers, and connecting clients and their families to additional social services. Since its inception in 2000, the Children of Incarcerated Parents Program has helped hundreds of families in San Francisco overcome the numerous obstacles created as a result of the incarceration of a family member.

Clean Slate Program
The office's Clean Slate Program assists over 3,000 individuals each year who are seeking to "clean up" their records of criminal arrests and/or convictions. Clean Slate helps remove significant barriers to employment, housing, public benefits, civic participation, immigration and attainment of other social, legal and personal goals. The program, now in operation for over a decade, prepares and files over 1,000 legal motions in court annually, conducts regular community outreach, distributes over 6,000 brochures in English and Spanish and holds weekly walk-in clinics at five community-based sites, in predominantly African American and Latino neighborhoods most heavily impacted by the criminal justice system. The Clean Slate Program has been instrumental in helping individuals obtain employment and housing, factors that help stabilize and strengthen families.

As shown by a growing body of scientific research, interventions that address the underlying causes of violent behavior and victimization are effective in preventing new instances of family violence. Without compromising the due process rights of individuals as guaranteed by the Constitution, the Public Defender is committed to utilizing evidence-based alternatives that address individual-level risks that perpetuate family violence. As a participating agency of the Family Violence Council, the Public Defender is committed to engaging in interagency collaboration and implementing preventative measures aimed at addressing family violence in San Francisco.

San Francisco Superior Court Family Law Division and Probate Division

The Family Law Division of the San Francisco Unified Family Court is responsible for issuing civil domestic violence restraining orders. Family Law handles domestic relations cases including dissolutions, separations, nullity, domestic violence prevention, paternity actions, child custody, child support, visitation arrangements, spousal support, family support and adoptions.

Domestic Violence Restraining Orders

Survivors of domestic violence can request a restraining order from the Family Court. Domestic violence restraining orders are available for cases involving a current or former intimate partner or spouse, a person with a child in common, or family to the second degree, which include in-laws but not cousins. The majority of persons requesting a domestic violence restraining order receive a temporary restraining order, which remains in place from the date of filing until a hearing scheduled within 25 days, to determine if a permanent restraining order will be granted. There are a number of dispositions possible at the hearing:

- **Granted:** The Court grants a restraining order after hearing, which can last up to five years.
- **Denied:** The petitioner does not receive a restraining order after hearing, and the temporary order is dissolved.
- **Off-Calendar:** A case may be removed from the calendar if the petitioner does not attend the hearing, or if the petitioner indicates that he or she no longer wants the restraining order.
- **Continued:** The most common reason for a continuance, or a rescheduling of the hearing, is the inability to find and serve the respondent with the order prior to the hearing date.
- **Dismissal:** The judge decides to dismiss a case, or the petitioner requests a dismissal.
- **Set for Trial:** Instead of a short hearing, some restraining order requests require an evidentiary hearing or trial with evidences and witnesses testimony to determine a disposition.

In FY2012-13, the Family Court received 1,182 requests for Restraining Orders. Of these requests, 339 were granted, 29% of the total requests, and 55% of the requests that remain on calendar. The total number of domestic violence restraining order requests received by the Family Court has seen a modest decrease over the past three years, declining by 14% between FY2010-11 and FY2012-13.

Dispositions of Domestic Violence Restraining Order Requests to Family Court FY2010-2013[18]

	FY10-11		FY11-12		FY12-13	
	#	%	#	%	#	%
Requests for ROs	1,369		1,258		1,182	
Granted	471	34%	414	33%	339	29%
Denied	113	8%	112	9%	132	11%
Off Calendar	661	48%	562	45%	564	48%
Other Disposition	119	9%	79	6%	87	7%
Pending*	5	0%	2	0%	4	0%

A case may not have been resolved by the close of the fiscal year, June 30.

[18] The information in this table includes only domestic violence restraining order requests received by Family Court. It does not include restraining orders requested for civil harassment, for elder abuse, or those requested in the Criminal Court as part of a criminal prosecution.

Elder and Dependent Adult Abuse Restraining Orders

The Probate Court grants restraining orders in cases of elder and dependent adult abuse. Restraining order requests can be submitted to protect any individual 65 years of age and older from elder abuse. Requests for dependent adults can be made for all individuals between the ages of 18 and 64 who have physical or mental limitations that restrict their ability to carry out normal activities or to protect their rights.

In FY2012-13, the Probate Court received 79 requests for elder or dependent abuse restraining orders (TRO-EA). For disposition at conclusion of hearing: 17 (22%) of these requests were granted, and 27% of those that remained on calendar. The number of elder and dependent abuse restraining order requests received over the last five years has fluctuated greatly. In FY08-09, 23 requests were received, and this number nearly quadrupled to 83 requests received in FY2011-12. Another significant trend appears to be the variance in the percentage of cases receiving other dispositions, which means these cases were either continued, dismissed, or set for trial. These rates dropped to 3% in FY2010-11, then surged to 85% of cases in FY2012-13.

Permanent Dispositions of Elder Abuse Restraining Order Requests to Family Court FY2010-2013

	FY10-11		FY11-12		FY12-13	
	#	%	#	%	#	%
Requests for TRO-EA	37	-	83	-	79	-
Granted	16	43%	26	31%	17	22%
Denied	5	14%	17	20%	22	28%
Off Calendar	13	35%	15	18%	15	19%
Other Disposition	1	3%	30	36%	67	85%
Pending	2	5%	0	0%	0	0%

Public Service Agencies

The City and County of San Francisco administers agencies designed to protect the welfare of vulnerable populations such as children, elders, and dependent adults. The following are statistics from those agencies, as well as public agencies that interact with a significant population of child abuse, elder abuse or domestic violence survivors.

Family and Children's Services

San Francisco Family and Children's Services, also known as Child Protective Services (CPS), is a division of the Department of Human Services within the Human Services Agency that protects children from abuse and neglect, and works in partnership with community-based service providers to support families in raising children in safe and nurturing homes. Whenever possible, Family and Children's Services helps families stay together by providing a range of services from prevention through aftercare, to keeping children safe with their families or with families who can provide permanency.

Researchers from the Center for Social Services Research (CSSR) at the University of California at Berkeley aggregate and provide access to all child welfare data for the state on an annual basis as part of a joint venture between the University and the California Department of Social Services. The data included in this section comes from this database and has been organized by calendar year rather than fiscal year.[19]

Differential Response

Family and Children's Services uses a method called "differential response" to respond to allegations of abuse. Based on information received during a hotline call or referral, Family and Children's Services social workers assess the evidence of neglect or abuse. If there is insufficient evidence to suspect neglect or abuse, the case is "evaluated out of the system" and the family may be referred to voluntary services in the community. If there appears to be sufficient evidence of abuse or neglect, Family and Children's Services opens the case and conducts further assessment and investigation. Under this differential response model, the social worker taking the hotline report or referral determines the initial response path for all referrals. There are three possible initial response paths:

- **Path 1: Community Response** – When there are no known safety issues and a low-to-moderate risk level of future maltreatment, the social worker refers the family to voluntary support services in the community. This is the path for all referrals that are "evaluated out of the system."
- **Path 2: Family and Children's Services and Community Response** – When the safety threat is assessed as moderate-to-high, Family and Children's Services opens a referral.

[19] Source for all subsequent calendar year (CY) child welfare data: Needell, B., Webster, D., Armijo, M., Lee, S., Dawson, W., Magruder, J., Exel, M., Cuccaro-Alamin, S., Putnam-Hornstein, E., Williams, D., Simon, V., Hamilton, D., Lou, C., Peng, C., Moore, M., King, B., Henry, C., & Nuttbrock, A. (2014). Child Welfare Services Reports for Children. Retrieved 3/6/2014, from University of California at Berkeley Center for Social Services Research website. URL: http://cssr.berkeley.edu/ucb_childwelfare.

The response team may include a public health nurse, a CalWORKs worker, or other community representatives who may already be working with the family.

- **Path 3: Family and Children's Services Only (and possible law enforcement) Response** – When the safety threat is assessed as high-to-very high, Family and Children's Services opens a referral.

Family and Children's Services began using differential response for Path 1 and 2 cases in 2006. This model serves as a strong tool for child abuse prevention by supporting families at risk of abuse or neglect even when cases do not rise to the level of Family and Children's Services action.

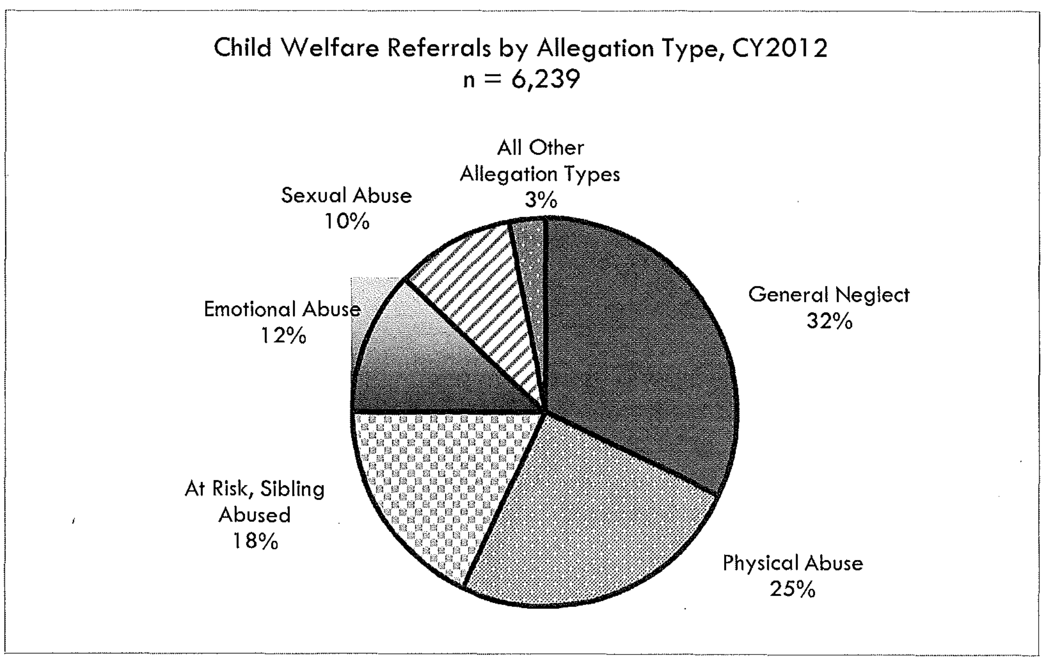
Child Welfare Referrals

During Calendar Year 2012 (CY2012), Family and Children's Services received 6,239 referrals for suspected child abuse or neglect.[20]

Family and Children's Services Referrals and Substantiations CY2010-2012

	2010	2011	2012
Total Children Referred	5,950	6,025	6,239
Total Cases Substantiated	833	659	717
Percent Substantiated	14%	11%	11.5%

The majority of referrals received by Family and Children's Services were for general neglect (32%) and physical abuse (25%). Children at-risk due to abuse of a sibling (18%), emotional abuse (12%), and sexual abuse (10%) accounted for an additional 2,438 referrals. Other allegation types reported in CY2012 included caretaker absence or incapacity (3%), severe neglect (1%), and exploitation (less than 1%).



20 This figure counts each child with a child maltreatment allegation once for each analysis year. If a child has more than one allegation in a specific year, that child is counted one time in the category of the most severe occurrence.

The breakdown among the different types of referrals received in CY2012 is similar to that of previous years during which general neglect and physical abuse were the most frequently received referrals. Since CY2010, general neglect and physical abuse allegations have each accounted for between 25% and 32% of referrals every year.

Family and Children's Services Referrals by Allegation Type CY2010-2012

Allegation Type	CY2010		CY2011		CY2012	
	#	%	#	%	#	%
General Neglect	1,850	31%	1,893	31%	2,019	32%
Physical Abuse	1,569	26%	1,628	27%	1,572	25%
At Risk, Sibling Abused	927	16%	973	16%	1,096	18%
Emotional Abuse	776	13%	735	12%	730	12%
Sexual Abuse	613	10%	583	10%	612	10%
Caretaker Absence/Incapacity	175	3%	158	3%	160	3%
Severe Neglect	30	1%	47	1%	43	1%
Exploitation	10	<1%	8	<1%	7	<1%
Substantial Risk	0	0%	0	0%	0	0%
Total	**5,950**		**6,025**		**6,239**	

Examining the data over the past three years from CY2010 to CY2012 reveals increases in the numbers of referrals for two allegation categories: the number of children referred who were at-risk due to abuse of a sibling, an increase of 18% over the three year period; and severe neglect, which increased by nearly 43%. The number of Child Protective Services referrals has climbed slightly in each of the past three years.

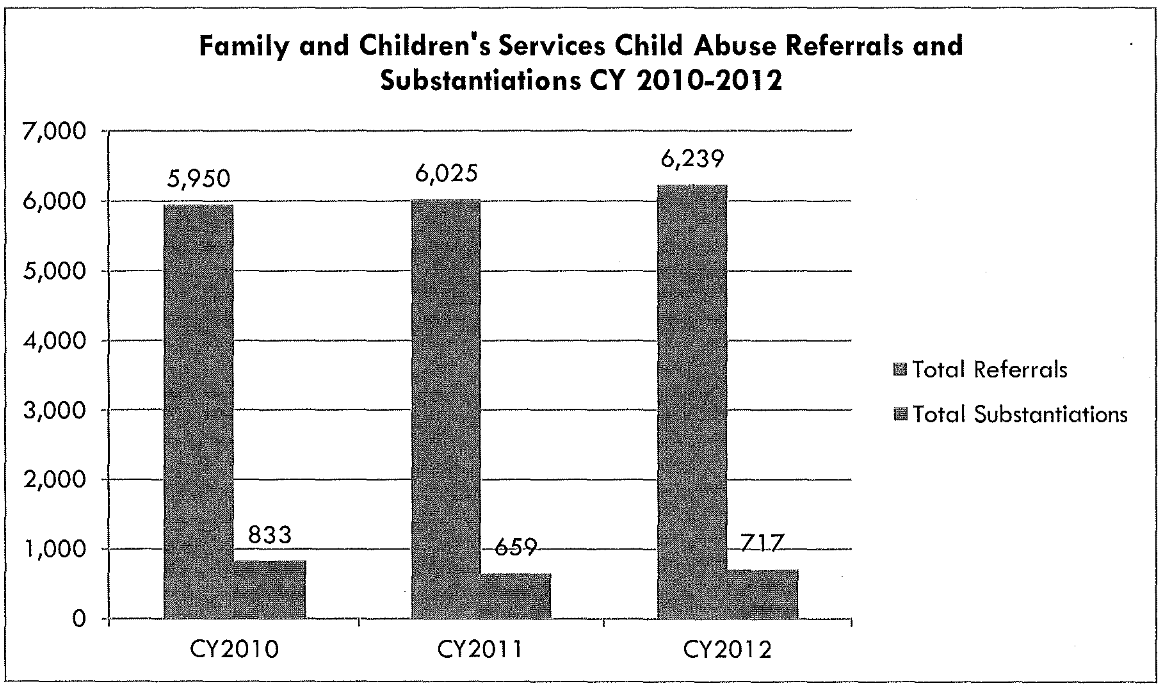
Referral Findings

Of the 6,239 referrals received during CY2012, 11% (717) were substantiated, or found to be true, following investigation by Family and Children's Services. During CY2012, 7% of referrals were inconclusive due to a lack of evidence to substantiate the abuse. Considered "unfounded," 38% of referrals did not meet the definition of abuse or neglect. An additional 39% of referrals were evaluated and not found to warrant further investigation and required an "assessment only" by Family and Children's Services.

Substantiated Allegations of Abuse and Neglect

Over half (55%) of substantiated referrals were for general neglect. Caretaker absence or incapacity and at-risk due to abuse of a sibling each accounted for 11% of substantiated referrals, and emotional abuse accounted for 10%. The remaining 13% of substantiated referrals were for physical abuse, sexual abuse, severe neglect, and exploitation.

Family and Children's Services Referrals by Allegation Type and Findings: CY2012						
Allegation Type	Substantiated	Inconclusive	Unfounded	Assessment Only	Not Yet Determined	Total Referrals
General Neglect	397	114	667	840	1	2,019
Physical Abuse	59	129	708	676	0	1,572
At Risk, Sibling Abused	76	68	594	353	5	1,096
Emotional Abuse	71	107	239	313	0	730
Sexual Abuse	26	26	116	444	0	612
Caretaker Absence/ Incapacity	77	13	23	47	0	160
Severe Neglect	11	6	21	5	0	43
Exploitation	0	0	0	7	0	7
Substantial Risk	0	0	0	0	0	0
Total	**717**	**463**	**2,368**	**2,685**	**6**	**6,239**



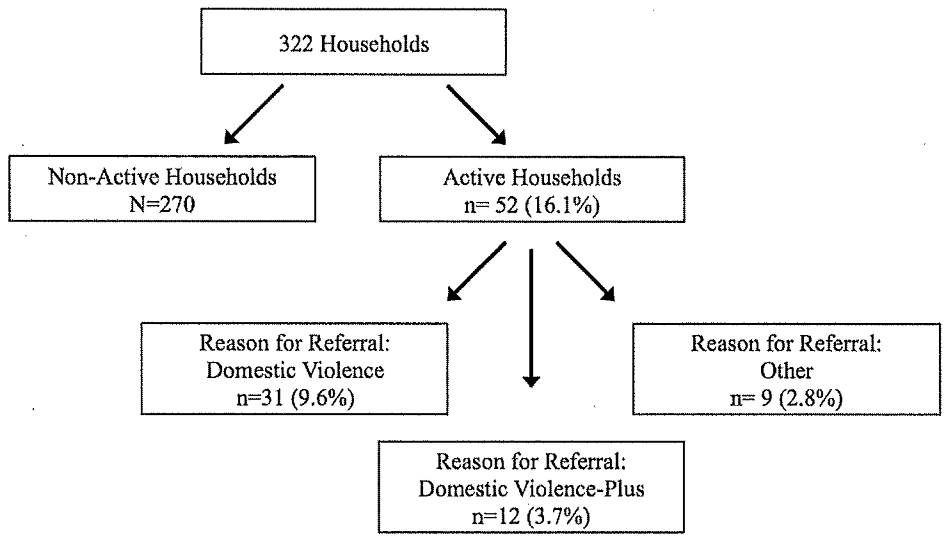
Domestic Violence Among Investigated Families

In this year's report, we were able to include specialized data on prevalence of domestic violence in the Family and Children's Services caseload as a result of original research conducted by Dr. Colleen Henry at the University of California, Berkeley.[21] During fiscal year 2011, Family and

[21] Henry, C. (2014). Constructing Maltreatment: An Urban Child Welfare Agency's Response to Child Exposure to Domestic Violence. Unpublished manuscript, University of California, Berkeley. Available upon request at colleen.elizabeth.henry@gmail.com.

Children's Services investigated approximately 2,000 households one or more times for allegations child maltreatment.[22] Dr. Henry analyzed a random sample of Family and Children's Services case records from these households (n=322), and found that 30% (n=97) of households were experiencing or had experienced domestic violence prior to investigation: 16% (n=52) of investigated households reported experiencing active domestic violence at time of investigation (i.e. domestic violence experienced within the 12-months prior to investigation) and 14% (n=45) reported experiencing domestic violence in the past (i.e. prior experience of domestic violence, but not within the 12-months prior to investigation).

The following paragraphs compare differences between those households that reported experiencing domestic violence within the 12-months prior to investigation (active households) and those households who reported no domestic violence prior to investigation *or* no domestic violence within the 12-months prior to investigation (no-active households).



Prevalence of active domestic among households investigated by Family and Children's Services and reason for referral among households experiencing active domestic violence at time of investigation.

Examination of differences between active households (n=52) and non-active households (n=270) found that active households were significantly more likely to consist of younger caregivers and younger children than were non-active households. Active households were also significantly more likely to be referred to the Agency by law-enforcement (39% vs. 8%) and to be assigned an allegation of emotional abuse (75% vs. 25%) than were non-active households.

Among households experiencing active domestic violence at time of investigation (n=52), 61% (n=31) or 10% of the sample were referred to the Agency for domestic violence, 24% (n=12) or 4% of the sample were referred to the Agency for domestic violence and another form of maltreatment (e.g., physical abuse, general neglect) (n=12), and 18% (n=9) or 3% of the sample were referred to the Agency for reasons other than domestic violence.

Overall, Family and Children's Services assessed active households to be as safe as non-active

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[22] During CY2011, 6,025 were referred to Family and Children's Services for suspected abuse or neglect; approximately 2,000 of these referrals met criteria for further investigation.

households, however, active households required more services to maintain their children safely in their homes than did non-active households – 35% of active households required services (Family and Children's Services or community-based) to maintain their children safely in their homes, whereas 11% of non-active households required services to maintain their children safely in their homes.

Of the 52 active households examined in this study, approximately one-third (29%, n=15) were substantiated by Family and Children's Services for child maltreatment, another third (n=15) received ongoing formal child welfare services (i.e. the referral was promoted to case status), and six (12%) active households had one or more children removed from their homes and placed in out-of-home care. Of active households referred to FCS for domestic violence alone, one resulted in out-of-home placement. Regardless of substantiation or promotion to case status, many active households were referred to or received Family and Children's Services or community-based domestic violence services. Over half (54%) of active households were contacted by Family and Children's Services's domestic violence liaison and nearly two-thirds (73%) were referred to or received community-based domestic violence services.

Geo-Coded Data

Data is also available from the Center for Social Services Research database that examines child abuse and neglect allegation rates by zip code.[23] The most recent geo-coded data for CY2012 is detailed in the table below and shows that referrals to Family and Children's Services vary greatly by zip code. The neighborhoods with the highest number of children with allegations were Bayview (1,004), Ingleside/Excelsior (671), Mission (537), and Visitacion Valley (527). Together, these four areas accounted for 2,739 allegations of abuse, or 44% of the total allegations received by Family and Children's Services during that year. However, the small community at Treasure Island has an incidence rate of 362 allegations per 1,000 children.

The citywide incidence rate for CY2012 was 53.8 per 1,000 children, an increase of 17% from CY2008 of 45.8 per 1,000 children. Among neighborhoods with the highest numbers of child abuse allegations, the incidence rates in CY2012 were 116.1 (Bayview), 40.9 (Ingleside/Excelsior), 44.0 (Mission), and 55.9 per 1,000 children (Visitacion Valley).

Family and Children's Services Referrals, CY2012
Children with Child Maltreatment Allegations and Incidence Rates by ZIP Code

ZIP Code	Neighborhood	Child Population	Children with Allegations	Incidence per 1,000 Children
94124	Bayview	8,651	1,004	116.1
94112	Ingleside/ Excelsior	16,407	671	40.9
94110	Mission	12,211	537	44.0
94134	Visitacion Valley	9,435	527	55.9
94115	Pac Heights/Western Addition/Japantown	3,916	281	71.8
94102	Hayes Valley/Tenderloin	3,368	228	67.7
94107	Potrero Hill	3,122	222	71.1
94103	SOMA	3,058	148	48.4

94109	Nob Hill/Russian Hill	4,396	144	32.8
94132	Lake Merced	4,357	136	31.2
94133	North Beach/Fisherman's Wharf	2,855	114	39.9
94117	Haight/Cole Valley	3,021	113	37.4
94130	Treasure Island	279	101	362.0
94127	West Portal	3,406	71	20.8
94118	Inner Richmond	5,263	62	11.8
94131	Twin Peaks/Glen Park	3,781	55	14.5
94108	Chinatown	1,184	47	39.7
94123	Marina/Cow Hollow	2,333	46	19.7
94116	Outer Sunset	6,774	45	6.6
94114	Castro/Noe Valley	2,727	40	14.7
94121	Outer Richmond	5,875	33	5.6
94122	Inner Sunset	8,063	30	3.7
94129	Presidio	607	12	19.8
94111	Embarcadero	247	12	48.6
94104	Financial District	25	10	400.0
94105	Embarcadero/SOMA	275	4	14.5
94158	Mission Bay	438	4	9.1
ZIP Code Missing, or Out of County		1,552		
	San Francisco	**116,074**	**6,239**	**53.8**
	California	**9,697,339**	**486,991**	**50.2**

Emerging Trends in Child Welfare

Over the past few years, Family and Children's Services has seen a rise in the number of adolescents becoming involved in the child welfare and foster care systems as the subject of referrals for abuse and through Differential Response. During CY2012, adolescents aged 11 to 17 years were the age group with highest number of referrals to Family and Children's Services (2,410) and made up 39% of the referrals.

Family and Children's Services Referrals by Age Group CY2010-2012

Age	2010	2011	2012
0 - 5	1,807	1,928	1,986
6 - 10	1,699	1,710	1,843
11 - 17	2,444	2,387	2,410
Total	**5,950**	**6,025**	**6,239**

This trend will likely increase as California revamps its response to commercially sexually exploited youth. The California Child Welfare Council has called for Child Welfare Agencies rather than juvenile justice systems to take jurisdiction over these youth. Commercial sexual exploitation of children (CSEC) has emerged as a serious human rights and social welfare issue at the national, state and local level. The FBI has identified the San Francisco Bay Area as a high-concentration area for domestic minor sex trafficking. It is estimated that between 50-80% of children who become victims have prior involvement with the child welfare system.[24]

The Office of the Mayor has identified creating a comprehensive, coordinated city-wide response to human trafficking as a significant priority for San Francisco, and established the San Francisco Mayor's Task Force on Anti-Human Trafficking in March 2013. This Task Force, which includes a Child Sex Trafficking Subcommittee, is comprised of a variety of stakeholders across the public, nonprofit and private sector that collaborate to shape policy and strengthen protocols around San Francisco's response to victims of trafficking.

CY2012 continued the downward trend of adolescents entering foster care in the past 10 years with 139 ages 11 to 17 entering the system, down 23% from CY2010 of 179. Conversely, the number of children ages 0-5 entering foster care increased to 191, a 22% increase over CY2011.

Family and Children's Services Foster Care Entries by Age Group CY2010-2012

Age Group	2010	2011	2012
0 - 5	183	156	191
6 - 10	100	88	74
11 - 17	179	138	139
Total	**462**	**382**	**404**

The number of children involved with Family and Children's Services and the child welfare system has declined overall since the initial data capture in 1998. In January 1998, there were 3,049 children in foster care in San Francisco. With the exception of 2003, the point-in-time caseload count has decreased every year since then, reaching a low of 1,076 children in January 2012. The number of children in foster care in January 2013 rose very slightly to 1,099. There are several changes that have likely contributed to this overall decline: San Francisco's decreasing child population, and new Family and Children's Services policies that emphasized early intervention and providing increased family support services to keep more children safely in their homes, when appropriate, rather than placing them in foster care.

[24] Kate Walker, California Child Welfare Council, *Ending the Commercial Sexual Exploitation of Children: A Call for Multi-System Collaboration in California* (2013), p. 11, available at http://www.youthlaw.org/fileadmin/ncyl/youthlaw/publications/Ending-CSEC-A-Call-for-Multi-System_Collaboration-in-CA.pdf.

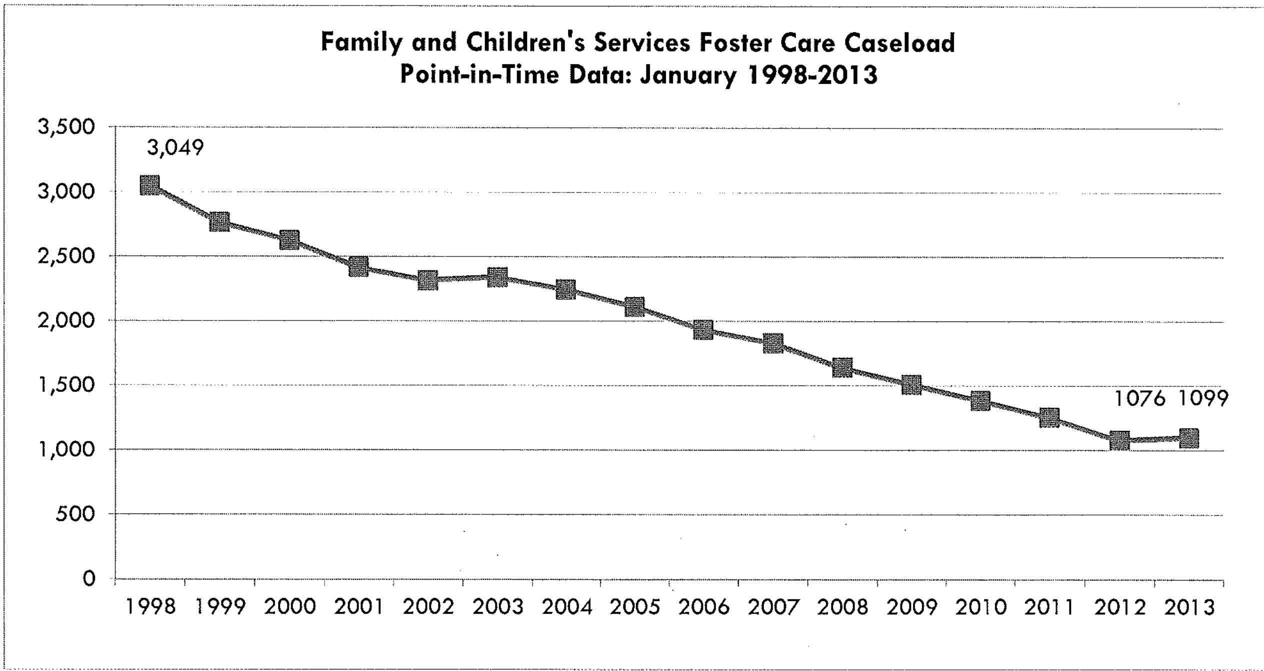


Figure provided by San Francisco Human Services Agency

Another significant change to the child welfare system that remains relevant today came with the passage of State Assembly Bill 12 (AB 12), the California Fostering Connections to Success Act, in August 2010. Under AB 12, eligible foster youth have the option to remain in care until age 21 and receive transitional support. Youth who continue in extended foster care will remain under the jurisdiction of the juvenile court as "non-minor dependents," and will continue to work with a county child welfare worker to maintain their eligibility and fulfill their Independent Living Case Plan, a plan to develop independent living skills and permanent connections with caring and committed adults. Non-minor dependents in extended foster care can live in a number of different types of supervised placements, all of which must be either approved or licensed under new standards. This extended foster care program has been incrementally implemented over a three-year period. In January 2012, eligible youth were able to extend their foster care until age 19, and in January 2013, until age 20. With the passage of AB 787 in October 2013, as of January 2014 eligible youth were able to remain in foster care until age 21.

CalWORKs Domestic Violence Advocates

The Department of Human Services within the San Francisco Human Services Agency administers California's version of TANF, the welfare program for low-income families known as **CalWORKs (California Work Opportunity and Responsibility to Kids)**, which has two distinct components: eligibility benefits that consist of cash assistance, supplemental nutrition assistance (food stamps) and medical coverage to eligible members of the family; and employment services to those work eligible adults who are required to be engaged in welfare to work activities.

The CalWORKs program also includes domestic violence services that offer specialized support and resources to survivors of domestic violence who are on CalWORKs assistance. The intent is to balance the security and safety needs of survivors of domestic violence with the opportunities to participate in welfare-to-work activities to the full extent of their abilities. The domestic violence services include supportive services such as counseling to assist the survivors to achieve independence and economic self-sufficiency. The Domestic Violence Services are provided by a community agency that contracts with Human Services Agency to work with domestic violence survivors on-site at the CalWORKs office and in the agency's community space.

Human Services Agency
CalWORKs and Domestic Violence Advocate Caseloads
FY2010-2013

	FY10-11	FY11-12	FY12-13
Average Monthly CalWORKs Caseload	4,907	4,729	4,468
Average Monthly Domestic Violence Advocate Caseload	234	246	167
Percent of Caseload working with DV Advocate	5%	5%	3.7%

San Francisco's CalWORKs caseload has not fluctuated widely in the past few years, despite the aftermath of a severe recession that began in December 2007. CalWORKs adult recipients currently time out after reaching a lifetime limit of 48 months, but children continue to receive cash assistance on a reduced scale. In 2011-12, the CalWORKs caseload rose by 8% with an increase of 371 families. The highest caseload was achieved in May 2012 at 5,089 families receiving aid. During 2012-13, the caseload gradually began to decline. Between July 2012 and June 2013, the caseload declined by 275 families (5%) to reach 4,526 in June 2013, the lowest in the fiscal year.

The case management of domestic violence services is contracted out to Homeless Prenatal Program (HPP). HPP advocates can assist domestic violence survivors in applying for waivers of various CalWORKS rules, including the lifetime limit on aid. HPP took over the domestic violence contract from Riley Center as of July 2012 and began providing case management services to CalWORKs clients. HPP worked with Riley Center closely, to smoothly transition all domestic violence cases so as to minimize the impact of change of provider. Despite sustained outreach, the domestic violence caseload declined from an average of 246 cases to 65 in July 2012 and gradually rose to 194 in December 2012, the highest in the fiscal year 2012-13. The average caseload has decreased by 32% from FY2011-12 to FY2012-13.

Adult Protective Services

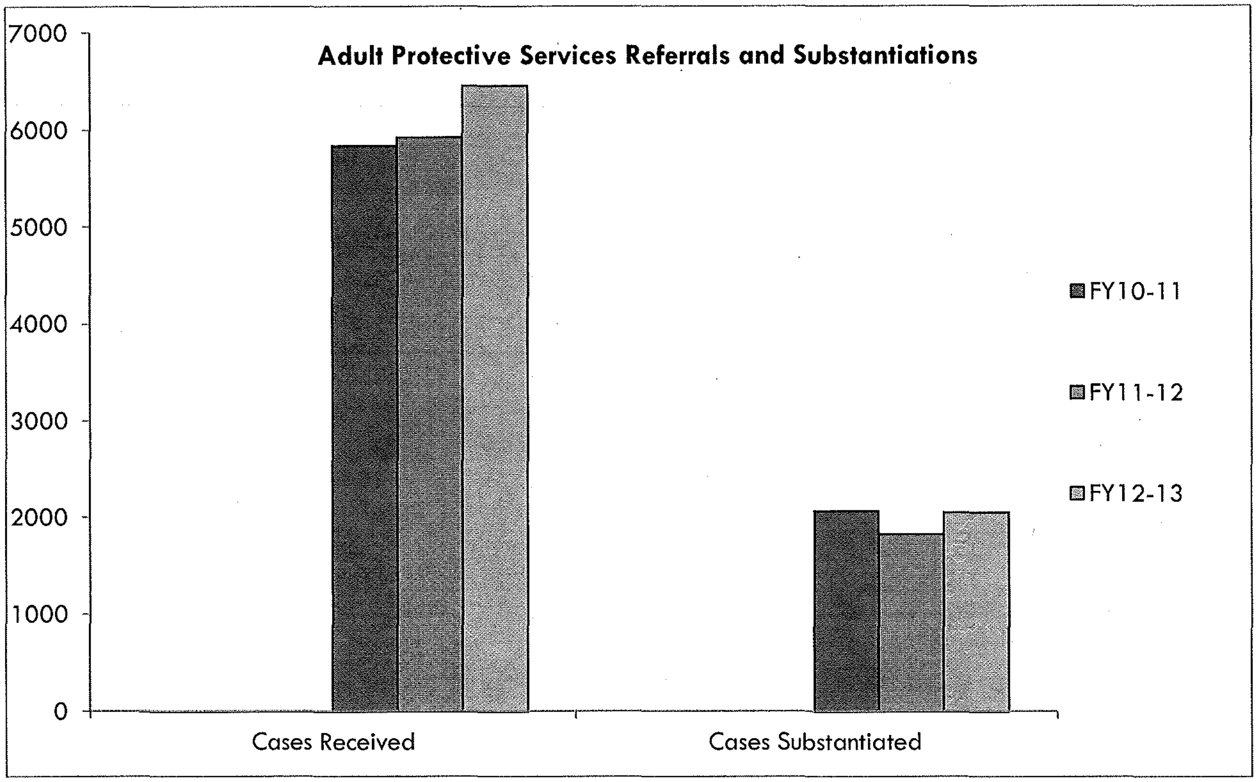
The Department of Aging and Adult Services within the Human Services Agency operates the Adult Protective Services (APS) program for the City and County of San Francisco. APS is a state mandated, county administered program that is charged with responding to reports of abuse, neglect, exploitation, and self-neglect of elders and of adults between the ages of 18 and 64 that have physical, mental, or cognitive disabilities. APS social workers in San Francisco may collaborate with local law enforcement, emergency medical services, the District Attorney's Office, as well as experts from the Elder Abuse Forensic Center in order to effectively investigate and intervene in cases of elder and dependent adult abuse. APS social workers assist their clients to maintain the greatest level of independence possible while promoting their health, safety, and well-being.

The 2012 US Census found that 14% of the total population in San Francisco is 65 or over, and this is higher than the California average of 12%. The Center of Excellence on Elder Abuse and Neglect affiliated with the University of California Irvine estimates that an elder or dependent adult is abused once every three minutes in California. Abuse of the "oldest old," those individuals over 85 years of age, is believed to occur at a higher rate than other elders, and family members are the most common perpetrators of abuse towards these individuals.

In FY2011-12, San Francisco APS received 5,924 cases of abuse, neglect, or self-neglect, and this number increased to 6,455 in FY2012-13. Overall, referrals rose 10% between FY2010-11 and FY2012-13. State level data mirrors this rising trend in case numbers. The Center for Excellence on Elder Abuse and Neglect reported that between January 2006 and September 2012, APS cases rose throughout the state of California by 20%. APS responds to all reports made, though APS social workers do not provide a face-to-face investigation on every report. A report may not warrant a face-to-face evaluation for a variety of reasons. This includes the fact that the elder or dependent adult who is the subject of the referral may not reside in San Francisco, and such reports are referred to the APS in the county of residence. Another reason might be that the individual referred may be in a skilled nursing facility and such reports are under the jurisdiction of the Long Term Care Ombudsman program.

Adult Protective Services Statistics
FY2010-2013

	FY10-11	FY11-12	FY12-13
Cases Received	5,839	5,924	6,455
Cases Substantiated	2,065	1,821	2,046
Percent Substantiated	35%	31%	32%



The rates of substantiation have decreased steadily over the past six fiscal years, declining from a 67% rate of reports substantiated in FY07-08, to only 32% of referrals found to meet the standards of abuse in FY2012-13.

Elder abuse cases accounted for more than twice the number of dependent adult abuse cases in FY2012-13, 70% and 30% respectively.

Adult Protective Services Case Breakdown Statistics FY11-13				
	FY11-12		FY12-13	
	Elder Abuse	Dependent Adult Abuse	Elder Abuse	Dependent Adult Abuse
Cases Received	4068	1856	4531	1924
Cases Substantiated	1307	514	1487	559
Percent Substantiated	32%	28%	33%	29%

Adult Protective Services Confirmed Cases of Abuse by Others								
	FY11-12				FY12-13			
Type of Abuse	Elder Abuse	%	Dependent Adult Abuse	%	Elder Abuse	%	Dependent Adult Abuse	%
Psychological / Mental	257	35%	93	38%	307	38%	80	33%
Financial	237	32%	44	18%	256	31%	50	21%
Neglect	115	16%	34	14%	126	15%	31	13%
Physical	109	15%	67	27%	100	12%	69	28%
Isolation	9	1%	0	-	18	2%	5	2%
Abandonment	9	1%	-	-	9	1%	2	1%
Sexual	4	1%	7	3%	1	0%	6	2%
Abduction	-	-	1	0%	1	0%	-	-
Total	**740**		**246**		**818**		**243**	

Among the cases that were found to have confirmed findings of abuse by others, financial abuse and psychological abuse were the most prevalent types of abuse. Self-neglect is characterized by the failure to provide for basic needs such as food, clothing, medical care, and personal hygiene. In FY2012-13, APS confirmed 2,321 cases of reported self-neglect, and these allegations may be co-occurring alongside allegations of abuse, neglect, or exploitation from others.

Adult Protective Services Confirmed Cases of Self-Neglect FY2011-2013		
Type of Case	FY11-12	FY12-13
Elder Abuse	1,344	1,613
Dependent Adult Abuse	643	708
Total	**1,987**	**2,321**

Department of Public Health

The San Francisco Department of Public Health strives to reduce family violence both through public health prevention programs and by directly addressing family violence with patients seen in the Department of Public Health network of hospitals and healthcare clinics. Healthcare providers may be the first or only professionals to encounter and provide services to many victims of family violence. Although some victims of family violence may present with obvious injuries during a healthcare visit, it is far more common that they present with only subtle symptoms of repeated abuse or violence like chronic pain, depression, or exacerbation of chronic health problems. Therefore, treating and preventing family violence requires extensive training of healthcare staff, protocols to use in screening for and responding to family violence, and the development of educational materials for healthcare providers and staff.

Data on all forms of family violence in the healthcare setting can be captured in multiple different ways. Mention of family violence (child abuse, intimate partner violence, elder abuse) may be made in the text of a paper or electronic healthcare note. With charting of violence in the textual portion of a note, information on violence must be extracted by reading each healthcare note and, thus, is impossibly time-consuming to collect. Other ways of capturing data include the development of specific "standardized fields" in an electronic medical record that can be filled out to capture the results of a violence "screening" done by healthcare staff or providers. This method of capture makes digital extraction of the data possible. Yet healthcare providers may not fill out this "standardized field." Finally, another way to capture data on all forms of family violence is through "billing code data" (called "ICD codes"). These are codes that describe the diagnoses made and counseling done during a healthcare encounter for purposes of billing. There are many diagnostic and counseling codes related to family violence. National data strongly suggests that these codes are underutilized in healthcare settings. For example, a provider may code a "fracture" that was the result of abuse but not the abuse itself.

Both the San Francisco General Hospital Emergency Department and the Department of Public Health outpatient clinics have begun to document intimate partner violence in standardized fields in newly adopted electronic medical records systems. Because learning to use new electronic medical record systems is quite challenging, it is not expected that there will be a high level of documentation at first. Department of Public Health is working on a plan to extract data from these electronic medical record systems. The following data are preliminary results from Department of Public Health electronic medical record systems. The Department of Public Health is excited to begin implementing the recommendations from the *2011 Family Violence Council Report* to gather family violence data from its Emergency Department and Outpatient Clinics.

The San Francisco General Hospital Emergency Department screens for intimate partner violence with triage nurses and other healthcare providers asking each patient about his/her intimate partner violence experiences. All patients identified as, or suspected to be, victims of intimate partner violence are offered treatment, counseling, and referrals to community services. Department of Public Health has not yet been able to extract the intimate partner violence billing code data for all healthcare encounters which may reveal further cases identified and documented. Data from the "standardized field" for intimate partner violence screening at the nurse triage area reveals that this method of recording data has resulted in the identification and documentation of a small percent of the expected number of victims of intimate partner violence.

Department of Public Health – Emergency Department Statistics August 2011-January 2012	
Clients Served	18,359
Number of Clients with either "negative" or "not applicable" intimate partner violence screen	17,551[25]
Number of Clients With "Positive" intimate partner violence screen	86
Percentage of Clients with Positive intimate partner violence screen	.46%

The Department of Public Health outpatient clinics also have an intimate partner violence protocol that was endorsed by the San Francisco Health Commission in 1998, mandating that healthcare providers in each clinic routinely screen for and address intimate partner violence with their patients. As with the San Francisco General Hospital Emergency Department model, all patients identified as, or suspected to be, victims of intimate partner violence are offered treatment, counseling, and community resources.

In the new electronic medical record system, Department of Public Health established "searchable" fields for: (1) Physical and emotional intimate partner violence; (2) Sexual abuse by an intimate partner or another person; and (3) Contraceptive coercion (whether a partner tried to interfere with contraceptive method or tried to force a female patient to become pregnant). In FY2011-2012 only three clinics started using the new electronic medical record system. In FY2012-2013, the new electronic record system was expanded to five more clinics.

Department of Public Health – Outpatient Clinic Statistics FY2011-2012[26]	
Female clients screened: (number of female clients with completed standardized field in at least 1 of the 3 categories of abuse)	1,601
Female clients with <u>current</u> intimate partner violence: number female clients with positive screen in any one of the 3 categories of abuse)	14
Female clients with <u>past</u> intimate partner violence: number female clients with positive screen for past abuse (> 1 year ago) in any one of 3 categories of abuse)	140
Male clients screened: number of male clients with completed standardized field in at least 1 of the 3 categories of abuse)	809
Male clients with <u>current</u> intimate partner violence: number male clients with positive screen in any one of the 3 categories of abuse)	9
Male clients with <u>past</u> intimate partner violence: number male clients with positive screen for past abuse (> 1 year ago) in any one of 3 categories of abuse)	35

[25] Some "intimate partner violence screen" fields were left blank.
[26] Three clinics began using this electronic record system in FY11-12, and this data represents clients at those clinics.

Department of Public Health – Outpatient Clinic Statistics FY2012-2013[27]	
Female clients screened: (number of female clients with completed standardized field in at least 1 of the 3 categories of abuse)	1,682
Female clients with <u>current</u> intimate partner violence: (number female clients with positive screen in any one of the 3 categories of abuse)	52
Female clients with <u>past</u> intimate partner violence: (number female clients with positive screen for past abuse (> 1 year ago) in any one of 3 categories of abuse)	148
Male clients screened: (number of male clients with completed standardized field in at least 1 of the 3 categories of abuse)	603
Male clients with <u>current</u> intimate partner violence: (number male clients with positive screen in any one of the 3 categories of abuse)	5
Male clients with <u>past</u> intimate partner violence: (number male clients with positive screen for past abuse (> 1 year ago) in any one of 3 categories of abuse)	15

To attempt to provide additional data for this report, an audit of diagnosis and counseling codes that refer to elder abuse and intimate partner violence was done at Laguna Honda Hospital. This audit revealed that data on elder abuse and intimate partner violence is not being captured by current coding practices. Further investigation revealed that, upon admission to Laguna Honda Hospital, data is collected and documented as mandated by a federal intake form called the "Minimum Data Set for Nursing Home Patient Assessment" or "MDS." Data from the MDS is transmitted to the Centers for Medicare and Medicaid. Review of this federally mandated form reveals that the MDS does not include any questions related to elder abuse or intimate partner violence. Thus, data collection for this report has highlighted a federal policy that should be examined and addressed.

Because many survivors of family violence do not feel safe or ready to disclose their experiences of abuse when asked by a healthcare provider, not all family violence survivors may be identified in the healthcare setting. Once survivors of family violence and sexual assault are identified within the Department of Public Health system, they are treated by their primary health care team and referred to community services. However, there are also a number of **trauma-specific treatment programs** within Department of Public Health to assist patients in recovering from the physical and emotional trauma they have experienced.

[27] Eight clinics used the electronic record system in FY2012-13 and this data represents clients at those clinics.

Trauma Recovery Center

The Trauma Recovery Center provides mental health and case management services to survivors of interpersonal violence, including intimate partner, sexual and other physical assaults, gang-related violence, and more. In FY2011-12, Trauma Recovery Center provided services to 738 clients, 51% of whom were seen following experiences of sexual assault and 49% of whom were seen following experiences of domestic violence or other assaults. In FY2012-13, the Trauma Recovery Center provided services to 742 clients, evenly divided between survivors of sexual assault and survivors of domestic violence or other assaults.

Department of Public Health – Trauma Recovery Center Statistics FY2011-2013		
	FY11-12	FY12-13
Clients Served	738	742
Number of Clients Receiving Services Following Sexual Assault	379	372
Percent of Clients Receiving Services Following Sexual Assault	51%	50%
Number of Clients Receiving Services Following Domestic Violence or Other Assaults	359	370
Percent of Clients Receiving Services Following Domestic Violence or Other Assaults	49%	50%

Child Trauma Research Program

The Child Trauma Research Program (CTRP) is a program of the University of California, Department of Psychiatry that serves families at San Francisco General Hospital (SFGH) and at community centers throughout San Francisco. CTRP provides assessment and intensive mental health services to children birth through five years of age who have been exposed to trauma, including family violence.

During FY11-12, 271 children were referred to services at CTRP. By type of trauma: 136 were exposed to domestic violence, 42 experienced separation from a primary caregiver, 19 experienced child neglect, 16 experienced physical abuse, 16 were exposed to community violence, 14 experienced sexual abuse, 14 lost a close relation, and 14 experienced other traumas. Of these children, 165 (61% of all referred) were referred for multiple traumas.

During FY 2-13, 282 children were referred to services at CTRP. By type of trauma: 144 were exposed to domestic violence, 45 experienced separation from a primary caregiver, 20 experienced other traumas, 17 experienced physical abuse, 17 experienced sexual abuse, 14 experienced child neglect, 14 lost a close relation, and 11 were exposed to community violence. Of these children, 188 (67% of all referred) were referred for multiple traumas.

Department of Public Health – Child Trauma Research Project Statistics FY2011-2013		
	FY11-12	FY12-13
Families Served[28] at Child Trauma Research Program at San Francisco General Hospital and Community Centers	271	282[29]

[28] Families served refers to the number of children served at the clinic.
[29] 147 of these families were for continued treatment begun in FY11-12.

Department of Public Health – Child Trauma Research Program Statistics by Type of Trauma FY2011-2013		
Type of Trauma Endorsed	FY 11-12	FY 12-13
Domestic Violence	136 (50%)	144 (51%)
Physical Abuse	16 (6%)	17 (6%)
Sexual Abuse	14 (5%)	17 (6%)
Child Neglect	19 (7%)	14 (5%)
Community Violence	16 (6%)	11 (4%)
Loss of Close Relation	14 (5%)	14 (5%)
Separation from Primary Caregiver	42 (16%)	45 (16%)
Other Traumas	14 (5%)	20 (7%)

Child and Adolescent Support Advocacy and Resource Center
The Child and Adolescent Support Advocacy and Resource Center (CASARC) serves children and adolescents up to 24 years of age who have been sexually or physically abused, or have witnessed severe violence. Located at San Francisco General Hospital, CASARC provides forensic medical and crisis management services 24 hours a day; trauma-focused psychotherapy services to children and families; and educational training for community providers, including teachers, students, and health care and mental health professionals.

