



KING COUNTY

1200 King County Courthouse
516 Third Avenue
Seattle, WA 98104

Signature Report

Motion 16975

Proposed No. 2026-0068.1

Sponsors Barón

1 A MOTION acknowledging receipt of the first semiannual
2 report on the status of activities related to contract
3 management and compliance reporting protocols, as
4 required by Ordinance 20023, Section 60, Proviso P1.

5 WHEREAS, the 2026-2027 Biennial Budget Ordinance, Ordinance 20023,
6 Section 60, Proviso P1, requires the executive to transmit semiannual reports on the
7 status of activities required by Ordinance 19978 related to contract management and
8 compliance reporting protocols, and

9 WHEREAS, the proviso further requires the executive to submit motions that
10 acknowledge receipt of the reports, and

11 WHEREAS, the first semiannual report on the status of activities related to
12 contract management and compliance reporting protocols, which is Attachment A to this
13 motion, is submitted by the executive;

14 NOW, THEREFORE, BE IT MOVED by the Council of King County:

15 The receipt of the first semiannual report on the status of activities related to
16 contract management and compliance reporting protocols, which is Attachment A to this

Motion 16975

17 motion, as required by Ordinance 20023, Section 60, Proviso P1, is hereby
18 acknowledged.

Motion 16975 was introduced on 4/7/2026 and passed by the Metropolitan King County Council on 6/2/2026, by the following vote:

Yes: 9 - Balducci, Barón, Dembowski, Dunn, Fain, Lewis, Mosqueda, Perry and von Reichbauer

KING COUNTY COUNCIL
KING COUNTY, WASHINGTON

Signed by:

062AC77E76FB49B...

Sarah Perry, Chair

ATTEST:

DocuSigned by:

8DE1BB375AD3422...

Melani Hay, Clerk of the Council

Attachments: A. Report on the Status of Activities Related to Contract Management and Compliance Reporting Protocols

Report on the Status of Activities Related to Contract Management and Compliance Reporting Protocols

*Responding to Ordinance 20023, Section 60, Proviso P1
and Ordinance 19978, Section 5.A*

March 31, 2026



King County

Summary

DCHS is taking immediate action to strengthen its fiscal and compliance oversight as it advances implementation of the King County Auditor's Office (KCAO) recommendations. Since the August 2025 KCAO report, the department has adopted nine new policies and procedures, launched contracted provider fiscal stewardship trainings, initiated interdepartmental coordination with Public Health – Seattle & King County (PHSKC), developed an anti-fraud training for employees, and engaged an external consultant to conduct a risk assessment, gap analysis, and provide recommendations for future improvements. As detailed for each recommendation in the body of this report, DCCHS is on track to complete KCAO recommendations within committed timeframes.

The actions summarized in this report are consistent with Executive Zahilay's March 4, 2026 Executive Order.¹ The order is focused on Countywide efforts, but the planned department steps in the report support the objectives of the Order on governance and financial management practices. Notably for this report, the Order directed the County's executive branch to increase accountability, transparency, and internal controls.

As identified in the October 2025 Service Provider Capacity and Fiscal Partnership Program Feasibility Analysis Report to the Council, a service provider capacity and fiscal partnership program as envisioned by Ordinance 19978 would only be feasible with new funding.² Because it was not funded in the 2026-2027 budget, the program has not been launched. DCCHS continues limited technical assistance and capacity building through Best Starts for Kids (BSK) and the Veterans, Seniors and Human Services Levy (VSHSL), as well as a time-limited pilot in the Developmental Disabilities and Early Childhood Supports Division.

DCCHS significantly increased its systematic tracking of contract compliance monitoring activities throughout 2025, in response to KCAO recommendations and Ordinance 19978. This report provides information about how the department is prioritizing these activities to respond to the KCAO report and Ordinance 19978 requirements given limited available resources. It also provides data from 2025 on the number of multiyear contract agencies, risk and readiness assessments, fiscal compliance monitoring visits, and program compliance monitoring visits.

DCCHS will assess the impact of updated processes and monitoring activities on providers through direct contractor feedback. The initial changes that will have an impact on contractors were implemented in March 2026. DCCHS expects to provide initial data on the effects of these changes on providers in the March 31, 2027 report.

DCCHS is prioritizing strengthening its overall infrastructure to ensure accountability and compliance, both internally and with contracted providers, while also implementing the KCAO recommendations swiftly. While many improvements can be made within existing resources, certain initiatives will require additional resources and capacity. DCCHS plans to work closely with the Executive's Office on supplemental budget requests to advance this work.

Background

In January 2025, by Motion 16723, the King County Council adopted a work program for the King County Auditor's Office (KCAO) that included plans to conduct an audit of DCHS' management of juvenile diversion services.^{3,4} The KCAO responded by releasing a report in August 2025 that reviewed and made recommendations regarding DCHS' internal controls and compliance standards.⁵

DCHS is working to implement the recommendations included in the KCAO report by strengthening the department's internal policies and procedures, increasing staff capacity to achieve contract management and compliance monitoring standards, and training contracted providers on contract and invoicing requirements.⁶ DCHS is implementing these changes with the support of the Executive, the Finance and Business Operations Division (FBOD) of the Department of Executive Services, and an external consultant.

