

INVITATION FOR COMMENT - ADMIN. BULLETIN 600 REVISIONS
DEPARTMENT COMMENT SUBMISSION FORM

DEPARTMENT: All Departments

No.	Dept.	Section	Proposed Edits	Comments	CAO Response	Notes
1	Agriculture	II.B.2.e.	Fixed Asset Purchases. One of the following Fixed Asset Codes must be applied to a Requisition for the purchase of a Capital Outlay Item equal to or greater than \$5,000.	Grammar issue, above than should be greater than	Agree	Corrected in final draft
2	Agriculture	III.B.4.a.	other services that, by law, some other officer or body is specifically charged with obtaining and	remove the and unless there is something else to add, if it needs to be before the last entry add it to the line above	Agree	Corrected in final draft
3	Auditor-Controller	II. B. 2. e.	Add Capital Accounts 4948 Miscellaneous Equipment and 4949 Special Assistive Devices to the list of accounts.	Draft AB is currently incorrect... The list in the draft AB is incomplete and needs to be corrected. The list should contain all accounts under Summary Sub-Account 4950.	Agree	Corrected in final draft
4	Auditor-Controller	II. B. 2. e.	Change the first sentence in the paragraph after the account list to read "...route to the Auditor-Controller to confirm the availability of adequate appropriations for the capital purchase."	Draft AB is currently incorrect... Currently the sentence reads "...route to the Auditor-Controller to record the item as an asset for inventory purposes." That is not why the requisition is routed to the Auditor's Office, it is to ensure the department has adequate appropriations for the purchase. Capital equipment is not recorded in the Capital Asset system until after the purchase has been made.	Agree	Corrected in final draft
5	Auditor-Controller	II. B. 3. a. 14. A.	Assuming that the new threshold of \$5,000 for computer purchases made under authority of the Warrant Request is not lowered, provide instruction on how the County will ensure it adheres to the requirement that the Auditor's Office confirms a department has adequate appropriations for a capital purchase.	Draft AB is currently not in compliance with requirements... \$5,000 is the threshold for determining if equipment is capital. How will the Auditor's Office be aware of the potential purchase, prior to the purchase, in order to ensure appropriations are available?	Agree	Corrected in final draft
6	Auditor-Controller	I. B.	The Capital Outlay Item definition should include "Additions to capitalized equipment costing \$5,000 or more per item." and note that this definition is specific to a Capital Outlay Item for equipment (not land, intangible assets, etc.).	Draft AB is currently incorrect... AB 200 "Fixed Asset Accounting and Budgeting Policy" defines capital equipment as both the addition of the equipment as well as additions to capitalized equipment costing \$5k or more.	Agree	Corrected in final draft
7	Auditor-Controller	I. D.	"Fixed Asset Code" should be "Equipment Capital Asset Code"	Draft AB is currently incorrect... the AB only deals with a small subset of the capital accounts in the financial system and the AB should specify that (as written the AB indicates that it is dealing with all capital accounts). In addition, the AB uses the outdated term Fixed Asset instead of Capital Asset.	Agree	Corrected in final draft
8	Auditor-Controller	II. B.	Add accountability requirements as has been done with Service Contracts in III. B. 7. The AB's regarding receiving and matching are being repealed and no accountability re: receiving and matching is included in the new AB.	Loss of accountability with draft AB... Three-way matching is a standard practice in modern accounts payable procedures and modern accounting systems. We are using matching in Workday, but we were not able to fully utilize Workday's "three-way matching" functionality due to the fact that full procurement was not included for go live.	Agree	Added Section II(B)(5) "Receipt of Shipments"
9	Auditor-Controller	II. B. 1. a. II. B. 2. a. II. B. 2. b. II. B. 4. II. C. V.	Use the same list for "materials, supplies, equipment, furnishings, and other personal property of any kind and nature" throughout the document or use the complete list once and then specify a truncated list that represents the complete list will be used in the rest of the document. Or be clearer if the lists are supposed to be different (and specify how items that appear on the initial list are supposed to be handled, since they do not appear on subsequent lists).	Draft AB is confusing... various different versions of the list "of goods" appear throughout the document and it is not clear why the same list is not always used (are items dropped or added for a particular purpose or is that not intentional).	Agree	Corrected in final draft