During FY2011-12, CASARC served 340 children and adolescents. Forensic interviews were conducted with 292 children and adolescents who were suspected victims of abuse. CASARC physicians and nurse practitioners conducted 89 sexual and 47 physical abuse medical exams. In FY2012-13 CASARC served 343 children and adolescents. Forensic interviews were conducted with 303 children and adolescents who were suspected victims of abuse. CASARC physicians and nurse practitioners conducted 87 sexual and 64 physical abuse medical exams.

Department of Public Health – CASARC statistics FY2011-2013		
Type of contact	FY 11-12	FY 12-13
Total served	340	343
Forensic interviews	292	303
Sexual abuse exams	89	87
Physical abuse exams	47	64

Child Abuse Intervention Program (CAIP)
The Department of Public Health runs the new child abuse intervention program discussed earlier in the report in the Adult Probation Department section. The Child Abuse Intervention Program (CAIP) is a part of the Violence Intervention Program (VIP), a San Francisco Health Network behavioral health program that provides treatment for individuals who are mainly court-ordered for treatment in relation to violent offenses involving child abuse and endangerment, domestic violence, sexual offenses, and other forms of interpersonal violence. The aim of the program is to

enhance the safety of children in the community by assisting at-risk individuals in improving their parenting skills and quality of life as to reduce the risk of future violence.

CAIP is designed in accordance with California Penal Code Section 273.1 requirements for treatment programs to which those convicted of a violation of Section 273a or 273d are referred as a condition of probation. As mandated by law, the program provides a minimum of 52 weeks of counseling, in a group setting, focusing on assisting clients to take responsibility for their child abuse offenses. The curriculum addresses, among other things, child abuse prevention methods, anger and violence, behavioral health issues, child development education, and parenting education. The program has the capability of identifying substance use problems and making the appropriate referrals for treatment to the extent that the court has not already done so. The program also provides psychiatric medication services and case management.

The Child Abuse Intervention Program began offering services to clients in November of 2012. By the end of FY2012-13, 10 out of the original 11 clients that were enrolled remained in treatment. One client had been terminated by program decision. Of the original 11 clients, seven were male and four female. They ranged in age from 21 years old to 64 years old (three clients in their 20s; one in their 30s; four in their 40s; two in their 50s; and one in their 60s). The criminal charges included child abuse or endangerment in nine cases, child abduction in one case, and child neglect in another case. In some cases involving endangerment, there were additional charges of abuse or willful cruelty/unjustifiable punishment.

Department of Public Health – Child Abuse Intervention Program	
FY2012-2013	
Characteristic	**Number**
Clients Enrolled	12
Clients remaining enrolled for minimum of 52 weeks	11
Criminal charges: Child Abuse/Endangerment	9
Criminal charges: Child Abduction	1
Criminal charges: Child Neglect	1
Client Age Range:	21-64
Client Gender:	7 male 4 female

Department of Child Support Services

The San Francisco Department of Child Support Services (DCSS) works with parents and legal guardians to ensure that families receive the court-ordered financial and medical support they need to raise their children. DCSS helps children and their families by locating absent parents, establishing paternity, and requesting and enforcing child support orders. During FY2012-13, DCSS provided case management services for 13,856 child support cases.

In cases where domestic violence or family violence has occurred, enforcing child support obligations can elevate risk for survivors of abuse and their children. Therefore, DCSS developed the **Family Violence Indicator** to be used by case managers to flag cases in which the enforcement of support obligations may be dangerous.[30] The number of cases identified with the Family Violence Indicator more than tripled from FY2009-10 to FY2010-11, increasing from 569 to 1,721. This represented 11% of the overall DCSS caseload, compared to 3% during the previous year. Since FY2010-11, this 11% caseload for cases flagged with Family Violence Indicator has remained steady, though the number of cases has decreased slightly to 1,574 in FY2012-13.

Department of Child Support Services Family Violence Statistics FY2010-2013

	FY10-11	FY11-12	FY12-13
Open cases at Fiscal Year-End	15,853	14,520	13,856
Cases flagged with Family Violence Indicator	1,721	1,611	1,574
Percent of caseload flagged with Family Violence Indicator	11%	11%	11%

The dramatic increase in the number of cases flagged with the Family Violence Indicator in FY2010-11 prompted DCSS to create a ground-breaking special enforcement solution to ensure the safety and well-being of custodial parents who rely on child support to care for their children, but whose cases could qualify for good-cause closure due to the likelihood of intimidation, threats, or violence by the noncustodial parent in response to a child support order. In July 2011, DCSS launched its Family Violence Initiative case management model which introduced strategies to support special handling of cases that are flagged with the Family Violence Indicator.

DCSS also works closely with the Adult Probation Department on cases in which noncustodial parents are on probation or incarcerated for domestic violence. This collaboration allows both departments to work with noncustodial parents to ensure that they meet their support obligations and remain in compliance with their probation terms. DCSS and Adult Probation Department are also exploring video conferencing, to allow parents who are on probation for domestic violence incidents to participate in court proceedings without making a personal appearance.

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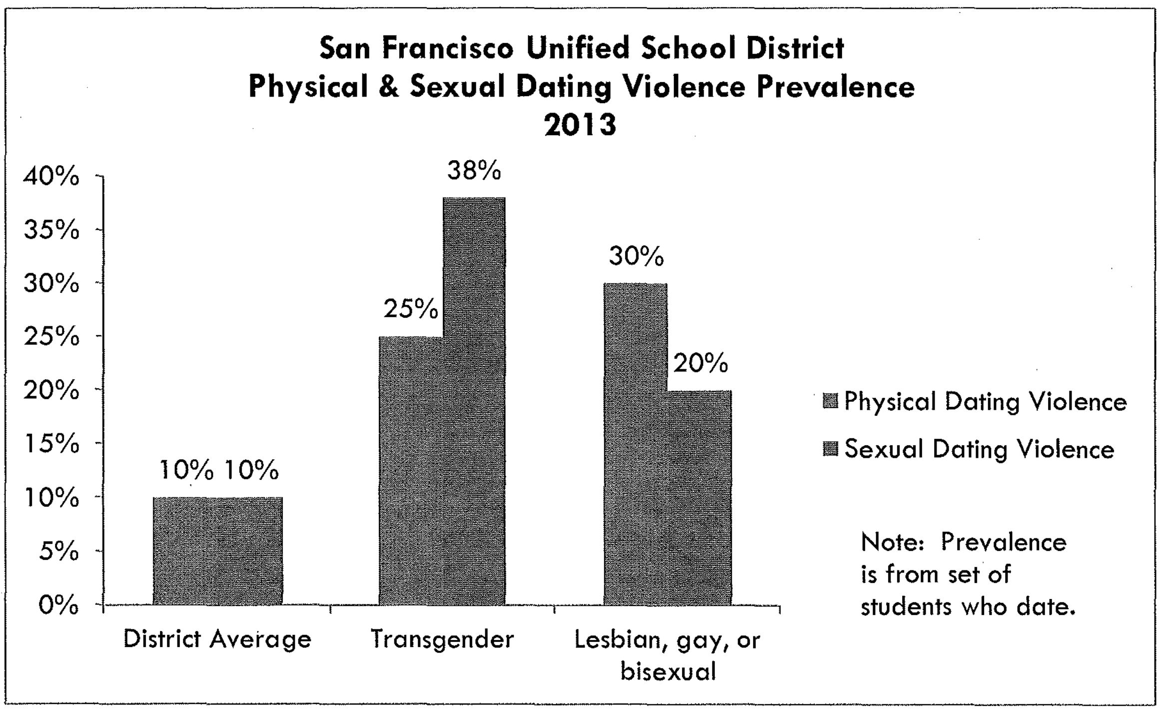
30 When a case participant (noncustodial or custodial party) claims family violence, the case manager marks the case with a Family Violence Indicator in the Child Support Services database. This automatically updates the information in the records for any dependent children in that family as well as the case participant. The Family Violence Indicator counts listed are unique case counts, not participant counts. The count of individual participants with Family Violence Indicators is greater than the count of cases with Family Violence Indicators. For example, if a case participant with one dependent child makes a claim of family violence, the Family Violence Indicator would be marked at both the case and participant levels, for a Family Violence Indicator case count of one and a Family Violence Indicator participant count of two.

San Francisco's overall performance for child support payment compliance is 73% and the cases managed under this initiative perform comparably. DCSS has not received any new reports of family violence towards the custodial parents or children on this caseload. Further efforts by DCSS to increase participation and compliance for cases with family violence history are ongoing.

San Francisco Unified School District

The San Francisco Unified School District (SFUSD) provides a broad range of specialized services and programs to support students and their families beyond the classroom. SFUSD has a variety of prevention and intervention services to address the needs of students experiencing violence. Programs include professional development opportunities for teachers and staff, violence prevention curricula for teachers, on-site Wellness Programs, Health Promotion Committees at the high schools and middle schools, Caring School Communities at the elementary schools, support services for lesbian, gay, bisexual, and transgender youth, and grant-funded projects such as School Community Violence Prevention.

Every two years, SFUSD administers the **Center for Disease Control and Prevention's Youth Risk Behavior Survey (YRBS)** to a random sample of students across all SFUSD middle and high schools, and uses the data to examine risk factors present in students' lives. Data from the 2012-2013 survey found, among high school students who dated, rates of physical dating violence at 10% for students overall, rising to 25% for transgender students and 30% for lesbian, gay or bisexual students.[31] Sexual dating violence occurred at 10% for students overall, 20% for lesbian, gay or bisexual students, and spiking to 38% of transgender students. Physical violence was defined as being physically hurt on purpose one or more times during the past year. Sexual violence was defined as being forced to do sexual things that they did not want to do one or more times in the past year.



As of April 2013, the SFUSD school district had 317 school-wide health events reported for School Year (SY) 2013-3014 across grades 6 through 12. "Violence Awareness" was among the top three focus areas for the presentations that were held, which included events such as

[31] Standard CDC Youth Risk Behavior Survey Questionnaires can be accessed at: http://www.cdc.gov/healthyyouth/yrbs/questionnaire_rationale.htm

workshops, student-led campaigns, and school-wide resource fairs among others. Elementary school data on violence prevention education efforts are available for SY2012-2013; in this year there were 1,627 violence prevention lessons taught across all SFUSD elementary schools.

SFUSD has designated November of each school year to be "Violence Prevention" month and each January to be "Building Friendships and Healthy Relationships" month. During these months, SFUSD puts forth coordinated efforts to provide classroom curricula around peer violence, family violence and teen relationship issues for its teachers to present to their students. Additionally, throughout the school year, Wellness Center staff and other school personnel put on a number of workshops at various elementary, middle and high schools throughout the district to educate, create public awareness, and equip students with tools and resources to recognize and address these issues as they present themselves in children's lives.

School staff members are also among the most frequent reporters of child abuse to Family and Children's Services. During SY12-13, public and private school staff members made 1,587 reports of suspected child abuse. SFUSD staff members made 1,354 of these reports: 59% were regarding public elementary school students, 17% regarding public middle school students, and 24% regarding public high school students. Only 4% of reports were from SFUSD child development centers and pre-schools. Private school and non-SFUSD preschool and day care center staff members were responsible for 175 reports of suspected child abuse or neglect. This breakdown has remained relatively consistent over the past ten years. SY12-13 saw a slight increase in the percentage of reports made regarding elementary school students as compared to previous years.

San Francisco Unified School District Child Abuse Reporting Statistics SY2010-2013[32]

	SY10-11	SY11-12	SY12-13
Reports by Elementary Schools	672	725	802
Reports by Middle Schools	252	270	231
Reports by High Schools	300	325	321
Reports by Private Schools	103	120	130
Reports by SFUSD Child Development Centers and Pre-Schools	9	20	58
Reports by Non-SFUSD Preschools and Day Care Centers	54	58	45
Total	**1390**	**1518**	**1587**

[32] SY refers to School Year. In SFUSD, the school year runs from August to the following May.

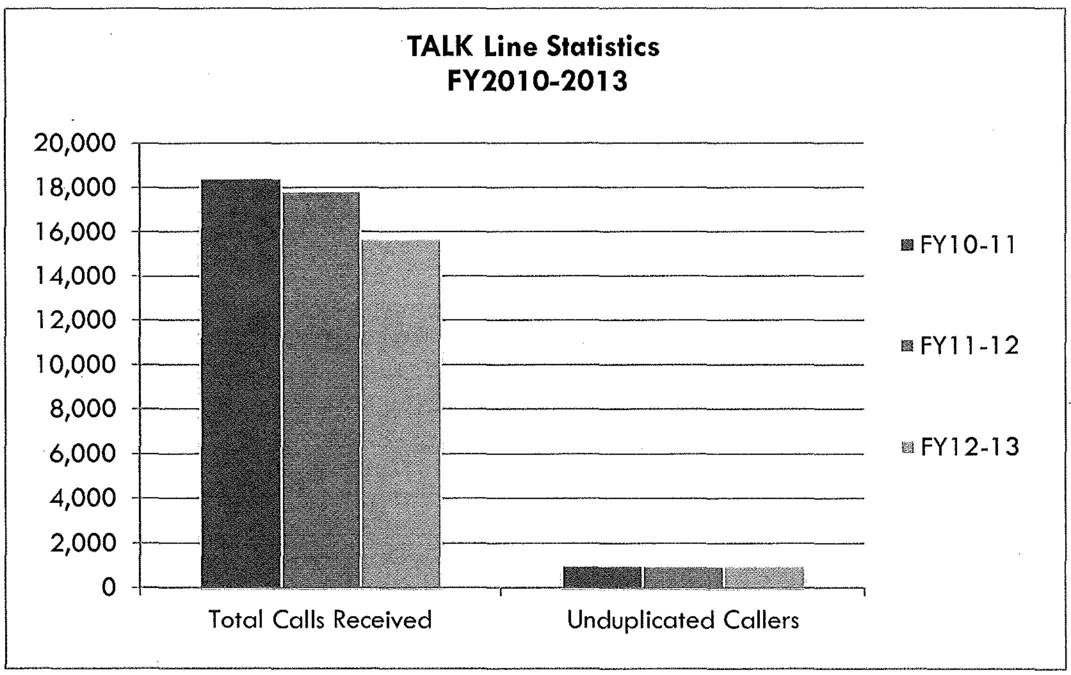
Community-Based Agencies

Child Abuse Prevention and Support Services

The San Francisco Child Abuse Prevention Center is dedicated to the prevention of child abuse and neglect, the promotion of healthy families, and the mental health of parents and children. The San Francisco Child Abuse Prevention Center operates the TALK Line, a 24-hour support hotline for parents and caregivers to help cope with the stress of parenting in healthy ways and serve as a preventive measure to stop child abuse before it happens. During FY2012-13, TALK Line received 15,691 calls from an estimated 1,000 unduplicated callers.[33]

San Francisco Child Abuse Prevention Center Statistics FY2010-2013

	FY10-11	FY11-12	FY12-13
TALK Line Calls Received	18,422	17,852	15,691
Unduplicated Callers	1,000	1,000	1,000
SafeStart Families Served	174	232	209



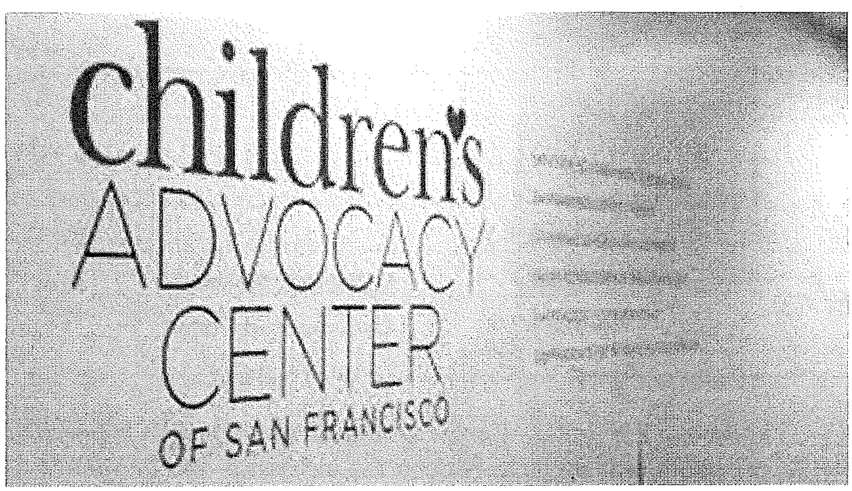
The San Francisco Child Abuse Prevention Center also operates the San Francisco SafeStart Initiative, a city-wide program that seeks to reduce the incidence and impact of exposure to both community and domestic violence on children ages 6 and under. SafeStart providers are located at sites throughout the city, including Family Resource Centers, Family Court, the San Francisco Police Department's Special Victims Unit, and other locations where children exposed to violence can be reached. Services for SafeStart families include case management, advocacy, support groups, parenting education, counseling, and more. In FY2012-13, SafeStart served 209 families.

33 The TALK Line is anonymous and callers are not required to identify themselves.

The *2009 Annual Report* noted that Family Resource Centers should be better equipped to meet the needs of families who have experienced violence, and the SafeStart program has made significant efforts to increase the capacity of the Family Resource Centers to respond to children exposed to family and community violence. SafeStart places advocates at six Family Resource Centers in San Francisco and provides advocates with special training and support specifically to work with these families and children. It also has a full-time staff person who provides training to service providers at family-focused agencies in San Francisco throughout the year, and an annual training held in May that focuses exclusively on how to better serve families with young children exposed to violence. The 2013 annual training was attended by 133 individuals representing 45 family-focused agencies, including 20 Family Resource Centers.

The most significant new accomplishment of the Child Abuse Prevention Center was the opening of the **Children's Advocacy Center** of San Francisco, located in the Bayview neighborhood, in 2014. The Children's Advocacy Center is modeled on the simple but powerful concept of multi-disciplinary coordination to create a best-in-class response to incidents of child abuse. Core services at the Children's Advocacy Center include:

- Coordinated response including criminal and child protective investigation, forensic medical exams and interviews, mental health evaluation, family support and advocacy, and parent education;
- A state-of-the-art database allowing partners to communicate and track cases electronically;
- Multi-disciplinary case conferences ensuring clear communication between all parties working with a family, even across organizational boundaries; and
- Education and training, research and evaluation, and public policy development.



Domestic Violence Prevention and Support Services

Survivors of domestic violence often need significant support and resources to heal and rebuild a safer, healthier life. For victims of abuse, leaving the abusive relationship can be one of the most dangerous times, and San Francisco's network of supportive services play a key role in helping protect these victims. Survivors, friends and neighbors call the community crisis hotlines three times as often as they call 911. Through the **Violence Against Women Prevention and Intervention (VAW) Grants Program**, the Department on the Status of Women distributes City funding to 24 agencies and collects statistics regarding the services provided.[34] For the FY2012-2013 report, we have expanded our data collection efforts to include all program services provided by our partner organizations, rather than just the services funded through the VAW grant. For this reason, comparison with previous years is inapplicable, as the data in those years did not account for the totality of services.

In FY2012-13, the three emergency shelters (with a combined total of 75 beds) provided 19,352 bed nights and delivered counseling, advocacy, case management, and other services to 500 women and children. Unfortunately, during the same time period, 3,245 individuals were turned away from the emergency shelters due to a lack of space.

The VAW Grants Program also partners with three transitional housing programs and one permanent supportive housing program that provided a total of 31,685 bed nights and delivered counseling, case management, advocacy, and other support services to 170 women and their children. As in the case of the emergency shelters, 823 individuals were turned away from these transitional and supportive housing programs due to a lack of space.

Violence Against Women Services FY2012-13		
Emergency Shelter	FY11-12	FY12-13
Shelter Bed Nights	19,604	19,352
Individuals Served	620	500
Turn-aways	2,559	3,245
Transitional and Permanent Housing	FY11-12	FY12-13
Housing Bed Nights	26,713	31,685
Individuals Served	182	170
Turn-aways	794	823
Crisis Lines	FY11-12	FY12-13
Crisis Line Calls	32,612	24,461[35]
Supportive Services	FY11-12	FY12-13
Hours of Supportive Services[36]	35,251	39,116

[34] Several other City departments, including the Department of Children, Youth, and Their Families, the Mayor's Office of Housing and Community Development, and the Human Services Agency, also support certain services provided by San Francisco's domestic violence programs. The numbers reported here only reflect the agencies funded in part by the Department on the Status of Women.

[35] Though it appears "Crisis Line Calls" fielded decreased, this change was due to several agencies modifying the way in which they track their service data rather than a reduction in services.

[36] This figure includes solely VAW grant-funded services.

Crisis line call statistics from FY2011-12 and FY2012-13 were gathered from five community-based domestic violence prevention and intervention agencies. In FY2012-13, Department on the Status of Women-funded agencies Women Organized to Make Abuse Nonexistent, Inc. (WOMAN, Inc.) and San Francisco Women Against Rape (SFWAR), fielded 12,177 calls and 2,807 calls respectively. The other three crisis lines operated by La Casa de las Madres, the Riley Center, and Asian Women's Shelter received an additional 9,477 calls, bringing the total number of crisis calls to 24,461 and demonstrating the crucial need for this simple and confidential way for victims of violence to reach out for help. Even with this tremendous volume of calls, it is important to remember that victims of abuse may use other access points for services not specific to domestic violence and that some victims may never access any services at all.

As evidenced by the thousands of service hours provided by the community agencies, much more is needed in addition to housing to support those who have experienced abuse. In FY2012-13, the VAW Grants Program partnered with 24 organizations to fund the operation of 31 different community programs that provided advocacy, case management, counseling, crisis intervention, education, and legal services, among others. These 31 programs provided a combined total of 39,116 hours of supportive services to an estimated 19,585 victims of violence.[37]

[37] This figure includes solely VAW grant-funded services.

Elder Abuse Prevention and Support Services

The San Francisco Elder Abuse Forensic Center is a public/private partnership between the non-profit Institute on Aging and the following City and County of San Francisco Agencies: Department of Aging and Adult Services (Adult Protective Services and the Public Guardian), the District Attorney's Office, the City Attorney's Office, and the Police Department. The mission of San Francisco Elder Abuse Forensic Center is to prevent and combat the abuse, neglect, and exploitation of elders and dependent adults in San Francisco using the following strategies:

- Improve communication and coordination among the legal, medical, and social services professionals who investigate and intervene in cases of elder and dependent adult abuse;
- Increase access to potential remedies and justice for those who have been victimized;
- Educate policy makers, professionals, caregivers, older adults and their families about preventing, reporting and stopping elder and dependent adult abuse.

San Francisco Elder Abuse Forensic Center provides forensic review meetings, coordinated home visits, medical evaluations, medical record reviews, psychological/neuropsychological assessments, and collaboration and community outreach. The data from San Francisco Elder Abuse Forensic Center represents a subset of Adult Protective Services cases. San Francisco Elder Abuse Forensic Center uses a standardized intake form developed in collaboration with the other three forensic centers in California. Any member of San Francisco Elder Abuse Forensic Center may refer a case for consultation and referrals largely come from Adult Protective Services. Cases are accepted based upon the relative complexity and/or the need for specialized consultation.

In FY2012-13, there were 36 new cases and 72 follow-up cases presented at the San Francisco Elder Abuse Forensic Center during 19 meetings. Demographic data on gender, age, race/ethnicity, and zip code was identified in addition to categories of types of abuse. The median age of elder abuse victims was 77. The gender distribution indicated that 61% of victims were female and 39% males. Caucasians (44%), Pacific Islanders (22%) and African Americans (17%) present the highest rates of abuse within the case population. It should be noted that multiple types of abuse are found within a given case. Prevalence data indicates that Financial – Other and Self-Neglect, each with 16 cases are the most common types of abuse. Unknown/Other category (which includes Undue Influence), Neglect, and Psychological cases range from 7-10. The incidence of abuse cases were fairly distributed throughout San Francisco except for a slightly higher cluster occurring in the neighborhood of Russian Hill (zip code 94109), SOMA (94103), Mission (94110), Ingleside (94112) and Lake Merced (94132).

San Francisco Elder Abuse Forensic Center Case Statistics FY2010-2013

	FY10-11	FY11-12	FY12-13
New Cases	44	40	36
Follow-Up Cases	54	64	72
Number of Meetings	25	25	19
Female Clients	31	25	22
Male Clients	13	15	14
Average Age of Clients	73.8	78	74
Median Age of Clients	75	80	77

San Francisco Elder Abuse Forensic Center New and Follow Up Case Statistics FY2008-2013

	FY10-11		FY11-12		FY12-13	
	#	%	#	%	#	%
Caucasian	21	48%	20	50%	16	44%
African American	12	27%	10	25%	6	17%
Native American	0	0%	0	0%	1	3%
Asian	2	5%	3	8%	2	6%
Latina/o	2	5%	6	15%	2	6%
Pacific Islander	2	5%	1	2%	8	22%
Other/Unknown	5	11%	0	0%	1	3%
Total	**44**		**40**		**36**	
Financial - Other	28	26%	17	20%	16	24%
Other/Unknown	18	17%	18	21%	10	15%
Psychological	13	12%	8	9%	7	10%
Self-Neglect	13	12%	16	19%	16	24%
Neglect	12	11%	11	13%	7	10%
Physical - Assault/Battery	10	9%	3	4%	3	4%
Financial - Real Estate	9	8%	6	7%	3	4%
Isolation	5	5%	4	5%	1	15
Sexual	DATA NOT BROKEN OUT UNTIL FY11-12		0	0%	2	3%
Abandonment			1	1%	1	1%
Abduction			0	0%	1	1%
Physical - Restraint			1	1%	0	0%
Total	**108**		**85**		**67**	

The different types of abuse identified in San Francisco Elder Abuse Forensic Center are financial abuse, isolation, physical abuse, psychological/emotional abuse, neglect, self-neglect, and other/unknown abuses. At the end of 2012, San Francisco Elder Abuse Forensic Center completed the development of a more advanced database system that has allowed for more expansive reporting, and categories now include abandonment, abduction, physical restraint, and sexual abuse.

San Francisco Elder Abuse Forensic Center Statistics Number of Evaluations Per Fiscal Year[38] FY2010-2013

	Evaluations Requested		Evaluations Completed		Evaluations Cancelled	
	Medical	Psychological	Medical	Psychological	Medical	Psychological
FY10-11	7	30	6	24	1	6
FY11-12	3	31	1	26	2	5
FY12-13	0	27	0	23	0	4

[38] The category "medical" includes both physical evaluations and medical record evaluations combined.

San Francisco Elder Abuse Forensic Center Statistics
New Cases of Elder Abuse by Zip Code
FY2010-2013

Zip Code	Neighborhood	FY10-11	FY11-12	FY12-13
94109	Nob Hill/Russian Hill	10	6	4
94122	Inner Sunset	7	2	1
94124	Bayview	5	2	2
94110	Mission	3	3	3
94103	SOMA	3	2	3
94115	Pacific Heights/Western Addition/Japantown	2	1	2
94112	Ingleside/Excelsior	2	6	3
94134	Visitacion Valley	2	3	2
94121	Outer Richmond	2	4	1
94118	Inner Richmond	2	2	1
94102	Hayes Valley/Tenderloin	1	0	2
94116	Outer Sunset	1	2	2
94117	Haight/Cole Valley	1	3	0
94132	Lake Merced	1	0	3
94108	Chinatown	1	0	0
94131	Twin Peaks/Glen Park	0	1	1
94127	West Portal	0	0	1
94107	Potrero Hill	0	0	0
94123	Marina/Cow Hollow	0	1	1
94114	Castro/Noe Valley	0	2	2
94133	North Beach/Fisherman's Wharf	0	0	0
Unknown		1	0	1
	Total	**44**	**40**	**36**

In December 2012, the Institute on Aging partnered with the Center of Excellence on Elder Abuse and Neglect at UC Irvine to release an innovative smartphone application. Named after CA Penal Code 368, the **"368+ Elder and Dependent Adult Abuse Guide for CA Law Enforcement" app** was developed with the advice and assistance of colleagues in the fields of law enforcement, civil law, and medicine. The free app is available on Droid devices, iPhones, and iPads. It can also be viewed on a mobile web browser. This technology reflects a significant stride in providing first responders tools they can use in the field to provide appropriate response and referrals to victims of elder and dependent adult abuse.

Since its launch in December 2012, the 368+ app has been downloaded 3,130 times, and entities in three other states are creating apps based on it. A District Attorney investigator who attended a recent presentation on the app at the California District Attorney Association's Elder Abuse Symposium reported that he is using the app to train all the officers in his department about elder abuse. Not only did he share the app with those officers, but he also told a sheriff's deputy in Colorado about it, too. As word of the 368+ app spreads, leading to more downloads by tech-savvy law enforcement, elders and dependent adults who have experienced abuse will benefit.

Limitations of the Data

Victims of family violence seek help and access services in many ways beyond those included in this report. The data contained in this report is meant to provide a broad overview of the scope of family violence in San Francisco. It does not, and cannot, include data from every agency and service with which these individuals may come into contact. The Family Violence Council is constantly looking to improve and expand the sources of data collected and referred to in this report.

There are other legal avenues for family violence cases in addition to the criminal justice proceedings outlined in this report. For example, cases of elder financial abuse may come under the jurisdiction of the Probate Court, and cases of child abuse fall under the jurisdiction of the Dependency Court. While these Civil Court statistics may overlap with those of the Criminal Court that are already included, there are some victims that choose to only pursue civil remedies. This data is currently not captured within the scope of this report.

We are still not tracking San Francisco Fire Department or Animal Care and Control statistics in a way that captures accurate prevalence data to better explain and understand the interaction between these emergency response cases and family violence issues.

Additional community-based organizations that are not included in this report also provide services to victims of family violence through the course of their work. Family Resource Centers and other family-focused programs in the community, particularly those serving families with children, may not be specifically designed to provide services to victim of family violence. However, advocates at these agencies are likely to be access points for victims and to provide services on an ad hoc basis, by way of the trusting relationships they often develop with their clients. It is important to identify these sites and agencies that can intervene in families where children are exposed to parental domestic violence, as exposed children are at increased risk for becoming involved in future violent relationships.

Identifying these information gaps further demonstrates the pervasiveness and complexity of the issue of family violence. However, despite these and other missing pieces, this report provides a broad overview for policy makers and advocates to use in assisting victims of family violence in San Francisco.

Statistical Summary

2013 U.S. Census Bureau Data	
San Francisco	**Population Count[39]**
Children Ages 0-17 years	112,255
Adults Ages 18-64 years	606,277
Older Adults 65 years and older	118,910
Total San Francisco Population	**837,442**

Selected Family Violence Statistics in Summary FY2011-2012			
	Child Abuse	**Domestic Violence**	**Elder Abuse**
Crisis Calls Received by Community Providers[40]	17,852	32,612	N/A
Calls Received by Child Protective Services, 911, and Adult Protective Services	6,051	7,719	6,024
Cases Substantiated by Child Protective Services and Adult Protective Services	717	N/A	1,821
Requests for Restraining Orders from Family & Probate Courts	N/A	1,285	83
Cases Received and Assessed by Police Department	2,959	4,560	127
Cases Investigated by Police Department	130	3,129	66
Cases Received by District Attorney's Office	171	1,856	99
Cases Filed by District Attorney's Office	61	496	69
Convictions by Guilty Plea & Probation Revocation	23	462	43
Cases Brought to Trial	3	41	1
Convictions After Trial	1	23	1

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[39] Calculated from U.S. Census Bureau 2013 population estimates program at http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk.

[40] Call volumes were provided by TALK Line (child abuse) and domestic violence providers (domestic violence hotlines). There is presently no dedicated community-based hotline for elder abuse.

Selected Family Violence Statistics in Summary FY2012-13			
	Child Abuse	**Domestic Violence**	**Elder Abuse**
Calls Received by Community Providers[41]	15,691	24,461	N/A
Calls Received by Child Protective Services, 911, and Adult Protective Services	6,272	7,979	6,585
Cases Substantiated by Child Protective Services and Adult Protective Services	717	N/A	2,046
Requests for Restraining Orders from Family and Probate Courts	N/A	1,182	79
Cases Received and Assessed by Police Department	5,078	4,031	127
Cases Investigated by Police Department	204	2,655	64
Cases Received by District Attorney's Office	204	1,735	92
Cases Filed by District Attorney's Office	56	478	60
Convictions by Guilty Plea & Probation Revocation	25	371	44
Cases Brought to Trial	1	47	1
Convictions After Trial	1	24	1

[41] Call volumes were provided by TALK Line (child abuse) and domestic violence hotlines. There is presently no dedicated community-based hotline for elder abuse prevention.

Conclusions and Recommendations

Family violence continues to affect tens of thousands of San Francisco residents. Child abuse, domestic violence, and elder and dependent adult abuse are inter-related. In many families, more than one type of family violence occurs simultaneously. For example, it is estimated that 30-60% of families with domestic violence also have child abuse. Recent research at Family and Children's Services determined that 30% of the cases included families that had experienced domestic violence in the past, and 16% had experienced domestic violence in the last year. Children exposed to parental domestic violence experience significant trauma and are at increased risk for future victimization or perpetration of violence. Children who are physically abused are at increased risk of committing violent crimes later in life, including community or gang violence. Seniors experience domestic violence in addition to other forms of abuse. It is imperative that we examine and strengthen all of the systems of support and intervention discussed in this report and that the recommendations identified for 2015 are prioritized without our respective organizations. Through collaborative policy and program improvement efforts we can increase the safety of all San Franciscans now and in the future.

This year, each Department participating in the Family Violence Council was asked to identify one family violence related objective for the upcoming year that would be incorporated into this report's recommendations. Council members came up with a record 23 objectives, more than double the number of recommendations in the last report. These recommendations are summarized on the following pages and include three unfinished recommendations from prior years (numbers 3, 4, and part of 7). Appendix A contains a summary of the status of recommendations from the 2011 Family Violence Council report.

Family Violence Council Recommendations for 2015

(Recommendations in grey are carry overs from the 2011 report)

	Department	Recommendation
1.	All	Create a Justice and Courage Committee within the Family Violence Council to continue the work of the Justice and Courage Oversight Panel.
2.	All	Advocate for change in federal tracking through the MDS system to capture questions related to elder abuse and intimate partner violence. The MDS (Minimum Data Set for Nursing Home Patient Assessment) is a federally mandated healthcare intake form, which currently does not ask any questions related to elder abuse or intimate partner violence.
3.	All	Develop a factsheet on family violence to distribute to San Francisco Unified School District.
4.	Adult Probation Department	The Adult Probation Department plans to establish a victim/survivor program within the Probation Department that will work collaboratively with other City and County departments and victim/survivor services, which include, but are not limited to, the Sheriff Department's Survivor Restoration Program and the District Attorney's Office of Victim Services. The estimated cost of this program is $800,000.
5.	Board of Supervisors	The Board of Supervisors has committed to sending a Supervisor or staff member to Family Violence Council meetings.
6.	Child Abuse Council	The Child Abuse Council will: • Continue to develop its scope by increasing the number of children served and expanding training of all referring partners on how to access the Children's Advocacy Center's services; • Provide services to expanded populations including Commercially Sexually Exploited Children (CSEC) and children exposed to violence via community collaboration, training, and protocol development; • Improve mental health access for Children's Advocacy Center kids through mental health screening and follow up conducted by partners; and • Develop shared database which provides information for providers working with children and also aggregate data used to direct systems improvement.

7.	Commission/ Department on the Status of Women	The Commission/Department on the Status of Women will: • Amend the Family Violence Council Ordinance to include the Public Defender's Office, Juvenile Probation, Animal Care and Control, and San Francisco Unified School District as official members; • Ensure the annual publication of the Family Violence Council report; • Include the status of girls in the Family Violence Council report; and • Organize a presentation for the Family Violence Council on the connection between Adverse Childhood Experiences (ACEs) and toxic stress.
8.	Department of Aging and Adult Services	The Department of Aging and Adult Services plans to: • Develop a joint outreach campaign on all forms of family violence including child abuse, domestic violence, and elder abuse; and • Advocate at the statewide level for budget augmentation and legislation to strengthen the infrastructure of Adult Protective Services.
9.	Department of Child Support Services	The Department of Child Support Services plans to develop a training product to share with the community based on its models of collecting child support in families experiencing domestic violence.
10.	Department of Children, Youth, and Families	The Department of Children, Youth, and Families has committed to: • Focus on revising and refining its Violence Prevention and Intervention (VPI) funding to better meet the needs of youth involved with the juvenile justice system; • Continue to work with the Department of Public Health on this refinement work to prepare for its next funding cycle (DCYF is currently in year two of a three year funding cycle); and • Focus on the Family Resource Center which it funds through First 5 San Francisco, in hopes of collaborating with the Juvenile Probation Department on this refinement.
11.	Department of Emergency Management	Department of Emergency Management staff will receive refresher training on all three forms of family violence, including information on stalking, and explore the idea of training in partnership with other call centers in the area.

12.	Department of Human Services	The Department of Human Services plans to develop a joint protocol between law enforcement and child welfare on how to handle child abuse investigations and then facilitate trainings on this protocol.
13.	Department of Public Health	The Department of Public Health will: • Become a national leader in its creation of a "trauma informed system of care" by training Department of Public Health's 9,000 person workforce (1,700 in the upcoming year) on the principles of trauma informed systems; and • Continue to improve its intimate partner violence data collection system.
14.	District Attorney's Office	The District Attorney's Office will: • Facilitate California District Attorney's Association training on domestic violence with the Special Victims Unit (SFPD) for new attorneys; • Develop policies and protocols on elder abuse cases; • Develop legislation on elder abuse continuations to enable continuity of case staffing when a District Attorney who has been handling a case is busy with another case; • Continue collaboration with the Department of Human Services and the San Francisco Police Department at the Child Advocacy Center; • Facilitate California District Attorney's Association Child Sexual Assault and Physical Abuse training for staff; and • Develop protocols for family violence cases for the new courthouse dog.
15.	Domestic Violence Consortium	The Domestic Violence Consortium plans to: • Continue domestic violence court watch; • Work on language access with the Police Department; • Continue work with the Adult Probation Department on monitoring Batterer's Intervention Programs.
16.	Elder Abuse Forensic Center	The Elder Abuse Forensic Center is committed to: • Increase attendance at the Forensic Center Multidisciplinary Teams (MDT) by 25%; • Make Adult Protective Services workers presenting in teams feel more comfortable; • Bring expert speakers on topics such as consumer law and Medi-Cal; and • Focus on elder abuse prevention.

17.	Juvenile Probation Department	The Juvenile Probation Department plans to train 60 probation officers on responding appropriately to cases of child trafficking within the JPD system as well as investigate best practices.
18.	Mayor's Office	The Mayor's Office will light up city hall purple during the month of October for National Domestic Violence Awareness month.
19.	Police Department	The Police Department plans to: • Procure referral cards for children when parents are arrested; and • Finalize policies for updated domestic violence general order and new officer involved general order.
20.	Public Defender's Office	The Public Defender's Office will expand its community re-entry program for defendants since many have a history of abuse as well as work more closely to collaborate with other Family Violence Council agencies.
21.	Sheriff's Department	The Sheriff's Department will: • Place inmates coming out of the Domestic Violence Court on the priority lists for the Resolve to Stop the Violence Project (RSVP) and the Sisters in Sober Treatment Empowered in Recovery (SISTER) Program; • Prioritize individuals with a history of family violence into the community re-entry program: No Violence Alliance Project (NoVA); • Provide case managers for persons who are victims of family violence; • Create new vocational programs for inmates with histories of family violence; and • Develop new programs for children of incarcerated parents.
22.	Superior Court	The Superior Court will continue to host justice partner meetings.
23.	Unified School District	The Unified School District has committed to: • Focus on LGBTQ youth who are disproportionately victims of violence; • Initiate a young men's health program; • Evaluate the status of dating violence, ensuring that LGBTQ and trans youth are included; and • Investigate best practices for supporting unaccompanied minors.

Appendix A: Status of Implementation of Recommendations from 2011 Family Violence Council Report

RECOMMENDATION 1: Exploring new data collection from the Sheriff's Department and the San Francisco Unified School District for future reports.

Status: *Completed*

RECOMMENDATION 2: Development of a data collection plan and the collection of data on intimate partner and family violence screenings and diagnosis rates at the San Francisco General Hospital and the San Francisco Department of Public Health community clinics.

Status: *Completed*

RECOMMENDATION 3: Department of Emergency Management provide monthly statistics on the number of domestic violence calls by district and by domestic violence call codes to the Department on the Status of Women.

Status: *Completed*

RECOMMENDATION 4: Joint trainings for 911 dispatchers by child abuse, domestic violence, and elder abuse experts and advocates.
Status: *Completed and future trainings to be planned*

RECOMMENDATION 5: The San Francisco Unified School District should work with the Family Violence Council to develop a one-page factsheet on how to recognize signs of family violence and how to report family violence to the appropriate authorities.
Status: *Not Completed – Recommendation carried over to 2012-13 report*

RECOMMENDATION 6: A joint outreach campaign on all forms of family violence including child abuse, domestic violence, and elder abuse.

Status: *Not Completed – Recommendation carried over to 2012-13 report*

RECOMMENDATION 7: The continued support of a multidisciplinary response to family violence in San Francisco.

Status: *Ongoing*

RECOMMENDATION 8: The creation of a victim/survivor program within the San Francisco Adult Probation Department that will work collaboratively with other city and county department victim/survivor services which includes, but is not limited to, the Sheriff Department's Survivor Restoration Program and the District Attorney's Office of Victim Services.

Status: *Not Completed – Recommendation carried over to 2012-13 report*

RECOMMENDATION 9: The collaboration between the District Attorney Victim Services and SafeStart to provide counseling to youth who witness violence in the home.

Status: *Completed* - The District Attorney Victim Services Office and SafeStart collaborated on training for all SafeStart advocates in assisting the public in accessing their state victim compensation program for children/youth who witness community violence. They also collaborated on a new brochure that outlines this model program.

For more information, please contact:
The San Francisco Department on the Status of Women
25 Van Ness Avenue, Suite 240 | San Francisco, CA 94102
415.252.2570 | dosw@sfgov.org | sfgov.org/dosw

This report is available online at: http://sfgov.org/dosw/family-violence-council

CPage 8

SAN FRANCISCO
PLANNING DEPARTMENT

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO

2015 FEB 17 PM 3:20

AK

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Notice of Availability of and Intent to Adopt a Mitigated Negative Declaration

Date:	February 18, 2015
Case No.:	**2012.0054E**
Project Title:	**Sunol Long Term Improvements Project** **505 Paloma Road** **Sunol, CA 94586**
Land Use:	The project site is designated as Water Management in the Alameda County General Plan
Parcel Nos.:	96-375-12-2; 96-375-14
Project Site Size:	Approximately 44 acres including access and staging areas
Project Sponsor:	San Francisco Public Utilities Commission
Staff Contact:	Timothy Johnston – (415) 575-9035 Timothy.Johnston@sfgov.org

To Whom It May Concern:

This notice is to inform you of the availability of the environmental review document concerning the proposed project as described below. The document is a preliminary mitigated negative declaration (PMND), containing information about the possible environmental effects of the proposed project. The PMND documents the determination of the Planning Department that the proposed project could not have a significant adverse effect on the environment. Preparation of a mitigated negative declaration does not indicate a decision by the City to carry out or not to carry out the proposed project.

Project Description: The San Francisco Public Utilities Commission (SFPUC) proposes to implement the Sunol Long Term Improvement (SLTI) Project (the "project"), which is comprised of two main elements: improvements to the existing Sunol Corporation Yard (Sunol Yard) and development of a new interpretive center, to be named "the Alameda Creek Watershed Center" (Watershed Center), in the vicinity of the Sunol Water Temple.

The proposed project site is located in a primarily rural setting, south of the Town of Sunol and west of the State Route 84/Interstate 680 junction, in Alameda County, California. Adjoining the project site are the Sunol Water Temple Agricultural Park, a quarry operation, Alameda Creek, and Arroyo de la Laguna.

The project would be implemented at two areas within the SFPUC property located 505 Paloma Road, in Sunol, CA. Upgrades to the approximately 8-acre Sunol Yard would occur in the northern portion of the project site, while construction of the proposed Watershed Center would occur in an approximately 8-acre area located in the southern portion of the site, in the vicinity of the Sunol Water Temple

The project seeks to: (1) improve the existing Sunol Yard by replacing outdated and no longer serviceable facilities with new structures in an updated facility layout in order to efficiently provide operations and maintenance support to SFPUC operations in the East Bay area; and (2) enhance the use and educational value of the Sunol Water Temple site through the establishment of an interpretive facility to provide information and activities that allow visitors to learn about and further appreciate the Alameda Creek Watershed, including its natural resources, history, and role in the SFPUC water system.

Construction activities at the Sunol Yard are proposed to begin in October 2015 and estimated to take approximately 18 months to complete. Construction activities for the Watershed Center are proposed to begin in March 2016 and also estimated to take approximately 18 months to complete. Project construction activities would include site preparation, earthwork, demolition of select buildings at the Sunol Yard, construction of new facilities, road work, and landscaping. To ensure public and traffic safety during construction, access to the existing agricultural park for tours and events would require advance coordination with the SFPUC and would involve periodic interruptions in access, and no public access would be provided to the Sunol Water Temple while project construction activities are ongoing at the Sunol Yard or the Watershed Center.

The PMND is available to view or download from the Planning Department's SFPUC Negative Declarations and EIRs web page (http://www.sf-planning.org/puccases). Paper copies are also available at the Planning Information Center (PIC) counter on the ground floor of 1660 Mission Street, San Francisco.

If you have questions concerning environmental review of the proposed project, contact the Planning Department staff contact listed above.

Within 30 calendar days following publication of the PMND (i.e., by 5:00 p.m. on **March 20, 2015**), any person may:

1) Review the PMND as an informational item and take no action;

2) Make recommendations for amending the text of the document. The text of the PMND may be amended to clarify or correct statements and may be expanded to include additional relevant issues or to cover issues in greater depth. This may be done **without** the appeal described below; **OR**

3) Appeal the determination of no significant effect on the environment to the Planning Commission in a letter which specifies the grounds for such appeal, accompanied by a $521check payable to the San Francisco Planning Department.[1] An appeal requires the Planning Commission to determine whether or not an Environmental Impact Report must be prepared based upon whether or not the proposed project could cause a substantial adverse change in the environment. Send the appeal letter to the Planning Department, Attention: Sarah B. Jones, 1650 Mission Street, Suite 400, San Francisco, CA 94103. **The letter must be accompanied by a check in the amount of $521.00 payable to the San Francisco Planning Department, and must be received by 5:00 p.m. on March 20, 2015.** The appeal letter and check may also be presented in person at the PIC counter on the first floor of 1660 Mission Street, San Francisco.

In the absence of an appeal, the mitigated negative declaration shall be made final, subject to necessary modifications, after 30 days from the date of publication of the PMND.

Members of the public are not required to provide personal identifying information when they communicate with the Commission or the Department. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the Department's website or in other public documents.

1 Upon review by the Planning Department, the appeal fee may be reimbursed for neighborhood organizations that have been in existence for a minimum of 24 months.

From: Board of Supervisors (BOS)
To: BOS-Supervisors
Subject: FW: Complaint of Homeless Policies / I Amendment to the Claim / II Amendment of Shelter Reservation System.

From: Julianna Agardi [mailto:juliannaagardi@aol.com]
Sent: Thursday, February 19, 2015 10:39 AM
To: Board of Supervisors (BOS)
Cc: crsmith759@yahoo.com
Subject: Re: Complaint of Homeless Policies / I Amendment to the Claim / II Amendment of Shelter Reservation System.

II AMENDMENT TO THE COMPLAINT.

The subject is the mandatory sign up for one night reservation for beds . The reservation system that operating in the MSC South Resource Center providing one night reservations - only !

The policy in question is "If once booked have to leave the building" .
The system is operated by computer matching system which allegedly matches the available beds by a sign up sheet utilized at 5 PM and for those who are physically present at the drop in at that time.The info taken is the four digits ,the preferences to wanting to go to and names.The rest waiting outside and signs in when one is able to get in. Or not !

Allegedly the the first beds made available are the ones vacant at 5 P.M this is manually done.Allegedly there is a central data for the beds available at all shelters and released and in the system .One employee is dropping the beds the other is catching it .

The beds are available several times during the time period from 5 PM to 2 AM , on or about two hours intervals. At 5 and 7 P.M at sign in , and bed check times. for sure.

When the sign up for beds inside gets done a paper document is posted on the drop in for the clients to see.It contains rows of chairs numbered.Allegedly the computer goes by rows , and then the calling of the names begins by the desk.It is impossible to do . The employees are skipping people over and over and over again.

In the first round beds provided by manual typing to the favorites . Those who are informed in advance in which rows to sit.Always the same people .
The second round eliminates those who are the non - desirables or not liked, or considered a threat. Those such as complainant who is retaliated against, etc...

That takes place by changing the preferential status , and when refused kick the person

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out.Despite that the system generating and releasing beds continuously from five to two in the morning. Complainant getting kicked out regularly between 5 PM and 6 PM as soon as the process starts ."I do not have a bed for you " ! Complainant argued that it is still early to know . The answer is that she should be going to Glide.Furthermore there is a shuttle transporting the people to the shelters but there is no guarantee that the reservation 's time will coincide with the shuttle's time .Also it happened that the person accepted the reservation across town at night was heading towards the shuttle and the shuttle closed door and took off right front of her nose .The person went anyway on foot and was informed at the shelter that there was no beds available.

Then Complainant has to leave the building until tomorrow .When asked when tomorrow is the answer is tomorrow by Victoria Green and Cheryl Mason (Thomas ?) .

When Complainant returned after Midnight (tomorrow for her) Cheryl Mason kicked her out again for another tomorrow about eight more hours.Mason 's general behavior is questioned in this complaint.Her way to mock and patronize the clients , and speak to them without respect. The manner of intimidation and harassment.Besides these two women Wayne ? also practicing the "once booked have to live " policy.