In September 2025, the Council adopted Ordinance 19978, requiring DCHS to undertake certain actions as part of its fiscal stewardship responsibilities.⁷ These actions include implementing the use of best practices in contract management and compliance monitoring, performing regular risk assessments of contract agencies, and instituting financial management training for department staff and contract agencies. The Ordinance also calls for DCHS to provide information to the Council about its response to several of the audit's recommendations, through a series of reports, letters, and briefings.⁸

The actions summarized in this report are consistent with Executive Zahilay's March 4, 2026 Executive Order.⁹ The order is focused on Countywide efforts, but the planned department steps in the report support the objectives of the Order on governance and financial management practices. Notably for this report, the Order directed the County's executive branch to increase accountability, transparency, and internal controls.

Report Requirements

This report responds to two related legislative requirements, from Ordinance 20023, Section 60, Proviso P1, and from Ordinance 19978, Section 5.A, both of which called for reporting to the Council due March 31, 2026.

Ordinance 20023, Section 60, Proviso P1, requires the Executive to provide a semiannual report, with the first report due March 31, 2026, describing the status of activities required by Ordinance 19978 related to contract management and monitoring protocols. Specifically, the Ordinance calls for:

- a summary of the activities initiated consequent to any recommendations from the King County auditor's office in the reporting period,
- a summary of the services provider capacity and fiscal partnership program activities supporting technical assistance and capacity building, and
- a summary of activities initiated consequent to the requirements defined by Ordinance 19978, including the financial management and best practices training requirements as described in Ordinance 19978, Section 1.A.2.d.

Report on the Status of Activities Related to Contract Management and Compliance Reporting Protocols

This report also responds to the requirement of Ordinance 19978, Section 5.A, for the Executive to report on the following by March 31 of each year, beginning in 2026:

- the percentage of its multiyear contract agencies that received an in-person site visit from the department during the prior calendar year,
- a status update on the department's contract management and compliance monitoring activities, and
- a summary of data for the prior calendar year regarding monitoring of contract agencies' time spent on contract compliance activities and evaluating the effectiveness and efficiency of contract processes and requirements.

Summary of Activities Initiated Consequent to Auditor's Recommendations and Ordinance 19978 Requirements including Financial Management and Best Practices Training

This section responds to:

- *Ordinance 20023, Section 60, Proviso P1, Part A;*
- *Ordinance 20023, Section 60, Proviso P1, Part C (See Recommendation 6); and*
- *Ordinance 19978, Section 5.A.1.b.*

As part of the established protocol with the KCAO for Executive responses to audits, on August 19, 2025, the King County Executive's Office provided the KCAO with an Executive Response that included a timeline for implementation of each KCAO recommendation, spanning from late 2025 through mid-2027. The timelines vary due to interconnectedness and phasing of the work, staffing capacity, overall complexity, and contract volume of the department. Notably, several improvement initiatives are already under way, including:

- the July 2025 implementation of DCHS' updated Contract Compliance Monitoring Policy and completion of associated staff trainings by all relevant staff;
- a risk assessment of the hybrid payment model; development of trainings for contracted providers regarding financial stewardship values and practices; and interdepartmental coordination with Public Health – Seattle & King County;¹⁰ and
- development of an anti-fraud training for all DCHS staff. This training will be launched on April 1, 2026, and staff will be required to complete it by December 31, 2026.

Table 1 below provides a summary of activities initiated for each of the ten KCAO report recommendations, updating information provided in Executive Braddock's November 2025 letter.¹¹

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Table 1. Activities Initiated and Expected Timeline for KCAO Report Recommendations

KCAO Report Recommendation	Status	Activities Initiated and Expected Timeline
<p>Recommendation 1: “Develop, document, and implement a strategy to strengthen internal controls for financial management that includes, at a minimum, 1) a clear vision of how financial stewardship relates to program goals, and 2) the role of compliance, fiscal, and program staff in supporting fiscal stewardship.”</p>	<p><i>On Track</i></p>	<ul style="list-style-type: none"> • An external consultant completed a current state assessment and gap analysis on December 22, 2025. The consultants briefed DCHS senior leaders on January 12, 2026. The next day, DCHS held the first of three half-day work sessions to develop a vision to strengthen DCHS infrastructure, improve internal controls, and ensure accountability to fiscal and program goals. <ul style="list-style-type: none"> ○ DCHS is finalizing a document to reflect the vision and ensure integration of KCAO, Council, and consultant recommendations and requirements and identify milestones, timelines, and resources needed to achieve the vision. ○ DCHS has initiated a recruitment process for a new senior leader to lead activities to strengthen internal and external compliance and controls. ○ DCHS is developing job aids that create stronger role clarity for key positions within the department. It will further specify responsibilities for program managers, contract managers, and fiscal and compliance staff in supporting fiscal stewardship. ○ During the second quarter of 2026, DCHS intends to complete a plan with timelines for implementing additional improvements. • DCHS updated multiple policies and procedures related to financial management and compliance. • DCHS has developed a three-part financial stewardship training series for providers, covering contracting financial management, and fiscal compliance, that launched in March 2026. • KCAO Recommendation 1 will be fully implemented by June 30, 2027.