10	Auditor-Controller	II. B. 4. b. II. B. 4. c. III. B. 2. a. III. B. 2. b. III. B. 2. c.	Change the reference to dollar amount ranges so that no amounts are left outside of a range or (as in the case of III B. 2. a. 2. be consistent within a section (the heading of this section says "Service Contracts up to \$25,000" and #2 in the section says "contracts under \$25,000."	Draft AB is confusing/incomplete... County staff will not know how to appropriately handle purchases that are on the cusp of the ranges (are not contained in any range) and those purchases will be handed inconsistently throughout the County.	Agree	Corrected in final draft

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11	Auditor-Controller	Memo II. B. 5. a.	Clarify which AB takes precedence, the new AB or AB 616 "Acquisition of Computer Hardware, Software and Computer-Related Services."	Draft AB is confusing/incomplete... II B. 5. a. states that purchases equal to or below \$200,000 require approval by the Purchasing Agent or designee (no other approvals required); the memo states that all transactions under \$200,000 will require the approval of the Purchasing Agent only (seemingly clarifying if II B. 5. a. means all purchases or just some). AB 616, which is not being repealed, requires approval of CAO and CIO for computer hardware that costs more than \$50,000 and less than or equal to \$200,000. With two ABs giving conflicting requirements for purchases, the result will be inconsistent practice throughout the County.	Agree	Corrected in final draft. Admin Bulletin 600 sets minimum standards for procurement; however, additional Admin Bulletins identified in Section VI or other policies adopted by the Board of Supervisors pursuant to Section V, including the SBE program may impose further requirements on the procurement process which must also be adhered to.
12	Auditor-Controller	II. B. 3. a.	Add "plus Board Resolution 2015/162" after the County Ordinance specification.	Draft AB is confusing/incomplete... it is the County Ordinance <i>plus</i> the Board Resolution that allows the use of the Warrant Request. The County Ordinance alone does not allow this.	Agree	Corrected in final draft with flag to update Resolution number once a new resolution is passed to effectuate the changes included in this policy.
13	Auditor-Controller	III. B. 8.	Add "if Board of Supervisors approval is required" after "Service contract documents must be approved by the Board of Supervisors"	Draft AB is confusing... BOS approval is not required on all service contracts, but III B. 8. makes it sound like BOS approval is required for all service contracts.	Agree	Corrected in final draft
14	Auditor-Controller	III. B. 4. a. last bullet	Remove the "; and" at the end of the bullet or make it clearer why it is there. It does not appear to be linking III B. 4. a. with III B. 4. b.		Agree	Corrected in final draft.
15	Auditor-Controller	II.B.3. (Warrant Requests)	N/A	The maximum amount for "other items" on warrant requests is being increased from \$1,000 to \$5,000 (a \$4,000 or 400% increase). Isn't that a little extreme? It wasn't that long ago that the limit was \$500. Maybe it's because \$5,000 is also the capitalization threshold, but that seems to be a high threshold for being able to bypass Purchasing.	Disagree	The maximum amount for "Other Items" to be paid under a Warrant Request was set at \$500 in 1995 and continued for 20 years until it was increased to \$1,000 in 2015. Over the past 28 years, the personnel costs related to processing a Purchase Order or Service Contract have increased dramatically. Increasing this amount from \$1,000 to \$5,000 will ensure that the County does not expend more funds to process a request than it would cost to simply make the purchase. This removes bureaucracy from the process and increases the amount of productive hours staff can direct to larger scale purchase transactions.
16	Auditor-Controller	I. B.	N/A	The definition of a "Capital Outlay Item" contains "with a life expectancy of more than one year that retains its identity throughout its useful life" - this is not consistent with AB 200 or the SCO ASP. It would be nice if definitions were consistent.	Agree	Corrected in final draft.
17	Auditor-Controller	II. B. 4. d. 1. A.	N/A	I'm not sure if "inability to conduct the solicitation process timely" has always been a justification for Sole Source (it was not when we had to complete the Sole Source form), but this just invites departments to delay the procurement process until they don't have adequate time for the "normal" process and therefore "must" use sole source.	Agree	Corrected in final draft to match with the definitions of Sole Source and Single Source added to Section I, "Definitions".