It has been eyewitnessed that person walked in sat down and in a couple of minutes got the reservation and left .

It can be said that the reservations are going by signals , or personal service all that can be seen is that certain people are disappearing from the floor , and seen again if the one is lucky enough to get a reservation as well.

It is also noticed that certain individuals are receiving more than one night ,and there is another system at work .The week – end reservations for 3 or 4 or 2 days.

The shelter reservation system on all level for any days are unfair and discriminative.

-----Original Message-----
From: Julianna Agardi <juliannaagardi@aol.com>
To: juliannaagardi <juliannaagardi@aol.com>; Board.of.Supervisors <Board.of.Supervisors@sfgov.org>
Sent: Fri, Feb 6, 2015 9:29 am
Subject: Re: Complaint of Homeless Policies / I Amendment to the Claim

To the Board of Supervisors of City & County of San Francisco.

I Amendment to the Claim .

As it was stated in the Claim filed on January 30 of 2015.
Claimant Julianna Agardi amends the complaint as follows based upon the new developments.

On the 30 of January 2015 after a long history with the " excessive and take it with you at all times " policy of the MSC South a Resource Center for Homeless Services, at 525 5 th Street San Francisco California .

claimant attempted to step out of the Drop – In Center for the Homeless 24/7 Service at the gate she was confronted by four black female employees of the Center to take her suitcase and little backpack with herself.

When Claimant continued to walk out she was denied services for the day until 4:30 PM.
Upon returning to the Center at 5 :30 PM after an hour waiting front of the gate outside , in the street , her suitcase and backpack was gone.

Subsequently Claimant attempted to reclaim her property at least four times , by talking to different employees .Twice to Supervisorial staff such as Victoria Green and Wayne ? after that the perpetrators themselves Cynthia ? and and another person whose name is not known for Complainant at this time. Unsuccessfully. Each and every employee states the same.They do not know anything about it and they are not going to go and look for it.

Claimant requested access to the second floor storage area to look for it and it was denied.
Claimant request the return of her property ,her suitcase and her backpack.

Julianna Agardi .

Friday, February 06, 2015

-----Original Message-----
From: Julianna Agardi <juliannaagardi@aol.com>
To: Board.of.Supervisors <Board.of.Supervisors@sfgov.org>
Sent: Fri, Jan 30, 2015 11:55 am
Subject: Complaint of Homeless Policies

BOARD OF SUPERVISORS.

CITY & COUNTY OF SAN FRANCISCO.

400 VAN NESS / GOODLETT PLACE

SAN FRANCISCO CALIFORNIA 94102

JULIANNA AGARDI

COMPLAINANT.

101 HYDE ST.GENERAL DELIVERY

SAN FRANCISCO CALIFORNIA .94142

COMPLAINT OF HOMELESS POLICIES IN GENERAL AND COMPLAINT OF PROPERTY RULES .

Today Julianna Agardi attempted to file a complaint with the City Operations and Neighborhoud Services, a board directed her to the # 18 and there she was told that her complaint has to be addressed to the Shelter Monitoring Committee, and then the complaint cam be addressed to the City Operations Neigborhood Services

Agardi answered that the Shelter Monitoring committee is not a legal entity has no executive power and Agardi does not feel necessary to hire to investigate her complaints.Furthermore ,

technically Agardi does not live in shelters .Furthermore Agardi has no income , no public assistance and cannot rent storage unit.

Complainant is homeless and hanging out in Resource Centers Currently the limit is one bag , the size of this bag is in question as well, and the policy that this property cannot be left "unattended"!

Complainant is harassed over this her property is being seized and carried off , and given back with a write off and denial of services.

This policy is selectively enforced , and is violative of federal law , that provides that the shelters and resource centers and drop - in places has to provide storage for the homeless clients.

Complainant request this policy changed and stop the harassment over this.

Julianna Agardi.

G

From: Board of Supervisors (BOS)
To: BOS-Supervisors
Subject: FW: Vote YES on The Safe Drug Disposal Stewardship Program

From: Marc Snyder [mailto:drdr@well.com]
Sent: Thursday, February 19, 2015 11:26 AM
To: Major, Erica
Subject: Vote YES on The Safe Drug Disposal Stewardship Program

Dear Ms. Major,

The City and County of San Francisco are threatened by tons of dangerous, unused and excess drugs, both legal and illegal.

Like alcohol, these drugs negatively affect the environment and the health and safety of all residents and visitors.

Please require that any producer of a drug offered for sale in San Francisco must participate in a drug disposal plan to collect and dispose of unwanted drugs from residential sources.

Making drug companies responsible for taking back and safely disposing of unused medications is a great public health policy. I join with Alcohol Justice and the San Rafael Alcohol and Drug Coalition in extending my support for approval of this ordinance.

Passing the Safe Drug Disposal Stewardship program will greatly enhance the health and wealth being of San Francisco and the entire Bay Area community.

Sincerely,

Marc Snyder M.D.
3942 22nd St
San Francisco, CA 94114

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From: Board of Supervisors (BOS)
To: BOS-Legislative Services
Subject: File 150055 FW: The Sierra Club opposes the confirmation of Ike Kwon to the rate-payer advocate seat of the SFPUC.
Attachments: SFPUC Seat 2 Appointment 021915.pdf

-----Original Message-----
From: Sue Vaughan [mailto:susan.e.vaughan@sonic.net]
Sent: Thursday, February 19, 2015 12:33 PM
To: Breed, London (BOS); Mar, Eric (BOS); Farrell, Mark (BOS); Christensen, Julie (BOS); Tang, Katy (BOS); Kim, Jane (BOS); Yee, Norman (BOS); Wiener, Scott; Campos, David (BOS); Cohen, Malia (BOS); Avalos, John (BOS)
Cc: Karen Babbitt; Becky Evans; John Rizzo; Eric Brooks; Pagoulatos, Nickolas (BOS); Stefani, Catherine; Board of Supervisors (BOS); McCoy, Gary (BOS); Summers, Ashley (BOS); Johnston, Conor (BOS); Mormino, Matthias (BOS); Taylor, Adam (BOS); Ronen, Hillary; Bruss, Andrea (BOS); Pollock, Jeremy (BOS); Allbee, Nate
Subject: The Sierra Club opposes the confirmation of Ike Kwon to the rate-payer advocate seat of the SFPUC.

Dear Supervisors,

Please see the attached letter regarding your vote on February 24, 2015 regarding filling the rate-payer advocate vacant position to the SFPUC.

--
Sue Vaughan
(415) 668-3119
(415) 601-9297

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SIERRA CLUB
FOUNDED 1892

San Francisco Group, Sierra Club,
85 Second Street, 2nd Floor, Box SFG, San Francisco CA 94105-3441

February 19, 2015

London Breed
President, San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102

Re: San Francisco Public Utilities Commission, Appointment to Seat No. 2

Dear Supervisor Breed:

The Sierra Club opposes the confirmation of Ike Kwon to Seat No. 2 of the San Francisco Public Utilities Commission.

As stated in Proposition E passed by voters in June 2008, "Seat 2 must have experience in ratepayer or consumer advocacy."

Mr. Kwon's experience and statements indicate a commitment to sustainability, but unfortunately do not indicate that he is a good fit for this particular seat.

Proposition E was an important reform to the SFPUC appointment process. The seat designations it describes should be strongly considered when confirming appointments.

Sincerely,

Sue Vaughan
Chair
San Francisco Group
Sierra Club

CC: Angela Calvillo, Eric Mar, Mark Farrell, Julie Christensen, Katy Tang, London Breed, Jane Kim, Norman Yee, Scott Wiener, David Campos, Malia Cohen

From: Board of Supervisors (BOS)
To: BOS-Supervisors
Subject: FW: CCSF Monthly Pooled Investment Report for January 2015
Attachments: CCSF Monthly Pooled Investment Report for January 2015.pdf

From: Dion, Ichieh [TTX]
Sent: Friday, February 20, 2015 10:00 AM
To: Durgy, Michelle (TTX); aimee.brown@mac.com; Board of Supervisors (BOS); Perl, Charles (PUC); Cisneros, Jose (TTX); cynthia.fong@sfcta.org; Grazioli, Joseph; Lediju, Tonia (CON); Lu, Carol (MYR); Marx, Pauline (TTX); Morales, Richard (PUC); Ronald Gerhard; Rosenfield, Ben (CON); Rydstrom, Todd (CON); sfdocs@sfpl.info
Cc: White, Hubert (TTX)
Subject: CCSF Monthly Pooled Investment Report for January 2015

Hello All -

Please find the CCSF Pooled Investment Report for the month of January attached for your use.

Regards,

Ichieh Dion
City and County of San Francisco
1 Dr. Carlton B. Goodlett Place, Room 140
San Francisco, CA 94102
415-554-5433

Office of the Treasurer & Tax Collector
City and County of San Francisco

Pauline Marx, Chief Assistant Treasurer
Michelle Durgy, Chief Investment Officer

José Cisneros, Treasurer

Investment Report for the month of January 2015

February 15, 2015

The Honorable Edwin M. Lee
Mayor of San Francisco
City Hall, Room 200
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4638

The Honorable Board of Supervisors
City and County of San Francicsco
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4638

Ladies and Gentlemen,

In accordance with the provisions of California State Government Code, Section 53646, we forward this report detailing the City's pooled fund portfolio as of January 31, 2015. These investments provide sufficient liquidity to meet expenditure requirements for the next six months and are in compliance with our statement of investment policy and California Code.

This correspondence and its attachments show the investment activity for the month of January 2015 for the portfolios under the Treasurer's management. All pricing and valuation data is obtained from Interactive Data Corporation.

CCSF Pooled Fund Investment Earnings Statistics *

	Current Month		Prior Month	
(in $ million)	Fiscal YTD	January 2015	Fiscal YTD	December 2014
Average Daily Balance	$ 5,923	$ 6,392	$ 5,844	$ 6,436
Net Earnings	26.59	3.92	22.66	3.85
Earned Income Yield	0.76%	0.72%	0.77%	0.70%

CCSF Pooled Fund Statistics *

(in $ million) Investment Type	% of Portfolio	Book Value	Market Value	Wtd. Avg. Coupon	Wtd. Avg. YTM	WAM
U.S. Treasuries	9.37%	$ 585.1	$ 589.5	1.16%	1.09%	556
Federal Agencies	71.91%	4,511.9	4,523.9	0.85%	0.77%	803
State & Local Government Agency Obligations	2.87%	181.2	180.3	1.42%	0.92%	656
Public Time Deposits	0.01%	0.5	0.5	0.46%	0.46%	38
Negotiable CDs	6.60%	415.5	415.4	0.43%	0.44%	601
Commercial Paper	1.59%	100.0	100.0	0.00%	0.10%	6
Medium Term Notes	7.25%	457.7	456.2	0.78%	0.39%	385
Money Market Funds	0.40%	25.1	25.1	0.03%	0.03%	1
Totals	100.0%	$ 6,276.9	$ 6,290.8	0.85%	0.74%	716

In the remainder of this report, we provide additional information and analytics at the security-level and portfolio-level, as recommended by the California Debt and Investment Advisory Commission.

Very truly yours,

José Cisneros
Treasurer

cc: Treasury Oversight Committee: Aimee Brown, Ronald Gerhard, Joe Grazioli, Charles Perl
Ben Rosenfield, Controller, Office of the Controller
Tonia Lediju, Internal Audit, Office of the Controller
Cynthia Fong, Deputy Director for Finance & Administration, San Francisco County Transportation Authority
Carol Lu, Budget Analyst
San Francisco Public Library

* Please see last page of this report for non-pooled funds holdings and statistics.

Portfolio Summary
Pooled Fund

As of January 31, 2015

(in $ million) Security Type	Par Value	Book Value	Market Value	Market/Book Price	Current % Allocation	Max. Policy Allocation	Compliant?
U.S. Treasuries	$ 585.0	$ 585.1	$ 589.5	100.75	9.37%	100%	Yes
Federal Agencies	4,507.9	4,511.9	4,523.9	100.27	71.91%	100%	Yes
State & Local Government Agency Obligations	179.1	181.2	180.3	99.50	2.87%	20%	Yes
Public Time Deposits	0.5	0.5	0.5	100.00	0.01%	100%	Yes
Negotiable CDs	415.5	415.5	415.4	99.98	6.60%	30%	Yes
Bankers Acceptances	-	-	-	-	0.00%	40%	Yes
Commercial Paper	100.0	100.0	100.0	100.00	1.59%	25%	Yes
Medium Term Notes	455.1	457.7	456.2	99.67	7.25%	25%	Yes
Repurchase Agreements	-	-	-	-	0.00%	10%	Yes
Reverse Repurchase/ Securities Lending Agreements	-	-	-	-	0.00%	$75mm	Yes
Money Market Funds	25.1	25.1	25.1	100.00	0.40%	10%	Yes
LAIF	-	-	-	-	0.00%	$50mm	Yes
Supranationals	-	-	-	-	0.00%	5%	Yes
TOTAL	**$ 6,268.2**	**$ 6,276.9**	**$ 6,290.8**	**100.22**	**100.00%**	**-**	**Yes**

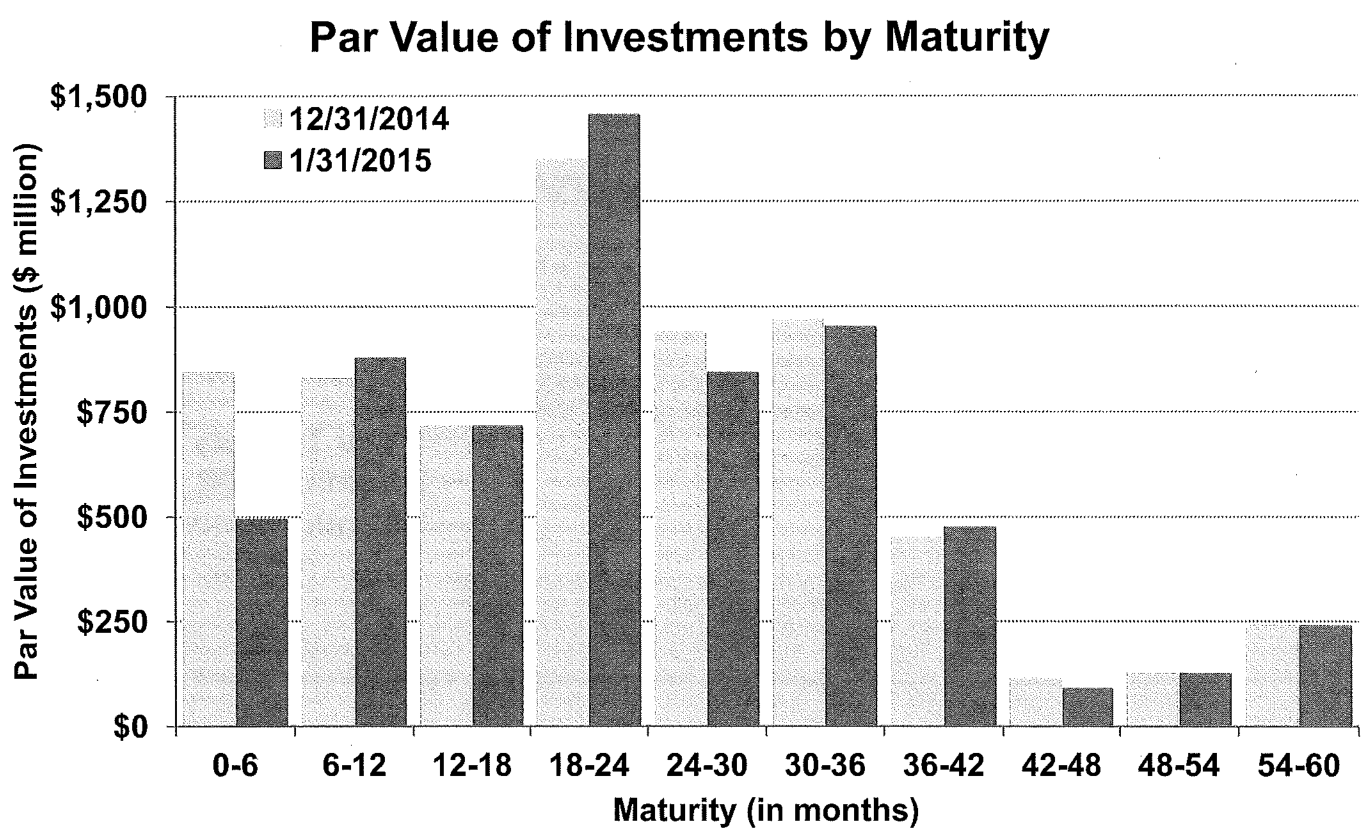
The City and County of San Francisco uses the following methodology to determine compliance: Compliance is pre-trade and calculated on both a par and market value basis, using the result with the lowest percentage of the overall portfolio value. Cash balances are included in the City's compliance calculations.

Please note the information in this report does not include cash balances. Due to fluctuations in the market value of the securities held in the Pooled Fund and changes in the City's cash position, the allocation limits may be exceeded on a post-trade compliance basis. In these instances, no compliance violation has occurred, as the policy limits were not exceeded prior to trade execution.

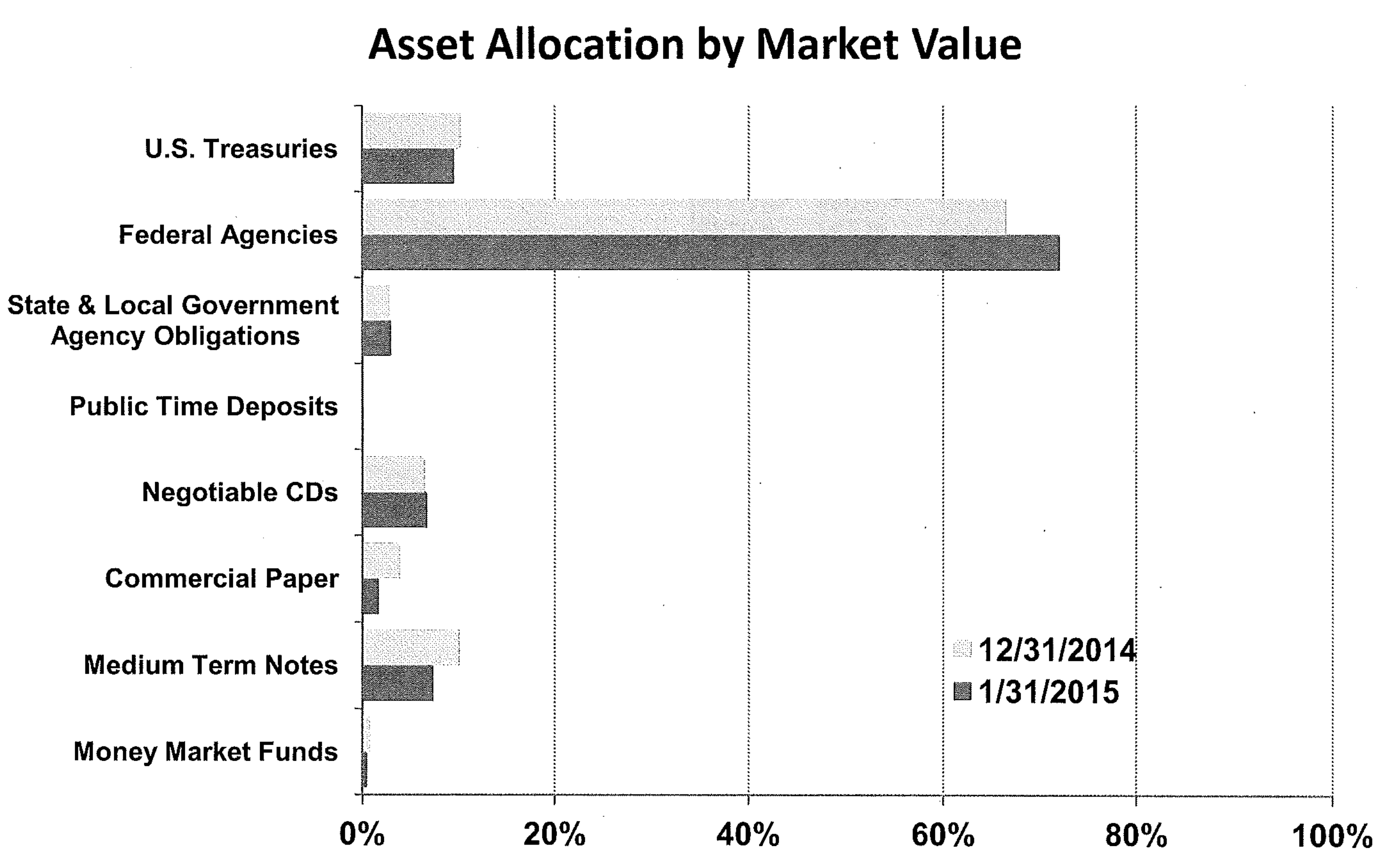
The full Investment Policy can be found at http://www.sftreasurer.org/, in the Reports & Plans section of the About menu.

Totals may not add due to rounding.

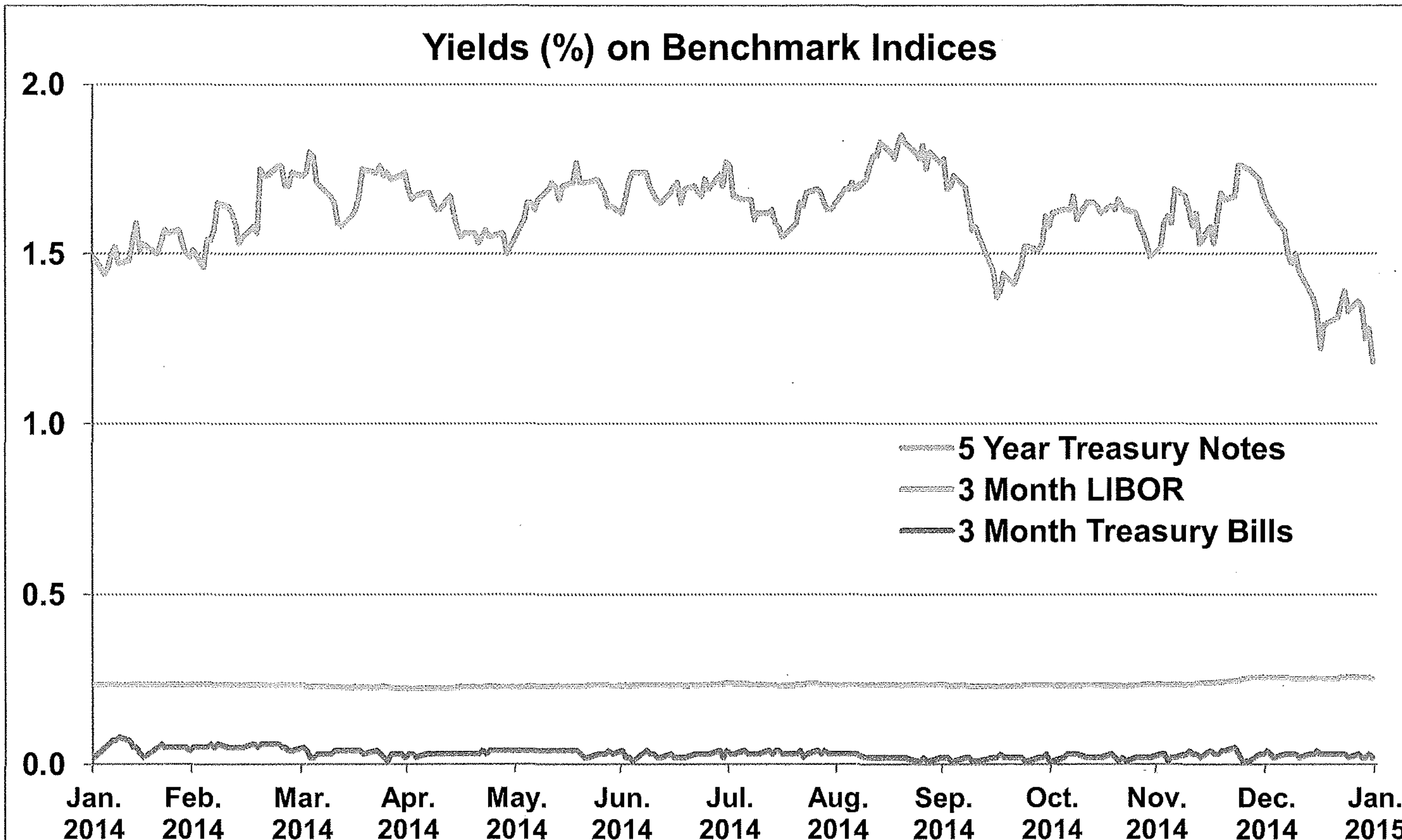
Portfolio Analysis
Pooled Fund



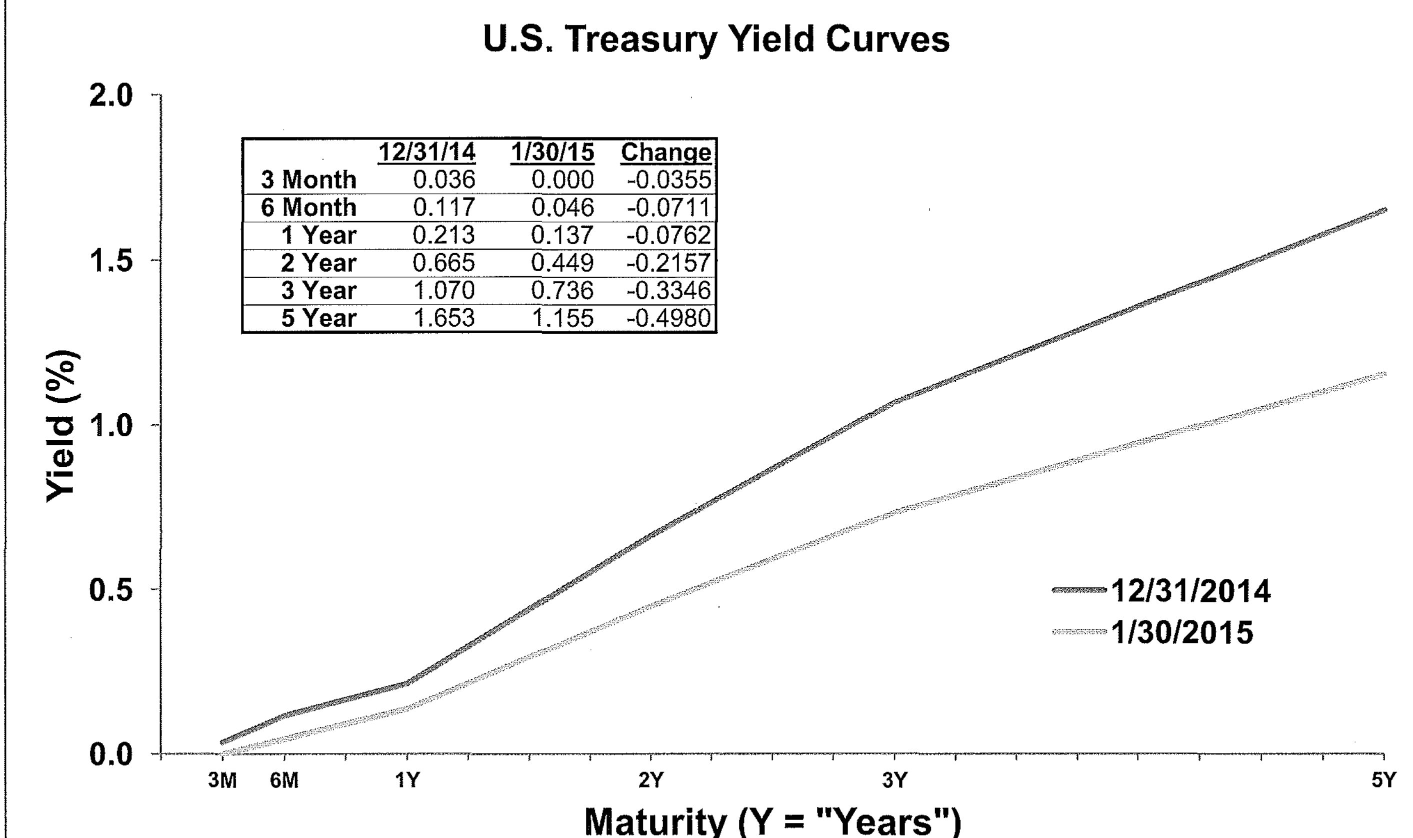
Callable bonds shown at maturity date.



Yield Curves



Source: Bloomberg



	12/31/14	1/30/15	Change
3 Month	0.036	0.000	-0.0355
6 Month	0.117	0.046	-0.0711
1 Year	0.213	0.137	-0.0762
2 Year	0.665	0.449	-0.2157
3 Year	1.070	0.736	-0.3346
5 Year	1.653	1.155	-0.4980

Source: Bloomberg

Investment Inventory
Pooled Fund

As of January 31, 2015

Type of Investment	CUSIP	Issue Name	Settle Date	Maturity Date	Duration	Coupon	Par Value	Book Value	Amortized Book Value	Market Value
U.S. Treasuries	912828MW7	US TSY NT	2/24/12	3/31/15	0.16	2.50	$ 50,000,000	$ 53,105,469	$ 50,159,255	$ 50,189,500
U.S. Treasuries	912828PE4	US TSY NT	12/23/11	10/31/15	0.75	1.25	25,000,000	25,609,375	25,117,720	25,199,250
U.S. Treasuries	912828PJ3	US TSY NT	12/16/10	11/30/15	0.83	1.38	50,000,000	49,519,531	49,919,833	50,492,000
U.S. Treasuries	912828PJ3	US TSY NT	12/16/10	11/30/15	0.83	1.38	50,000,000	49,519,531	49,919,833	50,492,000
U.S. Treasuries	912828PJ3	US TSY NT	12/23/10	11/30/15	0.83	1.38	50,000,000	48,539,063	49,755,295	50,492,000
U.S. Treasuries	912828RJ1	US TSY NT	10/11/11	9/30/16	1.65	1.00	75,000,000	74,830,078	74,943,203	75,773,250
U.S. Treasuries	912828RM4	US TSY NT	12/26/13	10/31/16	1.74	1.00	25,000,000	25,183,594	25,112,628	25,261,750
U.S. Treasuries	912828RX0	US TSY NT	2/25/14	12/31/16	1.90	0.88	25,000,000	25,145,508	25,097,798	25,191,500
U.S. Treasuries	912828SJ0	US TSY NT	3/14/12	2/28/17	2.06	0.88	75,000,000	74,771,484	74,904,407	75,562,500
U.S. Treasuries	912828SJ0	US TSY NT	3/21/12	2/28/17	2.06	0.88	25,000,000	24,599,609	24,831,858	25,187,500
U.S. Treasuries	912828SJ0	US TSY NT	3/21/12	2/28/17	2.06	0.88	25,000,000	24,599,609	24,831,858	25,187,500
U.S. Treasuries	912828SM3	US TSY NT	4/4/12	3/31/17	2.14	1.00	50,000,000	49,835,938	49,928,954	50,496,000
U.S. Treasuries	912828TM2	US TSY NT	9/17/12	8/31/17	2.56	0.63	60,000,000	59,807,813	59,899,922	59,934,600
Subtotals					**1.51**	**1.16**	**$ 585,000,000**	**$ 585,066,602**	**$ 584,422,566**	**$ 589,459,350**
Federal Agencies	3135G0HG1	FNMA GLOBAL	1/13/14	3/16/15	0.12	0.38	$ 9,399,000	$ 9,418,089	$ 9,400,922	$ 9,401,820
Federal Agencies	31315PWJ4	FARMER MAC FLT NT FF+26	5/3/12	5/1/15	0.01	0.37	50,000,000	50,000,000	50,000,000	50,029,000
Federal Agencies	3133EAQC5	FFCB FLT NT 1ML+1	6/8/12	5/14/15	0.04	0.18	50,000,000	49,985,500	49,998,618	50,013,500
Federal Agencies	3133EAVE5	FFCB FLT NT 1ML+2	12/5/12	6/22/15	0.06	0.19	50,000,000	49,987,300	49,998,072	50,020,000
Federal Agencies	31315PDZ9	FAMCA	11/22/13	7/22/15	0.47	2.38	15,000,000	15,511,350	15,144,054	15,155,550
Federal Agencies	3133ECVW1	FFCB FLT NT T-BILL+14	8/5/13	8/5/15	0.02	0.17	62,500,000	62,487,500	62,496,832	62,515,625
Federal Agencies	313383V81	FHLB	12/12/13	8/28/15	0.58	0.38	9,000,000	9,014,130	9,004,710	9,009,450
Federal Agencies	3137EACM9	FHLMC BONDS	12/15/10	9/10/15	0.60	1.75	50,000,000	49,050,000	49,878,642	50,476,000
Federal Agencies	313370JB5	FHLB	12/15/10	9/11/15	0.61	1.75	75,000,000	73,587,000	74,818,783	75,713,250
Federal Agencies	31315PGT0	FARMER MAC	9/15/10	9/15/15	0.62	2.13	45,000,000	44,914,950	44,989,474	45,530,100
Federal Agencies	3133ECJB1	FFCB FLT NT QTR T-BILL+16	4/24/13	9/18/15	0.13	0.19	16,200,000	16,198,073	16,199,497	16,206,804
Federal Agencies	31398A3T7	FNMA EX-CALL NT	10/14/11	9/21/15	0.63	2.00	25,000,000	25,881,000	25,142,136	25,288,000
Federal Agencies	3133EAJF6	FFCB FLT NT 1ML+2.5	11/30/12	9/22/15	0.06	0.19	27,953,000	27,941,120	27,950,302	27,969,772
Federal Agencies	31398A4M1	FNMA	12/15/10	10/26/15	0.73	1.63	25,000,000	24,317,500	24,897,394	25,260,500
Federal Agencies	31398A4M1	FNMA	12/23/10	10/26/15	0.73	1.63	42,000,000	40,924,380	41,837,562	42,437,640
Federal Agencies	31331J2S1	FFCB	12/15/10	11/16/15	0.79	1.50	25,000,000	24,186,981	24,869,700	25,247,500
Federal Agencies	3133ECLZ5	FFCB FLT NT MONTHLY 1ML+0	5/8/13	11/19/15	0.05	0.17	25,000,000	24,997,000	24,999,056	25,011,750
Federal Agencies	313371ZY5	FHLB	12/3/10	12/11/15	0.86	1.88	25,000,000	24,982,000	24,996,928	25,343,250
Federal Agencies	313371ZY5	FHLB	12/14/10	12/11/15	0.86	1.88	50,000,000	49,871,500	49,977,937	50,686,500
Federal Agencies	3133ED5A6	FFCB FLT	12/12/13	1/20/16	0.06	0.17	50,000,000	50,000,000	50,000,000	50,025,000
Federal Agencies	3130A3P81	FHLB	12/29/14	1/29/16	0.99	0.25	25,000,000	25,000,000	25,000,000	25,004,000
Federal Agencies	313375RN9	FHLB NT	4/13/12	3/11/16	1.10	1.00	22,200,000	22,357,620	22,244,593	22,355,622
Federal Agencies	3133XXP43	FHLB	12/12/13	3/11/16	1.09	3.13	14,000,000	14,848,400	14,417,992	14,433,020
Federal Agencies	3133EAJU3	FFCB NT	4/12/12	3/28/16	1.15	1.05	25,000,000	25,220,750	25,064,271	25,202,250
Federal Agencies	3135G0VA8	FNMA GLOBAL NT	12/13/13	3/30/16	1.16	0.50	25,000,000	25,022,250	25,011,231	25,069,750
Federal Agencies	31315PTF6	FAMCA FLT MTN 1ML+0	4/1/13	4/1/16	0.01	0.17	50,000,000	50,000,000	50,000,000	50,023,000
Federal Agencies	3133792Z1	FHLB NT	4/18/12	4/18/16	1.21	0.81	20,000,000	19,992,200	19,997,640	20,111,000
Federal Agencies	3133ECWT7	FFCB NT	11/20/13	5/9/16	1.27	0.65	22,650,000	22,746,489	22,699,583	22,770,725
Federal Agencies	3133EDB35	FFCB FLT NT 1ML+3	1/15/14	6/2/16	0.01	0.20	50,000,000	49,991,681	49,995,338	50,039,500
Federal Agencies	31315PB73	FAMCA NT	2/9/12	6/9/16	1.35	0.90	10,000,000	10,000,000	10,000,000	10,078,300
Federal Agencies	313373SZ6	FHLB	10/23/14	6/10/16	1.34	2.13	28,000,000	28,790,468	28,656,513	28,628,320
Federal Agencies	313771AA5	FHLB SUB NT	5/20/13	6/13/16	1.33	5.63	16,925,000	19,472,890	18,057,901	18,128,706
Federal Agencies	313771AA5	FHLB SUB NT	5/30/13	6/13/16	1.33	5.63	14,195,000	16,259,095	15,121,053	15,204,548

Investment Inventory
Pooled Fund

Type of Investment	CUSIP	Issue Name	Settle Date	Maturity Date	Duration	Coupon	Par Value	Book Value	Amortized Book Value	Market Value
Federal Agencies	313771AA5	FHLB SUB NT	9/4/14	6/13/16	1.33	5.63	8,620,000	9,380,715	9,204,624	9,233,054
Federal Agencies	3133EDDP4	FFCB NT	2/11/14	6/17/16	1.37	0.52	50,000,000	50,062,000	50,036,317	50,059,000
Federal Agencies	3130A1BK3	FHLB EX-CALL NT	3/24/14	6/24/16	1.39	0.50	25,000,000	25,000,000	25,000,000	25,026,750
Federal Agencies	3135G0XP3	FNMA GLOBAL NT	3/25/14	7/5/16	1.43	0.38	50,000,000	49,753,100	49,845,873	50,009,500
Federal Agencies	31315PA25	FAMCA MTN	7/27/11	7/27/16	1.47	2.00	15,000,000	14,934,750	14,980,643	15,358,650
Federal Agencies	31315PA25	FAMCA MTN	3/26/13	7/27/16	1.47	2.00	14,100,000	14,735,205	14,382,429	14,437,131
Federal Agencies	31315PA25	FAMCA MTN	3/26/13	7/27/16	1.47	2.00	11,900,000	12,440,498	12,140,320	12,184,529
Federal Agencies	31315PA25	FAMCA MTN	3/26/14	7/27/16	1.47	2.00	20,000,000	20,643,350	20,408,309	20,478,200
Federal Agencies	3134G4UC0	FHLMC CALL NT	11/20/14	7/29/16	1.49	0.65	15,000,000	15,022,500	15,019,838	15,025,200
Federal Agencies	3135G0YE7	FNMA GLOBAL NT	3/17/14	8/26/16	1.56	0.63	50,000,000	50,124,765	50,079,917	50,162,000
Federal Agencies	31315PQB8	FAMCA NT	10/29/13	9/1/16	1.56	1.50	7,000,000	7,156,240	7,087,001	7,107,520
Federal Agencies	313370TW8	FHLB BD	10/11/11	9/9/16	1.58	2.00	25,000,000	25,727,400	25,237,469	25,617,250
Federal Agencies	313370TW8	FHLB	11/5/14	9/9/16	1.58	2.00	25,000,000	25,739,903	25,653,453	25,617,250
Federal Agencies	3133EDH21	FFCB FLT NT 1ML+2	3/14/14	9/14/16	0.04	0.19	50,000,000	49,993,612	49,995,874	50,030,000
Federal Agencies	3134G4XW3	FHLMC EX-CALL MTN	3/26/14	9/26/16	1.64	0.60	25,000,000	25,000,000	25,000,000	24,985,250
Federal Agencies	3130A1CD8	FHLB NT CALL	1/9/15	9/28/16	1.64	1.13	25,000,000	25,216,406	25,204,336	25,145,000
Federal Agencies	3134G3P38	FHLMC NT CALL	12/14/12	10/5/16	1.67	0.75	75,000,000	75,071,250	75,005,331	74,995,500
Federal Agencies	3133EDJA1	FFCB FLT NT 1ML+2	4/11/14	10/11/16	0.03	0.19	25,000,000	24,993,750	24,995,774	25,015,000
Federal Agencies	313378UB5	FHLB	10/23/14	10/11/16	1.68	1.13	5,000,000	5,062,083	5,053,627	5,052,050
Federal Agencies	3137EADS5	FHLMC GLOBAL NT	3/3/14	10/14/16	1.69	0.88	25,000,000	25,200,250	25,130,079	25,164,250
Federal Agencies	3130A3CE2	FHLB	11/3/14	10/14/16	1.69	0.63	40,000,000	40,045,194	40,041,144	40,104,000
Federal Agencies	3136G1WP0	FNMA CALL NT	11/4/13	11/4/16	1.74	1.50	18,000,000	18,350,460	18,132,503	18,166,140
Federal Agencies	3134G5LS2	FHLMC CALL MTN	11/17/14	11/17/16	1.79	0.60	25,000,000	25,000,000	25,000,000	24,982,250
Federal Agencies	3130A3J70	FHLB	11/17/14	11/23/16	1.80	0.63	25,000,000	24,990,000	24,991,031	25,051,250
Federal Agencies	313381GA7	FHLB NT	11/30/12	11/30/16	1.83	0.57	23,100,000	23,104,389	23,102,007	23,106,006
Federal Agencies	313371PV2	FHLB	11/6/14	12/9/16	1.83	1.63	25,000,000	25,513,000	25,454,582	25,490,500
Federal Agencies	313371PV2	FHLB	12/4/14	12/9/16	1.83	1.63	25,000,000	25,486,750	25,447,731	25,490,500
Federal Agencies	313371PV2	FHLB	12/12/14	12/9/16	1.83	1.63	25,000,000	25,450,885	25,419,536	25,490,500
Federal Agencies	3130A12F4	FHLB CALL NT	3/19/14	12/19/16	1.87	0.70	20,500,000	20,497,950	20,498,600	20,548,380
Federal Agencies	313381KR5	FHLB NT CALL	12/28/12	12/28/16	1.90	0.63	13,500,000	13,500,000	13,500,000	13,511,745
Federal Agencies	313381KR5	FHLB NT CALL	12/28/12	12/28/16	1.90	0.63	9,000,000	9,000,000	9,000,000	9,007,830
Federal Agencies	3134G5VG7	FHLMC CALL MTN	12/29/14	12/29/16	1.90	0.78	50,000,000	50,000,000	50,000,000	50,139,000
Federal Agencies	3130A3QU1	FHLB NT CALL	12/30/14	12/30/16	1.91	0.75	8,000,000	8,000,000	8,000,000	8,023,280
Federal Agencies	3130A3QU1	FHLB NT CALL	12/30/14	12/30/16	1.91	0.75	50,000,000	50,000,000	50,000,000	50,145,500
Federal Agencies	3134G33C2	FHLMC NT	1/3/13	1/3/17	1.91	0.60	50,000,000	50,000,000	50,000,000	50,100,500
Federal Agencies	3133ECB37	FFCB NT	12/20/12	1/12/17	1.94	0.58	14,000,000	14,000,000	14,000,000	14,007,000
Federal Agencies	31315PWW5	FARMER MAC MTN	5/4/12	1/17/17	1.95	1.01	49,500,000	49,475,250	49,489,691	49,938,075
Federal Agencies	3133EDRD6	FFCB FLT QTR T-BILL+14	12/12/14	1/30/17	0.16	0.17	50,000,000	49,981,400	49,982,616	50,010,000
Federal Agencies	3134G5X91	FHLMC CALL MTN	1/30/15	1/30/17	1.98	0.90	25,000,000	25,000,000	25,000,000	25,007,250
Federal Agencies	3133786Q9	FHLB NT	1/10/13	2/13/17	2.01	1.00	67,780,000	68,546,456	68,160,921	68,301,228
Federal Agencies	3133EDFW7	FFCB FLT NT 1ML+5.5	2/27/14	2/27/17	0.08	0.22	50,000,000	50,000,000	50,000,000	50,063,000
Federal Agencies	3133782N0	FHLB	12/15/14	3/10/17	2.09	0.88	50,000,000	50,173,951	50,170,510	50,272,000
Federal Agencies	3133EDP30	FARMER MAC FLT NT 1ML+4	10/3/14	3/24/17	0.07	0.21	26,000,000	26,009,347	26,008,095	26,024,180
Federal Agencies	3134G4XM5	FHLMC CALL MTN	3/28/14	3/28/17	2.14	0.78	25,000,000	25,000,000	25,000,000	25,079,000
Federal Agencies	3136G1ZB8	FNMA CALL NT	3/28/14	3/28/17	2.14	0.88	25,000,000	25,000,000	25,000,000	25,072,250
Federal Agencies	3133EDZW5	FFCB FLT NT 1ML+2	10/29/14	3/29/17	0.08	0.19	25,000,000	24,999,750	24,999,777	25,012,250
Federal Agencies	31315PTQ2	FARMER MAC MTN	4/10/12	4/10/17	2.16	1.26	12,500,000	12,439,250	12,473,418	12,639,250

Investment Inventory
Pooled Fund

Type of Investment	CUSIP	Issue Name	Settle Date	Maturity Date	Duration	Coupon	Par Value	Book Value	Amortized Book Value	Market Value
Federal Agencies	3133ECLL6	FFCB NT	4/17/13	4/17/17	2.20	0.60	10,000,000	10,000,000	10,000,000	9,995,600
Federal Agencies	31315PUQ0	FARMER MAC MTN	4/26/12	4/26/17	2.21	1.13	10,500,000	10,500,000	10,500,000	10,599,960
Federal Agencies	3137EADF3	FHLMC NT	5/14/12	5/12/17	2.25	1.25	25,000,000	25,133,000	25,060,594	25,323,500
Federal Agencies	3136FTR27	FNMA CALL NT	9/4/14	5/24/17	2.29	1.02	17,000,000	16,995,750	16,996,392	17,007,650
Federal Agencies	31315PZQ5	FARMER MAC MTN	12/28/12	6/5/17	2.32	1.11	9,000,000	9,122,130	9,064,458	9,045,810
Federal Agencies	313379FW4	FHLB	12/19/14	6/9/17	2.33	1.00	12,000,000	12,024,093	12,023,082	12,092,520
Federal Agencies	3130A3SL9	FHLB	12/30/14	6/15/17	2.35	0.95	25,000,000	24,959,750	24,961,229	25,125,750
Federal Agencies	3133EAUW6	FFCB FLT NT FF+22	6/19/12	6/19/17	0.13	0.34	50,000,000	50,000,000	50,000,000	50,089,000
Federal Agencies	3133EEGH7	FFCB	12/26/14	6/26/17	2.38	0.93	8,400,000	8,397,312	8,397,421	8,439,816
Federal Agencies	3137EADH9	FHLMC GLOBAL NT	3/25/14	6/29/17	2.39	1.00	25,000,000	24,920,625	24,941,468	25,179,500
Federal Agencies	3134G5VV4	FHLMC CALL MTN	12/30/14	6/30/17	2.40	1.05	25,000,000	25,000,000	25,000,000	25,080,250
Federal Agencies	3134G5W50	FHLMC	12/30/14	6/30/17	2.40	1.00	50,000,000	50,000,000	50,000,000	50,344,500
Federal Agencies	3134G5VV4	FHLMC CALL MTN	12/30/14	6/30/17	2.40	1.05	25,000,000	25,000,000	25,000,000	25,080,250
Federal Agencies	3133ECV92	FFCB FLT NT 1ML+4	7/24/13	7/24/17	0.07	0.21	50,000,000	50,000,000	50,000,000	50,038,500
Federal Agencies	3134G3ZH6	FHLMC EX-CALL MTN	4/15/14	7/25/17	2.46	1.00	19,000,000	18,995,250	18,996,409	19,120,460
Federal Agencies	3133ECVG6	FFCB FLT NT 3ML+0	8/5/13	7/26/17	0.24	0.26	23,520,000	23,520,000	23,520,000	23,544,696
Federal Agencies	3133EEFX3	FFCB FLT 1ML+5	12/23/14	8/23/17	0.07	0.22	50,000,000	50,000,000	50,000,000	50,047,000
Federal Agencies	3134G5HS7	FHLMC CALL MTN	9/25/14	9/25/17	2.61	1.13	20,100,000	20,079,900	20,082,266	20,202,108
Federal Agencies	3136G0D81	FNMA STEP NT	9/27/12	9/27/17	2.63	0.72	100,000,000	100,000,000	100,000,000	100,052,000
Federal Agencies	3137EADL0	FHLMC GLOBAL NT	3/25/14	9/29/17	2.62	1.00	25,000,000	24,808,175	24,854,936	25,167,500
Federal Agencies	3136G0Y39	FNMA STEP NT	11/8/12	11/8/17	2.75	0.80	50,000,000	50,000,000	50,000,000	49,959,500
Federal Agencies	3133EEBR0	FFCB FLT NT 1ML+3	11/18/14	11/13/17	0.04	0.20	25,000,000	24,988,794	24,989,564	25,005,750
Federal Agencies	3134G44F2	FHLMC CALL MTN	5/21/13	11/21/17	2.78	0.80	50,000,000	50,000,000	50,000,000	49,838,500
Federal Agencies	3134G5NE1	FHLMC CALL STEP	11/24/14	11/24/17	2.79	0.50	25,000,000	25,000,000	25,000,000	25,005,000
Federal Agencies	3134G5NE1	FHLMC CALL STEP	11/24/14	11/24/17	2.79	0.50	11,200,000	11,191,600	11,192,129	11,202,240
Federal Agencies	31315PJ83	FARMER MAC FLT CALL 1ML+17	12/1/14	12/1/17	0.01	0.34	25,000,000	25,000,000	25,000,000	25,057,750
Federal Agencies	3130A3HF4	FHLB	12/22/14	12/8/17	2.81	1.13	25,000,000	24,988,313	24,989,999	25,177,500
Federal Agencies	3133EEFE5	FFCB	12/18/14	12/18/17	2.84	1.13	50,000,000	50,012,500	50,011,987	50,375,000
Federal Agencies	3133EEFE5	FFCB	12/19/14	12/18/17	2.84	1.13	50,000,000	49,916,063	49,919,498	50,375,000
Federal Agencies	31315PZ28	FAMCA MTN	12/22/14	12/22/17	2.85	1.20	46,000,000	46,000,000	46,000,000	46,494,040
Federal Agencies	3136G13T4	FNMA STEP NT	12/26/12	12/26/17	2.88	0.80	39,000,000	39,000,000	39,000,000	39,033,150
Federal Agencies	3136G13Q0	FNMA STEP NT	12/26/12	12/26/17	2.88	0.75	29,000,000	29,000,000	29,000,000	29,022,620
Federal Agencies	3134G32M1	FHLMC CALL NT	12/28/12	12/28/17	2.87	1.00	50,000,000	50,000,000	50,000,000	49,924,000
Federal Agencies	3134G5VA0	FHLMC CALL MTN	12/29/14	12/29/17	2.87	1.25	25,000,000	25,000,000	25,000,000	25,077,750
Federal Agencies	31315P4S5	FARMER MAC FLT CALL 1ML+16	1/5/15	1/5/18	0.02	0.33	50,000,000	50,000,000	50,000,000	50,074,500
Federal Agencies	3134G5XM2	FHLMC CALL STEP NT	1/30/15	1/30/18	2.98	0.50	25,000,000	25,000,000	25,000,000	24,996,750
Federal Agencies	3133EEAN0	FFCB FLT NT 1ML+4	11/5/14	2/5/18	0.02	0.21	25,000,000	25,000,000	25,000,000	25,007,000
Federal Agencies	3133EEAN0	FFCB FLT NT 1ML+4	11/5/14	2/5/18	0.02	0.21	25,000,000	24,991,750	24,992,361	25,007,000
Federal Agencies	3133EEAN0	FFCB FLT NT 1ML+4	11/5/14	2/5/18	0.02	0.21	50,000,000	49,983,560	49,984,777	50,014,000
Federal Agencies	3135G0UN1	FNMA GLOBAL NT CALL	2/26/14	2/28/18	3.02	1.15	19,000,000	18,877,450	18,905,931	18,998,670
Federal Agencies	3135G0UN1	FNMA GLOBAL NT CALL	2/26/14	2/28/18	3.02	1.15	8,770,000	8,713,434	8,726,580	8,769,386
Federal Agencies	3130A35B6	FHLB FLT CALL NT 1ML+23	10/2/14	4/2/18	0.01	0.40	50,000,000	50,000,000	50,000,000	50,097,000
Federal Agencies	3136G1KN8	FNMA NT CALL	4/24/13	4/24/18	3.15	1.50	50,000,000	50,903,000	50,101,433	50,107,000
Federal Agencies	3136G1K81	FNMA NT STEP	4/30/13	4/30/18	3.21	0.75	12,600,000	12,600,000	12,600,000	12,610,332
Federal Agencies	31315PZM4	FARMER MAC STEP NT	5/3/13	5/3/18	3.22	0.70	24,600,000	24,600,000	24,600,000	24,634,440
Federal Agencies	313382XK4	FHLB STEP NT	5/7/13	5/7/18	3.24	0.75	25,000,000	25,000,000	25,000,000	25,031,750
Federal Agencies	3133ECPB4	FFCB NT	5/23/13	5/14/18	3.24	0.88	10,000,000	9,934,600	9,956,880	9,954,400