<p>Recommendation 2: “Work with Public Health – Seattle & King County to develop, document, and implement a plan to identify opportunities for efficiencies in the financial oversight of organizations funded by both departments.”</p>	<p><i>On Track</i></p>	<ul style="list-style-type: none"> • A cross-departmental DCHS and Public Health - Seattle & King County (PHSKC) workgroup began meeting in October 2025 to develop, document and implement a plan to identify opportunities for efficiencies. <ul style="list-style-type: none"> ○ The workgroup is currently mapping existing financial monitoring and risk assessment processes across both departments to identify financial efficiencies, including compliance and analysis functions such as site visits, risk assessments and budget monitoring of contract delivery. <ul style="list-style-type: none"> ○ The workgroup is developing additional metrics to track coordinated and leveraged monitoring visits, and will implement them by June 30, 2026. ○ Once the mapping is complete, the departments will develop shared standards and coordinated practices for financial monitoring, data collection, and risk assessments to reduce administrative burden on providers and improve oversight. ○ The workgroup has established a short-term goal of synchronizing upcoming Q1 and Q2 site visits and strategies, including documenting areas of common and different approaches and recommending solutions to achieve consistency. <ul style="list-style-type: none"> ○ The cross-departmental team has developed a tracking tool that has identified providers that have contracts that overlap both DCHS and PHSKC. This tool helps both agencies focus on which providers require synchronized site visits and risk assessment review and elevates any urgent issues that may exist in provider oversight. ○ The cross-departmental team has established monthly meetings to share a 60-day fiscal monitoring schedule. These meetings will allow the agencies to coordinate a more efficient fiscal monitoring plan for agencies with contracts in both departments. The monitoring visit may include shared information on document gathering and sampling of costs, which will result in a reduction in duplicative oversight requests of agencies. • As of the drafting of this report, DCHS is currently developing a documented joint implementation strategy, with completion planned for spring 2026.
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KCAO Report Recommendation	Status	Activities Initiated and Expected Timeline
		<p>Following finalization of the report, identified changes will be phased in, with initial implementation anticipated by June 30, 2026.</p>
<p>Recommendation 3: “Develop, document, and implement a plan to offer ongoing anti-fraud training for all staff. At a minimum, this training should include information on the impact of fraud, why people commit fraud, how to identify it, and how to report it.”</p>	<p><i>On Track</i></p>	<ul style="list-style-type: none"> ● DCHS developed anti-fraud training for department staff. The training incorporates input from King County’s Finance and Business Operations Division, Public Health – Seattle & King County, and key DCHS staff. ● Additionally, DCHS has developed an anti-fraud training plan, which outlines ongoing training requirements for current staff, the process and training requirements for new staff, and training completion tracking activities. ● DCHS will launch anti-fraud training for all staff on April 1, 2026, and will require all department staff to complete it by December 31, 2026 and annually thereafter.
<p>Recommendation 4: “Conduct and document the results of a risk assessment of its hybrid payment model that specifies how its response appropriately mitigates the risks of fraud and improper payments.”</p>	<p><i>On Track</i></p>	<ul style="list-style-type: none"> ● DCHS completed a risk assessment of its hybrid payment model in December 2025. This included analysis of additional approval steps for new hybrid contracts and conducting a detailed review of payment process and reconciliation timing. ● DCHS finalized its strategies for mitigating risk based on the assessment on January 29, 2026, by introducing a centralized process to review, approve, and track hybrid payment model utilization and oversight and establishing reconciliation standards. Specifically, DCHS intends to: <ul style="list-style-type: none"> ○ determine the precise criteria for eligibility of hybrid contracts at the program and RFP level; ○ incorporate provider readiness reviews to triage oversight strategies ○ create a procedure manual to outline steps to be followed to monitor payments and collected documentation;¹² and ○ establish principles when payment pauses or request to return unused funds shall occur. ● DCHS will implement the recommended strategies by June 30, 2026.

KCAO Report Recommendation	Status	Activities Initiated and Expected Timeline
<p>Recommendation 5: “The Department of Community and Human Services should develop, document, and implement a plan to monitor the effectiveness of the Best Starts for Kids capacity-building program in improving the financial capacity of grantees and use monitoring results to inform Recommendation 6.”</p>	<p><i>On Track</i></p>	<ul style="list-style-type: none"> • A full evaluation of the Best Starts for Kids (BSK) Technical Assistance and Capacity Building (TACB) strategy was under way before the KCAO made this recommendation. <ul style="list-style-type: none"> ○ Data collection activities began in 2022 and are being led by evaluators in Public Health Seattle-King County (PHSKC). ○ Initial findings from the full evaluation are expected by June 30, 2026, and will be used to inform planning for a potentially renewed Best Starts for Kids levy and the Executive’s response to Recommendation 6. ○ A full evaluation report will be available by December 31, 2026. • Staff and evaluators have also adjusted the original evaluation plan to more explicitly address Recommendation 5. <ul style="list-style-type: none"> ○ To strengthen the evaluation’s assessment of financial capacity outcomes, the evaluation team added several new questions to the survey that goes to each TACB recipient every six months. This targeted data collection began in January 2026, with two additional rounds of data collection occurring in July 2026 and January 2027. ○ To deepen understanding of how financial capacity building supports are delivered and where improvements may be needed, evaluators also plan to conduct a focus group with financial capacity building consultants in mid-2026. ○ DCHS is preparing a supplemental report to the BSK TACB evaluation report, expected by June 30, 2027. It is expected to summarize findings from the targeted data collection above. Plans for the report also include highlighting factors that support or hinder fiscal capacity development and making recommendations for strengthening future capacity-building investments.