18	Auditor-Controller	II. B. 4. d. 2.	N/A	Editorial... County Counsel reviews all Cooperative Purchasing Contracts except those related to Health Services. Is that because HSD is exempt or because HSD has some other review path they go down? It would be nice to know (have that info included, instead of mysteriously excluding HSD).	Agree	Corrected in the final draft. HSD initiates legal review of Cooperative Purchasing Contracts directly with County Counsel.
19	Auditor-Controller	Various	N/A	It seems like this AB has less Authority specifications than the AB's it is replacing. Having been one of the people who has had to chase down what authorizes various County practices, specifying the Authority (and being specific instead of saying something like "state law") is extremely helpful for County staff.	Disagree	The Administrative Bulletin cites all sources in statute, County municipal code or policy and hyperlinks to each reference. Prior Administrative Bulletins that are being replaced may have had citations, but did not link to those references - this actually enhances transparency and the ability to access the underlying authorization.
20	Auditor-Controller	None	Add something relating to procurement card usage	There is zero mention of the procurement card program. As problem riddled as that program is, the least they can do is include a reference to the Procurement Card Manual, and that using the procurement card does not preclude you from having to follow the new purchasing AB.	Agree	Added Section II(B)(3), "Procurement Cards"
21	Auditor-Controller	None	Add something about the receiving process	AB 603 - <i>Receiving Shipments</i> is being repealed with the new AB. There is not one mention of receiving in the new AB. AB 603 may be almost as old as I am, but receiving is a relevant portion of the purchasing process, which is supposed to be as follows: Requisition→Purchase Order/Issue→Receive→Invoice→Payment. There has to be confirmation of receipt before the purchase is deemed to be complete, and an invoice can be paid.	Agree	Added Section II(B)(5) "Receipt of Shipments"
22	Contra Costa Fire	Page 9, Section III B.1	Purchasing needs to provide mechanism to determine findings	The County is asking staff to determine that a, b and c are valid but staff has no way to determine this.	Disagree	This is currently the responsibility of departments

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23	Contra Costa Fire	Page 12, Section III B.7.d	There are two section "d"'s	Need to renumber	Agree	Corrected in the final draft.
24	Contra Costa Fire	Page 13, Section III B.8 and C.1	Section B.8 should read that "service contracts \$200,000 and greater must be approved by the Board . . . If under \$200,000, refer to Section C.1	Statements conflict	Agree	Corrected in the final draft.
25	Contra Costa Fire	Page 13, Section III B.7.e	We would like language included to determine when a contract extension is appropriate or a new solicitation is required.	Language seems a bit vague	Agree	Corrected in the final draft.
26	Contra Costa Fire	Section I, c.	Other Cooperative agreements- This list is for example purposes	Fire will sometimes use fire specific cooperative purchasing agreements - need flexibility.	Agree	That flexibility is contemplated in the policy
27	Contra Costa Fire		This list is not all encompassing- there are others available for use		Agree	The Cooperative Purchasing Agreements identified in the policy are used as examples
28	Contra Costa Fire	Section II d. 2	Needs better definition.	"County Counsel will initiate review of cooperative agreements". Is this one and done, each time they are used, only new ones?	Agree	County Counsel review of a Cooperative Purchasing Agreement, like other contracts, is only necessary during the term of the Agreement. Any new or subsequent agreements would be subject to a new County Counsel review.
29	Employment & Human Services	Section I. H	Add: Submissions are not requested from bidders. Similar to the language at the end of paragraph J.	This will clarify the process as bidders inquiry about submitting proposals at the same time they are submitting their intend to participate.	Agree	Added language specifying that if departments receive a single response to an RFI from a qualified vendor, then no further solicitation activity is required.
30	Employment & Human Services	Section 1 (E.)	Invitation to Bid - If Purchasing has the capacity to handle EHSD RFIs, RFP, RFB	Does Purchasing have the capacity to handle EHSD's RFIs, RFP, and IFB	Agree	Yes, but it is important to note that all bid solicitations are the responsibility of the department. Bid Solicitation documents for procurement transactions above \$100,000 must be submitted to Purchasing Services for listing on BidSync. Purchasing Services has the capacity to receive and post solicitations received.