Investment Inventory
Pooled Fund

Type of Investment	CUSIP	Issue Name	Settle Date	Maturity Date	Duration	Coupon	Par Value	Book Value	Amortized Book Value	Market Value
Federal Agencies	3135G0WJ8	FNMA NT	5/23/13	5/21/18	3.26	0.88	25,000,000	24,786,500	24,858,954	24,910,500
Federal Agencies	3133834P3	FHLB STEP NT	5/22/13	5/22/18	3.28	0.50	50,000,000	50,000,000	50,000,000	50,026,000
Federal Agencies	31315P4W6	FARMER MAC FLT CALL	6/6/14	6/6/18	0.10	0.37	25,000,000	25,000,000	25,000,000	25,078,500
Federal Agencies	3134G52D6	FHLMC CALL MTN	4/17/14	7/17/18	3.38	1.64	25,000,000	25,000,000	25,000,000	25,152,000
Federal Agencies	3134G5ZP3	FHLMC CALL STEP NT	1/27/15	7/27/18	3.45	0.75	25,000,000	25,000,000	25,000,000	25,018,500
Federal Agencies	3134G5ZZ1	FHLMC STEP CALL MTN	1/30/15	7/30/18	3.45	1.00	25,000,000	25,000,000	25,000,000	25,028,750
Federal Agencies	3134G4LZ9	FHLMC CALL STEP	12/10/13	12/10/18	3.80	0.88	50,000,000	50,000,000	50,000,000	50,322,500
Federal Agencies	3134G4MB1	FHLMC CALL MULTI-STEP	12/18/13	12/18/18	3.78	1.50	25,000,000	25,000,000	25,000,000	25,045,000
Federal Agencies	3136G2C39	FNMA CALL NT	12/30/14	12/28/18	3.80	1.63	15,000,000	15,000,000	15,000,000	15,196,950
Federal Agencies	31315PQ69	FARMER MAC FLT CALL NT 3ML+15	4/3/14	4/3/19	0.17	0.41	50,000,000	50,000,000	50,000,000	50,056,500
Federal Agencies	31315PE47	FARMER MAC FLT CALL NT 1ML+31	11/3/14	5/3/19	0.01	0.48	25,000,000	25,000,000	25,000,000	25,024,000
Federal Agencies	31315P3W7	FARMER MAC FLT CALL	6/3/14	6/3/19	0.09	0.38	50,000,000	50,000,000	50,000,000	50,099,000
Federal Agencies	31315PS91	FARMER MAC FLT CALL NT 3ML+12	8/12/14	8/12/19	0.04	0.35	50,000,000	50,000,000	50,000,000	50,033,000
Federal Agencies	3130A2UF1	FHLB FLT CALL NT 3ML+20	8/27/14	8/27/19	0.08	0.44	25,000,000	25,000,000	25,000,000	25,106,250
Federal Agencies	3130A35A8	FHLB FLT CALL NT 1ML+40	10/2/14	10/2/19	0.01	0.57	50,000,000	50,000,000	50,000,000	50,039,000
Federal Agencies	313586RC5	FNMA 0 CPN	11/21/14	10/9/19	4.69	0.00	29,675,000	26,700,081	26,820,213	27,279,634
Federal Agencies	313586RC5	FNMA 0 CPN	11/24/14	10/9/19	4.69	0.00	25,000,000	22,498,750	22,595,709	22,982,000
Federal Agencies	313586RC5	FNMA 0 CPN	11/24/14	10/9/19	4.69	0.00	10,000,000	9,005,200	9,043,762	9,192,800
Federal Agencies	31315PJ26	FARMER MAC FLT CALL 3ML+12	12/2/14	12/2/19	0.08	0.35	50,000,000	50,000,000	50,000,000	50,027,000
Subtotals					**1.41**	**0.82**	**$ 4,507,887,000**	**$ 4,511,926,606**	**$ 4,508,888,138**	**$ 4,523,919,982**
State/Local Agencies	13063BN65	CALIFORNIA ST TAXABLE GO BD	3/27/13	2/1/15	0.00	0.85	$ 10,000,000	$ 10,038,000	$ 10,000,000	$ 10,010,400
State/Local Agencies	649791JS0	NEW YORK ST TAXABLE GO	3/21/13	3/1/15	0.08	0.39	4,620,000	4,619,076	4,619,964	4,620,693
State/Local Agencies	91412GPW9	UNIV OF CALIFORNIA REVENUE BC	3/14/13	5/15/15	0.29	0.39	5,000,000	5,000,000	5,000,000	4,999,600
State/Local Agencies	612574DQ3	MONTEREY COMM COLLEGE GO	5/7/13	8/1/15	0.50	0.63	315,000	315,000	315,000	315,680
State/Local Agencies	13063BHZ8	CALIFORNIA ST TAXABLE GO BD	8/19/14	11/1/15	0.74	3.95	5,000,000	5,215,300	5,133,888	5,159,400
State/Local Agencies	64966GXS6	NEW YORK CITY TAXABLE GO	4/1/13	12/1/15	0.82	5.13	12,255,000	13,700,477	12,704,671	12,802,921
State/Local Agencies	13063BN73	CALIFORNIA ST TAXABLE GO BD	3/27/13	2/1/16	1.00	1.05	11,000,000	11,037,180	11,013,036	11,063,910
State/Local Agencies	13063BN73	CALIFORNIA ST GO BD	12/19/14	2/1/16	1.00	1.05	7,000,000	7,072,485	7,067,718	7,040,670
State/Local Agencies	91412GUT0	UNIV OF CALIFORNIA REVENUE	4/10/14	5/15/16	1.28	0.63	2,500,000	2,500,000	2,500,000	2,497,975
State/Local Agencies	612574DR1	MONTEREY COMM COLLEGE GO	5/7/13	8/1/16	1.49	0.98	2,670,000	2,670,000	2,670,000	2,676,168
State/Local Agencies	13063CPM6	CALIFORNIA ST TAXABLE GO BD	12/9/14	11/1/16	1.74	0.75	44,000,000	44,059,033	44,055,433	44,033,440
State/Local Agencies	91412GUU7	UNIV OF CALIFORNIA REVENUE BD	4/10/14	5/15/17	2.26	1.22	3,250,000	3,250,000	3,250,000	3,257,995
State/Local Agencies	13063CFC9	CALIFORNIA ST GO BD	11/5/13	11/1/17	2.69	1.75	16,500,000	16,558,905	16,540,591	16,626,390
State/Local Agencies	13063CPN4	CALIFORNIA ST GO BD	11/25/14	11/1/17	2.71	1.25	50,000,000	50,121,500	50,113,793	50,142,500
State/Local Agencies	13063CPN4	CALIFORNIA ST GO BD	12/22/14	11/1/17	2.71	1.25	5,000,000	5,009,238	5,009,059	5,014,250
Subtotals					**1.77**	**1.42**	**$ 179,110,000**	**$ 181,166,194**	**$ 179,993,153**	**$ 180,261,992**
Public Time Deposits		TRANS PACIFIC NATIONAL BANK P	2/7/14	2/7/15	0.02	0.46	$ 240,000	$ 240,000	$ 240,000	$ 240,000
Public Time Deposits		BANK OF SAN FRANCISCO PTD	4/9/14	4/9/15	0.19	0.45	240,000	240,000	240,000	240,000
Subtotals					**0.10**	**0.46**	**$ 480,000**	**$ 480,000**	**$ 480,000**	**$ 480,000**

Investment Inventory

Pooled Fund

Type of Investment	CUSIP	Issue Name	Settle Date	Maturity Date	Duration	Coupon	Par Value	Book Value	Amortized Book Value	Market Value
Negotiable CDs	78009NGU4	ROYAL BANK OF CANADA NY YCD	5/19/14	6/25/15	0.15	0.35	$ 5,500,000	$ 5,497,250	$ 5,499,015	$ 5,497,140
Negotiable CDs	78009NSA5	ROYAL BANK OF CANADA NY YCD	9/16/14	3/10/16	0.03	0.33	25,000,000	25,000,000	25,000,000	24,995,250
Negotiable CDs	06417HHL3	BANK OF NOVA SCOTIA FLT 3ML+2:	4/3/14	3/22/16	0.14	0.48	10,000,000	10,000,290	10,000,167	9,997,370
Negotiable CDs	96121TWJ3	WESTPAC FLT YCD 3ML+15	4/24/14	4/25/16	0.24	0.41	25,000,000	25,000,000	25,000,000	24,992,875
Negotiable CDs	96121TWK0	WESTPAC FLT YCD 1ML+22	4/24/14	4/25/16	0.07	0.39	50,000,000	50,000,000	50,000,000	49,985,950
Negotiable CDs	06417HKT2	BANK OF NOVA SCOTIA YCD 3ML+1	5/9/14	5/9/16	0.03	0.42	50,000,000	49,979,050	49,986,731	49,984,350
Negotiable CDs	06417HUW4	BANK OF NOVA SCOTIA FLT 3ML+2(	9/25/14	9/23/16	0.14	0.45	50,000,000	50,000,000	50,000,000	49,981,850
Negotiable CDs	06417HVR4	BANK OF NOVA SCOTIA YCD 3ML+2	10/7/14	10/7/16	0.18	0.45	50,000,000	50,000,000	50,000,000	49,981,400
Negotiable CDs	78009NSX5	ROYAL BANK OF CANADA YCD 3ML	12/15/14	12/15/16	0.12	0.42	100,000,000	100,000,000	100,000,000	100,000,000
Negotiable CDs	06417HUR5	BANK OF NOVA SCOTIA YCD 3ML+2	9/25/14	9/25/17	0.15	0.52	50,000,000	50,000,000	50,000,000	49,971,950
Subtotals					**0.12**	**0.43**	**$ 415,500,000**	**$ 415,476,590**	**$ 415,485,913**	**$ 415,388,135**
Commercial Paper	06538CP62	BANK OF TOKYO-MITSUBISHI UFJ C	1/30/15	2/6/15	0.00	0.00	$ 100,000,000	$ 99,998,056	$ 99,998,056	$ 99,998,194
Subtotals					**0.00**	**0.00**	**$ 100,000,000**	**$ 99,998,056**	**$ 99,998,056**	**$ 99,998,194**
Medium Term Notes	89233P7L4	TOYOTA MTN FIX-TO-FLOAT	2/4/13	2/4/15	0.01	0.33	$ 25,000,000	$ 25,000,000	$ 25,000,000	$ 25,000,000
Medium Term Notes	717081DA8	PFIZER MTN	12/9/13	3/15/15	0.12	5.35	3,000,000	3,185,850	3,016,932	3,016,590
Medium Term Notes	89236TAG0	TOYOTA MOTOR CREDIT CORP 3MI	4/12/13	4/8/15	0.19	0.40	50,000,000	50,000,000	50,000,000	50,013,000
Medium Term Notes	64952WAW3	NEW YORK LIFE MTN	9/22/14	5/4/15	0.26	3.00	5,000,000	5,084,250	5,034,603	5,033,550
Medium Term Notes	459200HD6	IBM MTN	12/19/13	5/11/15	0.27	0.75	5,425,000	5,460,859	5,431,988	5,433,029
Medium Term Notes	36962G5Z3	GE CAPITAL CORP MTN	8/19/13	7/2/15	0.42	1.63	5,000,000	5,075,250	5,016,661	5,027,400
Medium Term Notes	36962G4M3	GE CAPITAL CORP FLT MTN 3ML+7!	11/25/13	7/9/15	0.44	1.00	8,565,000	8,624,955	8,581,029	8,588,982
Medium Term Notes	89233P6J0	TOYOTA MTN	11/15/13	7/17/15	0.46	0.88	10,000,000	10,072,000	10,019,626	10,024,500
Medium Term Notes	89233P6J0	TOYOTA MTN	3/4/14	7/17/15	0.46	0.88	6,100,000	6,147,885	6,115,898	6,114,945
Medium Term Notes	594918AG9	MICROSOFT MTN	10/30/13	9/25/15	0.65	1.63	3,186,000	3,260,266	3,211,218	3,213,623
Medium Term Notes	961214BW2	WESTPAC NT	9/15/14	9/25/15	0.65	1.13	10,152,000	10,232,201	10,202,473	10,199,816
Medium Term Notes	369604BE2	GENERAL ELECTRIC MTN	3/5/14	10/9/15	0.69	0.85	10,000,000	10,069,000	10,029,588	10,033,700
Medium Term Notes	369604BE2	GENERAL ELECTRIC MTN	5/7/14	10/9/15	0.69	0.85	8,000,000	8,043,680	8,021,000	8,026,960
Medium Term Notes	369604BE2	GENERAL ELECTRIC MTN	5/19/14	10/9/15	0.69	0.85	9,300,000	9,358,311	9,328,696	9,331,341
Medium Term Notes	06366RJH9	BANK OF MONTREAL MTN	3/27/14	11/6/15	0.76	0.80	8,500,000	8,532,470	8,515,325	8,528,220
Medium Term Notes	36962G4T8	GE CAPITAL CORP MTN	5/12/14	11/9/15	0.77	2.25	7,000,000	7,183,890	7,094,639	7,099,750
Medium Term Notes	742718DS5	PROCTER & GAMBLE MTN	3/7/14	11/15/15	0.78	1.80	23,025,000	23,588,652	23,286,761	23,284,031
Medium Term Notes	742718DS5	PROCTER & GAMBLE MTN	3/12/14	11/15/15	0.78	1.80	10,000,000	10,231,900	10,108,573	10,112,500
Medium Term Notes	459200GU9	IBM CORP NT	2/11/14	1/5/16	0.92	2.00	19,579,000	20,139,743	19,852,493	19,867,007
Medium Term Notes	064255AK8	BTMUFJ FLT MTN 3ML+45	3/17/14	2/26/16	1.07	0.68	10,000,000	10,035,800	10,019,637	10,013,900
Medium Term Notes	36962G2V5	GE FLT MTN 3ML+20	5/19/14	5/11/16	1.27	0.43	17,689,000	17,703,328	17,698,215	17,701,029
Medium Term Notes	89114QAL2	TORONTO-DOMINION BANK 3ML+4(	12/15/14	9/9/16	1.60	0.70	18,930,000	19,018,326	19,011,805	19,005,341
Medium Term Notes	89236TBU8	TOYOTA MOTOR CREDIT CORP 3MI	9/23/14	9/23/16	1.64	0.35	50,000,000	50,000,000	50,000,000	49,933,000
Medium Term Notes	89236TBV6	TOYOTA MOTOR CREDIT CORP FF-	9/25/14	9/23/16	1.64	0.36	47,500,000	47,500,000	47,500,000	47,461,525
Medium Term Notes	89236TBU8	TOYOTA MOTOR CREDIT CORP 3MI	12/9/14	9/23/16	1.64	0.35	14,150,000	14,145,331	14,145,716	14,131,039
Medium Term Notes	9612E0DB0	WESTPAC FLT MTN 1ML+25	10/10/14	10/7/16	1.68	0.42	50,000,000	50,000,000	50,000,000	50,000,000
Medium Term Notes	36967FAB7	GENERAL ELEC CAP CORP FLT 3MI	1/9/15	1/9/17	1.93	0.53	20,000,000	20,000,000	20,000,000	19,999,800
Subtotals					**1.05**	**0.78**	**$ 455,101,000**	**$ 457,693,946**	**$ 456,242,878**	**$ 456,194,578**
Money Market Funds	61747C707	MS INSTL GOVT FUND	1/30/15	2/1/15	0.01	0.04	$ 10,089,205	$ 10,089,205	$ 10,089,205	$ 10,089,205
Money Market Funds	09248U718	BLACKROCK T-FUND INSTL	1/30/15	2/1/15	0.01	0.01	10,001,087	10,001,087	10,001,087	10,001,087
Money Market Funds	316175108	FIDELITY INSTL GOVT PORT	1/30/15	2/1/15	0.01	0.01	5,003,797	5,003,797	5,003,797	5,003,797
Subtotals					**0.01**	**0.02**	**$ 25,094,089**	**$ 25,094,089**	**$ 25,094,089**	**$ 25,094,089**
Grand Totals					**1.29**	**0.82**	**$ 6,268,172,089**	**$ 6,276,902,082**	**$ 6,270,604,791**	**$ 6,290,796,320**

Monthly Investment Earnings
Pooled Fund

For month ended January 31, 2015

Type of Investment	CUSIP	Issue Name	Par Value	Coupon	YTM[1]	Settle Date	Maturity Date	Earned Interest	Amort. Expense	Realized Gain/(Loss)	Earned Income /Net Earnings
U.S. Treasuries	912828MW7	US TSY NT	$ 50,000,000	2.50	0.48	2/24/12	3/31/15	$ 106,456	$ (85,119)	$ -	$ 21,337
U.S. Treasuries	912828PE4	US TSY NT	25,000,000	1.25	0.61	12/23/11	10/31/15	26,761	(13,417)	-	13,344
U.S. Treasuries	912828PJ3	US TSY NT	50,000,000	1.38	1.58	12/16/10	11/30/15	58,551	8,229	-	66,780
U.S. Treasuries	912828PJ3	US TSY NT	50,000,000	1.38	1.58	12/16/10	11/30/15	58,551	8,229	-	66,780
U.S. Treasuries	912828PJ3	US TSY NT	50,000,000	1.38	2.00	12/23/10	11/30/15	58,551	25,119	-	83,670
U.S. Treasuries	912828RJ1	US TSY NT	75,000,000	1.00	1.05	10/11/11	9/30/16	63,874	2,901	-	66,774
U.S. Treasuries	912828RM4	US TSY NT	25,000,000	1.00	0.74	12/26/13	10/31/16	21,409	(5,473)	-	15,936
U.S. Treasuries	912828F88	US TSY NT	-	0.38	0.52	11/6/14	10/31/16	3,626	(5,657)	45,898	43,867
U.S. Treasuries	912828RX0	US TSY NT	25,000,000	0.88	0.67	2/25/14	12/31/16	18,733	(4,337)	-	14,395
U.S. Treasuries	912828SJ0	US TSY NT	75,000,000	0.88	0.94	3/14/12	2/28/17	56,198	3,909	-	60,108
U.S. Treasuries	912828SJ0	US TSY NT	25,000,000	0.88	1.21	3/21/12	2/28/17	18,733	6,877	-	25,609
U.S. Treasuries	912828SJ0	US TSY NT	25,000,000	0.88	1.21	3/21/12	2/28/17	18,733	6,877	-	25,609
U.S. Treasuries	912828SM3	US TSY NT	50,000,000	1.00	1.07	4/4/12	3/31/17	42,582	2,791	-	45,374
U.S. Treasuries	912828TM2	US TSY NT	60,000,000	0.63	0.69	9/17/12	8/31/17	32,113	3,293	-	35,407
U.S. Treasuries	912828UE8	US TSY NT	-	0.75	0.80	1/4/13	12/31/17	15,539	(45,201)	50,781	21,119
Subtotals			**$ 585,000,000**					**$ 600,408**	**$ (90,979)**	**$ 96,680**	**$ 606,110**
Federal Agencies	3135G0HG1	FNMA GLOBAL	$ 9,399,000	0.38	0.20	1/13/14	3/16/15	$ 2,937	$ (1,386)	$ -	$ 1,551
Federal Agencies	31315PWJ4	FARMER MAC FLT NT FF+26	50,000,000	0.37	0.37	5/3/12	5/1/15	15,611	-	-	15,611
Federal Agencies	3133EAQC5	FFCB FLT NT 1ML+1	50,000,000	0.18	0.26	6/8/12	5/14/15	7,496	420	-	7,916
Federal Agencies	3133EAVE5	FFCB FLT NT 1ML+2	50,000,000	0.19	0.25	12/5/12	6/22/15	8,027	424	-	8,451
Federal Agencies	31315PDZ9	FAMCA	15,000,000	2.38	0.32	11/22/13	7/22/15	29,688	(26,115)	-	3,572
Federal Agencies	3133ECVW1	FFCB FLT NT T-BILL+14	62,500,000	0.17	0.20	8/5/13	8/5/15	8,927	531	-	9,457
Federal Agencies	313383V81	FHLB	9,000,000	0.38	0.28	12/12/13	8/28/15	2,813	(702)	-	2,111
Federal Agencies	3137EACM9	FHLMC BONDS	50,000,000	1.75	2.17	12/15/10	9/10/15	72,917	17,023	-	89,940
Federal Agencies	313370JB5	FHLB	75,000,000	1.75	2.31	12/15/10	9/11/15	109,375	25,305	-	134,680
Federal Agencies	31315PGT0	FARMER MAC	45,000,000	2.13	2.17	9/15/10	9/15/15	79,688	1,444	-	81,131
Federal Agencies	3133ECJB1	FFCB FLT NT QTR T-BILL+16	16,200,000	0.19	0.20	4/24/13	9/18/15	2,589	68	-	2,657
Federal Agencies	31398A3T7	FNMA EX-CALL NT	25,000,000	2.00	1.08	10/14/11	9/21/15	41,667	(18,992)	-	22,674
Federal Agencies	3133EAJF6	FFCB FLT NT 1ML+2.5	27,953,000	0.19	0.26	11/30/12	9/22/15	4,608	359	-	4,967
Federal Agencies	31398A4M1	FNMA	25,000,000	1.63	2.22	12/15/10	10/26/15	33,854	11,913	-	45,767
Federal Agencies	31398A4M1	FNMA	42,000,000	1.63	2.19	12/23/10	10/26/15	56,875	18,860	-	75,735
Federal Agencies	31331J2S1	FFCB	25,000,000	1.50	2.20	12/15/10	11/16/15	31,250	14,025	-	45,275
Federal Agencies	3133ECLZ5	FFCB FLT NT MONTHLY 1ML+0	25,000,000	0.17	0.18	5/8/13	11/19/15	3,568	101	-	3,668
Federal Agencies	313371ZY5	FHLB	25,000,000	1.88	1.89	12/3/10	12/11/15	39,063	304	-	39,367
Federal Agencies	313371ZY5	FHLB	50,000,000	1.88	1.93	12/14/10	12/11/15	78,125	2,185	-	80,310
Federal Agencies	3133ED5A6	FFCB FLT	50,000,000	0.17	0.17	12/12/13	1/20/16	7,166	-	-	7,166
Federal Agencies	31315P3B3	FARMER MAC MTN	-	0.42	0.42	1/27/14	1/25/16	2,800	-	30,000	32,800
Federal Agencies	3130A3P81	FHLB	25,000,000	0.25	0.25	12/29/14	1/29/16	5,208	-	-	5,208
Federal Agencies	313375RN9	FHLB NT	22,200,000	1.00	0.82	4/13/12	3/11/16	18,500	(3,422)	-	15,078
Federal Agencies	3133XXP43	FHLB	14,000,000	3.13	0.41	12/12/13	3/11/16	36,458	(32,074)	-	4,385
Federal Agencies	3133EAJU3	FFCB NT	25,000,000	1.05	0.82	4/12/12	3/28/16	21,875	(4,733)	-	17,142

Monthly Investment Earnings
Pooled Fund

Type of Investment	CUSIP	Issue Name	Par Value	Coupon	YTM[1]	Settle Date	Maturity Date	Earned Interest	Amort. Expense	Realized Gain/(Loss)	Earned Income /Net Earnings
Federal Agencies	3135G0VA8	FNMA GLOBAL NT	25,000,000	0.50	0.46	12/13/13	3/30/16	10,417	(823)	-	9,594
Federal Agencies	31315PTF6	FAMCA FLT MTN 1ML+0	50,000,000	0.17	0.17	4/1/13	4/1/16	7,298	-	-	7,298
Federal Agencies	3133792Z1	FHLB NT	20,000,000	0.81	0.82	4/18/12	4/18/16	13,500	166	-	13,666
Federal Agencies	3133ECWT7	FFCB NT	22,650,000	0.65	0.48	11/20/13	5/9/16	12,269	(3,320)	-	8,949
Federal Agencies	3133EDB35	FFCB FLT NT 1ML+3	50,000,000	0.20	0.21	1/15/14	6/2/16	8,568	297	-	8,865
Federal Agencies	31315PB73	FAMCA NT	10,000,000	0.90	0.90	2/9/12	6/9/16	7,500	-	-	7,500
Federal Agencies	313373SZ6	FHLB	28,000,000	2.13	0.39	10/23/14	6/10/16	49,583	(41,115)	-	8,468
Federal Agencies	313771AA5	FHLB SUB NT	16,925,000	5.63	0.65	5/20/13	6/13/16	79,336	(70,522)	-	8,814
Federal Agencies	313771AA5	FHLB SUB NT	14,195,000	5.63	0.77	5/30/13	6/13/16	66,539	(57,646)	-	8,893
Federal Agencies	313771AA5	FHLB SUB NT	8,620,000	5.63	0.62	9/4/14	6/13/16	40,406	(36,392)	-	4,014
Federal Agencies	3133EDDP4	FFCB NT	50,000,000	0.52	0.44	2/11/14	6/17/16	21,667	(2,243)	-	19,424
Federal Agencies	3130A1BK3	FHLB EX-CALL NT	25,000,000	0.50	0.50	3/24/14	6/24/16	10,417	-	-	10,417
Federal Agencies	3135G0XP3	FNMA GLOBAL NT	50,000,000	0.38	0.59	3/25/14	7/5/16	15,625	9,188	-	24,813
Federal Agencies	31315PA25	FAMCA MTN	15,000,000	2.00	2.09	7/27/11	7/27/16	25,000	1,107	-	26,107
Federal Agencies	31315PA25	FAMCA MTN	14,100,000	2.00	0.63	3/26/13	7/27/16	23,500	(16,154)	-	7,346
Federal Agencies	31315PA25	FAMCA MTN	11,900,000	2.00	0.62	3/26/13	7/27/16	19,833	(13,745)	-	6,088
Federal Agencies	31315PA25	FAMCA MTN	20,000,000	2.00	0.61	3/26/14	7/27/16	33,333	(23,353)	-	9,980
Federal Agencies	3134G4UC0	FHLMC CALL NT	15,000,000	0.65	0.56	11/20/14	7/29/16	8,125	(1,130)	-	6,995
Federal Agencies	3135G0YE7	FNMA GLOBAL NT	50,000,000	0.63	0.52	3/17/14	8/26/16	26,042	(4,331)	-	21,711
Federal Agencies	31315PQB8	FAMCA NT	7,000,000	1.50	0.70	10/29/13	9/1/16	8,750	(4,666)	-	4,084
Federal Agencies	313370TW8	FHLB BD	25,000,000	2.00	1.39	10/11/11	9/9/16	41,667	(12,562)	-	29,104
Federal Agencies	313370TW8	FHLB	25,000,000	2.00	0.55	11/5/14	9/9/16	41,667	(30,454)	-	11,213
Federal Agencies	3133EDH21	FFCB FLT NT 1ML+2	50,000,000	0.19	0.19	3/14/14	9/14/16	7,927	216	-	8,143
Federal Agencies	3134G4XW3	FHLMC EX-CALL MTN	25,000,000	0.60	0.60	3/26/14	9/26/16	12,500	-	-	12,500
Federal Agencies	3130A1CD8	FHLB NT CALL	25,000,000	1.13	0.80	1/9/15	9/28/16	17,188	(12,071)	-	5,117
Federal Agencies	3134G3P38	FHLMC NT CALL	75,000,000	0.75	0.72	12/14/12	10/5/16	46,875	(2,623)	-	44,252
Federal Agencies	3133EDJA1	FFCB FLT NT 1ML+2	25,000,000	0.19	0.20	4/11/14	10/11/16	3,956	212	-	4,168
Federal Agencies	313378UB5	FHLB	5,000,000	1.13	0.51	10/23/14	10/11/16	4,708	(2,596)	-	2,113
Federal Agencies	3137EADS5	FHLMC GLOBAL NT	25,000,000	0.88	0.57	3/3/14	10/14/16	18,229	(6,493)	-	11,736
Federal Agencies	3130A3CE2	FHLB	40,000,000	0.63	0.58	11/3/14	10/14/16	20,833	(1,395)	-	19,438
Federal Agencies	3136G1WP0	FNMA CALL NT	18,000,000	1.50	0.84	11/4/13	11/4/16	22,500	(14,883)	-	7,617
Federal Agencies	3134G5LS2	FHLMC CALL MTN	25,000,000	0.60	0.60	11/17/14	11/17/16	12,500	-	-	12,500
Federal Agencies	3130A3J70	FHLB	25,000,000	0.63	0.64	11/17/14	11/23/16	13,021	421	-	13,441
Federal Agencies	313381GA7	FHLB NT	23,100,000	0.57	0.57	11/30/12	11/30/16	10,973	(93)	-	10,879
Federal Agencies	313371PV2	FHLB	25,000,000	1.63	0.64	11/6/14	12/9/16	33,854	(20,815)	-	13,039
Federal Agencies	313371PV2	FHLB	25,000,000	1.63	0.65	12/4/14	12/9/16	33,854	(20,502)	-	13,352
Federal Agencies	313371PV2	FHLB	25,000,000	1.63	0.72	12/12/14	12/9/16	33,854	(19,056)	-	14,799
Federal Agencies	3130A12F4	FHLB CALL NT	20,500,000	0.70	0.70	3/19/14	12/19/16	11,958	63	-	12,022
Federal Agencies	313381KR5	FHLB NT CALL	13,500,000	0.63	0.63	12/28/12	12/28/16	7,031	-	-	7,031
Federal Agencies	313381KR5	FHLB NT CALL	9,000,000	0.63	0.63	12/28/12	12/28/16	4,688	-	-	4,688
Federal Agencies	3134G5VG7	FHLMC CALL MTN	50,000,000	0.78	0.78	12/29/14	12/29/16	32,500	-	-	32,500

Monthly Investment Earnings
Pooled Fund

Type of Investment	CUSIP	Issue Name	Par Value	Coupon	YTM[1]	Settle Date	Maturity Date	Earned Interest	Amort. Expense	Realized Gain/(Loss)	Earned Income /Net Earnings
Federal Agencies	3130A3QU1	FHLB NT CALL	8,000,000	0.75	0.75	12/30/14	12/30/16	5,000	-	-	5,000
Federal Agencies	3130A3QU1	FHLB NT CALL	50,000,000	0.75	0.75	12/30/14	12/30/16	31,250	-	-	31,250
Federal Agencies	3134G33C2	FHLMC NT	50,000,000	0.60	0.60	1/3/13	1/3/17	25,000	-	-	25,000
Federal Agencies	3133ECB37	FFCB NT	14,000,000	0.58	0.58	12/20/12	1/12/17	6,767	-	-	6,767
Federal Agencies	31315PWW5	FARMER MAC MTN	49,500,000	1.01	1.02	5/4/12	1/17/17	41,663	446	-	42,109
Federal Agencies	3133EDRD6	FFCB FLT QTR T-BILL+14	50,000,000	0.17	0.18	12/12/14	1/30/17	7,164	739	-	7,904
Federal Agencies	3134G5X91	FHLMC CALL MTN	25,000,000	0.90	0.90	1/30/15	1/30/17	625	-	-	625
Federal Agencies	3133786Q9	FHLB NT	67,780,000	1.00	0.72	1/10/13	2/13/17	56,483	(15,893)	-	40,590
Federal Agencies	3133EDFW7	FFCB FLT NT 1ML+5.5	50,000,000	0.22	0.22	2/27/14	2/27/17	9,654	-	-	9,654
Federal Agencies	3133782N0	FHLB	50,000,000	0.88	0.82	12/15/14	3/10/17	36,458	(2,222)	-	34,236
Federal Agencies	3133EDP30	FARMER MAC FLT NT 1ML+4	26,000,000	0.21	0.19	10/3/14	3/24/17	4,642	(321)	-	4,321
Federal Agencies	3134G4XM5	FHLMC CALL MTN	25,000,000	0.78	0.78	3/28/14	3/28/17	16,250	-	-	16,250
Federal Agencies	3136G1ZB8	FNMA CALL NT	25,000,000	0.88	0.88	3/28/14	3/28/17	18,229	-	-	18,229
Federal Agencies	3133EDZW5	FFCB FLT NT 1ML+2	25,000,000	0.19	0.19	10/29/14	3/29/17	4,076	9	-	4,085
Federal Agencies	31315PTQ2	FARMER MAC MTN	12,500,000	1.26	1.36	4/10/12	4/10/17	13,125	1,031	-	14,156
Federal Agencies	3133ECLL6	FFCB NT	10,000,000	0.60	0.60	4/17/13	4/17/17	5,000	-	-	5,000
Federal Agencies	31315PUQ0	FARMER MAC MTN	10,500,000	1.13	1.13	4/26/12	4/26/17	9,844	-	-	9,844
Federal Agencies	3137EADF3	FHLMC NT	25,000,000	1.25	1.14	5/14/12	5/12/17	26,042	(2,260)	-	23,781
Federal Agencies	3136FTR27	FNMA CALL NT	17,000,000	1.02	1.03	9/4/14	5/24/17	14,507	133	-	14,639
Federal Agencies	31315PZQ5	FARMER MAC MTN	9,000,000	1.11	0.80	12/28/12	6/5/17	8,325	(2,337)	-	5,988
Federal Agencies	313379FW4	FHLB	12,000,000	1.00	0.93	12/19/14	6/9/17	10,000	(713)	-	9,287
Federal Agencies	3130A3SL9	FHLB	25,000,000	0.95	1.02	12/30/14	6/15/17	19,792	1,389	-	21,181
Federal Agencies	3133EAUW6	FFCB FLT NT FF+22	50,000,000	0.34	0.34	6/19/12	6/19/17	14,553	-	-	14,553
Federal Agencies	3133EEGH7	FFCB	8,400,000	0.93	0.94	12/26/14	6/26/17	6,510	91	-	6,601
Federal Agencies	3137EADH9	FHLMC GLOBAL NT	25,000,000	1.00	1.10	3/25/14	6/29/17	20,833	2,064	-	22,898
Federal Agencies	3134G5VV4	FHLMC CALL MTN	25,000,000	1.05	1.05	12/30/14	6/30/17	21,875	-	-	21,875
Federal Agencies	3134G5W50	FHLMC	50,000,000	1.00	1.00	12/30/14	6/30/17	41,667	-	-	41,667
Federal Agencies	3134G5VV4	FHLMC CALL MTN	25,000,000	1.05	1.05	12/30/14	6/30/17	21,875	-	-	21,875
Federal Agencies	3133ECV92	FFCB FLT NT 1ML+4	50,000,000	0.21	0.21	7/24/13	7/24/17	8,926	-	-	8,926
Federal Agencies	3134G3ZH6	FHLMC EX-CALL MTN	19,000,000	1.00	1.01	4/15/14	7/25/17	15,833	123	-	15,956
Federal Agencies	3133ECVG6	FFCB FLT NT 3ML+0	23,520,000	0.26	0.26	8/5/13	7/26/17	4,957	-	-	4,957
Federal Agencies	3133EEFX3	FFCB FLT 1ML+5	50,000,000	0.22	0.22	12/23/14	8/23/17	9,256	-	-	9,256
Federal Agencies	3134G5HS7	FHLMC CALL MTN	20,100,000	1.13	1.16	9/25/14	9/25/17	18,844	569	-	19,412
Federal Agencies	3136G0D81	FNMA STEP NT	100,000,000	0.72	0.72	9/27/12	9/27/17	60,000	-	-	60,000
Federal Agencies	3137EADL0	FHLMC GLOBAL NT	25,000,000	1.00	1.22	3/25/14	9/29/17	20,833	4,631	-	25,465
Federal Agencies	3136G0Y39	FNMA STEP NT	50,000,000	0.80	0.80	11/8/12	11/8/17	33,333	-	-	33,333
Federal Agencies	3133EEBR0	FFCB FLT NT 1ML+3	25,000,000	0.20	0.21	11/18/14	11/13/17	4,186	318	-	4,504
Federal Agencies	3134G44F2	FHLMC CALL MTN	50,000,000	0.80	0.80	5/21/13	11/21/17	33,333	-	-	33,333
Federal Agencies	3134G5NE1	FHLMC CALL STEP	25,000,000	0.50	0.50	11/24/14	11/24/17	10,417	-	-	10,417
Federal Agencies	3134G5NE1	FHLMC CALL STEP	11,200,000	0.50	0.53	11/24/14	11/24/17	4,667	238	-	4,904
Federal Agencies	31315PJ83	FARMER MAC FLT CALL 1ML+17	25,000,000	0.34	0.34	12/1/14	12/1/17	7,073	-	-	7,073

Monthly Investment Earnings
Pooled Fund

Type of Investment	CUSIP	Issue Name	Par Value	Coupon	YTM[1]	Settle Date	Maturity Date	Earned Interest	Amort. Expense	Realized Gain/(Loss)	Earned Income /Net Earnings
Federal Agencies	3130A3HF4	FHLB	25,000,000	1.13	1.19	12/22/14	12/8/17	23,438	1,275	-	24,712
Federal Agencies	3133EEFE5	FFCB	50,000,000	1.13	1.12	12/18/14	12/18/17	46,875	(354)	-	46,521
Federal Agencies	3133EEFE5	FFCB	50,000,000	1.13	1.18	12/19/14	12/18/17	46,875	2,421	-	49,296
Federal Agencies	31315PZ28	FAMCA MTN	46,000,000	1.20	1.20	12/22/14	12/22/17	46,000	-	-	46,000
Federal Agencies	3136G13T4	FNMA STEP NT	39,000,000	0.80	0.80	12/26/12	12/26/17	26,000	-	-	26,000
Federal Agencies	3136G13Q0	FNMA STEP NT	29,000,000	0.75	0.75	12/26/12	12/26/17	18,125	-	-	18,125
Federal Agencies	3134G32M1	FHLMC CALL NT	50,000,000	1.00	1.00	12/28/12	12/28/17	41,667	-	-	41,667
Federal Agencies	3134G5VA0	FHLMC CALL MTN	25,000,000	1.25	1.25	12/29/14	12/29/17	26,042	-	-	26,042
Federal Agencies	31315P4S5	FARMER MAC FLT CALL 1ML+16	50,000,000	0.33	0.33	1/5/15	1/5/18	11,962	-	-	11,962
Federal Agencies	3134G5XM2	FHLMC CALL STEP NT	25,000,000	0.50	0.50	1/30/15	1/30/18	347	-	-	347
Federal Agencies	3133EEAN0	FFCB FLT NT 1ML+4	25,000,000	0.21	0.21	11/5/14	2/5/18	4,508	-	-	4,508
Federal Agencies	3133EEAN0	FFCB FLT NT 1ML+4	25,000,000	0.21	0.22	11/5/14	2/5/18	4,508	215	-	4,723
Federal Agencies	3133EEAN0	FFCB FLT NT 1ML+4	50,000,000	0.21	0.22	11/5/14	2/5/18	9,016	429	-	9,445
Federal Agencies	3135G0UN1	FNMA GLOBAL NT CALL	19,000,000	1.15	1.32	2/26/14	2/28/18	18,208	2,597	-	20,805
Federal Agencies	3135G0UN1	FNMA GLOBAL NT CALL	8,770,000	1.15	1.32	2/26/14	2/28/18	8,405	1,199	-	9,603
Federal Agencies	3130A35B6	FHLB FLT CALL NT 1ML+23	50,000,000	0.40	0.40	10/2/14	4/2/18	16,644	-	-	16,644
Federal Agencies	3136G1KN8	FNMA NT CALL	50,000,000	1.50	1.13	4/24/13	4/24/18	62,500	(38,347)	-	24,153
Federal Agencies	3136G1K81	FNMA NT STEP	12,600,000	0.75	0.75	4/30/13	4/30/18	7,875	-	-	7,875
Federal Agencies	31315PZM4	FARMER MAC STEP NT	24,600,000	0.70	0.70	5/3/13	5/3/18	14,350	-	-	14,350
Federal Agencies	313382XK4	FHLB STEP NT	25,000,000	0.75	0.75	5/7/13	5/7/18	15,625	-	-	15,625
Federal Agencies	3133ECPB4	FFCB NT	10,000,000	0.88	1.01	5/23/13	5/14/18	7,292	1,116	-	8,407
Federal Agencies	3135G0WJ8	FNMA NT	25,000,000	0.88	1.05	5/23/13	5/21/18	18,229	3,629	-	21,858
Federal Agencies	3133834P3	FHLB STEP NT	50,000,000	0.50	0.50	5/22/13	5/22/18	20,833	-	-	20,833
Federal Agencies	31315P4W6	FARMER MAC FLT CALL	25,000,000	0.37	0.37	6/6/14	6/6/18	7,611	-	-	7,611
Federal Agencies	3134G52D6	FHLMC CALL MTN	25,000,000	1.64	1.64	4/17/14	7/17/18	34,167	-	-	34,167
Federal Agencies	3134G5ZP3	FHLMC CALL STEP NT	25,000,000	0.75	0.75	1/27/15	7/27/18	2,083	-	-	2,083
Federal Agencies	3134G5ZZ1	FHLMC STEP CALL MTN	25,000,000	1.00	1.00	1/30/15	7/30/18	694	-	-	694
Federal Agencies	3134G4LZ9	FHLMC CALL STEP	50,000,000	0.88	0.88	12/10/13	12/10/18	36,458	-	-	36,458
Federal Agencies	3134G4MB1	FHLMC CALL MULTI-STEP	25,000,000	1.50	1.50	12/18/13	12/18/18	31,250	-	-	31,250
Federal Agencies	3136G2C39	FNMA CALL NT	15,000,000	1.63	1.63	12/30/14	12/28/18	20,313	-	-	20,313
Federal Agencies	31315PQ69	FARMER MAC FLT CALL NT 3ML+15	50,000,000	0.41	0.41	4/3/14	4/3/19	16,836	-	-	16,836
Federal Agencies	31315PE47	FARMER MAC FLT CALL NT 1ML+31	25,000,000	0.48	0.48	11/3/14	5/3/19	10,007	-	-	10,007
Federal Agencies	31315P3W7	FARMER MAC FLT CALL	50,000,000	0.38	0.38	6/3/14	6/3/19	16,025	-	-	16,025
Federal Agencies	31315PS91	FARMER MAC FLT CALL NT 3ML+12	50,000,000	0.35	0.35	8/12/14	8/12/19	14,713	-	-	14,713
Federal Agencies	3130A2UF1	FHLB FLT CALL NT 3ML+20	25,000,000	0.44	0.44	8/27/14	8/27/19	9,083	-	-	9,083
Federal Agencies	3130A35A8	FHLB FLT CALL NT 1ML+40	50,000,000	0.57	0.57	10/2/14	10/2/19	23,728	-	-	23,728
Federal Agencies	313586RC5	FNMA 0 CPN	29,675,000	0.00	2.18	11/21/14	10/9/19	-	51,723	-	51,723
Federal Agencies	313586RC5	FNMA 0 CPN	25,000,000	0.00	2.17	11/24/14	10/9/19	-	43,561	-	43,561
Federal Agencies	313586RC5	FNMA 0 CPN	10,000,000	0.00	2.16	11/24/14	10/9/19	-	17,325	-	17,325
Federal Agencies	31315PJ26	FARMER MAC FLT CALL 3ML+12	50,000,000	0.35	0.35	12/2/14	12/2/19	14,733	-	-	14,733
Subtotals			**$ 4,507,887,000**					**$ 3,102,966**	**$ (326,950)**	**$ 30,000**	**$ 2,806,016**

Monthly Investment Earnings
Pooled Fund

Type of Investment	CUSIP	Issue Name	Par Value	Coupon	YTM[1]	Settle Date	Maturity Date	Earned Interest	Amort. Expense	Realized Gain/(Loss)	Earned Income /Net Earnings
State/Local Agencies	13063BN65	CALIFORNIA ST TAXABLE GO BD	$ 10,000,000	0.85	0.64	3/27/13	2/1/15	$ 7,083	$ (1,743)	$ -	$ 5,341
State/Local Agencies	649791JS0	NEW YORK ST TAXABLE GO	4,620,000	0.39	0.40	3/21/13	3/1/15	1,502	40	-	1,542
State/Local Agencies	91412GPW9	UNIV OF CALIFORNIA REVENUE BC	5,000,000	0.39	0.39	3/14/13	5/15/15	1,633	-	-	1,633
State/Local Agencies	612574DQ3	MONTEREY COMM COLLEGE GO	315,000	0.63	0.63	5/7/13	8/1/15	165	-	-	165
State/Local Agencies	13063BHZ8	CALIFORNIA ST TAXABLE GO BD	5,000,000	3.95	0.35	8/19/14	11/1/15	16,458	(15,203)	-	1,255
State/Local Agencies	64966GXS6	NEW YORK CITY TAXABLE GO	12,255,000	5.13	0.66	4/1/13	12/1/15	52,390	(46,006)	-	6,384
State/Local Agencies	13063BN73	CALIFORNIA ST TAXABLE GO BD	11,000,000	1.05	0.91	3/27/13	2/1/16	9,625	(1,107)	-	8,518
State/Local Agencies	13063BN73	CALIFORNIA ST GO BD	7,000,000	1.05	0.48	12/19/14	2/1/16	6,125	(3,358)	-	2,767
State/Local Agencies	91412GUT0	UNIV OF CALIFORNIA REVENUE	2,500,000	0.63	0.63	4/10/14	5/15/16	1,321	-	-	1,321
State/Local Agencies	612574DR1	MONTEREY COMM COLLEGE GO	2,670,000	0.98	0.98	5/7/13	8/1/16	2,185	-	-	2,185
State/Local Agencies	13063CPM6	CALIFORNIA ST TAXABLE GO BD	44,000,000	0.75	0.69	12/9/14	11/1/16	27,500	(2,067)	-	25,433
State/Local Agencies	91412GUU7	UNIV OF CALIFORNIA REVENUE BD	3,250,000	1.22	1.22	4/10/14	5/15/17	3,310	-	-	3,310
State/Local Agencies	13063CFC9	CALIFORNIA ST GO BD	16,500,000	1.75	1.66	11/5/13	11/1/17	24,063	(1,253)	-	22,809
State/Local Agencies	13063CPN4	CALIFORNIA ST GO BD	50,000,000	1.25	1.17	11/25/14	11/1/17	52,083	(3,514)	-	48,570
State/Local Agencies	13063CPN4	CALIFORNIA ST GO BD	5,000,000	1.25	1.22	12/22/14	11/1/17	5,208	(135)	-	5,073
Subtotals			**$ 179,110,000**					**$ 210,652**	**$ (74,346)**	**$ -**	**$ 136,306**
Public Time Deposits		TRANS PACIFIC NATIONAL BANK P	$ 240,000	0.46	0.46	2/7/14	2/7/15	$ 95	$ -	$ -	$ 95
Public Time Deposits		BANK OF SAN FRANCISCO PTD	240,000	0.45	0.45	4/9/14	4/9/15	93	-	-	93
Subtotals			**$ 480,000**					**$ 188**	**$ -**	**$ -**	**$ 188**
Negotiable CDs	78009NGU4	ROYAL BANK OF CANADA NY YCD	$ 5,500,000	0.35	0.45	5/19/14	6/25/15	$ 1,625	$ 212	$ -	$ 1,837
Negotiable CDs	78009NSA5	ROYAL BANK OF CANADA NY YCD	25,000,000	0.33	0.33	9/16/14	3/10/16	7,096	-	-	7,096
Negotiable CDs	06417HHL3	BANK OF NOVA SCOTIA FLT 3ML+2	10,000,000	0.48	0.47	4/3/14	3/22/16	4,108	(13)	-	4,096
Negotiable CDs	96121TWJ3	WESTPAC FLT YCD 3ML+15	25,000,000	0.41	0.41	4/24/14	4/25/16	8,352	-	-	8,352
Negotiable CDs	96121TWK0	WESTPAC FLT YCD 1ML+22	50,000,000	0.39	0.39	4/24/14	4/25/16	16,673	-	-	16,673
Negotiable CDs	06417HKT2	BANK OF NOVA SCOTIA YCD 3ML+1	50,000,000	0.42	0.45	5/9/14	5/9/16	18,152	888	-	19,041
Negotiable CDs	06417HUW4	BANK OF NOVA SCOTIA FLT 3ML+2	50,000,000	0.45	0.45	9/25/14	9/23/16	19,465	-	-	19,465
Negotiable CDs	06417HVR4	BANK OF NOVA SCOTIA YCD 3ML+2	50,000,000	0.45	0.45	10/7/14	10/7/16	19,347	-	-	19,347
Negotiable CDs	78009NSX5	ROYAL BANK OF CANADA YCD 3ML	100,000,000	0.42	0.42	12/15/14	12/15/16	36,218	-	-	36,218
Negotiable CDs	06417HUR5	BANK OF NOVA SCOTIA YCD 3ML+2	50,000,000	0.52	0.52	9/25/14	9/25/17	22,587	-	-	22,587
Subtotals			**$ 415,500,000**					**$ 153,624**	**$ 1,088**	**$ -**	**$ 154,712**
Commercial Paper	06538CNG2	BANK OF TOKYO-MITSUBISHI UFJ C	$ -	0.00	0.17	12/16/14	1/16/15	$ 17,708	$ -	$ -	$ 17,708
Commercial Paper	47816GNT2	JOHNSON & JOHNSON CP	-	0.00	0.10	1/12/15	1/27/15	1,042	-	-	1,042
Commercial Paper	06538CNW7	BANK OF TOKYO-MITSUBISHI UFJ C	-	0.00	0.15	1/23/15	1/30/15	2,917	-	-	2,917
Commercial Paper	89116FNW6	TD HOLDINGS USA CP	-	0.00	0.12	1/23/15	1/30/15	2,333	-	-	2,333
Commercial Paper	06538CP62	BANK OF TOKYO-MITSUBISHI UFJ C	100,000,000	0.00	0.10	1/30/15	2/6/15	556	-	-	556
Subtotals			**$ 100,000,000**					**$ 24,556**	**$ -**	**$ -**	**$ 24,556**