<p>Recommendation 6: “Develop, document, and implement a plan for effectively communicating to grantees their role in financial stewardship and how they are supported and held accountable to that role.”</p>	<p><i>On Track</i></p>	<ul style="list-style-type: none"> • DCHS developed the following three online financial stewardship training courses and made them available on its website in March 2026 for its contracted providers to access.¹³ The trainings are responsive to Ordinance 19978 and KCAO Recommendation 6: <ul style="list-style-type: none"> ○ DCHS Contracting Overview Training ○ Financial Management and Best Practices Training ○ DCHS Fiscal Contract Compliance Training • All DCHS contracted providers can access these courses on a new training website that the department developed to support the training implementation and centralize access to additional resources.¹⁴ The training website includes information on how to do business with DCHS and technical assistance and capacity building resources. • DCHS will require the Financial Management and Best Practices training for multi-year contract agencies beginning April 1, 2026, ahead of the timeline called for by Ordinance 19978. The training: <ul style="list-style-type: none"> ○ clarifies DCHS’ financial management expectations for contracted providers; ○ covers key financial best practices a DCHS contract provider needs to understand to successfully manage a contract award; ○ provides consistent and equitable resources to support providers in implementing best practices; and ○ Includes content on accounting system and processes best practices, internal controls best practices, and best practices related to managing a DCHS contract award. • DCHS’ standard contract terms and conditions have been updated to include this requirement, and contract agencies that are required to complete the training must submit a training completion attestation form to DCHS to document that they have finished it. • DCHS communicated the financial stewardship training courses, including the required Financial Management and Best Practices training, to DCHS contracted providers and regional human service coalitions through email communication in March, published a blog post, and has published information about the trainings on its new training website. DCHS has also added the requirement to its contract templates, developed internal workflows
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KCAO Report Recommendation	Status	Activities Initiated and Expected Timeline
		<p>to operationalize the requirement, and trained DCHS staff on the new contracted provider Financial Management and Best Practices training requirement.</p> <ul style="list-style-type: none"> • DCHS intends to prioritize continuous improvement of the training to meet contract providers’ training needs. Contracted providers will have an opportunity to provide training feedback through a survey posted on the DCHS training website. • DCHS plans to develop Spanish language versions of the financial stewardship training courses in the second quarter of 2026 to improve access to these resources.

KCAO Report Recommendation	Status	Activities Initiated and Expected Timeline
<p>Recommendation 7: “Enforce contract requirements related to subcontractors by ensuring, at a minimum, that 1) it has issued written approval for all subcontractors, 2) subcontracts contain language required by contract, and 3) it takes action to correct any improper payments that may have occurred related to unapproved subcontracts.”</p>	<p><i>On Track</i></p>	<ul style="list-style-type: none"> • A cross-divisional staff working group in DCHS developed a Subcontract Review and Management Procedure and related job aids in the fourth quarter of 2025 and finalized the materials on January 23, 2026. <ul style="list-style-type: none"> ○ The procedure provides clear and standard steps and expectations for how contract managers should enforce and document contract requirements related to subcontractors, including approving subcontractors and reviewing subcontracts. ○ Job aids include guidance on how to determine if an entity is acting as a subcontractor, checklist for subcontractor and subcontract review, email templates, and tools for contractors including what to include in a subcontract request and a template of current required flow-down terms. ○ This procedure is intended in part to prevent improper payments to subcontractors. (DCHS, in coordination with the Finance and Business Operations Division, intends to develop and implement a procedure for correcting any improper payments, including those related to unapproved subcontracts, by July 31, 2026.) • DCHS staff and supervisors involved in contract management received training on the procedures and job expectations by the end of February 2026 and are expected to adhere to them for any subcontract that a contractor requests on or after March 1, 2026. • In February 2026, DCHS sent a broad communication to all DCHS contractors explaining the new subcontract request and review process, and created a website to provide information to support contractors to comply.¹⁵

KCAO Report Recommendation	Status	Activities Initiated and Expected Timeline
<p>Recommendation 8: “Develop, document, and implement clear and consistent policies and procedures for: 1. invoice validation including, at a minimum, a) guidance on allowable and reasonable costs and b) staff duties to request and review supporting documents for high-risk costs, like subcontracts, stipends, and prepaid cards 2. contract amendments 3. stipend payments 4. prepaid card logs 5. when contract payments exceed actual expenditures 6. contract termination 7. funding eligibility of for-profit businesses as both grantees and subcontractors on community grants 8. documentation management including, at a minimum, the appropriate system(s) for collecting and storing documentation that is used to validate invoices and comply with contract terms.”</p>	<p><i>On Track</i></p>	<ul style="list-style-type: none"> • Cross-divisional subject matter experts in DCHS collaborated to develop all eight of the recommended policies and procedures required in KCAO Recommendation 8. <ul style="list-style-type: none"> ○ The policies and procedures incorporate feedback from King County’s Finance and Business Operations Division and DCHS staff. ○ DCHS leadership approved all eight of the policies and procedures in Recommendation 8. ○ DCHS intends to continue to evolve these policies and procedures over time. • Training, conducted by the Contract Management Learning and Development Manager, has been provided for staff and supervisors involved in procurements and contract management on all eight policies and procedures in Recommendation 8, with consistent implementation expected by March 31, 2026.