31	Employment & Human Services	Section II (B 4.a & b) and III. (B.2. a & b))	a. Purchases up to \$10,000 (For compliance with ACF)	Lower the threshold for micro-purchases not requiring quotes to comply with Head Start - 45 CFR Part 75; Threshold 48 CFR Subpart 2.1	Disagree	This Administrative Bulletin outlines the minimum standards for procurement in the County; however, departments are required to abide by additional or more onerous state and federal grant requirements specific to each unique funding source.
32	Employment & Human Services		b. Purchases between \$10,000 and \$100,000	Lower the threshold for expenditures requiring a Purchase Order. For compliance with ACF	Disagree	This Administrative Bulletin outlines the minimum standards for procurement in the County; however, departments are required to abide by additional or more onerous state and federal grant requirements specific to each unique funding source.
33	Employment & Human Services	Section II (B 3.a)	Include expenditures incurred for the benefits of clients in Warrant Requests	Include expenditures incurred for the benefits of clients mandated by the Court, e.g., food, clothing, shelter for infants, Foster Youth and other clients to no longer require utilizing the Purchasing Agent or Board Order.	Agree	Corrected in final draft
34	Employment & Human Services	Section III (B - 4a)	Exemption from Solicitation Requirements - include services for the immediate placement and meals for infants, youths, and other Employment and Human Services Department clients ordered by the Courts	Exemption from Solicitation Requirements - waive the requirement for court ordered expenditures incurred for the benefits of clients mandated by the Court	Agree	Language included in the Warrant Requests section for mandated costs ordered by the Court for the benefit of Wards.
35	Employment & Human Services	Section III (B - 4 c 3	Needs to be more specific - EHSD website, newspaper, or other examples.	Service Contracts Greater than \$100,000 is confusing	Agree	Corrected in final draft
36	Employment & Human Services	Section III (B 7.d)	Change Remediation Plan -to Corrective Action Plan	Language is not clear. Needs to clarify.	Agree	Corrected in final draft
37	Employment & Human Services	Section III. C. A. 1.	The purchase order is equal to or below \$200,000	This will provide consistency in the language	Agree	Corrected in final draft
38	Employment & Human Services		Purchase Order Process RFP and RFI	Policy does not include a protest/appeal process	Agree	Each bid solicitation process is unique and may have different requirements, including how a protest/appeal process is structured. The policy mandates bid solicitation, but does not dictate how those solicitations are structured. Once the policy is adopted, staff plans to conduct a comprehensive update to the Procurement Manual and provide more information about RFP process in that document.
39	Employment & Human Services		The term of the RFP is not included. A range should be listed.	Policy needs to include the term of the RFP, e.g., every 3 years, every 5 years, or annually.	Disagree	Each department has different requirements depending on its line of business. In some cases, conducting a solicitation every three years may be appropriate, but in others every five years may be appropriate. This discretion is reserved for the department head to determine, in consultation with Purchasing Services, if needed.

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40	Sheriff's Office	II, e	Fixed Asset Purchases	Are there other capital codes to include such as 4948?	Agree	Corrected in final draft to require that the "appropriate code" be used rather than listing a non-exhaustive list in the Administrative Bulletin.
41	Sheriff's Office	N/A	N/A	***Should procurement card policy/rules also be included in this?***	Agree	Added Section II(B)(3), "Procurement Cards"
42	Sheriff's Office	Section I (E)	"Invitation for Bid" (IFB) is a solicitation method by which awards are made to the lowest bid. The winning must be responsive (conforms to bid requirements) and responsible (competent and qualified to perform under the contract).	I think the lowest bid should be removed. The focus should be on the expertise of the service and the quality of work. A bid should not solely be awarded due to its low cost.	Disagree	There is no requirement to accept the lowest bid in a solicitation process. There are many different solicitation vehicles, including IFB, which is defined in this section to help educate the reader, but does not establish a mandate.