Monthly Investment Earnings

Pooled Fund

Type of Investment	CUSIP	Issue Name	Par Value	Coupon	YTM[1]	Settle Date	Maturity Date	Earned Interest	Amort. Expense	Realized Gain/(Loss)	Earned Income /Net Earnings
Medium Term Notes	36962G5M2	GE CAPITAL CORP MTN	$ -	2.15	0.77	7/12/13	1/9/15	$ 41,960	$ (26,276)	$ -	$ 15,684
Medium Term Notes	36962G5M2	GE CAPITAL CORP MTN	-	2.15	0.59	8/7/13	1/9/15	2,303	(1,641)	-	662
Medium Term Notes	36962G5M2	GE CAPITAL CORP MTN	-	2.15	0.29	12/16/13	1/9/15	13,255	(11,274)	-	1,981
Medium Term Notes	36962G6T6	GE FLT NT 3ML+38	-	0.61	0.61	1/10/13	1/9/15	3,395	-	-	3,395
Medium Term Notes	46625HHP8	JP MORGAN CHASE MTN	-	3.70	0.51	2/18/14	1/20/15	33,070	(28,059)	-	5,012
Medium Term Notes	46625HHP8	JP MORGAN CHASE MTN	-	3.70	0.48	3/17/14	1/20/15	44,094	(37,515)	-	6,579
Medium Term Notes	89233P7H3	TOYOTA MTN 3ML+17	-	0.40	0.40	1/23/13	1/23/15	8,568	-	-	8,568
Medium Term Notes	89233P7L4	TOYOTA MTN FIX-TO-FLOAT	25,000,000	0.33	0.33	2/4/13	2/4/15	6,919	-	-	6,919
Medium Term Notes	717081DA8	PFIZER MTN	3,000,000	5.35	0.44	12/9/13	3/15/15	13,375	(12,498)	-	877
Medium Term Notes	89236TAG0	TOYOTA MOTOR CREDIT CORP 3MI	50,000,000	0.40	0.40	4/12/13	4/8/15	17,090	-	-	17,090
Medium Term Notes	64952WAW3	NEW YORK LIFE MTN	5,000,000	3.00	0.26	9/22/14	5/4/15	12,500	(11,660)	-	840
Medium Term Notes	459200HD6	IBM MTN	5,425,000	0.75	0.27	12/19/13	5/11/15	3,391	(2,188)	-	1,202
Medium Term Notes	36962G5Z3	GE CAPITAL CORP MTN	5,000,000	1.63	0.81	8/19/13	7/2/15	6,771	(3,420)	-	3,350
Medium Term Notes	36962G4M3	GE CAPITAL CORP FLT MTN 3ML+7!	8,565,000	1.00	-0.40	11/25/13	7/9/15	7,113	(3,145)	-	3,968
Medium Term Notes	89233P6J0	TOYOTA MTN	10,000,000	0.88	0.44	11/15/13	7/17/15	7,292	(3,665)	-	3,627
Medium Term Notes	89233P6J0	TOYOTA MTN	6,100,000	0.88	0.30	3/4/14	7/17/15	4,448	(2,969)	-	1,479
Medium Term Notes	594918AG9	MICROSOFT MTN	3,186,000	1.63	0.39	10/30/13	9/25/15	4,314	(3,313)	-	1,002
Medium Term Notes	961214BW2	WESTPAC NT	10,152,000	1.13	0.35	9/15/14	9/25/15	9,518	(6,630)	-	2,888
Medium Term Notes	369604BE2	GENERAL ELECTRIC MTN	10,000,000	0.85	0.42	3/5/14	10/9/15	7,083	(3,669)	-	3,414
Medium Term Notes	369604BE2	GENERAL ELECTRIC MTN	8,000,000	0.85	0.46	5/7/14	10/9/15	5,667	(2,604)	-	3,063
Medium Term Notes	369604BE2	GENERAL ELECTRIC MTN	9,300,000	0.85	0.40	5/19/14	10/9/15	6,588	(3,558)	-	3,029
Medium Term Notes	06366RJH9	BANK OF MONTREAL MTN	8,500,000	0.80	0.56	3/27/14	11/6/15	5,667	(1,709)	-	3,958
Medium Term Notes	36962G4T8	GE CAPITAL CORP MTN	7,000,000	2.25	0.48	5/12/14	11/9/15	13,125	(10,441)	-	2,684
Medium Term Notes	742718DS5	PROCTER & GAMBLE MTN	23,025,000	1.80	0.34	3/7/14	11/15/15	34,538	(28,274)	-	6,264
Medium Term Notes	742718DS5	PROCTER & GAMBLE MTN	10,000,000	1.80	0.41	3/12/14	11/15/15	15,000	(11,727)	-	3,273
Medium Term Notes	459200GU9	IBM CORP NT	19,579,000	2.00	0.48	2/11/14	1/5/16	32,632	(25,084)	-	7,548
Medium Term Notes	064255AK8	BTMUFJ FLT MTN 3ML+45	10,000,000	0.68	0.40	3/17/14	2/26/16	5,893	(1,561)	-	4,332
Medium Term Notes	36962G2V5	GE FLT MTN 3ML+20	17,689,000	0.43	0.38	5/19/14	5/11/16	6,597	(614)	-	5,983
Medium Term Notes	89114QAL2	TORONTO-DOMINION BANK 3ML+4(	18,930,000	0.70	0.43	12/15/14	9/9/16	11,339	(4,211)	-	7,127
Medium Term Notes	89236TBU8	TOYOTA MOTOR CREDIT CORP 3MI	50,000,000	0.35	0.35	9/23/14	9/23/16	15,160	-	-	15,160
Medium Term Notes	89236TBU8	TOYOTA MOTOR CREDIT CORP 3MI	14,150,000	0.35	0.37	12/9/14	9/23/16	4,290	221	-	4,512
Medium Term Notes	89236TBV6	TOYOTA MOTOR CREDIT CORP FF-	47,500,000	0.36	0.36	9/25/14	9/23/16	14,889	-	-	14,889
Medium Term Notes	9612E0DB0	WESTPAC FLT MTN 1ML+25	50,000,000	0.42	0.42	10/10/14	10/7/16	17,907	-	-	17,907
Medium Term Notes	36967FAB7	GENERAL ELEC CAP CORP FLT 3MI	20,000,000	0.53	0.53	1/9/15	1/9/17	6,799	-	-	6,799
Subtotals			**$ 455,101,000**					**$ 442,547**	**$ (247,483)**	**$ -**	**$ 195,063**
Money Market Funds	61747C707	MS INSTL GOVT FUND	$ 10,089,205	0.04	0.04	1/30/15	2/1/15	$ 644	$ -	$ -	$ 644
Money Market Funds	09248U718	BLACKROCK T-FUND INSTL	10,001,087	0.03	0.03	1/30/15	2/1/15	249	-	-	249
Money Market Funds	316175108	FIDELITY INSTL GOVT PORT	5,003,797	0.01	0.01	1/30/15	2/1/15	43	-	-	43
Subtotals			**$ 25,094,089**					**$ 936**	**$ -**	**$ -**	**$ 936**
Grand Totals			**$ 6,268,172,089**					**$ 4,535,877**	**$ (738,670)**	**$ 126,680**	**$ 3,923,887**

[1] Yield to maturity is calculated at purchase

Investment Transactions

Pooled Fund

For month ended January 31, 2015

Transaction	Settle Date	Maturity	Type of Investment	Issuer Name	CUSIP	Par Value	Coupon	YTM	Price	Interest	Transaction
Purchase	1/2/2015	2/1/2015	Money Market Funds	BLACKROCK T-FUND INSTL	09248U718	$ 702	0.03	0.03	$ 100.00	$ -	$ 702
Purchase	1/5/2015	1/5/2018	Federal Agencies	FARMER MAC FLT CALL 1ML+	31315P4S5	50,000,000	0.17	0.17	100.00	-	50,000,000
Purchase	1/9/2015	1/9/2017	Medium Term Notes	GENERAL ELEC CAP CORP FL	36967FAB7	20,000,000	0.53	0.53	100.00	-	20,000,000
Purchase	1/9/2015	9/28/2016	Federal Agencies	FHLB NT CALL	3130A1CD8	25,000,000	1.13	0.80	100.55	78,906	25,216,406
Purchase	1/12/2015	1/27/2015	Commercial Paper	JOHNSON & JOHNSON CP	47816GNT2	25,000,000	0.00	0.10	100.00	-	24,998,958
Purchase	1/23/2015	1/30/2015	Commercial Paper	BANK OF TOKYO-MITSUBISHI	06538CNW7	100,000,000	0.00	0.15	100.00	-	99,997,083
Purchase	1/23/2015	1/30/2015	Commercial Paper	TD HOLDINGS USA CP	89116FNW6	100,000,000	0.00	0.12	100.00	-	99,997,667
Purchase	1/27/2015	7/27/2018	Federal Agencies	FHLMC CALL STEP NT	3134G5ZP3	25,000,000	0.75	0.75	100.00	-	25,000,000
Purchase	1/30/2015	1/30/2017	Federal Agencies	FHLMC CALL MTN	3134G5X91	25,000,000	0.90	0.90	100.00	-	25,000,000
Purchase	1/30/2015	1/30/2018	Federal Agencies	FHLMC CALL STEP NT	3134G5XM2	25,000,000	0.50	0.50	100.00	-	25,000,000
Purchase	1/30/2015	2/1/2015	Money Market Funds	MS INSTL GOVT FUND	61747C707	644	0.04	0.04	100.00	-	644
Purchase	1/30/2015	2/1/2015	Money Market Funds	FIDELITY INSTL GOVT PORT	316175108	43	0.01	0.01	100.00	-	43
Purchase	1/30/2015	2/6/2015	Commercial Paper	BANK OF TOKYO-MITSUBISHI	06538CP62	100,000,000	0.00	0.10	100.00	-	99,998,056
Purchase	1/30/2015	7/30/2018	Federal Agencies	FHLMC STEP CALL MTN	3134G5ZZ1	25,000,000	1.00	1.00	100.00	-	25,000,000
Subtotals						**$ 520,001,389**	**0.24**	**0.30**	**$ 100.02**	**$ 78,906**	**$ 520,209,559**
Sale	1/9/2015	1/25/2016	Federal Agencies	FARMER MAC MTN	31315P3B3	$ 30,000,000	0.42	0.42	$ 100.10	$ 57,400	$ 30,087,400
Sale	1/12/2015	2/1/2015	Money Market Funds	MS INSTL GOVT FUND	61747C707	25,000,000	0.04	0.04	100.00	-	25,000,000
Sale	1/15/2015	10/31/2016	U.S. Treasuries	US TSY NT	912828F88	25,000,000	0.38	0.52	99.89	19,682	24,992,339
Sale	1/16/2015	12/31/2017	U.S. Treasuries	US TSY NT	912828UE8	50,000,000	0.75	0.80	99.88	16,575	49,954,075
Subtotals						**$ 130,000,000**	**0.47**	**0.51**	**$ 99.95**	**$ 93,657**	**$ 130,033,813**
Maturity	1/9/2015	1/9/2015	Medium Term Notes	GE FLT NT 3ML+38	36962G6T6	$ 25,000,000	0.61	0.61	$ 100.00	$ 39,043	$ 25,039,043
Maturity	1/9/2015	1/9/2015	Medium Term Notes	GE CAPITAL CORP MTN	36962G5M2	87,824,000	2.15	0.77	100.00	944,108	88,768,108
Maturity	1/9/2015	1/9/2015	Medium Term Notes	GE CAPITAL CORP MTN	36962G5M2	4,820,000	2.15	0.59	100.00	51,815	4,871,815
Maturity	1/9/2015	1/9/2015	Medium Term Notes	GE CAPITAL CORP MTN	36962G5M2	27,743,000	2.15	0.29	100.00	298,237	28,041,237
Maturity	1/16/2015	1/16/2015	Commercial Paper	BANK OF TOKYO-MITSUBISHI	06538CNG2	250,000,000	0.00	0.17	100.00	-	250,000,000
Maturity	1/20/2015	1/20/2015	Medium Term Notes	JP MORGAN CHASE MTN	46625HHP8	16,935,000	3.70	0.51	100.00	313,298	17,248,298
Maturity	1/20/2015	1/20/2015	Medium Term Notes	JP MORGAN CHASE MTN	46625HHP8	22,580,000	3.70	0.48	100.00	417,730	22,997,730
Maturity	1/23/2015	1/23/2015	Medium Term Notes	TOYOTA MTN 3ML+17	89233P7H3	35,000,000	0.40	0.40	100.00	35,831	35,035,831
Maturity	1/27/2015	1/27/2015	Commercial Paper	JOHNSON & JOHNSON CP	47816GNT2	25,000,000	0.00	0.10	100.00	-	25,000,000
Maturity	1/30/2015	1/30/2015	Commercial Paper	BANK OF TOKYO-MITSUBISHI	06538CNW7	100,000,000	0.00	0.15	100.00	-	100,000,000
Maturity	1/30/2015	1/30/2015	Commercial Paper	TD HOLDINGS USA CP	89116FNW6	100,000,000	0.00	0.12	100.00	-	100,000,000
Subtotals						**$ 694,902,000**	**0.63**	**0.29**	**$ 100.00**	**$ 2,100,062**	**$ 697,002,062**
Interest	1/1/2015	4/1/2016	Federal Agencies	FAMCA FLT MTN 1ML+0	31315PTF6	$ 50,000,000	0.16	0.16	$ -	$ -	$ 6,674
Interest	1/1/2015	12/1/2017	Federal Agencies	FARMER MAC FLT CALL 1ML+	31315PJ83	25,000,000	0.33	0.33	-	-	6,771
Interest	1/2/2015	2/1/2015	Money Market Funds	BLACKROCK T-FUND INSTL	09248U718	10,001,087	0.03	0.03	-	-	702
Interest	1/2/2015	4/2/2018	Federal Agencies	FHLB FLT CALL NT 1ML+23	3130A35B6	50,000,000	0.38	0.38	-	-	16,000
Interest	1/2/2015	6/2/2016	Federal Agencies	FFCB FLT NT 1ML+3	3133EDB35	50,000,000	0.18	0.20	-	-	7,922
Interest	1/2/2015	7/2/2015	Medium Term Notes	GE CAPITAL CORP MTN	36962G5Z3	5,000,000	1.63	0.81	-	-	40,625
Interest	1/2/2015	10/2/2019	Federal Agencies	FHLB FLT CALL NT 1ML+40	3130A35A8	50,000,000	0.55	0.55	-	-	23,083
Interest	1/3/2015	1/3/2017	Federal Agencies	FHLMC NT	3134G33C2	50,000,000	0.60	0.60	-	-	150,000
Interest	1/3/2015	4/3/2019	Federal Agencies	FARMER MAC FLT CALL NT 3	31315PQ69	50,000,000	0.38	0.38	-	-	47,825
Interest	1/3/2015	5/3/2019	Federal Agencies	FARMER MAC FLT CALL NT 1	31315PE47	25,000,000	0.47	0.47	-	-	9,745
Interest	1/5/2015	1/5/2016	Medium Term Notes	IBM CORP NT	459200GU9	19,579,000	2.00	0.48	-	-	195,790

Investment Transactions
Pooled Fund

Transaction	Settle Date	Maturity	Type of Investment	Issuer Name	CUSIP	Par Value	Coupon	YTM	Price	Interest	Transaction
Interest	1/5/2015	2/5/2018	Federal Agencies	FFCB FLT NT 1ML+4	3133EEAN0	25,000,000	0.20	0.20	-	-	4,241
Interest	1/5/2015	2/5/2018	Federal Agencies	FFCB FLT NT 1ML+4	3133EEAN0	25,000,000	0.20	0.21	-	-	4,241
Interest	1/5/2015	2/5/2018	Federal Agencies	FFCB FLT NT 1ML+4	3133EEAN0	50,000,000	0.20	0.21	-	-	8,482
Interest	1/5/2015	7/5/2016	Federal Agencies	FNMA GLOBAL NT	3135G0XP3	50,000,000	0.38	0.59	-	-	93,750
Interest	1/7/2015	10/7/2016	Medium Term Notes	WESTPAC FLT MTN 1ML+25	9612E0DB0	50,000,000	0.41	0.41	-	-	16,967
Interest	1/7/2015	10/7/2016	Negotiable CDs	BANK OF NOVA SCOTIA YCD	06417HVR4	50,000,000	0.43	0.43	-	-	55,149
Interest	1/8/2015	4/8/2015	Medium Term Notes	TOYOTA MOTOR CREDIT CORP	89236TAG0	50,000,000	0.38	0.38	-	-	48,888
Interest	1/9/2015	4/9/2015	Public Time Deposits	BANK OF SAN FRANCISCO PT	XBKSF1504	240,000	0.45	0.45	-	-	276
Interest	1/9/2015	7/9/2015	Medium Term Notes	GE CAPITAL CORP FLT MTN	36962G4M3	8,565,000	0.98	0.05	-	-	21,008
Interest	1/11/2015	10/11/2016	Federal Agencies	FFCB FLT NT 1ML+2	3133EDJA1	25,000,000	0.18	0.19	-	-	3,843
Interest	1/12/2015	1/12/2017	Federal Agencies	FFCB NT	3133ECB37	14,000,000	0.58	0.58	-	-	40,600
Interest	1/12/2015	3/10/2016	Negotiable CDs	ROYAL BANK OF CANADA NY	78009NSA5	25,000,000	0.33	0.33	-	-	7,487
Interest	1/13/2015	11/13/2017	Federal Agencies	FFCB FLT NT 1ML+3	3133EEBR0	25,000,000	0.19	0.21	-	-	4,108
Interest	1/14/2015	5/14/2015	Federal Agencies	FFCB FLT NT 1ML+1	3133EAQC5	50,000,000	0.17	0.24	-	-	7,354
Interest	1/14/2015	9/14/2016	Federal Agencies	FFCB FLT NT 1ML+2	3133EDH21	50,000,000	0.18	0.19	-	-	7,784
Interest	1/17/2015	1/17/2017	Federal Agencies	FARMER MAC MTN	31315PWW5	49,500,000	1.01	1.02	-	-	249,975
Interest	1/17/2015	7/17/2015	Medium Term Notes	TOYOTA MTN	89233P6J0	10,000,000	0.88	0.44	-	-	43,750
Interest	1/17/2015	7/17/2015	Medium Term Notes	TOYOTA MTN	89233P6J0	6,100,000	0.88	0.30	-	-	26,688
Interest	1/17/2015	7/17/2018	Federal Agencies	FHLMC CALL MTN	3134G52D6	25,000,000	1.64	1.64	-	-	205,000
Interest	1/19/2015	11/19/2015	Federal Agencies	FFCB FLT NT MONTHLY 1ML+	3133ECLZ5	25,000,000	0.16	0.18	-	-	3,533
Interest	1/20/2015	1/20/2016	Federal Agencies	FFCB FLT	3133ED5A6	50,000,000	0.17	0.17	-	-	7,124
Interest	1/22/2015	6/22/2015	Federal Agencies	FFCB FLT NT 1ML+2	3133EAVE5	50,000,000	0.19	0.24	-	-	7,985
Interest	1/22/2015	7/22/2015	Federal Agencies	FAMCA	31315PDZ9	15,000,000	2.38	0.32	-	-	178,125
Interest	1/22/2015	9/22/2015	Federal Agencies	FFCB FLT NT 1ML+2.5	3133EAJF6	27,953,000	0.19	0.25	-	-	4,584
Interest	1/23/2015	8/23/2017	Federal Agencies	FFCB FLT 1ML+5	3133EEFX3	50,000,000	0.21	0.21	-	-	9,225
Interest	1/24/2015	3/24/2017	Federal Agencies	FARMER MAC FLT NT 1ML+4	3133EDP30	26,000,000	0.21	0.19	-	-	4,635
Interest	1/24/2015	7/24/2017	Federal Agencies	FFCB FLT NT 1ML+4	3133ECV92	50,000,000	0.21	0.21	-	-	8,913
Interest	1/25/2015	7/25/2017	Federal Agencies	FHLMC EX-CALL MTN	3134G3ZH6	19,000,000	1.00	1.01	-	-	95,000
Interest	1/26/2015	4/25/2016	Negotiable CDs	WESTPAC FLT YCD 3ML+15	96121TWJ3	25,000,000	0.38	0.38	-	-	24,241
Interest	1/26/2015	4/25/2016	Negotiable CDs	WESTPAC FLT YCD 1ML+22	96121TWK0	50,000,000	0.39	0.39	-	-	17,738
Interest	1/26/2015	7/26/2017	Federal Agencies	FFCB FLT NT 3ML+0	3133ECVG6	23,520,000	0.25	0.25	-	-	14,041
Interest	1/27/2015	2/27/2017	Federal Agencies	FFCB FLT NT 1ML+5.5	3133EDFW7	50,000,000	0.23	0.22	-	-	9,666
Interest	1/27/2015	7/27/2016	Federal Agencies	FAMCA MTN	31315PA25	15,000,000	2.00	2.09	-	-	150,000
Interest	1/27/2015	7/27/2016	Federal Agencies	FAMCA MTN	31315PA25	14,100,000	2.00	0.63	-	-	141,000
Interest	1/27/2015	7/27/2016	Federal Agencies	FAMCA MTN	31315PA25	11,900,000	2.00	0.62	-	-	119,000
Interest	1/27/2015	7/27/2016	Federal Agencies	FAMCA MTN	31315PA25	20,000,000	2.00	0.61	-	-	200,000
Interest	1/29/2015	1/29/2016	Federal Agencies	FHLB	3130A3P81	25,000,000	0.25	0.25	-	-	5,208
Interest	1/29/2015	3/29/2017	Federal Agencies	FFCB FLT NT 1ML+2	3133EDZW5	25,000,000	0.19	0.19	-	-	4,080
Interest	1/29/2015	7/29/2016	Federal Agencies	FHLMC CALL NT	3134G4UC0	15,000,000	0.65	0.56	-	-	48,750
Interest	1/30/2015	1/30/2017	Federal Agencies	FFCB FLT QTR T-BILL+14	3133EDRD6	50,000,000	0.17	0.19	-	-	21,259
Interest	1/30/2015	2/1/2015	Money Market Funds	MS INSTL GOVT FUND	61747C707	10,089,205	0.04	0.04	-	-	644
Interest	1/30/2015	2/1/2015	Money Market Funds	FIDELITY INSTL GOVT PORT	316175108	5,003,797	0.01	0.01	-	-	43
Subtotals						**$ 1,625,551,089**	**0.46**	**0.38**	**$ -**	**$ -**	**$ 2,429,517**

Grand Totals	14	Purchases
	(4)	Sales
	(11)	Maturities / Calls
	(1)	Change in number of positions

Non-Pooled Investments

As of January 31, 2015

Type of Investment	CUSIP	Issue Name	Settle Date	Maturity Date	Duration	Coupon		Par Value		Book Value		Amortized Book Value		Market Value
State/Local Agencies	797712AD8	SFRDA SOUTH BEACH HARBOR	1/20/12	12/1/16	1.78	3.50	$	2,640,000	$	2,640,000	$	2,640,000	$	2,640,000
Subtotals					**1.78**	**3.50**	**$**	**2,640,000**	**$**	**2,640,000**	**$**	**2,640,000**	**$**	**2,640,000**
Grand Totals					1.78	3.50	$	2,640,000	$	2,640,000	$	2,640,000	$	2,640,000

NON-POOLED FUNDS PORTFOLIO STATISTICS

	Current Month				Prior Month			
		Fiscal YTD		January 2015		Fiscal YTD		December 2014
Average Daily Balance	$	3,088,326	$	2,640,000	$	3,163,859	$	2,640,000
Net Earnings	$	63,088	$	7,700	$	55,388	$	7,700
Earned Income Yield		3.47%		3.43%		3.47%		3.43%

Note: All non-pooled securities were inherited by the City and County of San Francisco as successor agency to the San Francisco Redevelopment Agency. Book value and amortized book value are derived from limited information received from the SFRDA and are subject to verification.

Bos 11, CPage

STATE OF CALIFORNIA
Edmund G. Brown Jr., Governor

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2015 FEB 20 PM 3:24

Fish and Game Commission

AK

Sonke Mastrup, Executive Director
1416 Ninth Street, Room 1320
Sacramento, CA 95814
(916) 653-4899
(916) 653-5040 Fax
www.fgc.ca.gov

15 Day Notice of California Notice Register 2015, No.1-Z, Z2014-1223-01

Re: Mammal Hunting Regulations for 2015-2016

February 17, 2015

This is to provide you with a 15 day continuation notice of proposed regulatory action relative to amending section 708.5 "Deer Tagging and Reporting Requirements," Title 14, California Code of Regulations, relating to the proposed 2015 Sport Fishing regulations, which was published in the California Regulatory Notice Register on January 2, 2015, Register 2011, No. 1-Z; OAL Notice File No. Z2014-1223-01. The proposed additional language is in response to public comment and will permit the change to be adopted without applying a non-reporting fee until the 2016-2017 deer season.

Please note proposed amendments for sections 360, 361, 362, 363, 364, 702, 708.11 and 713, the dates of the public hearings related to this matter, and associated deadlines for receipt of written comments have not changed from the original notice.

Additional information and all associated documents may be found on the Fish and Game Commission website at www.fgc.ca.gov.

Karen Mitchell, Senior Environmental Scientist, Fisheries Branch, phone (916) 445-0826, has been designated to respond to questions on the substance of the proposed regulations.

Sincerely,

Jon D. Snellstrom
Associate Governmental Program Analyst

Attachment

(a)

Section 708.5 is amended to read:

§ 708.5. Deer Tagging and Reporting Requirements.

(a) Upon the killing of any deer the tag holder shall immediately fill out all portions of the tag including the report card completely, legibly, and permanently, and cut out or punch out and completely remove notches or punch holes for the month and date of the kill. The deer license tag shall be attached to the antlers of an antlered deer or to the ear of any other deer and kept attached during the open season and for 15 days thereafter. Except as otherwise provided, possession of any untagged deer shall be a violation. (Refer to Fish and Game Code, Section 4336).

(b) Every person to whom a deer license tag is issued shall ~~return the completed report card portion to the department within thirty days of taking a deer.~~ report to the Department their deer harvest.

(1) Successful deer tag holders are required to report deer harvested within 30 days of the date of harvest or by January 31, whichever date is first.

(2) Unsuccessful deer tag holders, whether they hunted or not, are required to report no harvest by January 31 annually.

(c) Harvest Report Card Return and Reporting Mechanisms.

(1) By mail or in person at the address specified on the harvest report card. A harvest report card returned by mail shall be postmarked by the date applicable to that card as specified in this section.

(2) Online through the department's internet license sales service website by the date specified in the section. Tag holders reporting online will be provided a confirmation number upon successful submission. The tag holder must record the provided confirmation number in the space provided on the harvest report card and retain the harvest report card until March 1 annually. Tags reported online must be surrendered to the department upon demand.

(d) Beginning July 1, 2016, deer tag holders, whether successful or unsuccessful, who fail to report by the date specified in this section shall be subject to a Deer Harvest Non-reporting Fee. The fee specified in Section 702 shall be charged prior to the issuance of a deer tag or deer tag drawing application in the following year.

Note: Authority cited: Sections 200, 202, 203, 215, 219, 220, 1050, 1572, 4336, 4340 and 10502, Fish and Game Code. Reference: Sections 200, ~~201,~~ 202, 203, 203.1, 207, 210, 215, 219, 220, 1050, 1570, 1571, 1572, 3950, 4336, 10500 and 10502, Fish and Game Code.

From: Reports, Controller (CON)
Sent: Thursday, February 19, 2015 10:57 AM
To: Calvillo, Angela (BOS); BOS-Legislative Aides; BOS-Supervisors; Kawa, Steve (MYR); Howard, Kate (MYR); Falvey, Christine (MYR); Elliott, Jason (MYR); Steeves, Asja (CON); Campbell, Severin (BUD); Newman, Debra (BUD); Rose, Harvey (BUD); gmetcalf@spur.org; bob@sfchamber.com; jballesteros@sanfrancisco.travel; CON-EVERYONE; CON-CCSF Dept Heads; CON-Finance Officers
Subject: Issued: PUBLIC HEALTH: Improved Controls Needed to Prevent Missing Billing Information

The Office of the Controller's City Services Auditor Division (CSA) today issued a report on its audit of the Department of Public Health's controls over billings, collections, and reimbursements. The audit found that the internal controls of the Department of Public Health's Community Health Network do not ensure the completeness of information required for billing and that insufficient analysis and monitoring of billing problems prevent their causes from being resolved. With improved controls, the Community Health Network could have collected approximately $1.15 million in additional revenue per year. The audit also found that Patient Financial Services does not have a comprehensive process to ensure that all revenue adjustments for the Community Health Network are proper and accurate and that inconsistencies in some adjustment processes may undermine the effectiveness of financial reports used by management to monitor write-offs.

To view the full report, please visit our Web site at:
http://openbook.sfgov.org/webreports/details3.aspx?id=1889

This is a send-only e-mail address. For questions about the report, please contact Director of City Audits Tonia Lediju at tonia.lediju@sfgov.org or 415-554-5393 or the CSA Audits Unit at 415-554-7469.

Follow us on Twitter @SFController

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City and County of San Francisco

Office of the Controller – City Services Auditor

DEPARTMENT OF PUBLIC HEALTH:

Improved Controls Are Needed to Prevent Missing Billing Information and More Analysis and Monitoring Could Reduce Avoidable Revenue Adjustments

SEAL OF THE CITY AND COUNTY OF SAN FRANCISCO

CONTROLLER'S OFFICE

February 19, 2015

OFFICE OF THE CONTROLLER
CITY SERVICES AUDITOR

The City Services Auditor Division (CSA) was created in the Office of the Controller through an amendment to the Charter of the City and County of San Francisco (City) that was approved by voters in November 2003. Charter Appendix F grants CSA broad authority to:

- Report on the level and effectiveness of San Francisco's public services and benchmark the City to other public agencies and jurisdictions.
- Conduct financial and performance audits of city departments, contractors, and functions to assess efficiency and effectiveness of processes and services.
- Operate a whistleblower hotline and Web site and investigate reports of waste, fraud, and abuse of city resources.
- Ensure the financial integrity and improve the overall performance and efficiency of city government.

CSA may conduct financial audits, attestation engagements, and performance audits. Financial audits address the financial integrity of both city departments and contractors and provide reasonable assurance about whether financial statements are presented fairly in all material aspects in conformity with generally accepted accounting principles. Attestation engagements examine, review, or perform procedures on a broad range of subjects such as internal controls; compliance with requirements of specified laws, regulations, rules, contracts, or grants; and the reliability of performance measures. Performance audits focus primarily on assessment of city services and processes, providing recommendations to improve department operations.

CSA conducts audits in accordance with the Government Auditing Standards published by the U.S. Government Accountability Office. These standards require:

- Independence of audit staff and the audit organization.
- Objectivity of the auditors performing the work.
- Competent staff, including continuing professional education.
- Quality control procedures to provide reasonable assurance of compliance with the auditing standards.

For questions regarding the report, please contact Director of City Audits Tonia Lediju at Tonia.Lediju@sfgov.org or 415-554-5393 or CSA at 415-554-7469.

Audit Team: Mark de la Rosa, Lead Manager
Debbie Richardson, Audit Manager
Mark Tipton, Audit Manager
Jessica Bull, Audit Lead
Joanna Zywno, Audit Lead

City and County of San Francisco

Office of the Controller - City Services Auditor

Department of Public Health: **February 19, 2015**
Improved Controls Are Needed to Prevent Missing Billing Information and More Analysis and Monitoring Could Reduce Avoidable Revenue Adjustments

Purpose of the Audit

The audit, conducted at the request of the director of the Department of Public Health (Public Health), evaluated whether Public Health's internal controls over billings, collections, and reimbursements are sufficient to minimize write-offs that can be influenced by its processes. The audit focused on Public Health's Community Health Network (CHN),[1] which accounts for 81.7 percent of the department's revenues from sources that require the generation of a patient bill, and consists of San Francisco General Hospital and Trauma Center (General Hospital), Laguna Honda Hospital and Rehabilitation Center (Laguna Honda), and the Community-Oriented Primary Care Section (COPC).[2]

Highlights

CHN's billing controls are insufficient. CHN must improve procedures to ensure complete, accurate, and timely billing information and implement procedures to analyze and monitor processes that lead to write-offs in order to minimize aged-out charges and unbillable pharmacy and laboratory charges. It is estimated that with improved controls, CHN, which in 2012-13 collected $429.9 million from billing patients and third party payers, can collect an additional $1.15 million per year. Also, CHN's Patient Financial Services unit should improve controls over the processes by which it makes revenue adjustments in the financial system to ensure that they are accurate and appropriate.

The audit found three areas for improvement:

1. *Insufficient controls to prevent missing information that results in write-offs.*

   CHN does not have controls to ensure that complete billing information is available in time for bills to be issued so the City can recover all the costs to which it is entitled. In fiscal years 2011-12 and 2012-13, 37 percent, or $10.0 million of all charges that aged out were missing diagnoses or attending physician codes.

Recommendations

The report includes ten recommendations for Public Health to minimize avoidable revenue adjustments, including write-offs. Key recommendations include that Public Health should:

- Ensure that its relevant units collaborate to ensure completeness of billing information.
- Analyze significant write-off categories that could be influenced by CHN processes to determine how to minimize these write-offs.
- Monitor progress and performance in delivering timely and complete information needed for billing.

---

[1] CHN ceased to be a separate organizational unit of Public Health during 2012-13, after a major reorganization that created the SF Health Network, which includes General Hospital, Laguna Honda, and primary care, plus a number of other Public Health services that were not part of CHN, such as Behavioral Health, Jail Health, and Maternal, Child, and Adolescent Health.

[2] COPC consists of a network of 14 community-based and public primary care clinics and 6 youth clinics.

2. *Insufficient analysis and monitoring of write-offs, which prevents their causes from being resolved.*

   CHN has not analyzed write-offs of aged-out accounts or unbillable pharmacy accounts to determine whether and how they could be minimized. Also, CHN does not monitor these accounts or fully identify the underlying problems to ensure that they are addressed. Were the underlying problems preventing collection of aged out accounts addressed, it is estimated that CHN could collect an additional $1.15 million per year.

   CHN also did not begin to analyze why laboratory bills were written off until February 2014, although write-offs of laboratory charges have persisted since at least fiscal year 2009-10, which is the first year for which reports showing write-offs were examined for this audit.

   Staffing decisions that lead to unbillable charges for provider costs are also not fully analyzed. Payers will not reimburse Public Health for services provided by some types of non-physician providers, such as nurses, under some circumstances. CHN has not analyzed whether providing services using different staffing combinations could mitigate the negative financial impact. Nor has CHN analyzed in a data-driven manner whether its unreimbursed provider charges for services at Federally Qualified Health Center (FQHC) clinics—which were $9.4 million in 2012-13, compared to $2.9 million in 2009-10—are justified by healthcare outcome gains.

3. *Inadequate controls for making revenue adjustments.*

   Patient Financial Services, which enters CHN's revenue adjustments into the financial system, lacks some controls, including complete definitions and written policies and procedures, for its adjustment process. These missing controls increase the risk of improper adjustments and foregone revenue. Inconsistencies in adjustment processes also compromise the reliability of an internal CHN financial report, making it a less useful management tool.

   According to Public Health, it may face new financial issues due to changes brought about by the Patient Protection and Affordable Care Act. According to work by McKinsey & Company, these changes elevate the importance of a robust revenue cycle to providers' financial health. Therefore, it is imperative that Public Health take advantage of every opportunity to collect revenue.

- Annually analyze whether and how the negative financial impacts of using unbillable providers can be mitigated.

- Perform a data-driven analysis of Federally Qualified Health Center clinic staffing and wraparound services to more explicitly consider financial impacts as well as patient care goals.

- Formalize the criteria and process for making batch adjustments.

- Make outpatient adjustments regularly and in accordance with documented procedures to ensure that issues are addressed in a timely manner.

CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF THE CONTROLLER

Ben Rosenfield
Controller

Todd Rydstrom
Deputy Controller

February 19, 2015

Health Commission
101 Grove Street
San Francisco, CA 94102

Ms. Barbara A. Garcia
Director of Health
Department of Public Health
101 Grove Street
San Francisco, CA 94102

Dear Commission President and Members and Ms. Garcia:

The Office of the Controller's City Services Auditor Division (CSA) presents its audit report of controls over billing, collections, and reimbursements at the Department of Public Health (Public Health). CSA conducted the audit at the request of the director of health as a tool to further assess the effectiveness of the department's billing and collection processes. The audit objectives were to determine whether the Community Health Network's internal controls are adequate to minimize avoidable write-offs and to identify how Public Health's organization of billing compares to that in other jurisdictions.

The audit concluded that the Community Health Network's internal controls do not ensure the completeness of information required for billing and that insufficient analysis and monitoring of billing problems prevented resolution. With improved controls, the Community Health Network could have collected approximately $1.15 million in additional revenue per year. The audit also found that Patient Financial Services does not have a comprehensive process that provides reasonable assurance that all revenue adjustments for the Community Health Network are proper and accurate and that inconsistencies in some adjustment processes may undermine the effectiveness of financial reports used by management to monitor write-offs.

The report includes ten recommendations for Public Health to increase revenues and minimize avoidable revenue adjustments, including write-offs. The department's response to the report is attached as an appendix. CSA will work with Public Health to follow up on the status of the recommendations made in this report.

CSA appreciates the assistance and cooperation of your staff during the audit. For questions about the report, please contact me at Tonia.Lediju@sfgov.org or 415-554-5393 or CSA at 415-554-7469.

Respectfully,

Tonia Lediju
Director of City Audits

cc: Board of Supervisors
Budget Analyst
Citizens Audit Review Board
City Attorney
Civil Grand Jury
Mayor
Public Library

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GLOSSARY OF TERMS

Affordable Care Act	Patient Protection and Affordable Care Act
Behavioral Health	Community Behavioral Health Services Division of the Department of Public Health
CFO	Chief Financial Officer
CHN	Community Health Network
COPC	Community-Oriented Primary Care Section of the Department of Public Health
City	City and County of San Francisco
Community Health Network	A former organizational unit of the Department of Public Health that, for billing purposes, included San Francisco General Hospital and Trauma Center, Laguna Honda Hospital and Rehabilitation Center, and the Community-Oriented Primary Care Section . After this audit began in 2012-13, these entities were subsumed into the newly created SF Health Network, which also includes units not included in the scope of this audit.
CSA	City Services Auditor of the Office of the Controller
FQHC	Federally Qualified Health Center
Financial Services unit	Reports to the Chief Financial Officer for the Department of Public Health and includes units responsible for finance, budget, accounting, records, contract management and compliance, eligibility and administrative functions
General Hospital	San Francisco General Hospital and Trauma Center
HAH	Health at Home
LHH	Laguna Honda Hospital and Rehabilitation Center
Laguna Honda	Laguna Honda Hospital and Rehabilitation Center
Patient Financial Services	Part of the Financial Services Department of the Department of Public Health; responsible for the billing and collections function of General Hospital, Laguna Honda Hospital, and the COPCs
Pharmacy	Pharmacy Department
Public Health	San Francisco Department of Public Health
Radiology	Radiology Department
Revenue Adjustment	A charge that cannot or will not be pursued
SFGH	San Francisco General Hospital and Trauma Center
UCSF	University of California, San Francisco
Write-off	A missed billing opportunity

INTRODUCTION

Audit Authority

This audit was conducted under the authority of the Charter of the City and County of San Francisco (City), Section 3.105 and Appendix F, which requires that the City Services Auditor (CSA) of the Office of the Controller conduct periodic, comprehensive financial and performance audits of city departments, services, and activities. CSA conducted the audit at the request of the director of health as a tool to further assess the effectiveness of the department's billing and collection processes.

Background

The mission of the City's Department of Public Health (Public Health) is to protect and promote the health of all San Franciscans. As shown in Exhibit 1, the department is organized into 8 financial reporting divisions and 18 service-providing divisions or programs.

Public Health collected $1.9 billion in fiscal year 2012-13, almost one-third of which was from patient bills.

Exhibit 1 also shows the revenue collected by Public Health in fiscal year 2012-13, which totals $1.9 billion, and indicates that 28.3 percent of this revenue, or $526.0 million, was tied to individual patient bills.

Patient Financial Services bills for 81.7 percent of the department's billable revenues.

These bills are generated by four billing organizations within Public Health: Patient Financial Services, the Community Behavioral Health Services (Behavioral Health) Billing unit, the Health at Home Billing group, and City Clinic. As shown in the exhibit, Patient Financial Services performs the billing associated with 81.7 percent of Public Health's billable revenues, Behavioral Health billing brings in 17.7 percent, and the revenues billed by Health at Home and City Clinic each account for less than 1 percent of Public Health's billing revenue.

EXHIBIT 1 Public Health Divisions, Billing Units, and Revenues - Fiscal Year 2012-13

Financial Reporting Division	Description	Billing Unit	2012-13 Projected[a] Revenues (Thousands): Unrelated to Billing	2012-13 Projected[a] Revenues (Thousands): Billing-Related	Billing Revenue as % of Total Billed Revenue	Division Revenue as % of Total Public Health Revenue
Community Health Network[b]						
General Hospital	Acute-care hospital offering outpatient, inpatient, emergency, skilled nursing, diagnostic, mental health, and rehabilitation services	Patient Financial Services	$711,500	$289,551	55.0%	53.9%
Laguna Honda	Therapeutic community providing skilled nursing, acute care, and rehabilitation services to seniors and adults with disabilities		95,511	133,342	25.4%	12.3%
Community Oriented Primary Care clinics	A network of 6 youth clinics and 14 community-based and public primary care clinics that offer medical care to target populations defined by geography, age, gender, sexual orientation, family and/or cultural community		66,327	7,005	1.3%	3.9%
		Community Health Network Subtotal	**$873,338**	**$429,898**	**81.7%**	**70.2%**
Community Behavioral Health Services						
Mental Health	Mental health care, primarily through contracted providers	Behavioral Health Billing	169,017	90,154	17.1%	14.0%
Substance Abuse	Substance abuse care through contracted providers		70,118	2,899	0.6%	3.9%
		Community Behavioral Health Services Subtotal	**$239,135**	**$93,053**	**17.7%**	**17.9%**
Health at Home						
Health at Home	Licensed Home Health Agency providing services to homebound clients with a need for skilled nursing, physical or speech therapy	Health at Home Billing Group	**$4,547**	**$2,145**	**0.4%**	**0.4%**
Public Health[c]						
Public Health	Includes Tuberculosis Clinic, Laboratory, City Clinic, and ten other programs	City Clinic, Patient Financial Services	**$183,137**	**$901**	**0.2%**	**9.9%**
Jail Health						
Jail Health	Medical care for the jail population	NA	**$30,858**	-	**0.0%**	**1.7%**
Total Public Health Revenues in Fiscal Year 2012-13			**$1,331,015**	**$525,997**	**100%**	**100%**
Grand Total Billable and Unbillable *(Thousands)*						**$ 1,857,012**
Percentage Tied to Patient Billing						**28.3%**
Percentage Not Tied to Patient Billing						**71.7%**

[a] Public Health's revenues are reported as projections because the numbers available at the time the report is compiled exclude some items, such as external audit adjustments. According to the chief financial officer of General Hospital and the Community Oriented Primary Care clinics, there have not been many such adjustments in recent years.

[b] Community Health Network (CHN) ceased to be an organizational unit of Public Health during 2012-13, after a major reorganization that created the SF Health Network, which includes General Hospital, Laguna Honda, primary care, plus other services that were not parts of CHN, such as Behavioral Health, Jail Health, and Maternal, Child, and Adolescent Health.

[c] Public Health's programs and divisions include three that issue patient bills: the Tuberculosis Clinic and Laboratory—which, according to Patient Financial Services, both issue bills through the Patient Financial Services group that performs billing for the Community Health Network—and City Clinic, which performs its own billing. Public Health's ten other programs are the Adult Immunization and Travel Clinic; Maternal, Child, and Adolescent Health; Housing and Urban Health; HIV Program; Public Health Administration; Bureau of Environmental Health Management; Community Health and Epidemiology; Health Education; Emergency Medical Services Agency; and Occupational Safety and Health

[NA] Not Applicable

Source: Auditor's analysis of data from Public Health

The primary payers who reimburse Public Health based on the generation of individual patient bills are Medi-Cal, Medicare, and private insurance. Exhibit 2 shows how the fiscal year 2012-13 revenues are distributed by payer and division. The *Other Payer* category is composed of revenues from private insurers and individual patients.

EXHIBIT 2 Billable Revenue by Payer ***(in Thousands)***
Fiscal Year 2012-13

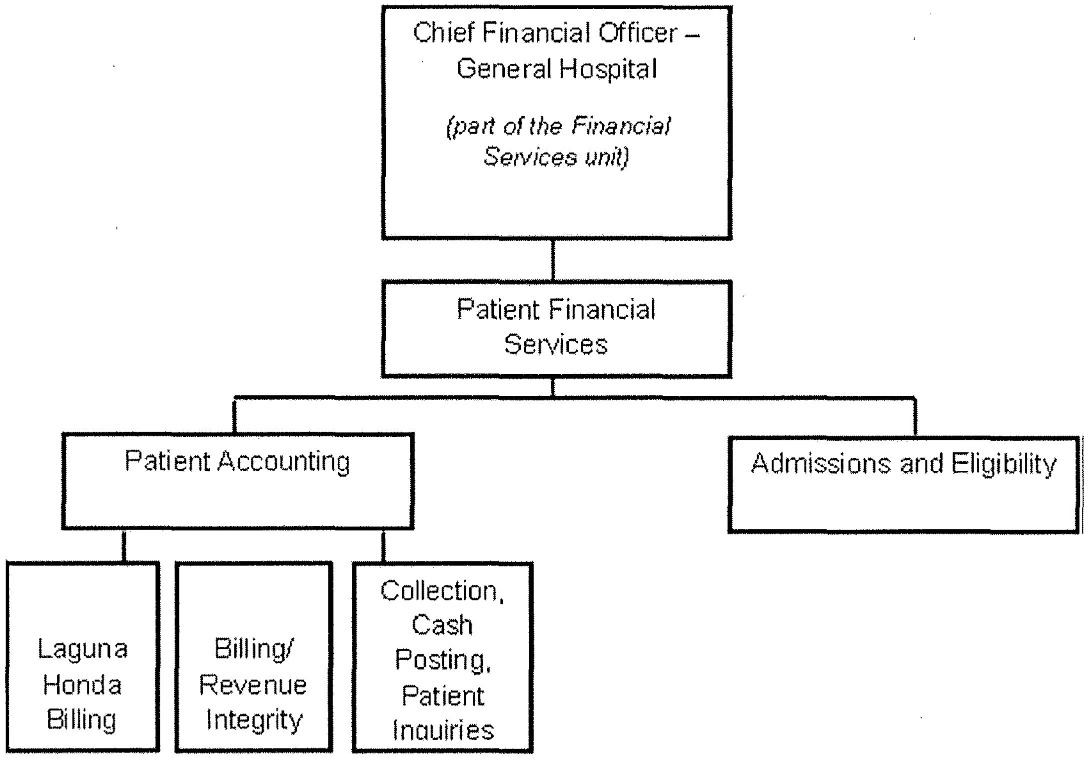
Division	Medi-Cal	Medicare	Other Payer	Short-Doyle *(Medi-Cal Mental Health)*	Total Billable Revenue
Community Health Network					
General Hospital	$102,496	$95,059	$86,628	$5,368	$289,551
Laguna Honda	129,563	3,550	229	-	133,342
Community Oriented Primary Care clinics	3,164	1,922	1,919	-	7,005
Subtotal	**235,223**	**100,531**	**88,776**	**5,368**	**429,898**
Behavioral Health					
Mental Health	6,513	1,963	242	81,436	90,154
Substance Abuse	-	-	-	2,899	2,899
Subtotal	**6,513**	**1,963**	**242**	**84,335**	**93,053**
Health at Home					
Subtotal	**126**	**1,574**	**445**	**-**	**2,145**
Public Health					
Tuberculosis Clinic	401	74	-	-	475
Laboratory	302	-	-	-	302
City Clinic	41	-	83	-	124
Subtotal	**744**	**74**	**83**	**-**	**901**
Grand Total	**$242,606**	**$104,142**	**$89,546**	**$89,703**	**$525,997**

Note: Public Health's revenues are reported as projections because the figures available at the time the report is compiled do not include some items, such as external audit adjustments.