KCAO Report Recommendation	Status	Activities Initiated and Expected Timeline
<p>Recommendation 9: “Develop, document, and implement checklists that help ensure staff adhere to all policies and procedures established in Recommendation 8.”</p>	<p><i>On Track</i></p>	<ul style="list-style-type: none"> • DCHS hired a Contract Management Learning and Development Manager in January 2026. This dedicated staff person has worked with cross-divisional staff to develop checklists and other job aids to support the implementation of the policies and procedures outlined in Recommendation 8. • This staff person maintains a comprehensive list of all policies, procedures, and job aids, as well as related definitions. • The Contract Management Learning and Development Manager will continue to develop, document, and implement checklists and other job aids as additional contract management policies and procedures are developed. • Ultimately, DCHS intends to develop and implement department-wide standard contract management requirements, including an onboarding plan for new staff with contract management duties and ongoing training requirements. This work will likely require additional resources. DCHS plans to utilize future supplemental budget opportunities to make this request.
<p>Recommendation 10: “Develop, document, and implement a comprehensive staff training plan that covers policies, procedures, and checklists from Recommendations 8 and 9.”</p>	<p><i>On Track</i></p>	<ul style="list-style-type: none"> • DCHS’s Contract Management Learning and Development Manager has developed and delivered multiple staff training courses on the policies and procedures outlined in Recommendation 8. This staff has scheduled regular drop-in help sessions for staff already trained on the policies and procedures outlined in Recommendation 8. Additionally, DCHS intends to offer quarterly trainings for new staff. • The Contract Management Learning and Development Manager is also developing a more comprehensive set of contract management-related policies, procedures, and job aids, beyond what is outlined in KCAO Recommendation 8, to further support Contract Managers in their roles. • DCHS intends to develop and implement more comprehensive training, for contract management staff, beyond what was completed March 31, 2026 (as described under Recommendations 7 and 8 above), by the first quarter of 2027.

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As detailed in Table 1, DCHS is putting in place stronger internal controls, so staff and contracted providers have what they need to succeed. In September 2025, an external financial consulting firm began working directly with DCHS to help assess the department's current state, identify additional gaps and risks, and support implementing the report's recommendations. At the end of December 2025, the consultant provided detailed recommendations for improvement. The consultants briefed DCHS senior leaders on January 12, 2026. The next day, DCHS held the first of three half-day work sessions to develop a vision to strengthen DCHS infrastructure, improve internal controls, and ensure accountability to fiscal and program goals. DCHS is finalizing a document to reflect the vision and ensure integration of KCAO, Council, and consultant recommendations and requirements and identify milestones, timelines, and resources needed to achieve the vision.

Components of the vision include restructuring and adding functions within the department to support a culture of accountability and standardization of practices. Examples include:

- creating a provider support and readiness team,
- creating a centralized accounts payable team for invoice review, approval, and payment,
- developing internal quality assurance and compliance functions, including the hiring of a new senior leader to oversee these contracting functions,
- enhancing training and development, and
- better leveraging technology.

DCHS intends to have a finalized plan (with timelines) for implementation of consultant-recommended improvements by the second quarter of 2026 and will then coordinate with the Executive's Office on supplemental budget requests that are necessary to make the plan a reality. The Report on Feasibility of Implementing Auditor Recommendations and Proposed Amendment Concepts, transmitted October 20, 2025, identifies areas where additional resources are expected to be necessary to implement audit recommendations and the other activities called for by Ordinance 19978, Section 1.A.2.

In addition, DCHS completed internal review of the 19 issues of potential improper payments that were referred to DCHS by the KCAO. The King County Ombuds Office is now managing a contract for an external independent party to review the items, to ensure objectivity and credibility.

Summary of Service Provider Capacity and Fiscal Partnership Program Activities Supporting Technical Assistance and Capacity Building

This section responds to Ordinance 20023, Section 60, Proviso P1, Part B.

DCHS transmitted a Service Provider Capacity and Fiscal Partnership Program Feasibility Analysis Report to the Council on October 20, 2025 in accordance with Ordinance 19978.¹⁶ The report provided a feasibility analysis of what it would take for DCHS to establish a service provider capacity and fiscal partnership program (PCFPP) that makes ongoing technical assistance and capacity building services available to all DCHS multiyear contract agencies. The report included a description of potential program elements, an estimated implementation timeline, resources needed for enabling program implementation, and a program administration recommendation. The report concluded that a potential PCFPP for multi-year contractors is feasible if the following conditions are met:

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- An implementation approach involving multiple strategies implemented at different times guides execution of the program.
- Sufficient additional resources to match the scale of the program are provided, including:
 - funding for expanded consultant resources; and
 - funding for additional staffing in DCHS.

A PCFPP was not funded in the King County 2026-2027 Biennial Budget. As a result, DCHS has not implemented this program. However, DCHS continues to administer Best Starts for Kids (BSK) and Veterans, Seniors, and Human Services Levy (VSHSL) technical assistance and capacity building programs. These programs are available to a subset of DCHS contract agencies who have been funded by BSK or VSHSL and agencies who are responding to BSK or VSHSL procurements.

In the October 2025 report, DCHS reported that the department was piloting a Developmental Disabilities and Early Childhood Supports Division (DDECSD) capacity building program. At the time the October 2025 report was transmitted, it was unknown if the DDECSD capacity building pilot would continue in 2026 due to funding uncertainty. Since that time, DCHS has determined that limited developmental disability millage funding is anticipated to be available to support the pilot through the end of 2027, allowing the division to continue small-scale implementation and learning while assessing impact and sustainability.