43	Sheriff's Office	Requisitions B (Submission)	A requisition is filed with the Purchasing Agent to order equipment and/or supplies.	Under this section, there should be a timeframe for approval. In the past, I have noticed that it has taken a long time for County Counsel to approve as well as the CAO.	Agree	The Administrative Bulletin increases the review standard from requiring CAO review of all Purchase Orders to only those over \$200,000, which should dramatically increase the turnaround time for review.
44	Sheriff's Office	Pg 1	Amend the County Ordinance Code to remove the need for County Administrator review and approval of service contracts at or below \$350,000 .	Disagree. Increase from \$200,000 to \$350,000. Either increase the service contract threshold or review only the first year and thereafter do not require any subsequent reviews. There are common service contracts throughout the County departments such as Microsoft Office 365 that are renewed on a recurring basis every 1 to 3 years. Sheriff's Office has ongoing maintenance/support contracts with several vendors, such as Central Square for the CAD/RMS system, ATIMS for the Jail Management System, and Thales Group for the fingerprint & ID system, as examples. These all exceed \$200,000 and do not warrant an annual review.	Disagree	Statute only allows general law counties, like Contra Costa County, to delegate signature authority from the Board of Supervisors to the Purchasing Agent up to \$200,000. One solution to the issue mentioned would be to conduct a bid solicitation process and award a multi-year contract rather than
45	Sheriff's Office	Pg 1	Increase the threshold for certain, ministerial payments via Warrant Request from \$1,000 to \$5,000.	Disagree. Increase from \$1,000 to \$10,000. Pg5-6 items listed under Warrant Requests, from an IT standpoint, this category of items can easily exceed \$5,000. 14 - Other items limited to a maximum cost of \$5,000, including A) Computer hardware and software C) One-time services that are not covered under a County service contract and are authorized by the Purchasing Agent. Examples of Warrant Requests that could apply: 1. Purchase of vendor retraining sessions outside the scope of the service contract. As staff turns over, the knowledge goes, and we need the vendor to retrain or refresh new and existing team members. 2. Vendor service for customized reports outside of the maintenance/support contract. 3. One-time hardware and software purchases often have warranty and service costs associated that would easily exceed the \$5,000 threshold.	Disagree	Increasing the "Other Items" limit from \$1,000 to \$5,000 helps to ensure that the cost of processing certain transactions for limited computer hardware/software, commodities and services do not exceed the cost of the related purchases. It is not meant as a way to bypass the procurement process. In the examples provided, if the costs exceeded \$5,000, the best course of action would be to negotiate a contract amendment to incorporate the scope of the additional services required.
46	Sheriff's Office	Section I - Definitions	Propose to redefine or increase "Capital Outlay Item" from \$5,000 to \$25,000, Pg 1.	To date, we've dealt with 873 radios, according to our internal inventory tracking. Some radios are retired, lost, or replaced. Radios, including all parts, warranty, and services baked in, go just over the \$5,000 threshold. Radios are mobile. They get reassigned, checked in/out, and relocated throughout the County. The annual Capital Asset Inventory threshold places too much burden on departments having to track too many day-to-day operational items. Another example is network equipment such as switches and routers. Over time, the cost goes up with newer models and more features. However, these are standard equipment items every department deploys. Having to purchase these kinds of items, ensuring the Fixed Asset Purchases balance is available in the appropriate ORG code forces each department to move funds around just to accommodate 1 Purchase Order. The return gained from tracking \$5,000 capital assets is not worth the time and effort of staff throughout the County. Simply using an Inflation Calculator, plug in \$5,000 in 1969. That value is equivalent to approx. \$40,000 today. The risk and accountability associated, considering the burden of the overhead processes involved, do not warrant the continuation of a policy that defines such a low Capital Asset threshold.	Disagree	The County has designated a \$5,000 capitalization level for equipment purchases, pursuant to Administrative Bulletin No. 200, "Capital Asset Accounting and Budgeting Policy".

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47	Sheriff's Office	Pg 20 - Contract Purcahse Orders	Remove all hardcopy paper references such as "pink copy" or "goldenrod copy."	All Contracts and Purchase Orders should be processed electronically or uploaded to an electronic system for tracking & dissemination purposes.	Agree	The section being referenced is the appendices, including the Administrative Bulletins proposed for repeal.