Patient Financial Services

As shown in Exhibit 1, Patient Financial Services bills for 81.7 percent of Public Health's billing-related revenues. Patient Financial Services reports to the Financial Services unit at San Francisco General Hospital and Trauma Center (General Hospital). This and other reporting relationships are shown in Exhibit 3.

EXHIBIT 3 Patient Financial Services Reporting Structure



Note: General Hospital's chief financial officer (CFO) reports to the Department of Public Health CFO, who is the head of the Financial Services unit. The Financial Services unit oversees finance, budget, and some administrative and compliance functions for all Public Health units.

Source: Auditor's representation based on organization chart provided by Patient Financial Services.

The patient account process: from patient intake to bill payment

The bills issued by Patient Financial Services require information that is generated by numerous units throughout Public Health.

The patient account process begins when a patient enters the medical facility.

Admissions

Admissions staff obtains basic patient information and the patient account is established.

Eligibility

Eligibility staff then screens the patient to identify the patient's payer (the party or parties who will pay for the services). This includes identifying whether the patient has insurance, how many types of insurance the patient carries, and if the patient is eligible for any programs in which they are not currently enrolled. For example, eligibility staff will identify if a patient is eligible for Medi-Cal but not currently enrolled. Eligibility staff can then refer the patient to a counselor to begin the enrollment process.

Clinical Staff

Clinical staff adds charges to the patient's account throughout the patient's stay at the medical facility, whether it is a few hours or several days or weeks. These charges can include those for supplies used by nurses or those for medical diagnoses.

Medical Records

Medical Records staff at General Hospital and Laguna Honda code the services provided from the medical record for billing. The process at the clinic level is similar, although coding of the charges is done by clinic staff at the time of service rather than by a distinct medical records unit.

Utilization Management

The Utilization Management unit conducts medical necessity reviews for inpatient services, requests and/or provides authorization for inpatient procedures, and reviews denials of coverage.

Patient Financial Services

Once patients have been discharged, their files continue to be coded and are closed. Complete accounts are automatically issued by the billing system, while those that require additional information are routed to Patient Financial Services. Once there are no issues with the bill and all of the information is complete, Patient Financial Services sends the bill and, if it is paid, payment is received by the unit's Collections group.

The Collections group is also charged with following up on payments that were not received or not received in full, including:

- Following up with third-party payers until a resolution is reached.
- Appealing underpayments from third-party payers.

Pursuing payment from patients when the patient is the responsible payer.

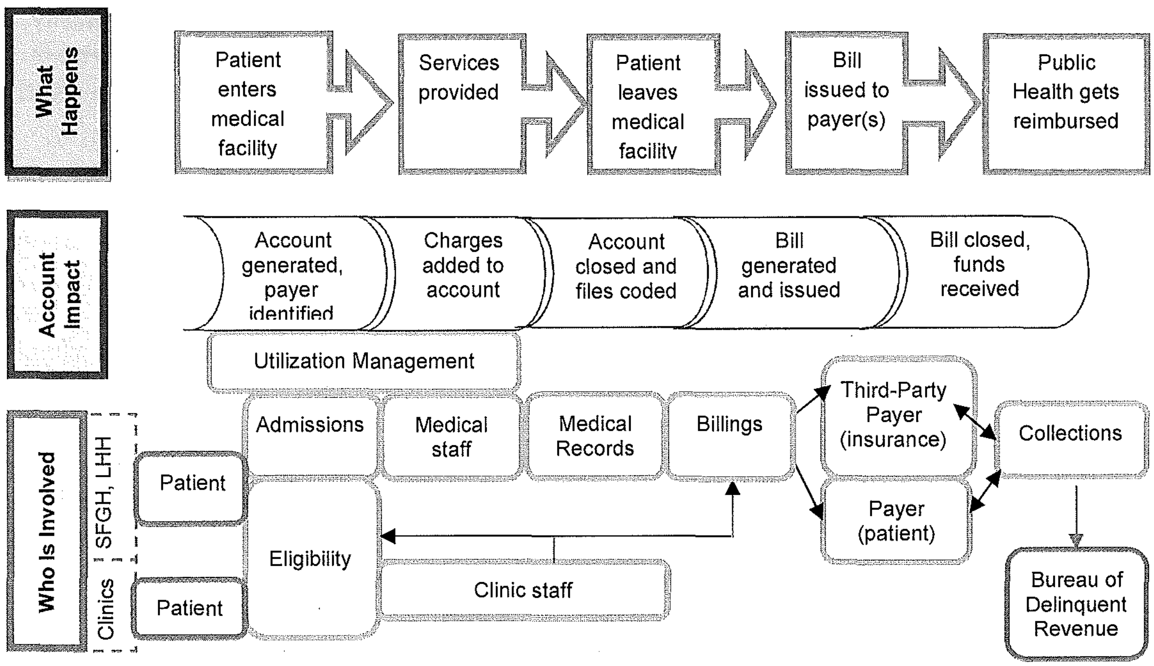
Bureau of Delinquent Revenue

When patients do not pay their portion of a bill, the Collections group will eventually refer the charges to the Bureau of Delinquent Revenue[3] for pursuit.

[3] A unit of the City's Office of the Treasure and Tax Collector.

Exhibit 4 shows the flow of the patient account process.

EXHIBIT 4 Community Health Network's Billing Process



Note: Blue arrows indicate steps in the patient account process. Purple rounded rectangles indicate what happens to the account at each step in the process. Green rectangles indicate who is involved at each step in the process. Rectangles in grey indicate entities outside of Public Health.

Source: Auditor's analysis based on information from Patient Financial Services.

Monitoring of Revenue Collections and Revenue Cycle Performance

The Financial Services unit monitors revenue collections for the Community Health Network, which in fiscal year 2012-13 accounted for 70.2 percent of Public Health's billable and unbillable revenue. According to the Finance Department, this monitoring is conducted at several of its levels and includes:

- Routine reviews of overall collections by payer.
- Monitoring to determine if self-pay, unsponsored accounts are decreasing.
- Review of aging accounts and review of revenue adjustments[4] to ensure that there are no unexpected spikes.

[4] A revenue adjustment, or an amount "adjusted out," is one that cannot or will not be billed or collected for one reason or another. A revenue write-off is a type of revenue adjustment that reflects a missed billing opportunity.

Patient Financial Services monitors the revenue cycle.

Patient Financial Services, the division of the Financial Services unit responsible for issuing bills, monitors accounts that are unbillable due to incomplete information and communicates with the units responsible for that information to complete the bills. According to Public Health management, inpatient accounts take priority over outpatient accounts in this monitoring, primarily because of the higher average reimbursement[5] and lower volume of inpatient accounts.

A Revenue Cycle Committee was created in 2013.

Patient Financial Services started the Revenue Cycle Committee in March 2013 to communicate with other departments and to address roadblocks and barriers faced by the Patient Accounts Department in issuing bills. Through the Committee, Patient Financial Services communicates about bill holds (missing or incomplete information needed for billing) with the units of the Community Health Network that control the areas responsible for the needed information or documentation. The Committee also raises awareness among management of some issues that impede billing and collections. As reflected in the Revenue Cycle Committee agendas, Patient Financial Services monitors how many accounts are held up by some areas of Public Health over time.

CHN has made efforts to ensure full collection.

The Finance Department and Patient Financial Services have taken a number of actions to ensure that collections are complete, including:

- Reviewing all inpatient accounts, which represent 76 percent of CHN's revenue, according to management, to ensure collections are accurate and complete.

- Using the services of contractors to ensure that reimbursements are accurate, to assist with identifying payer sources for patients who lack third-party payer coverage, and to ensure that the Chargemaster—a frequently-changing list of codes used in applying for third-party payer

[5] Reimbursement for procedures and services performed by providers (such as Public Health) is made by commercial payers or federal intermediaries. Commercial payers determine their own rules for medical necessity or payment and reimbursement schedules, while federal intermediaries are regulated as contractors by the U.S. Centers for Medicare & Medicaid Services.

reimbursement of supplies—is accurate and up to date.

- Hiring a consultant to identify and help implement revenue improvement strategies.

Financial pressures from the Affordable Care Act elevate the importance of capturing every opportunity to collect revenue.

The federal Patient Protection and Affordable Care Act (Affordable Care Act) is changing the financial landscape for public health organizations. The Affordable Care Act is expected to increase the number of patients who have balances after insurance and introduce more complicated payment responsibilities and more complex payment methodologies.

According to Public Health, it will lose a portion of federal subsidies due to changes brought about by the Affordable Care Act, but it hopes that enough people will enroll in new healthcare programs to offset the losses. The department faces potentially serious financial problems if enough people do not enroll in the new healthcare programs under Covered California, which would create new revenues for Public Health.

Revenue Adjustments

In fiscal year 2012-13 the Community Health Network generated $2.5 billion in charges and collected $429.9 million in patient revenue. In that year $2.1 billion in charges was adjusted out. Charges that are adjusted out cannot be collected, for various reasons explained below. The reasons are indicated by a code assigned to the charges in the financial system when they are adjusted out. In 2012-13, the amount recovered plus the amount adjusted out exceed the charges for the year because the amount of charges are those incurred in fiscal year 2012-13, while the amount of adjustments and revenue collected may be tied to charges that occurred in prior years.

Exhibit 5 shows the main categories of adjustments made in fiscal year 2012-13.

EXHIBIT 5 Revenue Adjustments Made by the Community Health Network Fiscal Year 2012-13

Source	Charges[a]	Percentage of Total
Contractual	$(1,003,239,579)	47.5%
Charity Care	(524,838,284)	24.8
Capitated	(397,781,552)	18.8
Bad Debt	(90,310,287)	4.3
Controllable	(59,925,584)	2.8
Unbillable Charges	(23,038,614)	1.1
Other	(12,555,947)	0.6
Small Amount	(558,481)	0.0[b]
Unknown	(688,470)	0.0[b]
Total	$(2,112,936,798)	100.0%[c]

[a] Amounts are shown as negative numbers because all of these revenue adjustments are reductions.
[b] Amount is less than 0.05 percent.
[c] Figures above do not sum to 100 percent due to rounding.

Source: Auditor's analysis of data from Public Health.

Public Health cannot influence the causes of most adjustments.

The majority of these adjustments are unavoidable due to the nature of medical billing and the rules and restrictions of third-party payers who pay for Community Health Network services.

Contractual adjustments must be made.

Contractual adjustments, the largest category, occur because payers will only reimburse Public Health for a portion of charges incurred. For example, according to Patient Financial Services management, Medicare only pays approximately 38 percent of the charges for Public Health's services and, similarly, Medi-Cal pays only a portion of expenses incurred.

Capitated payments result in unrecoverable charges.

Adjustments related to capitated payments reflect the fact that charges incurred for patients covered under the San Francisco Health Plan Managed Care Medi-Cal, Healthy Kids, and Healthy Workers programs are received as monthly payments sent to General Hospital's Accounting unit, and are not applied at the patient account level, according to Patient Financial Services management. Although the charges are adjusted out at the patient account level, the payments and charges are reconciled later through the financial system, according to Patient Financial Services.

Charity care, by definition, does not garner revenue.

Charity care also leads to a significant percentage of charges that are adjusted out. According to Public Health, it serves a patient population that often lacks resources, does not carry insurance, and sometimes does not have a linkage to a program like Medi-Cal or Medicare that would provide for the patient's medical services. Some of Public Health's write-offs reflect the fact that certain patient populations have no ability to pay and no linkage to a payer who can cover their medical expenses.

Improved internal controls could help minimize millions of dollars in controllable write-offs.

Although they constitute less than 3 percent of the value of the Community Health Network's (CHN) total revenue adjustments, several categories, shown as the Controllable category in Exhibit 5, encompass issues that Public Health can influence. Exhibit 6 summarizes these categories, which are also described as "write-offs."

EXHIBIT 6 Write-Offs That Can Be Influenced by CHN Processes: Charges Written Off and Estimated Portion That Was Collectible

	Charges Written Off *(in Millions)*				
Write-Off	2009-10	2010-11	2011-12	2012-13	Total
Aged Out*	$4.2	$6.9	$14.7	$13.2	$39.0
Unbillable Providers or Provider Combinations	15.8	20.8	23.4	32.6	92.6
Pharmacy Unbillables	N/A	3.9	0.3	1.1	5.3
Laboratory Unbillables	0.9	0.8	2.0	0.7	4.4
***Subtotal** (areas within audit scope)*	**$20.9**	**$32.4**	**$40.4**	**$47.6**	**$141.3**
Emergency Room Unbillables	N/A	N/A	0.3	0.1	0.4
Utilization Management	8.1	8.0	5.6	11.2	32.9
Treatment Authorizations	1.8	1.6	1.4	1.1	5.9
TOTAL	**$30.8**	**$42.0**	**$47.7**	**$60.0**	**$180.5**

* Aged out charges could either not be issued within the timeframe required by payers or were issued but no reimbursement was received, so the charges were written off.

N/A Not available

Source: Auditor's summary of data provided by Patient Financial Services.

The audit focused on the first four categories listed in Exhibit 6, representing $141.3 million in charges.

Billing delays, pharmacy unbillables, and laboratory unbillables represent areas that can be minimized through improved controls. Although completely eliminating these write-offs is unrealistic, stronger internal controls could help minimize the amount that is written off, as discussed in Finding 1.1 (in Chapter 1).

Unbillable providers represent an area of opportunity to analyze.

The use of unbillable providers should be—and to a large extent has been—analyzed by Public Health to determine if value creation opportunities exist. These write-offs account for the fact that certain providers (such as nurses or resident physicians) are not billable on their own or in certain combinations to Medicare or Medi-Cal. For example, Medicare will not reimburse for the services of a resident if supervision by the attending doctor is not documented. Although eliminating these write-offs is infeasible, periodic, data-driven analysis of methods to mitigate the negative financial impact, such as staffing additional attending physicians to increase billable resident physician charges, helps ensure that Public Health weighs the financial impact of staffing decisions in a data-driven manner.

The audit did not focus on the remaining three areas of write-offs in Exhibit 6: emergency room unbillables, utilization management, and treatment authorizations. The amounts written off in the emergency room unbillables category were deemed too small in relation to the other write-off areas, so this area was not considered by the audit. The utilization management and treatment authorizations write-offs can be due to clinical decisions as well as missing or untimely documentation. The audit did not focus on these categories because the primary cause of the write-off, as described by Patient Financial Services management during the survey phase of the audit, were clinical decisions, and not missing or untimely documents.

Billing groups outside of Patient Financial Services

As shown in Exhibit 1, the remaining billing groups outside of Patient Financial Services include those of:

- Behavioral Health
- Health at Home
- City Clinic

Because 85 percent of Public Health's billable revenues come from CHN, the audit did not focus on these other areas.[6]

Objectives

The objectives of the audit were to:

1. Determine whether Public Health's internal controls are adequate to minimize avoidable write-offs for CHN.

2. Identify how Public Health's organization of billing compares to that in other jurisdictions. (See Appendix A for the results related to this objective.)

Scope and Methodology

To meet these objectives, the audit team:

- Reviewed financial data provided by Public Health.
- Identified high-risk revenue adjustment categories within the influence of CHN's processes.
- Interviewed employees in the Patient Financial Services unit, elsewhere in the Finance Department, and in units across CHN that are responsible for various aspects of a patient bill.
- Reviewed written policies and procedures.
- Distributed a survey on organizational effectiveness to selected peer jurisdictions and analyzed the results.
- Distributed a survey on billing capacity to 11 Public Health units and analyzed the results from the 8 that responded.
- Interviewed employees across Public Health to determine their level of interaction with Patient Financial Services and each other.

Statement of Auditing Standards

This performance audit was conducted in accordance with generally accepted government auditing standards. These standards require planning and performing the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. CSA believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

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[6] Bills issued by the non-CHN billing groups made up only 15 percent of billable revenue, while CHN's made up 85 percent.

CHAPTER 1 – Public Health Has Insufficient Controls to Minimize Write-Offs and Must Better Analyze and Monitor Write-Offs to Address Their Causes

Summary

The Community Health Network (CHN) of the Department of Public Health (Public Health) wrote off $31.9 million in charges in categories that can be affected by their internal controls, including charges that aged out, and pharmacy and laboratory liability accounts in fiscal years 2011-12 and 2012-13. Of the aged out charges examined, 37 percent, or $10.0 million, were missing diagnoses, or in the case of non-Federally Qualified Health Center (FQHC) locations, a code indicating the attending physician, or both.

With sufficient controls, including procedures that ensure the timeliness and completeness of information needed for billing and procedures for analyzing and monitoring areas where billing can be improved, CHN could have collected an estimated $2.3 million over the two-year period, or an average of $1.15 million in revenue each year on top of what it already collects, which in 2012-13 was $429.9 million.

Also, CHN has not analyzed the financial implications of some staffing decisions in a data-driven manner. Payers do not reimburse for services provided by some types of staff, such as nurses or health workers, under some circumstances, leading to write-offs and revenue adjustments. Although the write-offs have persisted for years, CHN has yet to analyze whether it may be possible to mitigate some of these negative financial impacts.

Finding 1.1

The Community Health Network lacks sufficient controls to prevent missing information that leads to write-offs and procedures for analyzing and monitoring areas where billing can be improved.

In fiscal years 2011-12 and 2012-13, CHN wrote off $31.9 million in three controllable areas:

- Aged-out accounts
- Pharmacy charges
- Laboratory charges

With sufficient controls, including procedures that ensure the timeliness, accuracy, and completeness of information needed for billing and procedures for analyzing and monitoring areas where billing can be improved, CHN could have collected an estimated $2.3 million over the two-year period, or an average of $1.15 million in additional revenues each year.

<u>Missing and inaccurate billing information prevents CHN from collecting an estimated $1.15 million per year</u>

CHN was unable to collect this estimated $1.15 million in annual revenues partly due to missing and inaccurate information.

Many of the written-off charges are missing a diagnosis or code indicating the physician who provided the service.

Exhibit 7 shows the three categories of charges that were written off, the estimated reimbursement amounts associated with these charges, and the percentages of the charges that were missing one of two data inputs that are needed for billing but are commonly omitted.

Of the aged-out charges, 37 percent were missing diagnoses or, in the case of non-FQHC locations, a code indicating the attending physician or both. Charges cannot be billed without this information.

EXHIBIT 7 Write-Offs in Three Areas That Can Be Influenced by CHN Processes

Categories of Charges	Fiscal Year 2011-12	Fiscal Year 2012-13	2-year Total	Yearly Average
Charges Written Off *(in Millions)*				
Aged Out[a]	$14.74	$13.21	**$27.95**	$13.98
Pharmacy Unbillables	0.27	1.09	**1.36**	0.68
Laboratory Unbillables	1.97	0.66	**2.63**	1.32
Total	**$16.98**	**$14.96**	**$31.94**	**$15.98**[b]
Estimated Lost Reimbursement Associated With Aged Out Charges Above (in Millions) [c]				
Aged Out	**$1.0**	**$1.3**	**$2.3**	**$1.15**

Notes:
[a] Aged-out charges either could not be issued or were issued but could not be reimbursed within the timeframe required by payers for a variety of reasons, some of which can be influenced by Public Health.
[b] Yearly average is sum of figures above and not exactly 50 percent of 2-year total due to rounding.
[c] The reimbursement for aged-out charges was estimated using typical reimbursement rates and rates of payer coverage for General Hospital and the COPC clinics. These figures were then further discounted to account for the fact that some charges will not be reimbursed for reasons beyond Public Health's control. The estimate excludes radiology charges. The reimbursement value of pharmacy and laboratory unbillables cannot be determined because information such as insurance coverage, provider, and diagnoses for the accounts written off were not provided. The data provided did not show account information for individual patient accounts.

Source: Auditor's analysis of data provided by Patient Financial Services.

Other types of missing information also reduce Public Health's ability to bill accounts. Analysis of a purposeful sample of 300 aged-out accounts, which included 69 coded as missing diagnoses and 3 that were missing diagnoses but were not coded as such, shows that the following missing information also prevented billing or reimbursement:

- Missing denial of coverage or proof of payment from a primary payer[7] (7 accounts)
- Missing Treatment Authorization Request[8] or Medi-Service reservation[9] (5 accounts)
- Missing facility charge[10] (1 account)
- Missing medical record (1 account)

[7] A health maintenance organization that pays before the balance is sent to Medicare or Medi-Cal.

[8] A Treatment Authorization Request (TAR) is the form used by providers to seek authorization from Medi-Cal to provide and/or be paid for some services.

[9] A Medi-Service reservation is required by Medi-Cal as part of the claims process for certain services provided to a Medi-Cal recipient.

[10] A facility charge represents the hospital or clinic's charges for the room where the services are provided or the procedure is performed, per Patient Financial Services.

The balance of the 300 accounts included:

- 81 that should have been booked in a code that indicated the reason the charges were not collected, but which, according to management, were most likely ineligible for additional reimbursement.
- 59 that were denied by payers for a variety of reasons.
- 22 for which the claim was never sent for reasons that could not be determined.
- 21 that were billed but no payment was received.
- 12 for which the insurance coverage initially assigned to the account was not the same as the patient's final insurance determination.
- 9 for which the denial from the primary payer did not leave time to bill the secondary payer.
- 10 that were written off for a variety of other reasons that only affected a small number of accounts each.

Exhibit 8 summarizes the six CHN locations where diagnoses and/or attending physician codes missing from charges prevented the collection of the highest amounts of estimated revenues in fiscal years 2011-12 and 2012-13 combined. These six locations provided services for which CHN could not bill because of missing diagnoses, attending physician codes, or both.

EXHIBIT 8 Locations With the Highest Estimated Revenue Loss Due to Missing Diagnosis or Attending Physician Code[a]

Location	2011-12 and 2012-13 Charges Written Off	% Missing Diagnosis	% Missing Attending Physician Code	Estimated Revenue[b]
Laboratory	$2,476,944	49%	6%	$122,055
Ambulatory Treatment Center (FQHC)	2,236,419	21%	NA[c]	46,751
General Medicine Clinic 1M (FQHC)[d]	762,760	53%	NA[c]	39,944
3D Clinic[d]	592,521	63%	28%	37,339
Pharmacy	244,577	96%	54%	23,995
4M Clinic[d]	431,005	30%	14%	13,636

Notes:

[a] Some accounts may be missing both a diagnosis code and an attending physician code.

[b] This calculation is based on charges that were missing either one or both of the codes. Estimated revenues are based on typical rates of payer coverage and reimbursement for General Hospital and the COPC clinics. These rates were also discounted to account for reimbursements not received for reasons beyond Public Health's control.

[c] Not applicable. FQHC locations are subject to different rules regarding the reporting of attending physicians. The data set provided to the auditors did not include a field that would be needed to analyze these locations.

[d] 1M, 3D, and 4M represent floors and groups of offices in General Hospital where clinics are located and services are rendered. The clinics are not referred to by any other names, according to management.

Source: Auditor's analysis of data provided by Patient Financial Services.

Medi-Cal and Medicare will not pay claims submitted after their deadlines.

In addition to being complete, information used for billing must be submitted in a timely manner. Bills that cannot be issued in the timeframe required by payers will not receive reimbursement. Medi-Cal and Medicare deny claims received 12 months after services were rendered. Medi-Cal also provides reimbursement at a discounted rate if claims are received six months after services were rendered.

Of the aged-out charges considered by this audit, 82 percent listed Medi-Cal or Medicare as a payer on the account. For accounts aged out in 2011-12 and 2012-13, the average time between the date of service and the date accounts were written off was 256 days.

Although CHN has been tracking the volume of charges missing billing information for inpatient accounts and monitoring progress in this area through the Revenue Cycle Committee, only one outpatient location, the Emergency Department, is included in this effort. In addition to this, a focus group has been working to address problems in billing for one additional outpatient location: the Laboratory. Of the $14.0 million in average annual aged-out charges, $13.5 million originates from 73 outpatient locations.

As described in detail in the background section, a patient bill created at General Hospital or Laguna Honda requires cooperation from Admissions, Eligibility, clinical staff, Medical Records, and Utilization Management (see Exhibit 4) to ensure that information needed for billing is complete and timely. At Community-Oriented Primary Care (COPC) clinics, the process involves fewer units, with multiple functions performed by clinic office or medical staff.

Controls that allow incomplete information are partly to blame.

Processes in these areas do not have controls adequate to ensure that information is provided for billing purposes. Although Public Health has not performed the analyses that would identify the process breakdowns that are preventing complete data submission—and, thus, leading to write-offs in aged-out and laboratory and pharmacy liability categories—management noted the following examples of processes that may be leading to missing data:

- Clinical staff not providing diagnoses on paper forms used when sending a requisition to the Laboratory.
- Staff at clinics not updating patient accounts with codes indicating the physician who provided the service.

Exhibit 9 summarizes the top locations where write-offs due to aged-out charges originate. As the exhibit shows, 67 percent of aged-out charges originate in seven locations. More than 50 percent of the written off charges originating from Radiology, the Clinic 3D at General Hospital, and the General Medicine Clinic 1M[11] were missing diagnoses, and over 50 percent of those written off from the General Medicine 1M Clinic were also missing physician codes. However, although 68 percent of the charges originating in Radiology were missing diagnoses, according to management, these would likely not be billable because the results of the tests were not read by radiologists, a requirement for billing.

EXHIBIT 9 Top Locations Where Aged-Out Accounts Originate *(in Thousands)*

Location	Fiscal Year 2011-12	Fiscal Year 2012-13	2-Year Total	% of All Aged Out	% Missing Diagnosis	% Missing Attending Physician Code
Radiology[a]	$6,077	$1,793	$7,870	28%	68.4%	1.0%
Outpatient Emergency	1,191	2,696	3,887	14%	1.6%	0.0%
Laboratory	1,358	1,119	2,477	9%	49.0%	6.2%
Ambulatory Treatment Center[b]	616	1,621	2,237	8%	21.1%	0.0%
Women's Options Clinic[b]	361	408	769	3%	12.0%	0.0%
General Medicine Clinic 1M[b]	383	380	763	3%	53.0%	0.0%
Clinic 3D	400	193	593	2%	63.1%	6.8%
Top Locations with Aged-Out Accounts	**$10,386**	**$8,210**	**$18,596**	**67%**		
Total - Other locations analyzed	3,854	4,668	8,522	**30%**		
Unidentified locations[c]	502	331	833	3%		
Grand Total	**$14,742**	**$13,209**	**$27,951**	**100%[d]**		

Notes:
[a] Although 68 percent of Radiology Department charges were missing diagnoses and 1 percent were missing physician codes, these charges would be unbillable even if this information was available because they were not read by a radiologist, according to management. Because the University of California, San Francisco, provides the radiology services, Patient Financial Services considers this issue out of its control. Over 99 percent of all aged-out radiology charges examined had not been read by a radiologist.
[b] The portion of the location that is funded as a Federally Qualified Health Center (FQHC). FQHC locations are subject to different rules regarding the reporting of attending physicians. The data set provided to the auditors did not include a data field that would be needed to analyze these locations.
[c] The audit did not analyze data for some write-off codes that indicate aged-out charges because the amounts in each of these codes were relatively insignificant.
[d] The percentages in this column do not sum to 100 percent due to rounding.

Source: Auditor's analysis of data provided by Patient Financial Services

[11] 3D and 1M indicate the floor and set of offices in General Hospital where the clinics are located.

Healthcare financial management literature emphasizes the importance of timely and complete documentation for the revenue cycle and explains the need to involve all parts of the hospital to achieve this and to measure areas where change needs to occur.

Public Health units need to collaborate better to ensure completeness and accuracy of billing information.

Public Health units need to collaborate better to ensure completeness of billing information. The ability of a medical records department to ensure optimal reimbursement in the revenue cycle for inpatient and outpatient accounts depends largely on the quality of documentation that the billing staff receives. Staff, including nurses and physicians, must be properly trained to provide the necessary documentation.

If an organization is to be financially competitive, it should measure areas where change needs to occur, and set financial goals and objectives. In the case of Public Health, this would mean measuring amounts in write-off categories that can be minimized by improved internal controls and measuring the performance of individual units in improving controls to decrease write-offs originating from their location.

According to a May 2013 report by McKinsey & Company, in a hospital setting, the whole hospital must feel responsible for the revenue cycle's success and the financial health of the institution, and groups not traditionally included in revenue cycle management, like clinicians and other groups, should be involved in developing solutions.

<u>CHN's insufficient approach to analyzing and monitoring write-offs prevents problems from being addressed</u>

A 2003 management audit found that the General Hospital does not sufficiently analyze its process for billing and collection.

Insufficient monitoring has been identified as a problem in the organization before. In 2003 a management audit of General Hospital by the Board of Supervisors' Budget Analyst found that the hospital "does not sufficiently analyze [its] process for billing and collections, and as a result, Hospital management does not have a comprehensive understanding of all the variables impacting collection of patient accounts." The report also pointed out that:

> *Write offs have a significant impact on accounts receivable and can provide valuable insight in billing and collection performance….Adjustments caused by performance or processing issues should be segregated, analyzed, and*

closely monitored.

Exhibit 10 summarizes the top locations responsible for the charges that aged out or had incomplete documentation and indicates where causes of the write-off have not been analyzed by CHN and progress to address it is not monitored.

EXHIBIT 10 CHN's Controls Over Write-Offs Need Improvement Fiscal Years 2011-12 and 2012-13

	CHN Has Not Analyzed Causes	CHN Has Not Monitored Whether Unit Minimizes Write-Offs
Aged Out: *$28.0 million*		
Top locations with aged-out accounts		
Radiology	x	x
Outpatient Emergency	*	*
Laboratory	in progress	x
Ambulatory Treatment Center	partially	x
Women's Options Clinic	partially	x
Pharmacy Unbillables: *$1.4 million*		
	x	x
Laboratory Unbillables: *$2.7 million*		
	in progress	x

x Write-offs have not been analyzed by CHN and progress to address them is not monitored at this location.

* Patient Financial Services and the Emergency Department now collaborate to reduce the number and value of Emergency Department charges that are missing information needed for billing, and Patient Financial Services monitors the accounts outstanding. However, there is no regular monitoring of trends or drilling down into the write-off categories that would show whether the improvement in timeliness translates into decreased write-offs. As billing timeliness has improved, one would expect a corresponding positive impact on the write-off, but this has yet to be shown.

Source: Auditor's analysis based on information from Public Health and interviews of CHN staff.

CHN has performed no analysis to identify reasons that bills cannot be issued for two of the top locations whose bills aged out—Radiology and the Pharmacy. For the Ambulatory Treatment Center and Women's Options Clinic, Patient Financial Services indicated that it had identified missing diagnoses as a problem at these locations. However, as shown in Exhibit 9, missing diagnoses account for only 12 percent of the charges from the Women's Options clinic that aged out and only 21 percent of the charges from the Ambulatory Treatment Center that aged out. No formal analysis of other reasons accounts aged out was provided to the auditors.

CHN did not begin to analyze the causes of the write-offs originating at the Laboratory until February 2014.

Systematic collaboration between Patient Financial Services and the Emergency Department to improve the timeliness of billing data was undertaken through the Revenue Cycle Committee starting in March 2013, and efforts are monitored by Patient Financial Services via trends shared with the concerned units in the Revenue Cycle Committee agendas. These efforts have reduced the number and value of Emergency Department bills that could not be issued due to missing facility charges and missing coding. For example, there were many fewer outpatient and inpatient accounts needing a facility charge from the Emergency Department (85 percent and 84 percent lower, respectively) in January 2014 than in March 2013, when the committee began to communicate about this issue. The number of outpatient accounts needing coding decreased 47 percent in the same period.

In addition to the missing and inaccurate information that impacts billing, as described above, the audit found that possible incorrect insurance eligibility determinations and problems in documenting that the provider is associated with the location where services were rendered prevented bills from being reimbursed. Also, 22 claims (3.5 percent of the written-off charges sampled) had not been issued at all for reasons that management was unable to determine after reviewing the account history in the billing system.

Analysis of write-off data for fiscal years 2011-12 and 2012-13 also showed that the way in which services are rendered prevented some reimbursement. For example, more than 99 percent of the radiology charges written off could not be billed because the results had not been read by a radiologist.

Patient Financial Services focuses on inpatient accounts and does not prioritize analysis of these outpatient-related write-offs.

Patient Financial Services' approach to monitoring does not address problems that lead to these write-offs because the unit focuses primarily on collecting high-value inpatient accounts. These high-value inpatient accounts make up only 4 percent of outstanding accounts, according to management, but account for at least 76 percent of CHN's revenue. According to management, Patient Financial Services follows up thoroughly on inpatient accounts because they are generally higher-value, and pursues complete collection on each one, while outpatient accounts are given a lower priority. However, this approach overlooks the fact that unidentified problems prevent so many outpatient accounts from being billed that in fiscal years 2011-12 and 2012-13 the associated reimbursement was worth approximately $2.3 million, or $1.15 million on average each year.

A failure to identify underlying problems leading to write-offs prevents communication about 68 percent of the aged-out charges.

A failure to identify the underlying problems leading to write-offs prevents Patient Financial Services from communicating with management in units that could address the problems. According to Patient Financial Services management, the reasons for write-offs vary, and the reasons outpatient accounts are held up have not been fully identified for two of three write-off categories that indicate charges aged out. These categories represent 68 percent of the aged-out charges. Because it had not identified the reasons charges aged out, Patient Financial Services could not identify which managers oversee the processes that lead to these write-offs.

Systematic efforts to monitor Emergency Department accounts have significantly reduced missing information from this location.

Without identifying the causes of the write-offs, management in the responsible units cannot begin to systematically address the problems. For only one location identified in Exhibit 10, the Emergency Department, has CHN taken such a systematic approach, monitoring fluctuations in the problem area over time. This successful approach was implemented in March 2013 and is monitored through the Revenue Cycle Committee and through day-to-day communications between Patient Financial Services and the Emergency Department.

Although 57 percent of 37,663 outpatient accounts examined are below $500, some have much higher values.

Patient Financial Services management acknowledges that it could be more systematic in its approach to reviewing outpatient accounts. Patient Financial Services management explained that outpatient accounts generally average $300, which is much lower than the average of inpatient accounts, and that due to limited staffing resources, outpatient accounts are given lower priority than inpatient accounts.

The audit's review of the 37,663 accounts written off in the three largest categories for outpatient charges that aged out showed that, in fiscal years 2011-12 and 2012-13, although 57 percent of the adjustments were below $500, more than 4,000 were for amounts over $1,500, with the largest valued at $209,000.

Patient Financial Services does not track missing diagnoses at clinics over time.

For those areas where a problem is identified, the responsibility for addressing it has not always been clearly defined. For charges missing diagnoses, Patient Financial Services sometimes shares with the Revenue Cycle Committee the number of accounts missing diagnoses at various clinics, but does not monitor these problems over time to ensure that they are being managed. Patient Financial Services management believes that because various leaders from other units are members of the Revenue Cycle Committee, significant instances that result in nonreimbursement can be communicated and discussed, and that the unit submitting the charges is ultimately responsible for resolving or reducing the frequency of matters that result in significant amounts not being reimbursed.

The auditors interviewed four managers within clinical or operations leadership who had been identified by Patient Financial Services management as having control over areas that influence write-offs due to missing diagnoses. Of these four, two were aware of targeted efforts to address missing diagnoses at three specific locations: the Emergency Department, Radiology Department, and Laboratory. However, these two were not involved in these efforts. One described responding to issues raised by Patient Financial Services and having staff trained to review encounter forms for completeness, and the other was actively involved in determining the cause of unbillable laboratory charges.

In the case of radiology results that were not read by a radiologist—which, according to Patient Financial Services management, are therefore unbillable to Medicare and Medi-Cal—Patient Financial Services has not engaged in any discussions with UCSF to determine if services could be provided in a way that minimizes the write-offs because it believes that UCSF controls the processes that determine which provider (medical staff member) reads radiology results. Radiology results not read by a radiologist accounted for 29 percent of aged-out charges in fiscal years 2011-12 and 2012-13.

Also, according to management of Patient Financial Services, there is insufficient information technology staff assigned to Patient Financial Services to address all the issues that come up with the financial system. Addressing write-offs due to missing and inaccurate information, and thereby realizing additional revenue, is particularly important in the context of the changes brought about by the Affordable Care Act, which, according to Public Health, may cause adverse financial issues for the department.

Robust revenue cycle performance will play an increasingly important role in providers' financial health.

According to McKinsey & Company, with the changes brought about by the Affordable Care Act, robust revenue cycle performance will play an increasingly important role in providers' financial health. Such performance requires that providers understand their revenue cycle and identify where opportunities to collect more revenue exist, overcoming silos that separate functions. In Public Health's case, identification of opportunities to collect more revenue requires that areas where revenue is written off be analyzed to determine the underlying causes.

According to a textbook on financial management, organizations that aim to be financially competitive must measure the things they wish to see changed. Performance monitoring—including setting goals, creating plans to achieve goals, implementation of plans, monitoring results, and feeding the results back to affected parties—is of overriding importance to the success of a hospital revenue cycle.

For example, at the Arrowhead Regional Medical Center in San Bernardino County, a manager reviews the frequency and amount of write-offs as compared to the reimbursement rate. Santa Clara County's public health department has found that implementing a more advanced information system has helped hold responsible the units outside of the billing group that delay the processing of accounts. The system gives information on where bills are being held up and which departments are responsible for the delays.

Without monitoring, collaborating, and implementing internal controls to address write-offs effectively, Public Health misses an opportunity to collect more revenue. As shown in Exhibit 7, the average yearly revenue potential of these charges was an estimated $1.15 million in fiscal years 2011-12 and 2012-13.

Recommendations

The Department of Public Health should:

1. Ensure that its relevant units collaborate to implement the necessary process changes that would ensure that complete billing information is received by Patient Financial Services in a timely manner.

2. Analyze significant write-off categories that could be influenced by departmental processes to determine how to minimize them.

3. Monitor individual units' progress and performance using metrics pertaining to the delivery of timely and complete information needed for billing.

Finding 1.2

The Community Health Network does not analyze the financial impacts of some staffing choices that lead to unbillable charges for provider costs.

Payers will not reimburse Public Health for services provided by some types of providers or combinations of providers under some circumstances, according to management. CHN uses certain staffing arrangements that are not reimbursed without having fully analyzed whether staffing could be changed to improve financial results or whether the growth in certain unreimbursable charges is justified. The audit found two areas where such an analysis had not been performed:

- Use of unbillable providers, such as nurses, pharmacists, or health workers, alone or in combinations that Medicare and Medi-Cal will not reimburse. Charges adjusted out for this reason totaled $7.0 million in 2011-12 and 2012-13 combined.

- Services provided at Federally Qualified Health Center (FQHC) clinics by non-physicians, including "wraparound" services, some of which are considered covered in the physician's rate and, therefore, are not reimbursed. The charges adjusted out for these wraparound services grew substantially from fiscal year 2009-10, when the adjustment was $3.0 million, to $8.9 million in 2010-11, peaked in 2011-12 at $14.3 million, and dropped to $9.4 million in 2012-13. In addition to charges explicitly coded as wraparound services, $13.1 million was written off for provider charges at the Ambulatory Treatment Center in 2011-12 and 2012-13 but not analyzed.

Payers will not reimburse Public Health for services provided by some types of providers or combinations of providers.

Unlike the categories of write-offs in Finding 1.1, these cannot be minimized by improving processes that impact individual patient accounts. Rather, they present an area of opportunity to be analyzed to determine if providing services in a different manner could improve the overall financial outcome.

The unanalyzed write-offs associated with both unbillable non-physician providers and adjustments due to FQHC wraparound services across the CHN totaled $43.8 million in fiscal years 2011-12 through 2012-13.

CHN has not performed analyses to determine whether different staffing or provider models for provision of services could improve financial outcomes. CHN has also not analyzed whether the growth in unreimbursed charges for FQHC wraparound services, which increased from $2.9 million in fiscal year 2009-10 to $14.3 million in 2011-12 before dropping to $9.4 million in 2012-13, is justified by healthcare outcome gains from providing the wraparound services. CHN management stated that it would analyze unbillable providers at clinics in June 2014.

These analyses have not been performed because it is unclear that the effort would yield financial benefits.

Public Health has not performed these analyses because of the varied nature of the services and because it is unclear to the department whether such an effort would yield financial benefits for the organization. According to management, CHN is, however, working through legislative means to influence the amounts Federally Qualified Health Center clinics are reimbursed for the services they provide.

Unbillable providers, which accounted for $7.0 million in charges written off in fiscal years 2011-12 and 2012-13, have not been analyzed because, according to management, either the providers are at locations that receive the FQHC rate described above or because using nurses for certain procedures, such as lab draws and blood pressure tests, is considered more efficient, although providing these services this way means they are unbillable.

However, based on benchmarking results, jurisdictions have the option of changing their procedures to address the issue of unbillable providers. For example, San Bernardino County, which recently started an FQHC clinic, decided to change its operating procedures by requiring all patients to see billable providers in order to maximize the county's billing reimbursements.

A financially competitive organization must consistently apply quantitative decision-making tools and identify opportunities to create value.

According to *Fundamentals of Health Care Financial Management,*[12] an organization that aims to be financially competitive must possess a number of critical attributes including consistent application of quantitative decision-making tools by management. Also, as noted previously, according to McKinsey & Company, robust revenue cycle performance requires that providers identify where value creation opportunities exist, overcoming silos that separate functions.

Without performing a data-driven analysis of staffing choices that result in it rendering unreimbursable services, CHN cannot be assured that the write-offs due to staffing have been minimized and cannot weigh decisions about service levels against the cost implications of those levels.

Recommendations

The Department of Public Health should:

4. Annually analyze whether and how the negative financial impacts of using unbillable providers can be mitigated.

5. Perform a data-driven analysis of Federally Qualified Health Center clinic staffing and wraparound services to more explicitly consider financial impacts as well as patient care goals.

[12] Steven Berger, *Fundamentals of Health Care Financial Management*, Third Edition, Jossey-Bass, 2008.

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CHAPTER 2 – Public Health Needs to Improve Controls Over Revenue Adjustments

Summary

Patient Financial Services must improve how it manages and reviews the revenue adjustment process. In particular, Patient Financial Services:

- Lacks clear guidance for the adjustment process, such as a complete set of written policies and definitions.
- Lacks procedures to ensure that new automated adjustment categories are approved by management
- Has not reviewed how its system makes certain automated adjustments.
- Makes adjustments in a manner that obscures the source of problems that lead to write-offs.

These weak controls increase the risk that adjustments could be made incorrectly or revenue could be foregone inappropriately. They also indicate that reports based on the information may be unreliable and less useful for management purposes.

Finding 2

CHN has inadequate controls over the revenue adjustment process. Better controls are needed to ensure that decisions not to pursue potential revenue are accurate and appropriate.

<u>Patient Financial Services needs comprehensive policies and definitions to guide staff in the proper use of revenue adjustment categories and does not have comprehensive processes to ensure that adjustment codes are created and used appropriately.</u>

Patient Financial Services needs comprehensive written guidance to avoid inconsistency and misuse of revenue adjustment categories.

During the audit period Patient Financial Services had no comprehensive document that would define and explain the correct use of each adjustment category[13] and specify a policy as to whether adjustments in the category are to be made manually, through automation, or both. Patient Financial Services has since begun

[13] A document of definitions was created during the course of this audit at the request of the auditors.

creating a document that indicates which policies and procedures should be applied to most adjustment categories, but the document does not yet cover all categories or include the definitions of each category.

During the period examined, of the 163 revenue adjustment categories in the INVISION financial system used in fiscal year 2012-13, Patient Financial Services' definitions or written policies were clearly defined for only 19. Therefore, for 128 (87 percent) of the categories there was no guidance available for staff to know how and why these adjustments should occur. Although, according to management, most of the categories that lacked written guidance are subject to automatic adjustments made by the financial system, staff or managers may also occasionally enter adjustments into the system manually. A document provided by Patient Financial Services in November 2014 aims to allow users to see which policies and procedures apply to all but 22 adjustment codes.

$688,470 was written off in 2012-13 in categories reportedly not in use or unknown to managers.

A lack of clear definitions increases the possibility that staff may or could inadvertently misuse adjustment categories. For example, in fiscal year 2012-13 six adjustment categories, used for a total of $688,470 in write-offs, were not readily known to management. That is, at the time they were first interviewed about this, Patient Financial Services managers did not know what the categories represented or stated that the categories are no longer used. One of the categories, representing $335,405 of this amount, was subsequently identified by another manager and its proper use explained.

Patient Financial Services managers do not commit all adjustment codes to memory, but instead focus on those with the greatest value.

According to Patient Financial Services managers, they do not memorize all the adjustment codes because there are so many. Instead, management focuses its attention on the codes with the greatest values of charges.

Patient Financial Services management explained that the four smallest-value codes of the six codes noted above—which had been described by management as "not in use" and which contained a total of $135,810 in 2012-13—would have been adjusted manually, and would thus require management approval for any adjustment of $5,000 or more. However, the supervisor in the unit that made these entries confirmed that the unit had misused the codes.

Patient Financial Services management believes that automation of adjustments provides assurance that they are made properly.

Patient Financial Services management also explained that the remaining two of these six codes, which were larger and contained a total of $552,600 in 2012-13, contain only adjustments that were automated in the financial system, and that this automation gives management assurance that the adjustment is proper because a good deal of thought goes into the programming underlying the codes.

There is no formal process to assure management that an automated adjustment could not be set up improperly.

Although the use of many adjustment codes is automated, there are no formal processes to assure management that an automated code could not be created improperly without management's knowledge. Although Patient Financial Services managers state that they are involved in the process of programming automated adjustments, there is no formal review and approval process that ensures that this is always the case.

Patient Financial Services managers said that one way they would know if something had been programmed incorrectly without their knowledge would be that the new code would appear on a report listing all the adjustment codes. However, as noted above, management was not immediately familiar with some codes on the report, so this is not an effective control for ensuring that the system is programmed correctly.

Also, because there is no formal process for ensuring that adjustment codes are programmed with management approval, management should not rely on the fact that adjustments were automatically generated as an indication that they are correct.

Patient Financial Services managers stated that any adjustment problems would be indicated by other processes, such as inquiries by the General Accounting unit when an accountant has a question about a code, or audits performed by Medicare, Medi-Cal, or Macias Gini & O'Connell, LLP, which, according to Patient Financial Services, performs an annual audit. However, it is unclear whether these safeguards are comprehensive or designed to catch instances in which charges are written off under the wrong code or if too much is adjusted out.

An incomplete understanding by management of which categories are being used and the lack of a formal process for approval for programming automated adjustments opens the door for misuse of write-offs.

The use of categories unknown to management, or with which management is unfamiliar, indicates that it is possible for revenue to go unpursued for invalid reasons and that charges can be written off improperly without action being taken to correct them. An incomplete understanding by management of which categories are being used and the lack of a formal process for approval for programming automated adjustments increases the risk that write-offs could be misused. A strong internal controls environment, including a formal management approval process for the creation of adjustment algorithms, and clear and comprehensive definitions of adjustment categories and procedures for their use, would help ensure that revenue that is written off is appropriately adjusted and accounted for.

Because of the insights into billing and collection performance that these efforts can provide, adjustments should be summarized and analyzed, at a minimum, by meaningful categories, with adjustments caused by performance or processing issues (such as the missing diagnoses and physician codes described in Finding 1.1) systematically segregated, analyzed, and closely monitored.

As noted in recent healthcare financial management literature, tracking write-offs per month, with particular attention paid to noncontractual write-off codes, such as timely filing or procedures that are not covered, helps a healthcare organization identify billing problems.

<u>Weak controls over automated and manual revenue adjustments increase the risk that revenue will be written off inappropriately.</u>

Some rules governing automated revenue adjustments have not been reviewed by current Patient Financial Services management.

According to Patient Financial Services management, the revenue adjustment process is primarily automated. Also according to management, some of the rules that govern the automatic adjustments were established years ago and have not been reviewed by—and, therefore, are not fully known to—current Patient Financial Services managers. Management does not have a routine process for the review of these rules. This increases the risk that inaccurate, outdated, or otherwise inappropriate rules may be governing automated adjustments.

Other jurisdictions interviewed in the course of this audit have more stringent controls over the adjustment process. At the Arrowhead Regional Medical Center in San Bernardino County, a comprehensive review of all denial codes was conducted to generate standard operating procedures for staff to handle adjustments, and automatic adjustment rules are reviewed and updated every six months. At the Santa Clara County Public Health Department, a computer model built by consultants is used weekly to check for appropriate adjustments..

Because Patient Financial Services relies so heavily on automation for its billing, it is critical that the underlying software is accurate and up-to-date to comply with current billing rules. Patient Financial Services must periodically review and update the billing rules to ensure that claims are appropriately adjusted and revenue correctly written off.