In addition to these existing programs, DCHS previously administered a similar countywide program between July 2022 and December 2024, called the Grant Application and Capacity Building (GACB) program, which ended due to funding restrictions in 2024.¹⁷

2025 Compliance Monitoring Visits and Risk Assessments

This section responds to:

- *Ordinance 19978, Section 5.A.1.a.; and*
- *Ordinance 19978, Section 5.A.1.b.*

This section responds to the Ordinance 19978, Section 5.A.1.a, requirement for DCHS to report each March 31 on the percentage of its multiyear contract agencies that received an in-person site visit from the department during the prior calendar year, based on related activities called for by Ordinance 19978, Section 1.A.2.c. It also provides additional metrics on DCHS’ fiscal and program compliance activity in 2025. These data build upon the status update provided earlier in this report on the department’s contract management and compliance monitoring activities, in response to Ordinance 19978, Section 5.A.1.b.

Multiyear Contract Agencies

Since passage of Ordinance 19978 in October 2025, DCHS has developed a methodology to identify multiyear contract agencies for the purposes of conducting annual risk assessments and in-person compliance monitoring visits, tracking contractor training attendance, and implementing other related policies. DCHS intends to report on the percentage of its multiyear contract agencies that received an in-person site visit from the department during 2026 in its March 31, 2027 report.

As DCHS operationalizes direction from Ordinance 19978, the department considers an agency to be a multiyear contract agency in a particular year when the agency has at least one contract with DCHS’ standard terms and conditions that was active on or before the first day of that year that has

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at least 18 months left in its contract term as of the first day of that year. Due to typical contracting and fund source renewal cycles, the number of multiyear contract agencies fluctuates from year to year.

DCHS contracted with 248 multiyear contract agencies in 2025.¹⁸

Ordinance 19978 Interpretation and Prioritization

As described in the Report on Feasibility of Implementing Auditor Recommendations and Proposed Amendment Concepts, transmitted October 20, 2025, DCHS interprets the site visit requirement in Ordinance 19978, Section 1.A.2.c, as inclusive of in-person programmatic or fiscal monitoring site visits, consistent with its Contract Compliance Monitoring Policy instituted in July 2025.¹⁹

The department’s policy requires all department contractors that deliver human services or community-based programs directly to residents using DCHS-administered funding, which the policy references as subrecipients, to receive either an in-person or remote monitoring visit covering programmatic and fiscal contract compliance at least once every three years. Under this policy, program monitoring includes interviews with agency program staff, review of policies, procedures, and board minutes, and reviews of client files where applicable. Fiscal monitoring includes review of financial policies, internal controls, ledgers, and source documentation.

As also discussed in the October 2025 Report on Feasibility of Implementing Auditor Recommendations and Proposed Amendment Concepts, implementing a requirement for DCHS to conduct in-person site visits at least every three years will significantly increase workloads for monitoring staff, and additional funding for staffing resources would be needed to meet this threshold.²⁰ The October 2025 report also stated that unless directed otherwise by Council, DCHS intends to use the risk assessment process called for by Ordinance 19978, Section 1.A.2.c, to determine which organizations most need in-person monitoring and which allow for virtual monitoring (low-risk organizations), until sufficient resources are identified.²¹

Risk and Readiness Assessments

This report provides information on DCHS’ monitoring activity for multiyear contract agencies as well as previous tracking of monitoring and risk assessment activity prior to the passage of Ordinance 19978, including in responses to the August 2025 KCAO report. Consistent with DCHS’ Contract Compliance Monitoring Policy and the October 2025 Report on Feasibility of Implementing Auditor Recommendations and Proposed Amendment Concepts, prior to the passage of Ordinance 19978, compliance monitoring activities have been compared to the department’s total number of contractors that deliver human services or community-based programs directly to residents using DCHS-administered funding.^{22,23} In 2025, DCHS identified 358 contractors as eligible for risk assessments, because they had received payment from the department in 2024. Not all these 358 contractors are multiyear contract agencies.

DCHS’ fiscal compliance team performed a risk assessment on 100 percent of the 358 contractors deemed eligible for a risk assessment in 2025. In addition to fiscal compliance risk assessments, DCHS divisions conducted an additional 140 risk or readiness assessments in 2025, for a total of 498 risk and readiness assessments across DCHS during the year.^{24,25} These 498 risk and readiness assessments involved 405 unique agencies, 171 of which were 2025 multiyear contract agencies (approximately 69 percent of the 248 multiyear contract agencies).

DCHS intends to standardize department-wide risk and readiness assessments. The results of these assessments will be used to inform future contract management and monitoring activities. These include monitoring visits but also other supports an organization may need, such as technical assistance or capacity building (where available), or more frequent contact with their DCHS program manager.

Fiscal Compliance Monitoring Visits

Based on the prioritization within existing resources described above, DCHS conducted 79 fiscal compliance monitoring visits in 2025, representing 22 percent of the 358 organizations that received a risk assessment in 2025. As DCHS previously reported, these 358 agencies were prioritized for risk assessments and fiscal compliance monitoring visits, as guided by DCHS' Contract Compliance Monitoring Policy.²⁶ The 79 fiscal compliance monitoring visits included 36 agencies (approximately 14 percent) out of the department's 248 2025 multiyear contract agencies.

Program Compliance Monitoring Visits

In addition, DCHS contract management staff conducted 208 program compliance monitoring visits, covering 129 agencies. Of these, 63 were multiyear contract agencies in 2025, or 25 percent of the 248 total multiyear contract agencies in 2025, and 35 (14 percent) of the visits to 2025 multiyear contract agencies occurred in person. These visits include general compliance monitoring visits, as well as electronic data validation (EDV) visits that verify service delivery fidelity, and on-site housing capital and community capital contract compliance inspections.