48	Risk Management	I Definitions	N/A	Add a definition for Purchasing Services with a link to Public Works. The Public Works intranet site has the practical steps needed for each process.	Agree	Corrected in final draft
49	Risk Management	I Definitions E. Invitation for Bid (IFB)	N/A	I do not see the "lowest bid" language under the Solicitation sections throughout the bulletin. This could be confusing Examples: M. Solicitation" is a purchasing entity's request for offers to provide goods or services, including an informal request for price quotations, an Invitation for Bids (IFB), Request for Qualifications/Quote(RFQ) or a Request for Proposals (RFP). c. Purchases Greater than \$100,000 1. A department shall conduct an open and competitive solicitation for a purchase greater than \$100,000. The form of solicitation may be an Invitation for Bid (IFB), a Request for Qualifications/Quote (RFQ) or a Request for Proposals	Agree	The Administrative Bulletin provides the reader with definitions of different solicitation vehicles, such as an IFB, RFP, RFQ, etc. but does not mandate a certain solicitation type. This is to be completed at the discretion by the department and Purchasing Services depending on the type of services or supplies being procured. The Administrative Bulletin only mandates that a solicitation process must be completed in certain circumstances based on the dollar amount of the goods and services being procured.
50	Risk Management	II B 3a.	N/A	Purchasing Services initiated Cooperative Contracts with vendors for the purchase of goods and services used by all County Departments. The County spends a lot of money with certain vendors, so it is in the best interest of the County to take advantage of these contract benefits. We are responsible for keeping the order funded and in effect, and review each contract prior to expiration. Each contract is vetted by Counsel and review/approved by the Board. The contracts offer a variety of benefits from discounted products to free shipping. The Amazon agreement is a Prime Account, and everything that goes with being a Prime Member. Many of the contracts we initiated require users to be registered on the account. That registration can be done with the help the buyer. Buyers are noted at the top of each order. Please refer to each order to understand who to connect with to register.	Agree	Purchasing Services does, at times, initiate Cooperative Purchasing Contracts with certain agencies for use by County departments. However, the scenario provided in the comments are more reflective of Blanket Purchase Orders that are initiated by Purchasing Services for use of County departments. Both benefit County departments with pre-negotiated rates and terms, but are different transaction types.
51	Risk Management	III Section B. 4a	N/A	Does not mention management software systems. It is not realistic to bid annually for managemene software systems. Management software systems are often long term. A consideration for a multi-year contract (up to three years) and then require a competitive bid. Also, there are cyber service contract that we enter into in response to cyber insurance required vendors. How can we add these type of service exceptions?	Agree	The Administrative Bulletin does not mandate annual solicitation processes for any type of procurement. Solicitation requirements are driven by dollar amount of the goods or services being requested. In the examples being provided, exceptions are already built into the policy for Single Source purchases.
52	Risk Management	III Section B. 4d2	2. Cooperative Purchasing Contracts. In lieu of a bid solicitation process, a department may request that Purchasing Services initiate a Cooperative Purchasing Contract for goods that the County requires and that the County may procure under a Participating Agreement. Purchasing Services will initiate County Counsel review of Cooperative Purchasing Contracts, with the exception of those related to the Health Services Department that follows a separate contract review process	Clarify what is the process with HSD	Agree	Corrected in the final draft. HSD initiates legal review of Cooperative Purchasing Contracts directly with County Counsel.

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53	Risk Management	III Section B. 6	Outreach and SBE Program Compliance. Additional thresholds and goals under the County Outreach and SBE (Small Business Enterprise) programs may be required apply to solicitations for service contracts	Change to may be required to make sure staff is reviewing to determine if required	Agree	Corrected in the final draft
54	Risk Management	III Section B. 7b	N/A	Software contracts offer discounts connected to multi year or set number of months but requires payment in advance upon execution of the contract. Is there particular wording to use in the contract for this?	Agree	The would be a Payment Provision negotiated between the department and the vendor, but not something that would be discussed in the Administrative Bulletin.