Write-offs that are not guided by policy or reviewed by management create greater risk of abuse or misuse.

<u>The lack of comprehensive category definitions, inconsistent write-off practices, and weak controls over the adjustment process decrease the usefulness of financial data.</u>

A lack of formal policies for "adjustment sweeps" leads to unreliable financial reports.

According to Patient Financial Services management, the managers also periodically manually adjust out accounts with certain characteristics, such as missing diagnoses beyond a certain date range, unbillable physicians, and remittance advice codes from third-party payers that indicate why charges were not paid in full. However, there are no formal policies for how these periodic manual write-offs are conducted.

Patient Financial Services management reports that these "adjustment sweeps" are often performed close to the year end. Management noted that performing this process at the end of the year rather than throughout may result in charges being written off in categories that do not capture the underlying issue that led to the write-off. For example, a charge may be written off as "over 12 months" (aged out), which in reality does not capture the underlying issue that led to the write-off (for example, a missing diagnosis), and does not provide opportunity for potential recovery

Several revenue adjustment categories can be used interchangeably, which makes resulting management reports less useful.

In two of the three largest codes indicating charges aged out, the underlying reasons these charges were not reimbursed are as varied as missing diagnoses, no payment received on the charges, payer denials, incorrect insurance determinations, missing medical records, and a number of other reasons. Because of this, the Accounts Receivable Transaction Summary report, which shows adjustments and write-offs, does not allow management to see the extent and nature of billing problems throughout the organization that are leading to write-offs.

Moreover, this approach may be insufficient to ensure that problems with individual accounts are identified in a timely manner, which would help ensure that they can be addressed.

Write-offs should be made in categories that indicate the source of the problem that led to them. Other jurisdictions noted the importance of specific write-off codes that indicate the source of write-offs for conducting meaningful analyses. One jurisdiction found analysis of write-offs was not being performed because they lacked write-off codes that indicated specific problems. Another noted that detailed codes in its new data system allowed staff to easily identify the source of eventual write-offs, which enabled weekly discussions with departments that hold up bills. As noted in Finding 1.1., analyzing and monitoring the source of write-offs is a key step toward minimizing them.

A lack of policies and procedures provides less assurance of the appropriateness and accuracy of adjusted revenue.

Patient Financial Services lacks assurance of the appropriateness and accuracy of adjusted revenue, especially for outpatient accounts. The lack of clear processes and guidance for staff making revenue adjustments increases the risk that adjustments could be made incorrectly and that revenue could be foregone when it should not be. Also, adjustment data is used to generate collection success reports, so a lack of adjustment data that is accurate and indicates why charges are not collected may impede sound decision-making.

Recommendations

The Department of Public Health should, through its Finance Department's Patient Financial Services unit:

6. Develop a comprehensive set of definitions for adjustment categories and remove any inappropriate or obsolete categories from the financial system to prevent further use.

7. Develop a procedure to require management approval for programming of new automated adjustments.

8. Regularly review all rules for automated adjustments to ensure that they are current and correct and, if they are not, change the rules accordingly.

9. Develop comprehensive guidance for manual adjustments, including formalized criteria and processes for batch adjustments by managers.

10. Make manual adjustments monthly in accordance with documented procedures to ensure that issues that may prevent billing or collection are properly identified and addressed in a timely manner.

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APPENDIX A: Summary of Benchmarking Results From Three Other County Public Health Departments in California

The table below summarizes results from a benchmarking survey of three California county public health departments regarding their billing organization structure and collection tracking practice, conducted in February and March 2014, and follow-up interviews with two of the jurisdictions in July 2014. (No follow-up interview was conducted with Los Angeles County.) Responses from San Bernardino County for Part 1 of the survey were received from the County Department of Public Health. The follow-up interview took place with personnel of Arrowhead Regional Medical Center.

Part 1	San Bernardino County	Santa Clara County	Los Angeles County
Organization	Department of Public Health	Department of Public Health	Department of Public Health
Is billing centralized or decentralized?[14]	Centralized	Centralized	Decentralized
Is this structure (centralization or decentralization) successful in ensuring revenue maximization?	Yes	Yes	The (decentralized) structure is not particularly problematic.
Does your organization track collections against charges for a given year? If so, how?	Yes, by payer, facility, and insurance.	Yes. 17 percent collection rate. Divided on the account level. We do not look at it by payer or facility.	No response.
Additional comments from respondents		Santa Clara County was decentralized until 10-12 years ago, which was not a very good organization. [Decentralization] made it hard to establish controls over billing processes. It is good for the organization that the physician and facility are billed from the same unit; it helps us and the patient for bills to be linked. Also, centralization is good from a control perspective because the collection procedures and policies come from the same	Billing is done independently by five units: Health Services (programs like tuberculosis and sexually transmitted disease control), Substance Abuse, Children's Medical Services, HIV, and a drug treatment/rehabilitation center.

[14] Billing performed by a single group for all units of a public health department is centralized. In contrast, when multiple units perform a department's billing, this is decentralized.

		place.	

Part 2	San Bernardino County	Santa Clara County
Organization	Arrowhead Regional Medical Center	Department of Public Health
What types of analyses do you do to determine how to minimize write-offs?	Using an Excel tracking sheet filled out by follow-up billers. A manager reviews the frequency and amount of write-offs compared to the reimbursement rate.	The new billing system, EPIC, allows for weekly reporting and trend analysis of write-offs. It identifies where bills are being held and which departments are responsible for holding them.
What data-driven analysis have you done in terms of underlying causes of write-offs and what coordination do you do with the health providers and other public health units?	We have no specific analyses. We would like more specific codes for our write-offs.	The EPIC system and detailed codes in that system can easily identify the source of the eventual write-off
What is your experience in terms of unbillables due to inaccurate or incomplete information? What do you do to minimize these instances?	Missing diagnoses, which are a big problem, are discussed at a weekly meeting with Medical Records. Understaffing at Medical Records contributed to the problem, and paying a more competitive rate to staff has helped somewhat.	EPIC allows them to assign responsibility to departments. Weekly meetings with departments point out where holdups are and who is responsible. The impact on write-offs of the EPIC introduction has not yet been fully analyzed, but management notes that they are moving in a positive direction.
Comments from respondents regarding the write-off approval process	Write-offs must be reviewed or approved by management. Those under $50,000 are reviewed by assistant business office manager; over $50,000 by office manager and chief financial officer.	Write-offs have to be approved by managers. They have dollar thresholds for supervisory approval.
Have you analyzed the impacts of using unbillable providers or staffing choices?	Unbillable providers are not a particular issue.	This is an issue, and efforts have been undertaken to engage physician staff on the issue; however they have not yet been effective in minimizing the write-offs.
What controls do you have for your adjustment procedures?	A comprehensive review of all denial codes was conducted, and standard operating procedures for staff on how to handle the adjustments were developed. Automatic adjustment rules are reviewed and updated every six months.	Write-offs have to be approved by managers and there are thresholds for supervisory approval. A consultant analytical model is used weekly to check for underpayment and overpayment, thus ensuring that adjustments are appropriate.

APPENDIX B: DEPARTMENT RESPONSE

City and County of San Francisco
Edwin M. Lee, Mayor

Department of Public Health
Barbara A. Garcia, MPA
Director of Health

January 6, 2015

Tonia Lediju
Director of City Audits
City Hall, Room 476
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Dear Ms. Lediju:

Attached is the Department of Public Health's response to the Controller's report entitled "*Department of Public Health: Improved Controls Are Needed to Prevent Missing Billing Information; More Analysis and Monitoring Could Reduce Avoidable Revenue Adjustments.*"

In its ongoing operations the Department of Public Health (DPH) is intently focused on continuous improvement and optimization of its billing practices to support high-quality health care services for all San Franciscans. We thank the Controller's Office for its contribution to this effort by working closely with DPH staff to identify additional opportunities for potential improvement. DPH concurs with all of the report's recommendations, and the work necessary to implement the recommendations is already underway.

I look forward to a continued partnership with the Controller's Office to ensure DPH remains financially strong and delivers the best services possible to San Francisco residents.

Sincerely,

Barbara A. Garcia

101 Grove Street, Room 308, San Francisco, CA 94102
Phone (415) 554-2600 Fax (415) 554-2710

For each recommendation, the responsible agency should indicate whether it concurs, does not concur, or partially concurs. If it concurs with the recommendation, it should indicate the expected implementation date and implementation plan. If the responsible agency does not concur or partially concurs, it should provide an explanation and an alternate plan of action to address the identified issue.

RECOMMENDATIONS AND RESPONSES

Recommendation	Response
The Department of Public Health should:	
1. Ensure that its relevant units collaborate to implement the necessary process changes that would ensure that complete billing information is received by Patient Financial Services in a timely manner.	Concur: A workgroup comprising of Patient Financial Services, Information Technology, Clinical and Operational Leadership has been meeting monthly since the Fall of 2014 chaired by a member of Ambulatory Care Leadership. Its main charge is to develop cross-functional solutions to better align, integrate and optimize "front-end" processes for SFHN ambulatory services that include scheduling, eligibility, registration, and the entire revenue cycle. Various activities are underway with completion dates expected to take place throughout 2015. The first process change - auto-upload ICD-9 diagnostic codes from eCW (DPH's ambulatory electronic medical record) progress notes to Invision Financial System – is anticipated to take place by May 1, 2015.
2. Analyze significant write-off categories that could be influenced by departmental processes to determine how to minimize them.	Concur: A Healthcare Analyst will be hired and assigned to monitor and produce reports related to this recommendation. This will include the identification and review - on a quarterly basis – of adjustment/write-off transactions of significance that are not considered a contractual adjustment (i.e., different between hospital/clinic charges and the amount reimbursed) as the result of a claim processed by a Government

Recommendation	Response
	Program or Insurance Carrier. The identified transactions will be communicated to hospital and/or Ambulatory Care Leadership for review to determine if process modification could result in a positive financial impact. Pending completion of the hiring of the Healthcare Analyst, the target for implementation is July 1, 2015.
3. Monitor individual units' progress and performance using metrics pertaining to the delivery of timely and complete information needed for billing.	<u>Concur</u>: A Healthcare Analyst will be hired and assigned to monitor and produce reports related to this recommendation. Metrics will be established by DPH's Financial Leadership in collaboration with Hospital and Ambulatory Leadership. Pending completion of the hiring of the Healthcare Analyst, the target for implementation is July 1, 2015.
4. Annually analyze whether and how the negative financial impacts of using unbillable providers can be mitigated.	<u>Concur</u>: In collaboration between DPH's PFS and Finance Departments, a process to allow clinic specific analysis will be developed utilizing unbillable provider data, grouped by payer specific billing criteria over defined timelines beginning with the hospital based Family Health Center (FHC) and General Medical Clinic (GMC). This information will be used to perform a cost/benefit analysis to determine the financial/reimbursement impact if service delivery modifications are made by reducing the use of unbillable providers in these locations. Completion of this recommendation as it relates to the FHC and GMC is anticipated to take place by July 1, 2015. Similar analysis will subsequently be performed on other clinics using a high level of unbillable providers.

Recommendation	Response
5. Perform a data-driven analysis of Federally Qualified Health Center clinic staffing and wraparound services to more explicitly consider financial impacts as well as patient care goals.	Concur: In collaboration between DPH's PFS and Finance Departments, a process to allow clinic specific analysis will be developed utilizing unbillable provider data, grouped by payer specific billing criteria over defined timelines beginning with the hospital based Family Health Center (FHC) and General Medical Clinic (GMC). This information will be used to perform a cost/benefit analysis to determine the financial/reimbursement impact if service delivery modifications are made by reducing the use of unbillable providers in these locations. Completion of this recommendation as it related to FHC and GMC is anticipated to take place by July 1, 2015. Similar analysis will subsequently be performed on other clinics using a high level of wraparound services.
6. Develop a comprehensive set of definitions for adjustment categories and remove any inappropriate or obsolete categories from the financial system to prevent further use.	Concur: Review of existing adjustment categories – for appropriateness - along with the creation of definitions of use for each payment and adjustment transaction is underway. Completion of this recommendation is anticipated to take place by May 1, 2015.
7. Develop a procedure to require management approval for programming of new automated adjustments.	Concur: In collaboration with DPH's Information Systems Department, a policy and procedure will be created that ensures that the proper controls are in place and approvals (both PFS and IS) have been obtained and approved prior to programming being initiated to add, delete or change any automated adjustment transaction. Completion of this recommendation is anticipated to take place by July 1, 2015.

Recommendation	Response
8. Regularly review all rules for automated adjustments to ensure that they are current and correct and, if they are not, change the rules accordingly.	Concur: In collaboration with DPH's Information Systems Department, a policy and procedure will be created that ensures that the proper controls are in place and approvals (both PFS and IS) have been obtained and approved prior to programming being initiated to add, delete or change any automated adjustment transaction. Completion of this recommendation is anticipated to take place by July 1, 2015.
9. Develop comprehensive guidance for manual adjustments, including formalized criteria and processes for batch adjustments by managers.	Concur: Development of Policies and Procedures specific for manual (staff entered) adjustment transactions utilized by the PFS Department is underway. Completion of this recommendation is anticipated to take place by April 1, 2015.
10. Make manual adjustments monthly in accordance with documented procedures to ensure that issues that may prevent billing or collection are properly identified and addressed in a timely manner.	Concur: Development of Policies and Procedures specific for manual (staff entered) adjustment transactions utilized by the PFS Department to ensure identification and timeliness is underway. The P&P related to this recommendation could vary from payer to payer based on claims submission and reimbursement requirements. Completion of this recommendation is anticipated to take place by April 1, 2015.

From: jenessa.rozier@sfgov.org on behalf of Controller Reports [jenessa.rozier@sfgov.org]
Sent: Tuesday, February 17, 2015 12:25 PM
To: Gosiengfiao, Rachel (BOS)
Subject: Issued: SFPUC: Audit of Department Class One Power Sales to Modesto and Turlock Irrigation Districts in California

Follow Up Flag: Follow up
Flag Status: Flagged

The Office of the Controller's City Services Auditor Division (CSA) today issued an audit report on the San Francisco Public Utilities Commission's (SFPUC's) energy sales to the Modesto and Turlock Irrigation districts. The audit found that, in the aggregate, the two districts purchased less Class 1 energy from SFPUC than they were entitled to. However, the Modesto Irrigation District's monthly transactions show excess purchases of $214,943 in Class 1 energy, which the district sold to non-Class 1 customers. Also, the districts should strengthen the monitoring controls over their Class 1 customers. Further, the Turlock Irrigation District did not verify 3 percent of its Class 1 customers sampled by the audit. Last, SFPUC's energy sales agreements with the districts do not include specific record retention guidelines.

To view the full report, please visit our Web site at:
http://openbook.sfgov.org/webreports/details3.aspx?id=1885

This is a send-only e-mail address.

For questions about the report, please contact Director of City Audits Tonia Lediju at Tonia.Lediju@sfgov.org or 415-554-5393 or the CSA Audits Unit at 415-554-7469.

Follow us on Twitter @SFController

This email was sent by Controller Reports at 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102.

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City and County of San Francisco

Office of the Controller – City Services Auditor

SAN FRANCISCO PUBLIC UTILITIES COMMISSION:

Audit of Department Class One Power Sales to Modesto and Turlock Irrigation Districts in California

February 17, 2015

OFFICE OF THE CONTROLLER
CITY SERVICES AUDITOR

The City Services Auditor Division (CSA) was created in the Office of the Controller through an amendment to the Charter of the City and County of San Francisco (City) that was approved by voters in November 2003. Charter Appendix F grants CSA broad authority to:

- Report on the level and effectiveness of San Francisco's public services and benchmark the City to other public agencies and jurisdictions.
- Conduct financial and performance audits of city departments, contractors, and functions to assess efficiency and effectiveness of processes and services.
- Operate a whistleblower hotline and Web site and investigate reports of waste, fraud, and abuse of city resources.
- Ensure the financial integrity and improve the overall performance and efficiency of city government.

CSA may conduct financial audits, attestation engagements, and performance audits. Financial audits address the financial integrity of both city departments and contractors and provide reasonable assurance about whether financial statements are presented fairly in all material aspects in conformity with generally accepted accounting principles. Attestation engagements examine, review, or perform procedures on a broad range of subjects such as internal controls; compliance with requirements of specified laws, regulations, rules, contracts, or grants; and the reliability of performance measures. Performance audits focus primarily on assessment of city services and processes, providing recommendations to improve department operations.

CSA conducts audits in accordance with the Government Auditing Standards published by the U.S. Government Accountability Office. These standards require:

- Independence of audit staff and the audit organization.
- Objectivity of the auditors performing the work.
- Competent staff, including continuing professional education.
- Quality control procedures to provide reasonable assurance of compliance with the auditing standards.

For questions regarding the report, please contact Director of City Audits Tonia Lediju at Tonia.Lediju@sfgov.org or 415-554-5393 or CSA at 415-554-7469.

Audit Team: Irella Blackwood, Lead Audit Manager
Helen Vo, Auditor-in-Charge
Irene Chiu, Associate Auditor
Jenny Lee, Staff Auditor
Joseph Towner, Staff Auditor
Charisse Thomas, Audit Intern

City and County of San Francisco

Office of the Controller – City Services Auditor

San Francisco Public Utilities Commission: Audit of Department Class One Power Sales to Modesto and Turlock Irrigation Districts in California **February 17, 2015**

Purpose of the Audit

The Office of the Controller's City Services Auditor Division (CSA) audited the power sales of the San Francisco Public Utilities Commission (SFPUC) to the Modesto Irrigation District (MID) and Turlock Irrigation District (TID) to determine whether MID or TID buys excessive Class 1 power from SFPUC. The audit evaluated SFPUC's energy load offers, internal controls over district practices of requesting and accepting power sales, general compliance with energy sales agreements, district monitoring of municipal and pumping users, and the methodologies MID and TID use to provide SFPUC information such as load forecasts and historical usage and whether those practices comply with the energy sales agreements.

Highlights

Over the two fiscal years audited, each district's need for Class 1 energy exceeded the quantity provided by SFPUC. However, MID's monthly purchases of Class 1 energy exceeded its usage for 2 of the 24 months reviewed. Further, the districts should strengthen their controls over classifying and monitoring Class 1 customers.

Specifically, the audit found that:

- In the aggregate, the two districts purchased less Class 1 energy from SFPUC than they were entitled to. However, MID's monthly transactions show excess purchases of $214,943 in Class 1 energy, which the district sold to non-Class 1 customers.
- The districts should strengthen the monitoring controls over their Class 1 customers to ensure that they still qualify for the Class 1 energy rate.
- TID did not verify 3 percent of its Class 1 customers sampled by the audit, increasing the risk that SFPUC is selling more Class 1 energy, at cost, to TID than it is eligible for in accordance with the energy sales agreement.
- The methodologies for Class 1 load documents that the districts provided to SFPUC are adequately supported.
- SFPUC's energy sales agreements with the districts do not include specific record retention guidelines. The districts should be required to retain records for periods that should be specified in their agreements. Also, SFPUC should ensure that districts retain adequate supporting documents relating to Class 1 energy purchases.

Recommendations

The report includes 11 recommendations for SFPUC to improve the process by which it sells Class 1 power to the districts. Specifically, SFPUC should:

- Further develop Class 1 energy monitoring activities by improving oversight requirements in the districts' energy sales agreements.
- Adhere to the energy sales agreement requirement by annually comparing MID's Class 1 energy purchases to the metered Class 1 load to determine if an adjustment is required to the subsequent Class 1 energy offers to MID.
- Require the districts to develop procedures to periodically review and monitor Class 1 customers to ensure that they still qualify for the Class 1 energy rate.

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CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF THE CONTROLLER

Ben Rosenfield
Controller

Todd Rydstrom
Deputy Controller

February 17, 2015

San Francisco Public Utilities Commission
525 Golden Gate Avenue
San Francisco, CA 94102

Mr. Harlan Kelly, Jr.
General Manager
San Francisco Public Utilities Commission
525 Golden Gate Avenue
San Francisco, CA 94102

Dear Commission President and Members and Mr. Kelly:

The Office of the Controller's City Services Auditor Division (CSA) presents its audit report of the San Francisco Public Utilities Commission (SFPUC) power sales to the Modesto Irrigation District (MID) and Turlock Irrigation District (TID) to determine whether MID or TID buys excessive Class 1 power from SFPUC. The audit objectives were to:

- Evaluate the energy load offers, requesting and accepting practices and determine if those practices comply with the energy sales agreements.
- Determine if MID and TID appropriately identify and monitor their municipal and pumping users under Class 1.
- Assess the methodology of MID and TID for providing SFPUC information such as load forecasts and historical usage and determine whether those practices comply with the energy sales agreements.
- Assess the gap between Class 1 total usage and Class 1 energy provided by SFPUC to determine whether MID or TID buys excessive Class 1 power.

The audit concluded that, for fiscal years 2011-12 and 2012-13, the total Class 1 energy SFPUC sold to the districts did not exceed the amount of Class 1 energy used by the districts' Class 1 energy users. However, MID's total monthly purchases of Class 1 energy for SFPUC exceeded the usage of its Class 1 energy for 2 of 24 months reviewed, and MID sold the excess to non-Class 1 customers. Further, the districts should improve their controls over Class 1 customers to ensure that only eligible customers receive Class 1 energy and that this is in accordance with their energy sales agreements.

The report includes 11 recommendations for SFPUC to improve its energy sales agreements with the districts. SFPUC and the districts' responses to the report are attached as appendices. CSA will work with SFPUC to follow up on the status of the recommendations made in this report.

CSA appreciates the assistance and cooperation of SFPUC, MID, and TID staff during the audit. For questions about the report, please contact me at Tonia.Lediju@sfgov.org or 415-554-5393 or CSA at 415-554-7469.

Respectfully,

Tonia Lediju
Director of City Audits

cc: Board of Supervisors
Budget Analyst
Citizens Audit Review Board
City Attorney
Civil Grand Jury
Mayor
Public Library

TABLE OF CONTENTS

GLOSSARY OF TERMS

City	City and County of San Francisco
City Attorney	Office of the City Attorney, City and County of San Francisco
Class 1 Demand	According to the agreement between the City and County of San Francisco and the Modesto Irrigation District, the amount, expressed in kilowatts, determined (pursuant to Section 7.3.2 hereof) each month by dividing Modesto's Class 1 Load for the month as determined by the product of the monthly system load factor for Modesto's total system load for such month and the number of hours in such month. According to the agreement between the City and County of San Francisco and the Turlock Irrigation District, the rate of use of electrical energy, in kilowatts (kW) or megawatts (MW), during any determination period.
Class 1 Energy	According to the agreement between the City and County of San Francisco and the Modesto Irrigation District, the energy in kilowatt-hours from the Hetch Hetchy Project in excess of the city municipal load that must be sold to the districts at cost pursuant to Section 9(l) of the Raker Act. According to the agreement between the City and County of San Francisco and the Turlock Irrigation District, the amount of "Available Energy" to be used by either the Turlock or Modesto districts, as the case may be, for purposes that qualify for service pursuant to Section 9(l) of the Raker Act and that is to be sold to them pursuant to Section 9(l) of the Raker Act at a price that actually reimburses the City for developing, maintaining, and transmitting such energy to them.
Class 1 Load	According to the agreement between the City and County of San Francisco and the Modesto Irrigation District, the amount of energy during a period of determination, as metered by the Modesto Irrigation District, that would have qualified for Class 1 energy service pursuant to Section 9(l) of the Raker Act.
Controller	Office of the Controller, City and County of San Francisco
CSA	Office of the Controller's City Services Auditor Division
districts	Modesto Irrigation District and Turlock Irrigation District
GAO	United States Government Accountability Office
GIS	Geographic Information System
kW	Kilowatt (1,000 watts). A unit of measure for the amount of electricity needed to operate given equipment.
kWh	Kilowatt-hour, the most commonly used unit of measure for the amount of electricity consumed over time. It equals one kilowatt of electricity supplied for one hour.

MID	Modesto Irrigation District
MW	Megawatt (1,000 kilowatts).
MWh	Megawatt-hour, a unit of measure for the amount of electricity consumed over time. It equals one megawatt of electricity supplied for one hour.
PG&E	Pacific Gas and Electric Company
SFPUC	San Francisco Public Utilities Commission
TID	Turlock Irrigation District

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INTRODUCTION

Audit Authority

This audit was conducted under the authority of the Charter of the City and County of San Francisco (City), Section 3.105 and Appendix F, which requires that the Office of the Controller's City Services Auditor Division (CSA) conduct periodic, comprehensive financial and performance audits of city departments, services, and activities. CSA conducted this audit under that authority and pursuant to its annual audit plan.

Background

Overview of SFPUC

The San Francisco Public Utilities Commission (SFPUC) is a department of the City that provides retail drinking water and wastewater services to San Francisco, wholesale water to three Bay Area counties, and green hydroelectric and solar power to San Francisco's municipal departments.

SFPUC'S mission is to provide customers with high-quality, efficient and reliable water, power, and sewer services in a manner that includes environmental and community interests and that sustains the resources entrusted to its care.

Overview of the Energy Sales Agreement

SFPUC sells power to other parties including the Modesto Irrigation District (MID) and Turlock Irrigation District (TID) through energy sales agreements, as required by the Raker Act. Under this federal law, the City was allowed to construct, operate, and maintain facilities for conveying water for domestic purposes through public lands in Yosemite National Park. This was allowed to not only provide a source of water for San Francisco but the eventual production of electricity from that facility.

The Raker Act requires the City, upon request, to sell or supply energy to MID and TID for the use of any land owner to pump subsurface water for drainage or irrigation or for the actual municipal public purposes of the districts. The energy sold or supplied is to be from excess energy that the City has that is not required for pumping the City's water supply or actual municipal public purposes. The energy is to be sold "at cost," and, according to the energy sales agreements, the districts agree that no power sold to them under their agreements shall be resold to any private person or corporation. However, the districts have the right and option to sell power for resale if their total monthly load exceeds the amount of available energy taken in such a month.

Overview of MID

MID, located in California's Central Valley, provides electricity and irrigation and treats surface water for drinking. MID is an independent, publicly owned utility. MID provides benefits that include community ownership, control by a locally elected board of directors, and business operations on a not-for-profit basis.

In December 2013 MID provided electrical service to more than 115,000 accounts in an electrical service area that covers 560 square miles. Further, MID provided irrigation services to more than 3,100 active accounts in an irrigation service area spanning 101,700 acres.

Overview of TID

Established in 1887, TID was the first publicly owned irrigation district in the state and is one of only four in California today that also provides electric retail energy directly to homes, farms, and businesses. TID operates under the provisions of the California Water Code as a special district.

Since 1923 TID has provided safe, affordable, and reliable electricity to a growing retail customer base that now exceeds 98,000 residential, farm, business, industrial, and municipal accounts in an electric service area that encompasses 662 square miles in portions of Stanislaus, Merced, Tuolumne, and Mariposa counties.

TID provides irrigation water to more than 5,800 growers in a 307 square mile service area that incorporates 149,500 acres of Central Valley farmland. TID has been delivering irrigation water to growers since completing its gravity-fed water conveyance system of canals and laterals in 1900.

Class 1 Energy

Class 1 Energy Distribution

Class 1 is a term defined in the districts' energy sales agreements with SFPUC to refer to the energy that SFPUC must sell to the districts at cost, in accordance with the Raker Act. The Raker Act states that this energy is to be sold to the districts to be used for their pumping[1] and municipal public purposes.

Each district is required to notify SFPUC of its requested monthly Class 1 energy and to supply SFPUC with supporting work papers used in calculating the energy amount. SFPUC relies on this data to determine the amount of Class 1 energy to sell to each district.

Each day SFPUC uses its scheduling system to determine the scheduled amount of Class 1 energy to be offered to each district during each hour of the following day. According to SFPUC, the districts are provided with these nonbinding offers and have the opportunity to accept or reject the amount of energy offered daily. According to SFPUC, these daily offers must either be accepted or rejected for the full amount.

Objectives

The objectives of this audit were to:

1. Evaluate the load offer, requesting and accepting practices and determine if those practices comply with the energy sales agreements.

2. Determine if MID and TID appropriately identify and monitor their municipal and pumping users under Class 1.

3. Assess the methodology of MID and TID for providing SFPUC information such as load forecasts and historical usage and determine if those practices comply with the energy sales agreements.

4. Assess the gap between Class 1 total usage and Class 1 energy provided by SFPUC to determine if MID or TID buys excessive Class 1 power.

[1] Pumping is the process of pumping subsurface water for drainage or irrigation purposes.

Scope and Methodology

The audit included SFPUC's power sales to MID and TID from July 1, 2011, through June 30, 2013. To perform the audit, the audit team:

- Interviewed key SFPUC, MID, and TID staff and managers to gain an understanding of processes related to power sales.
- Reviewed key documents, including the Raker Act and agreements between SFPUC and MID and SFPUC and TID, related to SFPUC's power sales to the districts.
- Reviewed both districts' Class 1 customer lists.
- Randomly selected 30 Class 1 customers each from MID and TID and verified that they were within the districts' service area maps.
- Compared MID and TID's Class 1 usage to the amount of Class 1 energy provided by SFPUC.
- Assessed MID and TID's methodology for providing SFPUC with information on load forecasts and historical usage.

Statement of Auditing Standards

This performance audit was conducted in accordance with generally accepted government auditing standards. These standards require planning and performing the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. CSA believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

AUDIT RESULTS

Summary

In total, the districts used far more Class 1 energy than the amount provided by SFPUC during the two fiscal years reviewed. However, CSA reviewed the districts' Class 1 energy purchases by month and determined that for 2 of 24 months reviewed, MID purchased more Class 1 energy than its Class 1 customers consumed. Further, although the districts' methodologies for their Class 1 load estimates are adequately supported, their processes for determining and monitoring Class 1 customers should be strengthened to ensure that each district's Class 1 customers are accurately designated as eligible for Class 1 energy. Lastly, SFPUC's energy sales agreements with the districts lack specific record retention guidelines.

Finding 1

SFPUC provides less than half of the Class 1 energy used in the districts, but MID bought more Class 1 energy than it used in two months and sold the excess to non-Class 1 customers.

For fiscal years 2011-12 and 2012-13, the total amount of Class 1 energy sold to the districts by SFPUC did not exceed the amount of Class 1 energy used by the districts' Class 1 energy customers. However, MID's total monthly purchases of Class 1 energy from SFPUC exceeded the usage of its Class 1 customers for 2 of 24 months reviewed, amounting to $214,943 more Class 1 energy purchased and, therefore, sold to non-Class 1 customers of MID.

Finding 1.1

In total, the districts' Class 1 energy used exceeds the amount of Class 1 energy provided by SFPUC.

The districts are not allowed to resell Class 1 energy unless their total monthly load exceeds the amount of Class 1 energy they received in that month.

The energy sales agreements state that each district agrees that no power sold to it under the agreement shall be resold to any private person or corporation. However, each district shall have the right and option to sell power for resale if its total monthly load exceeds its amount of available energy taken in that month.

Analysis of the districts' Class 1 customer energy usage found that SFPUC supplies the districts with less than half of the Class 1 energy they need to satisfy their annual Class 1 customer usage. As shown in Exhibit 1, Class 1 energy supplied by SFPUC only accounted for 136,561 of 337,878 megawatt-hour (MWh), or about 40 percent of MID's total Class 1 energy usage and, as shown in Exhibit 2, 144,220 of 339,856 MWh, or about 42 percent of TID's total Class 1 energy usage during the sampled period.

Exhibits 1 and 2 show the Class 1 customer usage (in megawatt-hours) for MID and TID, respectively.

EXHIBIT 1 Modesto Irrigation District Class 1 Customer Usage and Energy Provided by SFPUC, Fiscal Years 2011-12 and 2012-13

Fiscal Year	Class 1 Energy Provided by SFPUC (MWh)[a]	Class 1 Energy Provided by SFPUC ($)[b]	MID Class 1 Customer Usage (MWh)	Percent of Class 1 Energy Provided by SFPUC
2011-12	77,938	$3,063,743	168,551	46%
2012-13	58,623	2,568,274	169,327	35%
Total	**136,561**	**$5,632,017**	**337,878**	**40%**

[a] MWh = megawatt-hour
[b] Based on SFPUC's flat rate for fiscal years 2011-12 and 2012-13

Source: Class 1 customer usage provided by MID. Class 1 energy sold provided by SFPUC.

EXHIBIT 2 Turlock Irrigation District Class 1 Customer Usage and Energy Provided by SFPUC, Fiscal Years 2011-12 and 2012-13

Fiscal Year	Class 1 Energy Provided by SFPUC (MWh)[a]	Class 1 Energy Provided by SFPUC ($)[b]	TID Class 1 Customer Usage (MWh)	Percent of Class 1 Energy Provided by SFPUC
2011-12	76,586	$2,715,740	163,983	47%
2012-13	67,634	2,678,983	175,873	38%
Total	**144,220**	**$5,394,723**	**339,856**	**42%**

[a] MWh = megawatt-hour
[b] Based on SFPUC's flat rate for fiscal years 2011-12 and 2012-13

Source: Class 1 customer usage provided by TID. Class 1 energy sold provided by SFPUC.

During several months SFPUC supplied the districts with no Class 1 energy, which further reduced the percentage of Class 1 energy the districts purchased from SFPUC. In fiscal year 2011-12 SFPUC's Class 1 energy sales to the districts made up 47 percent of TID's total Class 1 usage for the year and 46 percent of MID's. In fiscal year 2012-13 SFPUC's Class 1 energy sales to the districts made up only 35 percent of MID's total Class 1 usage and 38 percent of TID's.

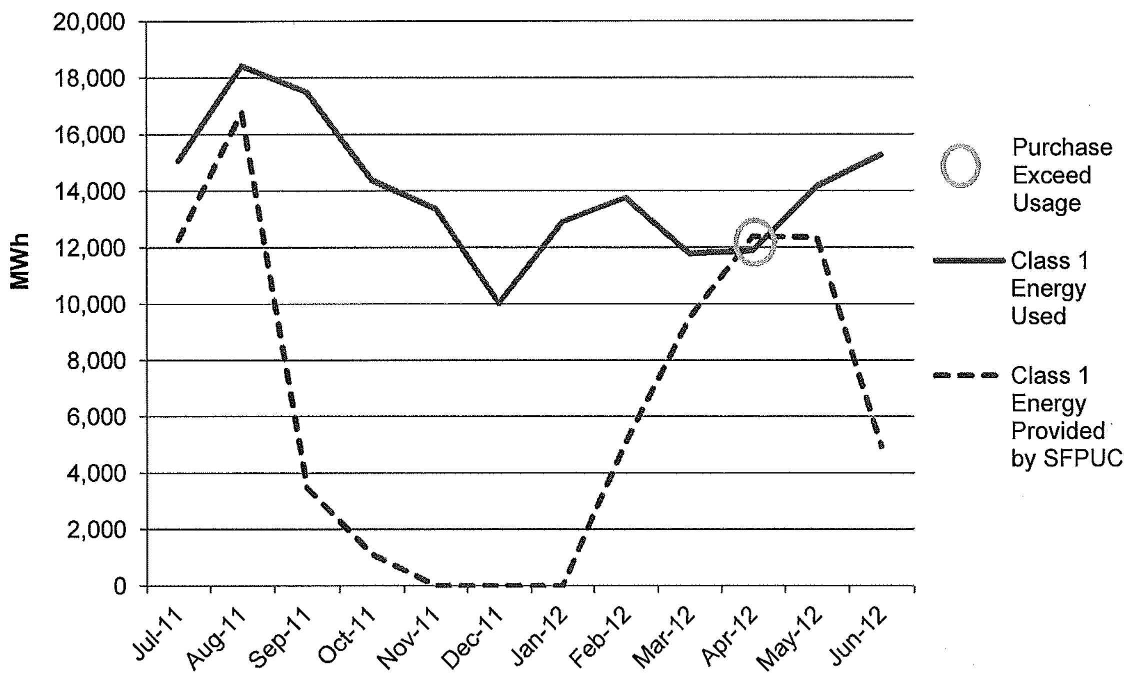
Finding 1.2

The monthly Class 1 purchases of MID sometimes exceed the usage of its Class 1 customers.

MID received more Class 1 energy than its Class 1 customers' load in 2 of the 24 months sampled.

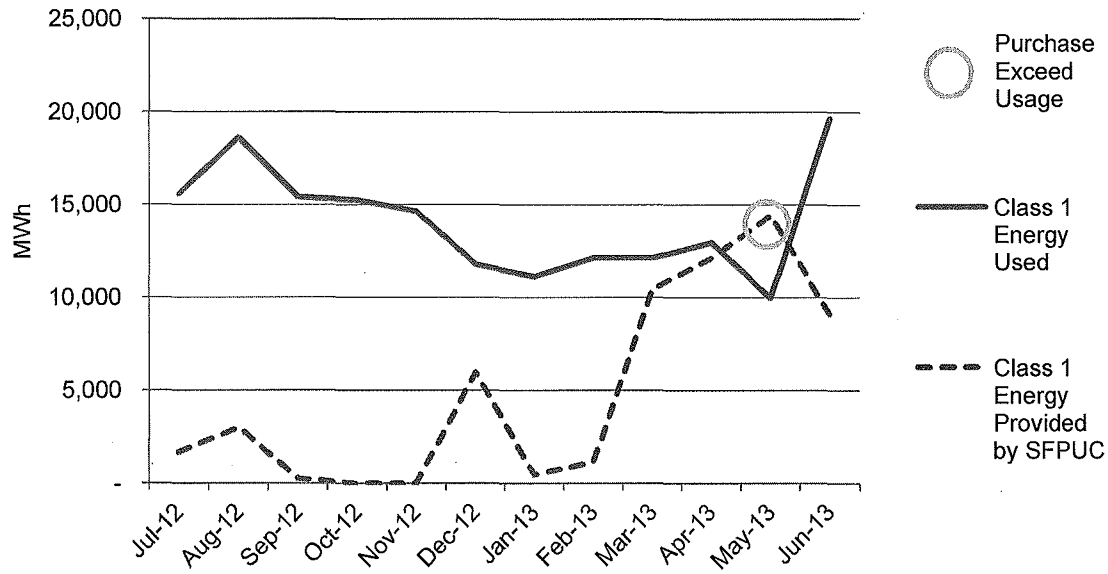
MID received from SFPUC 4,957 MWh more of Class 1 energy than its load for 2 of 24 months reviewed by the audit, resulting in an excessive purchase of energy totaling $214,943 for the two months. Exhibits 3 and 4 show MID's Class 1 customer usage and the amount of Class 1 energy received by the district in July 2011 through June 2013.

EXHIBIT 3 Modesto Irrigation District's Class 1 Energy Usage Fiscal Year 2011-12



Source: Auditor's analysis of data provided by SFPUC and Class 1 billed usage reports provided by the district.

EXHIBIT 4 **Modesto Irrigation District's Class 1 Energy Usage Fiscal Year 2012-13**



Source: Auditor's analysis of data provided by SFPUC and Class 1 billed usage reports provided by the district.

For 2 of the 24 months, MID received 26,819 MWh in Class 1 energy, but only used 21,862 MWh.Therefore, MID received 4,957 MWh (18 percent) more energy than needed, which amounted to nearly $215,000. Exhibit 5 shows the breakdown of MID's energy received and used, along with the purchase rate for the 2 months.

EXHIBIT 5 **Sample Months in Which Modesto Irrigation District Received Class 1 Energy in Excess of Its Class 1 Customers' Use**

Month	Excessive Class 1 (MWh)	Class 1 Rate ($/MWh)	Total Excessive Purchase Value
April 2012	494	$39.31	$19,419
May 2013	4,463	43.81	195,524
Total	**4,957**		**$214,943**

Source: Class 1 customer usage provided by MID. Class 1 energy sold provided by SFPUC.

The districts' energy sales agreements lack adequate details regarding how SFPUC should monitor energy sales to the districts.

CSA could not determine the amount that MID earned, if any, during the two months in question because MID does not separate energy purchased from SFPUC from other energy. Also, MID's energy rates vary by customer type and usage.[2] Therefore, CSA cannot determine the rates and amounts that MID charged for SFPUC's energy to non-Class 1 customers.

The districts' energy sales agreements are mostly silent on details regarding how SFPUC should best monitor its sales of energy to the districts. The lack of monitoring instructions makes it unclear if MID's energy purchases during the periods identified comply with its energy sales agreement because there are no criteria to hold MID accountable for any overpurchases of energy. Further, both SFPUC and MID failed to review MID's Class 1 load, despite the provision in MID's agreement that states that the:

> *Parties will annually compare Modesto's Estimated Class 1 Energy to the metered Class 1 Load to determine if an adjustment is required to the subsequent development of Modesto's Estimated Class 1 Energy.*

According to the Office of the City Attorney (City Attorney), this review should be performed so SFPUC may reduce the subsequent supply of Class 1 energy offered to the district if MID has received more Class 1 energy than its Class 1 load. If an annual review is performed and, if necessary, the amount of Class 1 energy offered is reduced in subsequent periods, then this allows for compliance with the energy sales agreement.

According to SFPUC, it relies on MID's calculation of its annual escalation/de-escalation factor, which adjusts the Class 1 energy request for the subsequent year. However, this procedure does not specifically compare MID's monthly purchased Class 1 energy to the metered Class 1 load, as required by the agreement.

According to MID, the energy it received from SFPUC could not be tracked and was used to fulfill the district's

[2] For example, pumping customers and residential customers are charged different rates.

load. MID also stated that it did not store excess energy or reimburse SFPUC for any excess amounts purchased. This indicates that the excess energy that MID received from SFPUC was sold to the district's retail customers, which is only allowable when MID's load exceeds that amount of Class 1 energy taken from SFPUC. This further indicates that the district did not comply with the energy sales agreement's prohibition of selling energy to private persons or corporations.

Recommendations

The San Francisco Public Utilities Commission should:

1. Further develop Class 1 energy monitoring activities by improving oversight requirements in the districts' new energy sales agreements.

2. Adhere to the energy sales agreement requirement by annually reconciling the Modesto Irrigation District's Class 1 energy purchases to the metered Class 1 load to determine whether an adjustment is required to the subsequent Class 1 energy offers to Modesto Irrigation District.

Finding 2

The districts should strengthen the monitoring controls over their Class 1 customers to ensure that they qualify for the Class 1 energy rate.

Neither district adequately monitors its Class 1 customers. Failure to actively monitor Class 1 customers could result in ineligible Class 1 customers being sold Class 1 energy.

Both districts maintain monthly lists that identify each customer's service locations that receive Class 1 energy. CSA calculated that, during the sampled months, MID and TID had 2,274 and 3,440 unique meters on their Class 1 reports, respectively.

According to MID, staff generates a monthly report of all new residential accounts and reviews it for accuracy to ensure that customers have been assigned the correct Class 1 code.[3] However, MID states that it did not periodically verify that its Class 1 customer list was

[3] MID assigns each Class 1 account a code that corresponds to a group of Class 1 customers that are eligible to receive Class 1 energy rates.

accurate. Once on the Class 1 list, a customer's meter location remains there without future review to ensure that the metered energy usage has not been changed to a non-Class 1 purpose.[4]

According to TID, it reviews its Class 1 customer list to ensure accuracy. However, TID stated that it does no ongoing analysis or verification of users designated as Class 1 to determine if the designation is accurate.

Therefore, the districts do not adequately monitor Class 1 customer locations after they have been classified as Class 1. The districts cannot verify that Class 1 customers remain eligible solely by reviewing their monthly Class 1 customer report.

Meters that are modified for non-Class 1 purposes and that are not reported could allow customers to receive Class 1 energy for activities that no longer qualify for Class 1 energy. According to TID, it is possible but illegal for customers to alter a pump, and procedures and city ordinances exist that customers have to follow to modify a pump. MID indicated that it relies on customers self-reporting by either contacting MID or the city for any changes that may occur to a Class 1 metered location.

TID automatically designates some meters as Class 1.

TID assumes that new customers who purchase land with existing Class 1 pumping locations will continue to use the pumps for Class 1 pumping uses. As a result, previously designated Class 1 pumps keep this designation without the districts confirming the new owner's intentions for the pumps. MID's customer service procedures regarding Class 1 codes state that the Class 1 code would usually remain with the service when a tenant change occurs. CSA asked MID for its criteria for determining whether a Class 1 code remains with the service after a tenant change, but a response had not been received as of this report's issuance date.

According to the U.S. Government Accountability Office (GAO) Standards for Internal Control in the Federal Government,[5] monitoring internal controls should

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[4] According to MID, Class 1 customer accounts are not designated as Class 1, their individual meter locations are. Class 1 customers can have meters on their account that do not qualify for Class 1 energy.

[5] Standards for Internal Control in the Federal Government, U.S. Government Accountability Office, September 2014, http://www.gao.gov.

generally be designed to assure that ongoing monitoring occurs in the course of normal operations. Monitoring includes regular management and supervisory activities. Failure to adequately manage its Class 1 customer list could cause a district to purchase incorrect amounts of Class 1 energy from SFPUC and, in turn, not comply with its energy sales agreement by selling Class 1 energy to ineligible customers.

Recommendations

The San Francisco Public Utilities Commission should:

3. Require the districts to develop procedures to periodically review and monitor Class 1 customers to ensure that they still qualify for the Class 1 energy rate.

4. Require the districts to inquire with new land owners who have purchased land with existing Class 1 services and document the purpose of land use to ensure that the use qualifies as Class 1.

Finding 3

TID did not verify the service area location of one Class 1 customer.

TID did not follow its procedure for verifying whether a customer is within its service area, increasing the risk of providing Class 1 energy to ineligible customers.

One ineligible TID customer was identified as receiving Class 1 energy.

Of 30 Class 1 customers selected for an audit sample, one TID customer (3 percent) was classified as a Class 1 customer receiving power although the customer was located outside the irrigation service area. Therefore, TID was receiving energy, at cost, from SFPUC for a customer that did not qualify for Class 1 energy. CSA calculates that the ineligible customer used 102,277 kWh[6] of electricity during the two-year audit period, of which SFPUC provided 56,317 kWh (or a multiplied equivalent of 60.48 MWh[7]) for a total cost of $2,268.[8] According to TID, this customer account was opened in May 2007.

[6] A kilowatt-hour (kWh) is the most commonly used unit of measure telling for electricity consumed over time. It is one kilowatt of electricity supplied for one hour.

[7] According to the agreement between the City and TID, energy is multiplied by a factor of 1.074 to account for losses between the point of utilization and point of delivery.

[8] Based on SFPUC's flat rate for fiscal years 2011-12 and 2012-13.

TID agreed that the identified customer should not receive Class 1 power.

TID agreed that the identified customer should not receive Class 1 power. According to TID, its newly hired customer service representative decided to consider the customer as Class 1 and a there may have been errors in the second review of this because TID did not have its geographic information system (GIS) in place to accurately verify coordinates.

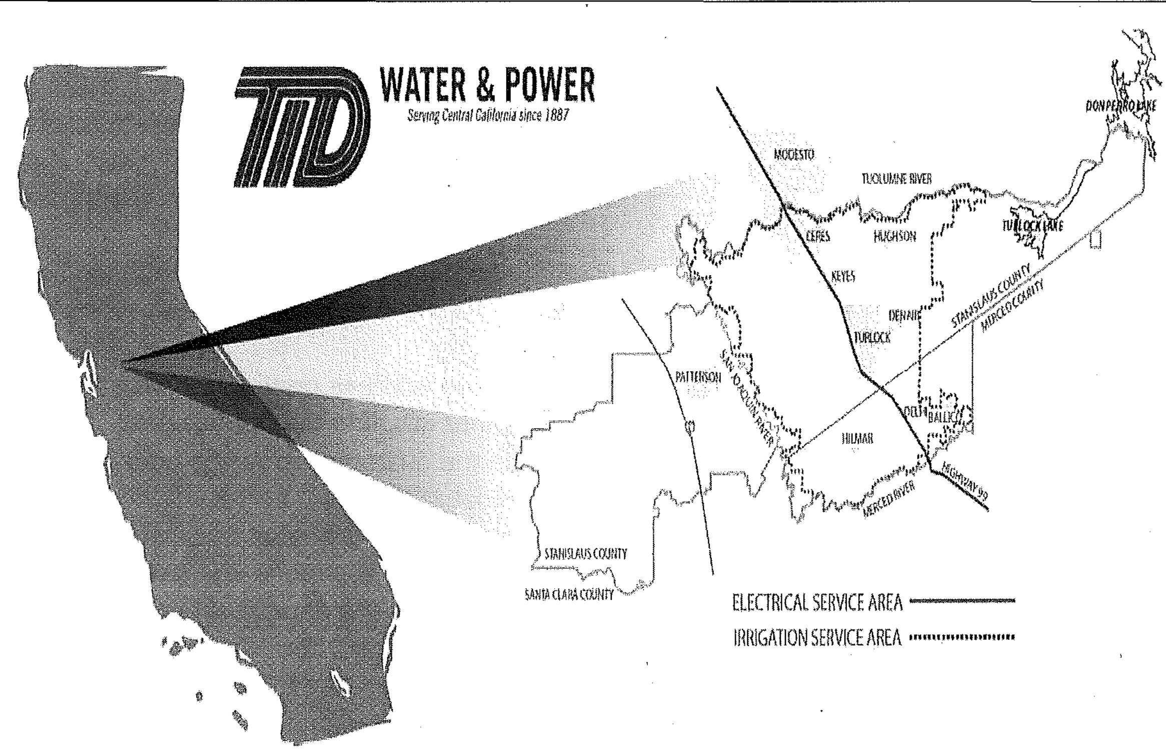
TID has a process for determining whether customers are within its service area.

According to TID, its process for determining whether a customer falls within its boundaries involves:

- Using the address provided to determine if a customer is within the boundaries.
- When the customer is near a boundary:
  - Most of the north and south boundaries are based on the Tuolumne River and Stanislaus River and, therefore, it is usually simple to determine the service area.
  - East and west boundaries are more complicated because there are fewer geologic markers.
- When questions arise about boundaries, TID relies first on its GIS, which includes latitude and longitude coordinates and mapping features.
- For some cases, TID must visit the site to determine which utility should serve a customer. This can occur when the boundary between electric service areas runs through a property.