Prioritization in 2026

Responding to direction from Ordinance 19978, DCHS is prioritizing risk assessments and in-person site visits for multiyear contract agencies in 2026. DCHS is currently recruiting for additional compliance staff, as provided in the 2026-2027 budget. This added staffing is needed to increase the number of on-site compliance monitoring visits and risk assessments for multiyear contract agencies in 2026. The department intends to continue to prioritize among multiyear contract agencies based on risk assessment results, as described above.

Monitoring Contract Agencies' Time Spent on Contract Compliance Activities and Evaluating the Effectiveness and Efficiency of Contract Processes and Requirements

This section responds to Ordinance 19978, Section 5.A.1.c.

As noted in the Report on Feasibility of Implementing Auditor Recommendations and Proposed Amendment Concepts, transmitted in October 2025, DCHS intends to use direct feedback from contractors to determine the impact of its updated processes and monitoring activities.²⁷ DCHS already routinely collects information about contractors' experience using a variety of methods, such as surveys administered at the end of the solicitation application process, required annual narrative reporting about successes and challenges in implementing contracted services, and annual fiscal compliance subrecipient surveys. DCHS intends to integrate questions into existing feedback mechanisms to limit burden on providers. The first round of updated processes and procedures that will have an impact on providers was implemented on March 31, 2026. DCHS anticipates having collected sufficient data to report to Council on the impact of updated processes and monitoring activity beginning with the March 31, 2027 report.

Conclusion

DCHS is taking swift action to reinforce its commitment to strengthening fiscal stewardship and creating a strong platform from which it can fulfill the more complex KCAO recommendations. Since the KCAO released its report in August 2025, DCHS has implemented several new policies and procedures. The implementation includes training numerous staff on the policies and procedures so they have the information they need to be successful. Many foundational improvement activities are already in motion, including the rollout of the new Contract Compliance Monitoring Policy and staff completion of associated trainings, the launch of interdepartmental coordination efforts with PHSKC, the development of an anti-fraud training, and the engagement of an external consultant.

While DCHS is confident in leveraging existing staff and tools to initiate many reforms, certain recommendations and improvements will require staffing increases, targeted technology, and reporting enhancements. DCHS plans to partner with the Executive's Office on supplemental budget requests.

With support from the Executive, structured timelines, and a phased resourcing strategy, DCHS intends to fulfill the recommendations outlined in the KCAO report.²⁸ New policies have been developed by the KCAO's March 31, 2026 deadline, with full implementation of all recommendations planned by mid-2027. Through these efforts, DCHS will deliver on its commitment to fiscal responsibility and community impact.

Endnotes

- ¹ Executive Girmay Zahilay Executive Order, March 4, 2026.
https://content.govdelivery.com/attachments/WAKING/2026/03/04/file_attachments/3573206/EO_GoodGovernance_FinancialManagement.pdf.
- ² Service Provider Capacity and Fiscal Partnership Program Feasibility Analysis Report, October 20, 2025.
<https://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=7709802&GUID=B99AFE29-D9C6-43F3-B008-08E2EAD50E66&Options=Advanced&Search=>
- ³ Motion 16723.
<https://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=7030493&GUID=9F12AB5C-3AF3-4096-A7C4-A33CAA52FC5B&Options=Advanced&Search=>
- ⁴ Initial calls for the audit in 2024 focused on the Restorative Community Pathways (RCP) youth diversion program. The audit did not contain any findings related to RCP, but the final scope of the audit encompassed a broader range of youth programs.
- ⁵ King County Auditor’s Office (August 26, 2025, updated September 10, 2025). Department of Community and Human Services Needs to Strengthen Financial Stewardship. <https://cdn.kingcounty.gov/-/media/king-county/independent/governance-and-leadership/government-oversight/auditors-office/reports/audits/2025/dchs-contracts/dchs-contracts-2025.pdf?rev=de1da047b6c94b9d9ac69aebf3b4de4f&hash=A3D1D5746BFA9C7911E02029536AA559>. The Executive Response is Appendix 3 to the KCAO report, and is included as Appendix B to this report.
- ⁶ King County DCHS (September 5, 2025). Cultivating Connections: Doing Right by Communities: Our Commitment to Accountability and Transparency. <https://dchsblog.com/2025/09/05/doing-right-by-communities-our-commitment-to-accountability-and-transparency/>
- ⁷ Ordinance 19978.
<https://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=7638134&GUID=6C08433A-B1B7-4E54-A3F9-C512CD12E80D&Options=Advanced&Search=>
- ⁸ Ordinance 19978.
<https://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=7638134&GUID=6C08433A-B1B7-4E54-A3F9-C512CD12E80D&Options=Advanced&Search=>
- ⁹ Executive Girmay Zahilay Executive Order, March 4, 2026.
https://content.govdelivery.com/attachments/WAKING/2026/03/04/file_attachments/3573206/EO_GoodGovernance_FinancialManagement.pdf.
- ¹⁰ King County Auditor’s Office (August 26, 2025, updated September 10, 2025). Department of Community and Human Services Needs to Strengthen Financial Stewardship. <https://cdn.kingcounty.gov/-/media/king-county/independent/governance-and-leadership/government-oversight/auditors-office/reports/audits/2025/dchs-contracts/dchs-contracts-2025.pdf?rev=de1da047b6c94b9d9ac69aebf3b4de4f&hash=A3D1D5746BFA9C7911E02029536AA559>
- ¹¹ Status Update Letter Responding to Auditor Recommendations and Available Plans for Improvements to Contract Management and Compliance Monitoring Activities, November 21, 2025.
<https://mkcclegisearch.kingcounty.gov/View.aspx?M=F&ID=14978676&GUID=39D14A7C-A355-494D-A36E-A83D4E820608>
- ¹² This activity is also associated with KCAO Recommendation 8.5.
- ¹³ King County DCHS Contractor Training Resources. <https://kingcounty.gov/en/dept/dchs/human-social-services/funding-opportunities-dchs/contractor-training-resources>
- ¹⁴ King County DCHS Contractor Training Resources. <https://kingcounty.gov/en/dept/dchs/human-social-services/funding-opportunities-dchs/contractor-training-resources>
- ¹⁵ King County DCHS Requesting to Subcontract. <https://kingcounty.gov/en/dept/dchs/human-social-services/funding-opportunities-dchs/how-to-contract-dchs/subcontracting>