55	Risk Management	III Section C 3. Page 13	N/A	Do we want to add a Risk Management Review for insurance compliance language? Especially for vendor's form. Do we want to add a timeframe for County Counsel to complete their review? Within 5 business days? County Counsel Review. A service contract that is either more than \$50,000 or not on a County standard form (i.e., on a vendor's form) must be reviewed and approved as to legal form by the County Counsel's Office before the Purchasing Agent executes the contract. If a service contract is \$50,000 or less and is on the County's standard form, the Purchasing Agent may sign the contract without County Counsel review.	Disagree	In rare circumstances, the County's General Conditions covering insurance compliance language are modified and subject to a review by County Counsel. It is impractical to build a mandate for County Counsel review timeframes into a policy such as this.
56	Health Services	Section I (A)	Blanket Purchase Order. . . . that permits the procurement of supplies, equipment, rental and maintenance services	Often purchase or rental of equipment includes regular maintenance together as 1 quote. Additionally, blanket POs have historically been used to procure ongoing maintenance for equipment and IT services as well. We have tried to convert these to service contracts in the past but vendors often have their own agreements that we have County Counsel review.	Agree	Corrected in final version
57	Health Services	Section II (A)	The Purchasing Agent is authorized to purchase all materials, supplies, equipment, maintenance and execute lease-purchase agreements for supplies, equipment, maintenance	Clarifies that maintenance can be a part of the purchase order	Agree	Corrected in final version
58	Health Services	Section II (B. 1. b.)	... a vendor agrees to abide by those terms and conditions unless County Counsel approves modifications to the terms and both the Purchasing Agent and vendor agree in writing to amend any of those terms and conditions.	Clarifies opportunity for County Counsel involvement and the negotiation with the vendor that is often necessary	Disagree	County Counsel is not a party to the contract. It is implied that the parties (i.e. the County and the vendor) have conducted internal review, presumably with legal counsel, and obtained appropriate approvals prior to agreeing to any modification of the terms.
59	Health Services	Section II (B. 2. b.)	A Requisition must be submitted to the Purchasing Agent to request the issuance of a Standard Purchase Order or Blanket Purchase Order or execution of a Lease Purchase Agreement.	It would also be helpful to add Lease Purchase Agreement to the definitions.	Agree	Corrected in final version
60	Health Services	Section II (B. 3. a. 5.)	food (see Administrative Bulletin No. 614, "Food and Beverage Policy" for additional requirements)	Clarifies procedure for purchasing food	Agree	Corrected in final version
61	Health Services	Section II (B. 3. a. 8.)	public transportation fares and bridge tolls for employees (see Administrative Bulletin No. 615, "Incentives for County Programs and Services" for additional requirements)	Clarifies procedure for purchasing public transportation fares	Agree	Corrected in final version
62	Health Services	Section II (B. 4. b. 1.)	...(3) written price quotes, with at least one (1) price quote from a Small Business Enterprise (SBE) provider without solicitation through an informal bid	Clarifies the type of solicitation needed	Agree	Corrected in final version
63	Health Services	Section II (B. 4. c. 1.)	A department shall conduct an open and competitive solicitation for a purchase greater than \$100,000 for new purchase orders or every X years for renewals.	Clarifies when a competitive solicitation is required. Need to ensure exceptions for "legacy" systems/applications that are part of the organization's infrastructure; solicitation for these would only be required when the organization has decided to "sunset" or move away from them.	Agree	Competative solicitation is not required for legacy systems and applications that underwent an RFP process previously (e.g. Workday, Granicus, Epic, etc.). However, if a procurement transaction doesn't meet Sole Source or Single Source exemption criteria, a solicitation process should be conducted at the conclusion of the existing agreement. Note that definitions for "Single Source" and "Sole Source" procurement have been added to Section I, "Definitions".