Exhibit 6 shows TID's electrical and irrigation service areas.

EXHIBIT 6 Turlock Irrigation District Service Areas



Source: TID.

In response to the ineligible Class 1 customer discovered by the audit, TID stated that it would immediately:

- Review all customers currently qualifying for Class 1 under pumping loads to assure they are within district boundaries.
- Remove any customer outside district boundaries and send information to SFPUC so that a true-up of unqualified kilowatt-hours may be performed according to the contract.
- Annually review all Class 1 pumping customer locations to certify their inclusion within district boundaries.

Customers outside TID's boundaries do not qualify as Class 1 customers.

The energy sales agreement includes guidance on where customers must be located to be eligible for Class 1 energy, as follows:

> *That the said grantee[9] shall, upon request, sell or supply to said irrigation districts, and also to the municipalities within either or both said irrigation districts, for the use of any land owner or owners therein for pumping subsurface water for drainage or irrigation, or for the actual municipal public purposes of said municipalities (which purposes shall not include sale to private persons or corporations) any excess of electrical energy which may be generated, and which may be so beneficially used by said irrigation districts or municipalities…*

TID's electrical and irrigation service area map illustrates boundaries for customers who are eligible for receiving electrical, irrigation service, or both services. TID stated that all of its Class 1 customers must be within its irrigation service area to be classified as Class 1 power customers, regardless of receiving electric or irrigation service. Therefore, customers outside TID's irrigation service area do not qualify as Class 1 customers and should be excluded from TID's Class 1 list for the purposes of purchasing energy from SFPUC at cost.

Recommendations

The San Francisco Public Utilities Commission should:

5. Follow up with the Turlock Irrigation District to ensure that the ineligible customer is removed from the Class 1 customer list and to determine whether to pursue the recovery of the cost of the energy provided to the ineligible customer.

6. Request the Turlock Irrigation District to review all of its Class 1 customers from the commencement of the agreement (April 2005) to ensure that they are within the district boundaries and report to the San Francisco Public Utilities Commission any Class 1 customers identified to be outside the district boundaries and the associated costs of the Class 1 energy provided to those ineligible Class 1 customers.

7. Require the Turlock Irrigation District to certify

[9] City and County of San Francisco

locations when determining the eligibility of new Class 1 customers to ensure accuracy.

Finding 4

CSA was unable to precisely determine whether all sampled MID Class 1 customers are within the district's boundary.

Based on CSA's interview with MID, it has a process for determining whether customers are within its boundaries. However, MID did not provide the GIS locations of the 30 selected Class 1 customers, so CSA could not precisely determine whether they were within the district's boundary. Further, MID provided CSA with a district boundary map without additional information, such as GIS coordinates, so the map was insufficient to determine district boundaries. Last, of the 30 Class 1 customers sampled, one MID customer (3 percent) is located outside the district based on the address provided.

MID has a process for determining whether customers are in its service area.

According to MID, its procedures for determining that a Class 1 applicant is within its district boundaries involves:

- MID's engineering personnel using a GIS to verify whether the location is within the boundaries.
- If a customer is near a boundary, MID's surveyor goes to the location, using its GIS coordinates, to determine whether it is within the boundary. If the location is confirmed to be within the boundary, the customer service unit establishes the account and power service is turned on. A MID supervisor reviews all surveyor decisions that customers are within boundaries.
- According to MID, if the location is not within the district, MID does not provide power service and the customer's power is either provided by another entity such as TID or Pacific Gas and Electric Company (PG&E).

CSA is unable to precisely determine MID's Class 1

Although MID provided addresses for the sampled Class 1 customers and the audit was able to identify *boundary areas.*

customers within MID's boundaries, the audit was unable to precisely determine whether MID's Class 1 customers located near its boundaries were within the district's boundaries due to a lack of GIS locations for Class 1 customers in MID's records and MID's service boundaries. MID stated that GIS coordinates are not stored in its system. For example, latitude and longitude coordinates are not stored in its customer data system. Therefore, GIS coordinates are not easily accessible, and MID stated that it does not have the capacity to look up customers' GPS coordinates.

Of the 30 Class 1 customers sampled for the audit, the address of one customer (3 percent) appeared to be located outside the area in which only MID provides electrical services. MID divides its district into a traditional electric service area, in which only MID provides electrical service, and an expansion service area, in which electrical service is provided by MID and PG&E. MID confirmed that Class 1 customers must be in the area in which only MID provides electrical services.

The service point in question is for a street light, served by the City of Riverbank, with a start date of April 26, 2006. Riverbank is a municipality that is in MID's expansion service area. MID stated that its policy has been not to include customers in the expansion area as Class 1 customers. CSA tested the location of Class 1 customers based on the district's traditional service area.

However, according to SFPUC, there is no definition of Class 1 customers related to service areas in the MID's contract. SFPUC believes that qualified Class 1 customers can be located within MID's expansion territory. Nevertheless, MID stated that it will remove this customer from the Class 1 list.

Also, based on a review of MID's Class 1 customer list for June 2013, CSA counted 63 customers with City of Riverbank service points listed. According to MID, aside from the one customer identified by CSA, to MID's knowledge, there are no other Class 1 customers in its expansion territory.

CSA calculated that the customer identified in the expansion area used 1,530 kWh of energy during the two-year audit period, of which SFPUC provided 579 kWh (or a multiplied equivalent of 0.61 MWh[10]) for a total cost of $25.[11]

MID has three service areas and confirmed that all its Class 1 customers are within the area in which only MID provides electrical services. However, some Class 1 customers are outside the irrigation service boundary.

Exhibit 7 shows MID's service area. The map includes three boundary/service areas:

- Irrigation service boundary
- Area in which only MID provides electric service (traditional area)
- Area in which both MID and PG&E provide electric service (expansion area)

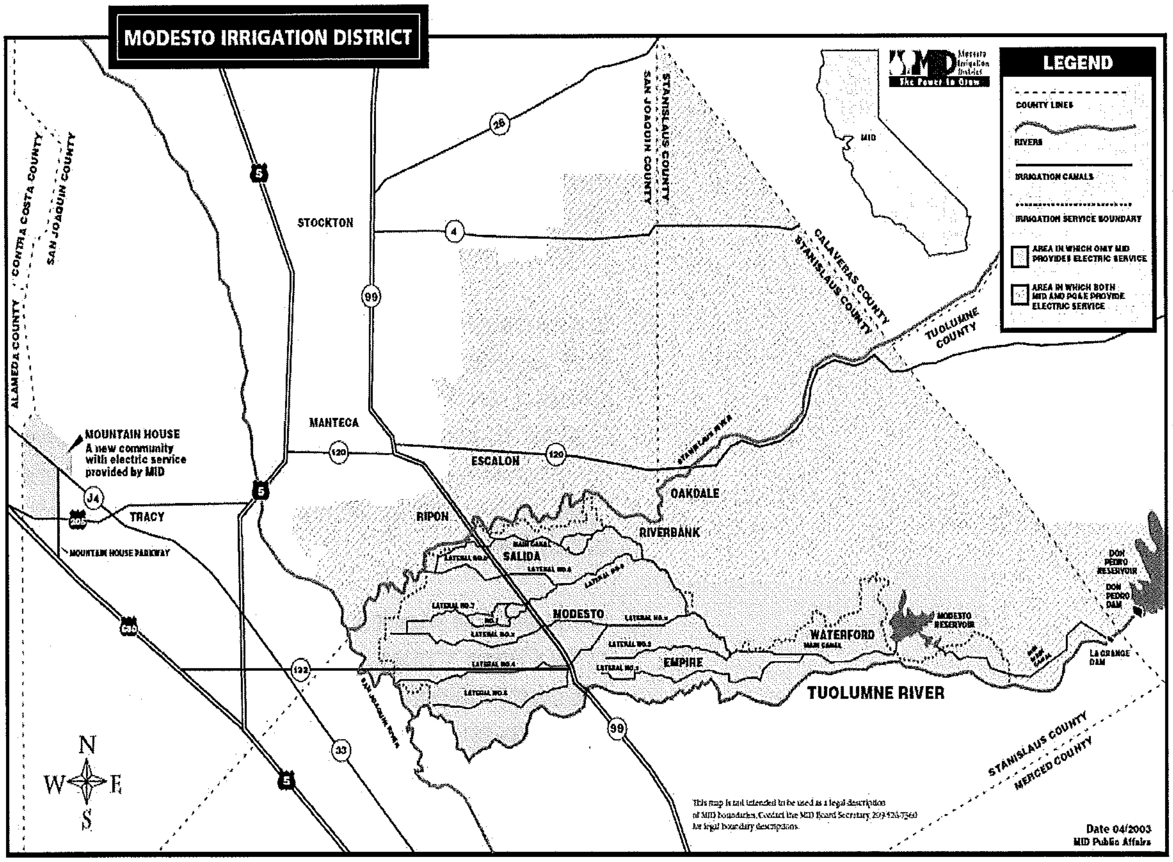
According to MID, Class 1 customers must be in the solid green boundary of MID's map, indicating the "area in which only MID provides electrical services."

However, according to the City Attorney, Class 1 customers should be within the irrigation service boundary, which is smaller than the area in which only MID provides electrical services. The audit's test of a sample of 30 Class 1 customers found that 2 (7 percent) have addresses in Waterford and appear to be outside the allowable service area (irrigation service boundary).

[10] According to the agreement between the City and MID, energy is multiplied by a factor of 1.054 at the point of utilization to account for losses between the point of utilization and point of delivery.

[11] Based on SFPUC's flat rate (per MWh) for fiscal years 2011-12 and 2012-13.

EXHIBIT 7 Modesto Irrigation District Service Area*



*Note: MID's service area map includes boundaries for electrical and irrigation services.

Source: MID.

According to MID's procedure for classifying and reporting Class 1 power usage, three primary uses qualify MID for Class 1 power:

- Pumping of subsurface water
- Uses by the Modesto Irrigation District
- Uses by municipalities

Further, according to MID's Class 1 Power Eligible Services and Code Assignment, the City of Riverbank,[12] qualifies for Class 1 because the city limits include land that is within MID's irrigation district boundaries. However, as stated by MID, its policy excludes Class 1 services in the expansion territory (i.e., area in which both MID and PG&E provide electric service).

[12] Class 1 Power Eligible Services and Code Assignment: Code 23, City of Riverbank

Recommendations

The San Francisco Public Utilities Commission should:

8. Request the Office of the City Attorney to confirm its interpretation of the energy sales agreements regarding boundaries for classifying Class 1 customers and, based on the interpretation, have the Modesto Irrigation District and Turlock Irrigation District clearly define service boundaries for Class 1 customers.

9. If it is determined by the Office of the City Attorney that an identified customer does not qualify for Class 1 energy, then require the Modesto Irrigation District to remove that customer from the Class 1 list and to agree to an approach for recovering the cost of the energy provided to the ineligible customer.

10. Request the Modesto Irrigation District to review all of its Class 1 customers to ensure that they are within the allowable district boundaries and to agree to an approach for recovering the cost of the energy provided to any identified ineligible customers.

Finding 5

The districts' methodologies for their Class 1 load estimates are adequately supported.

MID and TID's methodologies for Class 1 load estimates are adequate.

Based on a review of a sample of Class 1 load estimate documents that the districts provide to SFPUC, the audit determined that the districts' methodologies for calculating such documents are adequate.

Each year, each district is required to provide SFPUC with work papers to support its calculations according to its respective energy sales agreement. The audit determined that the districts' Class 1 energy requests were especially important because, according to SFPUC personnel, SFPUC uses this information to determine the amount of Class 1 energy that is offered to the districts.

According to its energy sales agreement, when TID makes a monthly request, it must provide SFPUC with its requested monthly Class 1 energy based on the same months of prior years, estimate any increases in qualifying loads,[13] and use prudent utility practice.

According to TID, it used a simple average, based on the same months from the prior three years, to determine its requested Class 1 energy for the year, and the audit verified that this is true.

According to MID's energy sales agreement, each year MID is required to provide SFPUC with its estimated monthly Class 1 energy, which shall not exceed the product of its metered Class 1 load for the previous year and its Class 1 energy escalation factor.[14] MID provided supporting documentation that the audit used to determine that MID correctly calculated its energy escalation factor and estimated monthly Class 1 energy.

The districts' ability to provide SFPUC with accurate documentation is essential. It allows the districts to verify that they comply with legal requirements in the energy sales agreements and allows SFPUC to offer the districts the correct amount of Class 1 energy.

Finding 6

SFPUC's energy sales agreements with the districts lack specific record retention guidelines.

The energy sales agreements lack record retention guidelines.

SFPUC's energy sales agreements with MID and TID do not specify document retention periods. This absence could lead to the districts or SFPUC not maintaining necessary documents. During the audit, CSA requested Class 1 customer service documents for a sample of Class 1 customers from TID. CSA planned to review these documents as part of the audit survey phase. However, TID initially stated that it had paperwork for its customers from the past two years, but paperwork older than that was sporadic. TID later clarified that it was certain that it had meter cards (customer service documents) from the last two years and had previously disposed of meter cards after 10 years because of its record retention policy, but was now keeping these documents indefinitely. Further, CSA requested Class 1

[13] "Qualifying loads" refers to qualifying Class 1 energy used by TID or its customers in accordance with the Raker Act, Section 9(l).

[14] The Class 1 Energy Escalation Factor is defined as the factor that is determined for any year by dividing the 12 months ending September 30th immediately before the year of determination by the Annual Class 1 Load for the second 12 months ending September 30th immediately before the year of determination.

support documentation from MID, which replied that it could not provide the requested documents for one of the 36 months requested because they could not be located.

SFPUC has an established records retention policy. According the policy, its purpose is to:

- Ensure retention of records and information necessary for the efficient transaction of SFPUC's business.

- Comply with applicable laws and regulations such as the Sunshine Act.

- Provide a method of identifying and maintaining records that would otherwise be subject to destruction, when it is known or reasonably anticipated that they will be needed for audit, investigation, or litigation proceedings.

- Provide for the destruction of records that do not need to be maintained under the Schedule[15] or Legal Hold,[16] thereby reducing storage costs, clutter, and improving SFPUC's ability to find and make available and accessible relevant records when needed.

According to SFPUC's departmental policy, documents related to both audit and regulatory compliance are to be retained indefinitely. However, the districts' contracts do not state the duration that documents are to be retained, only that, upon request, parties are to deliver any and all documents reasonably required to implement the energy sales agreement.

Failure to have retention guidelines for the districts could cause the districts not to retain all necessary records, which could interfere with the evaluation of compliance with their respective energy sales agreements.

[15] "Schedule" refers to SFPUC's record retention schedule which shows record-type categories and retention periods by functional area for documents that SFPUC prepares and received in the regular course of its business.

[16] "Legal Hold" refers to SFPUC's preservation of all relevant records in the event of a pending, threatened, or reasonably foreseeable lawsuit, investigation, or audit.

Recommendation

11. The San Francisco Public Utilities Commission should establish document retention guidelines for the districts to adhere to and amend contract agreements to reflect terms.

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APPENDIX A: DEPARTMENT RESPONSE

San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

Assurance & Internal Controls
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November 21, 2014

Tonia Lediju, Audit Director
Office of the Controller, City Services Auditor Division
City Hall, Room 476
One Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Subject: Management's Response to CSA Audit Report
SFPUC: Audit of Department Class One Power Sales to Modesto and Turlock Irrigation Districts in California

Dear Ms. Lediju,

Thank you for providing us the opportunity to review the draft report and recommendations contained in, '*Audit of Department Class One Power Sales to Modesto and Turlock Irrigation Districts in California*,' as prepared by the Controller's Office, City Services Auditor.

Our energy sales agreements with Modesto Irrigation District and Turlock Irrigation District are expiring in the near-term. The recommendations made will provide best practice guidance for upcoming discussions for renewal and we will seek to incorporate them, where applicable; and implement immediately for those possible. The department will also ensure adequate monitoring procedures are in place internally and will collaborate with both districts to accomplish adherence.

Attached are our responses to the recommendations contained in the draft report. If you have any questions or need additional information, please do not hesitate to contact me at (415) 554-1600.

Sincerely,

Harlan L. Kelly, Jr.
General Manager

cc: Michael Carlin, Deputy General Manager
Barbara Hale, Assistant General Manager, Power Enterprise
Steve Ritchie, Assistant General Manager, Water Enterprise
Todd L. Rydstrom, AGM Business Services & Chief Financial Officer
Nancy L. Hom, Director, Assurance & Internal Controls

For each recommendation, the responsible agency should indicate whether it concurs, does not concur, or partially c recommendation, it should indicate the expected implementation date and implementation plan. If the responsible ag partially concurs, it should provide an explanation and an alternate plan of action to address the identified issue.

RECOMMENDATIONS AND RESPONSES

Recommendation	Response
The San Francisco Public Utilities Commission should:	
1. Further develop Class 1 energy monitoring activities by improving oversight requirements in the districts' new energy sales agreements.	**Concur.** The SFPUC will consider additional improve Class 1 energy monitoring in future a open to collaboration with the Districts on mor
2. Adhere to the energy sales agreement requirement by annually reconciling the Modesto Irrigation District's Class 1 energy purchases to the metered Class 1 load to determine whether an adjustment is required to the subsequent Class 1 energy offers to Modesto Irrigation District.	**Concur.** The SFPUC, MID and TID are bounc Term Energy Sales Agreement (LTESA) and I Agreement (LTPSA), respectively (collectively Agreements"). If an adjustment is warranted, in a manner consistent with the Agreements. inform SFPUC staff in ensuring the City has a place in the new agreements to be negotiated
3. Require the districts to develop procedures to periodically review and monitor Class 1 customers to ensure that they still qualify for the Class 1 energy rate.	**Concur.** The SFPUC will introduce provision of customers for Class 1 eligibility into the upc the Districts.
4. Require the districts to inquire with new land owners who have purchased land with existing Class 1 services and document the purpose of land use to ensure that the use qualifies as Class 1.	**Concur.** See Response for Recommendation

Recommendation	Response
5. Follow up with the Turlock Irrigation District to ensure that the ineligible customer is removed from the Class 1 customer list and to determine whether to pursue the recovery of the cost of the energy provided to the ineligible customer.	**Concur**. The SFPUC will contact TID and rec ineligible Class 1 customer. The SFPUC will review the data to determine sales to the ineligible customer and then dete These findings will also inform SFPUC staff in appropriate safeguards in place in the new ag negotiated early next year.
6. Request the Turlock Irrigation District to review all of its Class 1 customers from the commencement of the agreement (April 2005) to ensure that they are within the district boundaries and report to the San Francisco Public Utilities Commission any Class 1 customers identified to be outside the district boundaries and the associated costs of the Class 1 energy provided to those ineligible Class 1 customers.	**Concur.** The SFPUC will request this review These findings will also inform SFPUC staff in appropriate safeguards in place in the new ag negotiated early next year.
7. Remind the Turlock Irrigation District to certify locations when determining the eligibility of new Class 1 customers to ensure accuracy.	**Concur**. The SFPUC will remind TID of the C requirements and request that they better mo customer list. The SFPUC will include monitor language for consideration in the upcoming ne
8. Request the Office of the City Attorney to confirm its interpretation of the energy sales agreements regarding boundaries for classifying Class 1 customers and, based on the interpretation, have the Modesto Irrigation District and Turlock Irrigation District clearly define service boundaries for Class 1 customers.	**Partially Concur**. The SFPUC will directly ac boundaries in the upcoming renewal discussic agreement with both MID and TID, and reque service boundaries for Class 1 eligible custom

Recommendation	Response
9. If it is determined by the Office of the City Attorney that an identified customer does not qualify for Class 1 energy, then require the Modesto Irrigation District to remove that customer from the Class 1 list and to agree to an approach for recovering the cost of the energy provided to the ineligible customer.	**Partially Concur.** If it is determined that the ic not qualify for Class 1 power, the SFPUC will the ineligible customer from the service list. The SFPUC will review the data to determine sales to the ineligible customer and then dete These findings will also inform SFPUC staff in appropriate safeguards in place in the new ag negotiated early next year.
10. Request the Modesto Irrigation District to review all of its Class 1 customers to ensure that they are within the allowable district boundaries and to agree to an approach for recovering the cost of the energy provided to any identified ineligible customers.	**Partially Concur.** See Response for Recomm similar application to TID. The SFPUC will review the data to determine sales to the ineligible customer and then dete
11. Establish document retention guidelines for the districts to adhere to and amend contract agreements to reflect terms.	**Concur.** The SFPUC will propose explicit doc requirements for consideration in the upcomin Although the Agreements do not specifically d retention requirement, sections within the Agr retention timelines by requiring that the Distric information upon request.

APPENDIX B: TURLOCK IRRIGATION DISTRICT RESPONSE

TID WATER & POWER
Serving Central California since 1887
(209) 883.8300 • www.tid.com
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September 12, 2014

Tonia Lediju
Director of City Audits
City Hall, Room 476
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: Response to Audit of Department Class One Power Sales to Modesto and Turlock Irrigation Districts in California (Draft Audit Report)

Dear Ms. Lediju:

Thank you for providing Turlock Irrigation District (TID) with an opportunity to comment on the Draft Audit Report. While we appreciate the opportunity to comment on the report it must be noted that the business relationship between City and County of San Francisco (CCSF) and TID is memorialized by the terms and provisions of the Amended and Restated Long Term Power Sales Agreement between The City and County of San Francisco and the Turlock Irrigation District (LTPSA). Therefore our comments are made solely as a courtesy to assist in clarifying the audit report and should not be interpreted as amending the LTPSA, nor should any comments or lack of any comment be considered concurrence or assent with any component of or statement within the audit report.

As a general comment, the audit in several sections states that TID is prohibited from selling the energy to private persons or corporations, which is incorrect. TID has agreed within the LTPSA that no Power sold under the LTPSA shall be resold to any private person or corporation for purposes *contrary to the provisions of the Raker Act,* and that TID has the right and option to sell the power for resale if TID's total monthly load exceeds its amount of Available Energy taken in such month. For example, irrigation pumping is a qualified use of Class 1 power, which may be done by a private person or corporation.

As a point of clarification in Finding 1, the statement that "the districts used far more Class 1 energy than the amount provided" should be clarified to say that the qualified load far exceeded the energy supplied.

As noted in Finding 3, TID agrees that one customer out of the sample of thirty was found to be outside the TID irrigation service area. That customer has been removed from the monthly report submitted to CCSF of Qualified Energy. However, we are doubtful that the removal of this customer would have altered the quantity of Class 1 energy offered by CCSF to TID nor TID's ability to properly use the power

Ms. Lediju
September 12, 2014
Page 2

in accordance with the LTPSA, considering, as stated in the audit, the TID's qualified load far surpasses the amount of Class 1 energy supplied.

TID is pleased that you concluded that our methodology for our Class 1 load is adequately supported.

In Findings 2, 3, and 6 it appears the Draft Audit Report is suggesting changes to the obligations placed on TID under the LTPSA. As noted above both parties' obligations are defined by the LTPSA, and should CCSF wish to amend those terms the appropriate forum would be to discuss these changes directly with TID.

While we have provided several comments on the Draft Audit Report, we reserve the right to make additional comments, to object, or to challenge any audit findings or content in the future.

Sincerely,

Casey Hashimoto

Casey Hashimoto, P.E.
General Manager

APPENDIX C: MODESTO IRRIGATION DISTRICT RESPONSE

MID Modesto Irrigation District
Water and Power

1231 Eleventh St.
P.O. Box 4060
Modesto, CA 95352
(209) 526-7373

September 17, 2014

Tonia Lediju
Director of City Audits
City and County of San Francisco
City Hall, Room 476
1 Dr. Carlton B. Goodlett Place
San Francisco, CA

RE: Draft Report, San Francisco Public Utilities Commission: Audit of Department Class 1 Power Sales to Modesto and Turlock Irrigation Districts in California dated July XX, 2014

Dear Ms. Lediju:

Thank you for providing Modesto Irrigation District (MID) with the Draft Report, San Francisco Public Utilities Commission: Audit of Department Class 1 Power Sales to Modesto and Turlock Irrigation Districts in California dated July, 2014 (Draft Report) and submitted to MID on September 3, 2014. MID has had limited time to review the Draft Report but provides the following comments to the City and County of San Francisco (CCSF) that underscore the audit staff's unreliable approach to the audit; errors and inaccuracies contained in this Draft Report; and resulting, flawed findings. After review of this Draft Report, MID is certain that it has not violated the Raker Act (that Act of Congress, 38 Stat. 242 (1913)) or the Long Term Energy Sales Agreement between City and County of San Francisco and Modesto Irrigation District (LTESA), executed March 26, 2008, which are the controlling documents in the transaction of Class 1 Energy. MID's comments provided in this response are a courtesy to CCSF and do not create any implied or explicit changes to existing agreements between MID and CCSF as Parties to the LTESA.

GENERAL COMMENTS

MID and CCSF have been Parties in the purchase of Class 1 Energy for a many years that have included periodic audits over that time. MID supports these audits as a way to ensure on-going conformance with controlling documents in the purchase of Class 1 Energy. This year CCSF's audit went far beyond the scope of the audit rights granted CCSF in the LTESA, and was conducted in a manner best characterized as a fishing expedition. The scope of the audit was not clearly established nor clearly communicated and continued to creep over time. This audit went well outside the Parties' normal business practices or the terms of the Parties' mutually governing documents for Class 1 Energy transactions.

The audit team assigned to perform the audit was unprepared and lacked the necessary knowledge of the LTESA or of basic electric system operation or resource planning. Examples of this include: 1) CCSF audit staff's request for a copy of the LTESA, a document that they should have reviewed prior to the outset of the audit; 2) CCSF audit staff questions regarding MID's "other sources of Class One Power", a product construct unique between MID and CCSF; and 3) lack of knowledge regarding the real world challenges of matching delivery of Class 1 wholesale energy with retail usage. The CCSF audit team's approach, reflected in the Draft Report, shows that they were auditing to contract standards that do not exist under the terms of the current LTESA.

Nevertheless, MID cooperated fully with CCSF's audit team, making every effort to provide required background information and to repeatedly respond to the same questions and requests for information. MID staff took valuable time away from their daily activities and went above and beyond the requirements of the LTESA to educate CCSF audit staff and provide timely responses. These extraordinary efforts include: (1) at least one on-site meeting; (2) at least two telephone conferences; (3) innumerable telephone calls; (4) more than 40 emails; and (5) hundreds of hours over a four month period researching and confirming that provided data was appropriate and complete.

Unfortunately, the audit team's lack of contextual knowledge has resulted in a demonstrably unreliable Draft Report. The Draft Report contains a number of mis-statements, a mis-understanding of clearly identified and publicly available procedures the Parties have incorporated into their business practices over many years, and severely flawed findings based on CCSF audit staff mis-understanding of both Raker and LTESA documents. The purpose of this letter is not to provide a complete, documented narrative response to each of the statements in the Draft Report with which MID disagrees. Further, MID's failure to challenge a specific finding or recommendation does not mean that MID is in agreement with such finding or recommendation.

The Draft Report erroneously draws legal conclusions regarding federal law, and also has little relationship to any evaluation of MID's adherence to the requirements outlined in the Raker Act. As the LTESA wisely contemplates, and what the CCSF audit staff obviously did not understand, is that CCSF and MID can only *estimate* each month's Class 1 Energy generation and usage. MID is not in automatic breach of the LTESA, much less the Raker Act, for routine consequences of estimations that ultimately get trued up on an ongoing, annual basis. After review of findings in this Draft Report, MID soundly rejects any notion that it has violated any aspect of the Raker Act or breached the LTESA. Any recommendations contained in the Draft Report should be used only for possible consideration as part of a new power sales contract that balances the benefits and burdens of requirements undertaken by the Parties.

SPECIFIC COMMENTS ON DRAFT REPORT FINDINGS

Below are but a few specific examples of the Draft Report's flaws and errors:

Summary Section:

The statement in the opening line of the Summary reads, "In total, the districts used far more Class 1 Energy than the amount provided by SFPUC during the two fiscal years reviewed."
This statement is false, and underscores the CCSF audit staff's misunderstanding of the fundamental issues being audited. MID believes that CCSF audit staff meant to say that MID's Class One Load exceeded the Class One Energy delivered by CCSF during the two fiscal years reviewed

Additionally, in another statement, "MID purchased more Class 1 Energy than their Class 1 customers consumed......"
This statement is likewise false, and MID's more detailed review is covered in response to Finding #1 below. In fact, MID's Class 1 eligible customers actually consumed far less Class 1 Energy than the total amount of energy they were entitled to consume for Class 1 eligible purposes.

Finding #1: This finding contains two sub-findings discussed below:

Finding 1.1 is materially flawed, and a purely arbitrary determination by CCSF audit staff for the following reasons: 1) It is undisputed that CCSF provides less than half of MID's Class 1 Load requirements on annual basis; 2) There is nothing in the Raker Act that establishes a monthly (or any shorter period) true-up between MID's requested Class 1 Energy and Class 1 Load prior to the beginning of a particular month (Notwithstanding this lack of monthly true-up, MID supplies a monthly Class 1 Load report to CCSF for review); and 3) The LTESA accommodates the inherent difficulties in exactly matching estimated CCSF Class 1 generation and estimated MID Class 1 load on a short term basis by virtue of true-up on a longer term, annual basis.

Finding 1.2 is also in error. First, the statement on page 10 second paragraph that states, *"Further, both parties failed to review MID's Class 1 Load, despite the provision in MID's agreement that states that the:*

> *Parties will annually compare Modesto's Estimated Class 1 Energy to the metered Class 1 Load to determine if an adjustment is required to the subsequent development of Modesto's Estimated Class 1 Energy."*

This statement is false. This is one more instance where the CCSF audit staff made findings with respect to contract terms that simply do not exist, rather than what actually is required by contract between the Parties. In conformance with Section 7.3 of the LTESA, MID annually compares the Class 1 delivered energy and load. From this data the Class 1 escalation/de-escalation factor is calculated, and used in order to adjust the Class 1 Energy request for the following year. Backup data used in this calculation is also provided to CCSF as part of the annual energy request.

Therefore, finding 1.2 is an incorrect conclusion based on the flawed assumptions, reasoning and conclusions of Finding 1.1. Accordingly, MID rejects the finding 1.2 in its entirety and considers CCSF's claim of excessive energy purchases totaling $214,943.00 baseless. Furthermore, if SFPUC believed there were billing errors, there are LTESA provisions to resolve disagreements concerning billing available to MID and CCSF. The Class 1 Energy audit process is not the appropriate forum to create or resolve billing disputes.

Finding #2:

This finding is severely flawed, and a statement used as part of this finding is false. On page 13 of the Draft Report the second paragraph states that, *"CSA contacted MID for its criteria for determining if a Class 1 code remains with the service after a tenant change. A response has not been received as of this report's issuance date."*

This statement is false. MID provided copies of its Class 1 criteria policy to CCSF audit staff during the on-site meeting of April 22, 2014, and again by email on May 23, 2014. In addition, Amy Burrow of MID sent an email response on July 18, 2014 to Mr. Joseph Towner's question of July 16, 2014 pointing him back to the previously provided criteria.

The following statement on page 13 is also in error, *"MID indicated that they rely on customers self-reporting by either contacting MID or the city for any changes that may occur to their Class 1 metered location".*

This statement does not accurately relay the information that MID staff delivered at length to CCSF auditors. MID's policies and procedures were explained and produced to the CCSF audit staff on multiple occasions. Neither the Raker Act nor the LTESA establish detailed criteria in the maintenance of a Class 1 customer list. Finding #2 appears to be based upon the CCSF audit staff's personal interpretation and not one based upon the Parties' legal or contractual requirements. MID has found over many years that Class 1 customer account changes are very infrequent due to their very nature. Once installed, municipal loads (i.e. schools, streetlights, city halls), subsurface water pump loads, and MID internal load, generally do not move or change except for major changes in account owner, land use or electrical facilities purpose, which is handled as part of standard account and service change procedures. Moreover, MID has published electric service rules that a customer must follow prior to modifying the use originally specified in application for any electric service. Tampering with an electrical service to change the purpose of electrical use is subject to shut off if the customer has made modifications to the service without prior notification to the District.

Finding #4:

This finding is in error. MID's retail electrical service territory is legally defined by the California Public Utilities Code. MID delivered to CCSF audit staff the established internal policy regulating eligibility for Class 1 Energy based on this State Law and the Raker Act. All Class 1 Energy accounts at MID are based on this internal policy. While MID considers its internal policy to be sound, MID also agrees there is always room for improving internal reporting systems and controls to preclude human error. For example, MID has found that, despite significant numbers of newly installed subsurface pumping added over the past several years due to California's drought, it appears MID has not added any of these to our eligible Class 1 customer list. This leads MID staff to conclude that, in fact, MID has actually been significantly under-reporting eligible Class 1 load. Class 1 account administration has historically been a manual process due to the relatively small number of MID accounts receiving Class 1 Energy. MID is open to the consideration of new concepts that can improve accuracy and minimize overall administrative costs.

Finding #6:

This finding is flawed. Neither the Raker Act nor the LTESA prescribe document retention guidelines or policy requirements. MID has an established document retention policy patterned after guidelines issued by the National Association of Regulatory Utility Commissioners (NARUC) as an electric utility that engages in both wholesale and retail electric energy transactions.

CCSF Finding Recommendations:

MID has reviewed CCSF Audit staff's recommendations and concludes that none are ripe at this time for response. The recommendations generally fall into two categories:

1) *Recommendations that suggest provisions that CCSF Audit Staff believes MID should have been subject to*. Recognizing that the LTESA will expire by its terms next year, CCSF may choose to seek such provisions through future negotiations of a successor transaction; however, these provisions should not form the basis of an audit of the CURRENT contract terms.
2) *Recommendations requesting legal interpretation of Raker Act provisions*. CCSF audit staff should have sought the legal interpretations it required in order to form the basis of its findings and conclusions regarding MID's compliance therewith, prior to conduction the audit or publishing audit findings on such matters.

CONCLUSION

Given the time expended, the level of interaction that MID staff experienced, and review of the Draft Report itself, it is clear that CCSF audit staff was uninformed of critical, operational aspects of both the Raker Act and LTESA, as well as having a basic misunderstanding of the day-to-day policies and procedures required of both CCSF and MID as operating electric utilities. MID is certain no violation of either Raker Act or LTESA has occurred.

As stated at the outset of this response, MID appreciates the opportunity to participate in an audit of our operations, as an audit gives reason for MID to consider those internal processes and controls that can be improved, and appreciates the opportunity to provide comments on this Draft Report. MID reserves the right to challenge the findings and recommendations incorporated in this Draft Report or any other findings or recommendations that may be contained in the final report. We trust that our comments will be given consideration as MID and CCSF have participated as Parties in electrical trading of Class 1 Energy for many years, and have many other critical partnerships under the Raker Act.

If you have any questions please direct them to Ed O'Brien (email edo@mid.org), Electric Resources Department, Modesto Irrigation District.

Sincerely,

Gregory E Salyer

Gregory Salyer
Assistant General Manager, Electric Resources
Modesto Irrigation District

Cc:
Irella Blackwood, Audit Manager, CCSF
Roger VanHoy, General Manager, MID
Barbara Hale, Assistant General Manager, SFPUC

APPENDIX D: AUDITOR COMMENTS ON TURLOCK IRRIGATION DISTRICT RESPONSE

The Office of the Controller's City Services Auditor Division (CSA) acknowledges the written response of the Turlock Irrigation District (TID) to the draft audit report. To provide clarity and perspective, CSA is commenting on TID's response. Although TID disagrees with general comments in the audit report, CSA affirms that the audit report is factual and well-supported.

General Comments

TID's response states that CSA is incorrect in stating that the district is prohibited from selling energy to private persons or corporations.

CSA acknowledges that there are instances in which the district may sell energy to private persons or corporations, including when TID's monthly load exceeds its amount of Available Energy taken in a month. The audit report does not indicate that TID is operating in violation of the Raker Act or the LTESA by selling energy to private persons or corporations. CSA's statement in the report that TID is prohibited from selling energy to these entities refers only to the sale of Class 1 energy. Discussions with the district and SFPUC make it clear that Class 1 energy cannot be isolated from the district's total energy supply, which is why a concern would arise only if it was determined that TID's monthly loads did not exceed its amount of Available Energy in a given month.

The evidence obtained during the audit provides a reasonable basis for the findings and conclusions based on the audit objectives. CSA is pleased that the San Francisco Public Utilities Commission (SFPUC) will use the audit report's findings and recommendations to assist in its efforts to improve the Long Term Power Sales Agreement. CSA looks forward to working with SFPUC to follow up on the status of the recommendations made in this report.

APPENDIX E: AUDITOR COMMENTS ON MODESTO IRRIGATION DISTRICT RESPONSE

The Office of the Controller's City Services Auditor Division (CSA) acknowledges the written response of the Modesto Irrigation District (MID) to the draft audit report. To provide clarity and perspective, CSA is commenting on MID's response. Although MID disagrees with findings 1, 2, 4, and 6, CSA affirms that the audit report is factual and well-supported.

Finding 1.1

MID's response states that the finding is materially flawed because, among other reasons, the Raker Act does not establish a monthly true-up between MID's requested Class 1 Energy and Class 1 Load before the beginning of a particular month. CSA agrees that the Raker Act does not establish such monitoring activities; therefore, CSA developed an appropriate finding and a recommendation that SFPUC:

> Further develop Class 1 energy monitoring activities by improving oversight requirements in the districts' new energy sales agreements.

CSA believes this recommendation to enhance oversight requirements in the districts' new energy sales agreements will improve monitoring controls.

Finding 1.2

MID's response states that the finding is in error and that CSA's statement that MID and SFPUC failed to review MID's Class 1 load is false. MID also states that the audit team made findings with respect to contract terms that do not exist.

CSA disagrees with MID's assertion that the finding is in error. CSA's quality control process includes an independent review of all findings and supporting documentation to ensure that documented facts are correct before report publication. CSA determined that MID did not adhere to the following Long Term Energy Sales Agreement (LTESA) contract provision (7.3.5):

> Parties will annually compare Modesto's Estimated Class 1 Energy to the metered Class 1 Load to determine if an adjustment is required to the subsequent development of Modesto's Estimated Class 1 Energy.

Based on its review, CSA found that this provision was not adhered to because both parties failed to identify that MID had overpurchased Class 1 energy during the two months noted.

Finding 2

MID's response states that the finding is severely flawed and that a statement used as part of the finding is false. Specifically, MID believes that the following statement is false:

> CSA contacted MID for its criteria for determining if a Class 1 code remains with the service after a tenant change. A response has not been received as of this report's issuance.

MID continues to state that it provided Class 1 criteria policy to CSA audit staff in addition to providing an e-mail response on July 18, 2014, pointing CSA back to the previously provided criteria.

CSA reviewed MID's Class 1 criteria policy and did not identify information regarding the Class 1 determination process *for new land owners who purchase land with existing Class 1 pumps*. According to MID's Class 1 criteria policy, "On a pumping service, the Class 1 Power code would usually remain with the service when a tenant change takes place."

To determine that new land owners are properly vetted before they are allowed to have a Class 1 code remain on their pump(s), CSA e-mailed MID and asked it to specify how this determination is made. MID responded that, "MID uses the policy provided (Class 1 criteria policy) to qualify class 1 service points" in an e-mail dated July 18, 2014. This response was not useful because CSA had read MID's policy, which did not adequately describe the process such that CSA could understand how new land owners are properly vetted. To obtain the needed clarification, CSA called MID personnel several times but was unsuccessful in receiving a response before the draft audit report was completed.

Finding 4

MID's response states that all Class 1 Energy accounts at MID are based on its internal policy regulating eligibility for Class 1 Energy based on the California Public Utilities Code and state law. However, MID acknowledged that its internal reporting systems and controls could be improved to preclude human error. Further, MID responded that significant numbers of subsurface pumps were added in the past several years, but were not added to the eligible Class 1 customer list, so the eligible Class 1 load has been underreported. MID stated that it was open to new concepts to improve accuracy and minimize costs.

As the audit report states, CSA could not precisely determine whether sampled MID Class 1 customers located near the district's boundaries were within the district due to the lack of geographic information system (GIS) locations in MID's records. According to MID, GIS coordinates are not stored in its customer data system and, therefore, are not easily accessible, and MID does not have the capacity to obtain this information.

CSA stands by its conclusion that, as a result of MID's acknowledgment that it has underreported the eligible Class 1 load, MID needs its customers' GIS locations to clearly identify eligible Class 1 customers.

<u>Finding 6</u>

MID's response states that the finding is flawed and that neither the Raker Act nor the LTESA prescribes document retention guidelines or policy requirements. MID also states that it has an established retention policy.

CSA agrees that neither the Raker Act nor LTESA prescribes document retention guidelines or policy requirements. In fact, MID's statement supports CSA's finding titled "SFPUC's energy sales agreements with the districts do not include record retention guidelines." MID's acknowledgment that it has a retention policy that is not agreed upon in the LTESA further supports CSA's concern that MID does not retain all documents for an agreed-upon period. As stated in the finding:

> Failure to have retention guidelines for the districts could result in the districts not retaining all necessary records, which could interfere with the evaluation of compliance with their respective energy sales agreements.

An agreed-upon policy must be established in the LTESA so all parties involved are subject to a uniform retention policy.

The evidence obtained during the audit provides a reasonable basis for the findings and conclusions based on the audit objectives. CSA is pleased that the San Francisco Public Utilities Commission (SFPUC) will use the audit report's findings and recommendations to assist in its efforts to improve the Long Term Power Sales Agreement. CSA looks forward to working with SFPUC to follow up on the status of the recommendations made in this report.

Gosiengfiao, Rachel (BOS)

From: jenessa.rozier@sfgov.org on behalf of Controller Reports [jenessa.rozier@sfgov.org]
Sent: Wednesday, February 18, 2015 12:30 PM
To: Gosiengfiao, Rachel (BOS)
Subject: Issued: SFPUC Ratepayer Assurance Scorecard FY2013-14

The Office of the Controller's City Services Auditor Division (CSA) today issued the FY2013-14 SFPUC Ratepayer Assurance Scorecard. The SFPUC received a B overall and exceeded or met standards in seven of nine highlighted performance metrics. Regulatory Compliance and Environmental Stewardship received lower grades this year, contributing to an overall decrease in the SFPUC's grade from FY2012-13's A-.

To view the full scorecard and corresponding manual, please visit our Web site at:
http://openbook.sfgov.org/webreports/details3.aspx?id=1887 and
http://openbook.sfgov.org/webreports/details3.aspx?id=1888

This is a send-only e-mail address.

For questions about the scorecard or manual, please contact Randle McClure at randle.mcclure@sfgov.org or 415-554-5344.

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SFPUC Ratepayer Assurance Scorecard
CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF THE CONTROLLER

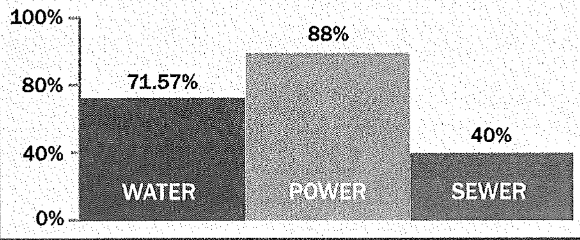
B

FY 2013-14

ASSET MANAGEMENT

1. Preventative Maintenance — B-

Combined Utility Avg Benchmark = 80%



2. Regulatory Compliance — B+

Meets or Exceeds the Standard

2* fines or sanctions for **WATER POWER or SEWER** Enterprises

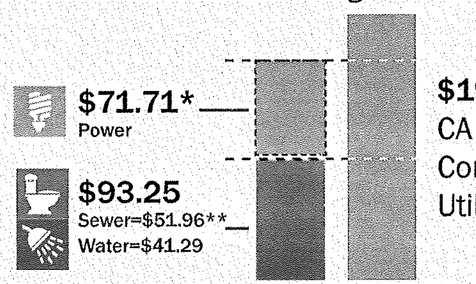
*The Power Enterprise had two incidents of non-compliance.

STEWARDSHIP

MISSION MANAGEMENT SUSTAINABILITY

3. Average Monthly Bill — A

Below the CA State Average



4. Cost of Service — C+

$2.26 per person/day

CA Average Cost/Person/Day = **$2.20**

$2.26	$1.96	$2.25	$2.77	$3.78
Power=$0.98* / W&S = $1.28**				
SFPUC W,P&S	Avg Coffee	MUNI Adult Fare	Cell Phone Cost/Day	Avg BART Fare

*SFPUC provides electricity to Hunter's Point and Treasure Island.

**WW rates reflect that San Francisco is the only major CA coastal city operating a city-wide combined sewer system that collects and treats both sewage *and* stormwater.

SERVICE

5. Credit Ratings — A

Maintained Low Risk

AA- WATER

Aa3 SEWER

Investment Grade rated by S&P/Moody's

6. Customer Service Quality — B

% of Retail Customers that rate SFPUC services as "good" or "excellent"

85%

STEWARDSHIP — SERVICE

7. Environmental Stewardship — B-

California Average
100 gallons per person/day

San Francisco
48.42 gallons per person/day

SF residential use is well under the CA average

SFPUC **100%** Renewable Energy, Retail/Municipal

20% California Requirement

5 SEWER unauthorized discharges in 3 years

ENVIRONMENTAL STEWARDSHIP

PERSONNEL MANAGEMENT

8. Contracted Hours in 2013-14 — A

Exceeds Minimum Local Hire Ordinance Requirements by an average of 14%

SFPUC Local Hires		Local Hire Requirements
44.4%	YR3	30%
40.3%	YR2	25%
34.5%	YR1	20%

9. Lost Time Incidents — C

Per 100 Employees
Slightly Below Standard

3.9 out of 100

SFPUC Ratepayer Assurance Scorecard

CITY AND COUNTY OF SAN FRANCISCO

OFFICE OF THE CONTROLLER

B

FY 2013-14

PURPOSE

The San Francisco Public Utilities Commission (SFPUC) is an agency of the City and County of San Francisco that provides high-quality drinking water to a population of approximately 2.6 million people, including retail customers in San Francisco and wholesale customers located in San Mateo, Santa Clara, and Alameda Counties. The SFPUC provides wastewater services to over 800,000 residents of San Francisco and green hydroelectric solar power to the City's retail and wholesale electricity customers, including municipal facilities.

In 2012, the SFPUC adopted the Ratepayer Assurance Policy and Scorecard, which is reviewed annually as part of the budget process. This review ensures measureable, verifiable and wise use of ratepayer resources for all enterprises: Water (W), Power (P), and Sewer (WW). The Scorecard, independently verified and published by the Office of the Controller, provides information on how well the SFPUC manages its assets, mission, sustainability and personnel. For further information, please refer to the SFPUC Ratepayer Assurance Scorecard Manual.

FY 2013-2014 SUMMARY

The SFPUC received a B overall and exceeded or met standards in seven of nine highlighted performance metrics. Regulatory Compliance received a lower grade this year with two incidents attributed to the Power Enterprise.[1] The Power Enterprise has further improved processes to reduce future compliance risk. Environmental Stewardship also received a lower grade this year, as a result of five unauthorized discharges by the Wastewater Enterprise due, in part, to storm water overflows. The Wastewater Enterprise has since strengthened internal controls over monitoring operating systems to prevent this from occurring again. This was offset by increased and maintained performance in water conservation and renewable energy; SFPUC's community outreach and public education efforts have resulted in the decrease of San Francisco residents' daily water use and SFPUC met the Renewables Portfolio Standard of 100% renewable energy (greenhouse gas free and without harmful radioactive byproducts) for all retail and municipal deliveries.

SFPUC exceeded the Local Hire Ordinance requirements by an average of 14 percent over three years for San Francisco resident workers on construction projects.[2] SFPUC's services remain affordable when compared to the California average combined utilities bill.[3]

1. In addition to the two Power Enterprise incidents, the SFPUC settled two Water Enterprise fines with the Regional Water Quality Board for the Central Valley Basin and the SF Bay Basin, totaling $1.6 million. These violations did not affect SF drinking water and therefore were not calculated in to the scorecard.
2. SFPUC exceeded the 20%, 25%, 30% requirements for FY 2012-2014.
3. The variance in grades between metric #3, Average Monthly Bill, and metric #4, Cost of Service, is due to a smaller average household number for San Francisco (2.43) when compared to the rest of California (2.94). In addition, while other jurisdictions charge on average a minimal amount for stormwater fees, San Francisco charges a higher rate because it collects and treats the polluted stormwater prior to releasing into the bay therefore minimizing the environmental impact.

Policy Category	#	Measure	W	P	WW	Average Score	Grade	Change from Prior Year
Asset Management	1	**Stewardship:** Preventive maintenance ratio	3.0	4.0	1.0	2.7	B-	---
	2	**Regulatory Compliance:** Number of incidents of fines/sanctions	4.0	2.0	4.0	3.3	B+	⇩
Mission Management & Sustainability	3*	**Service:** Average combined water, sewer, and power bill	4.0	4.0	4.0	4.0	A	---
	4*	**Service:** Cost per person per day	4.0	3.0	0.0	2.3	C+	---*
	5	**Stewardship:** Credit rating	4.0	NA	4.0	4.0	A	---
	6	**Service:** Percent of retail customers that rate SFPUC as "good" or "excellent"	3.0	3.0	3.0	3.0	B	---
	7	**Environmental Stewardship:** WATER: Amount of water sold to SF residential customers (gal/pp/day) POWER: Emissions-free municipal and retail electricity supplied SEWER: Unauthorized discharges from combined sewer system	4.0	4.0	0.0	2.7	B-	⇩
Personnel Management	8*	**Respect/Equal Opportunity:** Percent of local hires	4.0	4.0	4.0	4.0	A	---
	9*	**Safety:** Recordable lost time rate	2.0	2.0	2.0	2.0	C	---
		OVERALL	A-	B+	C+	**3.1**	**B**	⇩

**Rating methodology has changed from the prior year. See manual for details.*