¹⁶ Service Provider Capacity and Fiscal Partnership Program Feasibility Analysis Report, October 20, 2025. <https://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=7709802&GUID=B99AFE29-D9C6-43F3-B008-08E2EAD50E66&Options=Advanced&Search=>

¹⁷ DCHS established the Grant Application and Capacity Building (GACB) program in July 2022 to support small community-based organizations (CBOs) that traditionally face barriers to accessing King County funding but who are situated to best serve the diverse communities of King County. GACB provided support to access County funds through contracted assistance to CBOs applying to County procurements. The program aimed to address barriers and enable more small CBOs (less than 20 staff and organizational budget smaller than \$4 million) and BIPOC-led organizations to equitably apply to County procurements through the provision of grant assistance. Once contracted with the County, GACB provided capacity building support to help organizations thrive through a variety of services to strengthen organizational development and systems for long-term organization sustainability, including but not limited to, finance, human resources, fund development, information technology, change management, and board development. The program ended due to General Fund reductions.

¹⁸ As a comparison, applying the multiyear contract agency definition in this report, DCHS worked with 315 multiyear contract agencies in 2024. In 2026, DCHS is working with 360 multiyear contract agencies.

¹⁹ Report on Feasibility of Implementing Auditor Recommendations and Proposed Amendment Concepts, October 20, 2025. <https://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=7710207&GUID=5A92CECB-7BFB-42CE-BC66-58DAD45A2EEC&Options=Advanced&Search=>

²⁰ Report on Feasibility of Implementing Auditor Recommendations and Proposed Amendment Concepts, October 20, 2025. <https://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=7710207&GUID=5A92CECB-7BFB-42CE-BC66-58DAD45A2EEC&Options=Advanced&Search=>

²¹ Report on Feasibility of Implementing Auditor Recommendations and Proposed Amendment Concepts, October 20, 2025. <https://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=7710207&GUID=5A92CECB-7BFB-42CE-BC66-58DAD45A2EEC&Options=Advanced&Search=>

²² Report on Feasibility of Implementing Auditor Recommendations and Proposed Amendment Concepts, October 20, 2025. <https://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=7710207&GUID=5A92CECB-7BFB-42CE-BC66-58DAD45A2EEC&Options=Advanced&Search=>

²³ The department’s risk assessment activities do not include the roughly 85 fee-for-service contractors that deliver services to support DCHS contractors, such as language translation, workforce training, technical assistance and capacity building. Unlike subrecipients that deliver direct services to clients, these contractors provide discrete support services to other service providers rather than operating client-facing programs themselves.

²⁴ Many contracted providers hold multiple contracts with DCHS. Fiscal monitoring visits evaluate the agency as a whole, whereas program compliance monitoring visits typically evaluate performance on a specific program. This is why there is a difference between the number of visits and the number of agencies visited.

²⁵ In addition to risk assessments by DCHS’ fiscal compliance team, DCHS divisions’ risk and readiness assessments included: (a) pre-vendor assessment the Adult Services Division conducted on 96 agencies that were entering new contracts; (b) 29 risk assessments conducted by Housing and Community Development Division’s capital section, in alignment with standards developed with joint funders, and consistent with affordable housing industry metrics and contract requirements; and (c) 13 risk assessments conducted by the Developmental Disabilities and Early Childhood Supports Division, informed by ongoing discussions with Department of Children, Youth and Families (DCYF) and in alignment with federal monitoring requirements.

²⁶ Prioritization considerations for fiscal compliance monitoring visits included federally and state-funded contracts that require annual monitoring; agencies identified as high risk through the risk assessment

process; agencies that had not been monitored during the past three years; and agencies where possible concerns had been identified.

²⁷ Report on Feasibility of Implementing Auditor Recommendations and Proposed Amendment Concepts, October 20, 2025.

<https://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=7710207&GUID=5A92CECB-7BFB-42CE-BC66-58DAD45A2EEC&Options=Advanced&Search=>

²⁸ King County Auditor's Office (August 26, 2025, updated September 10, 2025). Department of Community and Human Services Needs to Strengthen Financial Stewardship. <https://cdn.kingcounty.gov/-/media/king-county/independent/governance-and-leadership/government-oversight/auditors-office/reports/audits/2025/dchs-contracts/dchs-contracts-2025.pdf?rev=de1da047b6c94b9d9ac69aebf3b4de4f&hash=A3D1D5746BFA9C7911E02029536AA559>. The Executive Response is Appendix 3 to the KCAO report.

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