64	Health Services	Section II (B. 4. c. 3.)	Purchasing Services shall post the solicitation online for X days to comply with the fair and open competition requirements of this policy.	Clarifies how long this process takes to assist with submitting request in a timely manner.	Agree	Corrected in final version to state minimum amount of time needed to post solicitation (at least 2 weeks)

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DEPARTMENT: All Departments

No.	Dept.	Section	Proposed Edits	Comments	CAO Response	Notes
65	Health Services	Section II (B. 4. d. 2.)	Cooperative Purchasing Contracts	Want to ensure that this covers our group purchasing agreements especially for CCRM such as Vizient	Agree	Yes, this covers all Cooperative Purchasing Agreements, such as Vizient used by HSD.
66	Health Services	Section III (B. 2. b. 1)	...after securing a minimum of three (3) written proposals without solicitation through an informal bid	Clarifies the type of solicitation needed	Agree	Corrected in final version
67	Health Services	Section III (B. 3. b.)	Purchasing Services shall post the solicitation online for X days to comply with the fair and open competition requirements of this policy.	Clarifies how long this process takes to assist with submitting request in a timely manner.	Agree	Corrected in final version to state minimum amount of time needed to post solicitation (2 weeks)
68	Health Services	Section III (B. 7. b.)	...outputs/outcomes negotiated as part of a service plan...	Missing word	Agree	Corrected in final version
69	Health Services	Section III (B. 7. b.)	Other negative payment terms, such as late payment penalties, should not be entertained as part of the negotiation of payment terms.	We do have contracts that currently include late payment penalties although we are moving away from those. Is there an exemption? If County Counsel approves?	Agree	The Administrative Bulletin would impact contracts on a prospective basis and states that such terms "should" not be entertained.
70	Health Services	Section III (B. 7. b.)	Effective date must be approved by the Board of Supervisors and executed before the service contract effective date.	Not always possible given patient care and IT considerations. Is there a provision and mechanism for retroactive issues?	Disagree	For contracts over \$200k, the Board of Supervisors must approve the contract to pursuant to statute. Contract ratifications occur from time-to-time on an <i>ad hoc</i> basis in emergent situations, but this is the exception not the rule.
71	Health Services	Section III (C. 2)	Contracts Processed Under a Purchase Order	We do have purchase orders that include service contracts over 200K. They are reviewed by County Counsel and include maintenance/services of equipment or software, and do go to the Board. We do not see this procedure in this document, and would request language added for this procedure to section III. D.	Agree	Added Section II(C), "Services Included Under a Purchase Order"
72	Health Services	N/A	N/A	Is it possible to have a flow chart of the procedures and examples (as in Admin Bulletin 616)?	Agree	This will be added to the revised Procurement Manual once the final policy has been adopted.

EDITORIAL COMMENTS

1	Auditor-Controller	II.B.5.(Approvals)	N/A	The CAO is basically reducing their role from being a part of the purchasing process to being an approver of the Board Order if the purchase is greater than \$200,000. They are going from reviewing and approving the PO Requisition to just agendzing the department prepared Board Order when greater than \$200K. According to the old AB611, the CAO's approval criteria was to include "how the purchase will meet the department's operational needs, whether or not funds exist in the budget specifically for the purchase, and the estimated cost of the equipment relative to the type and availability of fundiing." That is a lot of trust to hand over to departments.The CAO's role is now to just review and approve the Board Order prepared by the department. That is a major control step to remove.
2	Auditor-Controller	General Comment	N/A	CAO, County Counsel, and Purchasing have been working together since 2021 on this. Is there some reason (possibly implementing Workday) that our office was not involved in this process? When Purchasing was updating their Purchasing Guide, Elizabeth, Laura and I were involved. There is a definite reduction of internal control resulting from this AB.
3	Contra Costa Fire	General Comment	Purchsing needs to be responsive to other departments and districts from a customer service perspective. Regular communication, collaboration and helping to identify pathways to execute purchases. If experiences with purchasing are not positive, staff will get frustrated and find ways to circumvent the process.	N/A
4	Employment & Human Services		Familiarity with our Programs may be a challenge for the Purchasing Agent and may require working with a department subject matter expert prior to securing a PO.	N/A
5	Sheriff's Office	Pg 1	Consolidate nine (9) Administrative Bulletins in one single, comprehensive Bulletin.	Strongly agree.
6	Sheriff's Office	N/A	N/A	Looks like a good change for everyone, increasing dollar limits and removing the CAO approval.