

# Human Services Disclosure Reform

## Vendor Frequently Asked Questions (FAQ)

### Human Services Disclosure Reform - General

#### 1. Question: What is the Human Services Disclosure Reform?

**Answer:** The human services disclosure reform is package of reforms that will make the prequalification process easier for small nonprofits that receive City Council discretionary awards and ensure significant human services providers disclose key information necessary for the City to protect taxpayer dollars. **The first reform output** is a new discretionary PQL in PASSPort for nonprofits that only receive City Council discretionary awards. This PQL will be released in April 2025 and will only ask three questions to verify compliance with legal requirements. **The second reform output** is adding a 30-day extension option to both the new discretionary PQL and existing HHS PQL for financial statement audits or reviews that have not been completed by a Certified Public Accountant when the PQL is due. The 30-day extension option is available. **The third reform output** is adding additional disclosure questions to the existing HHS PQL for human services contractors as required under the new Citywide Related Party Transaction and Conflict of Interest Policy. The additional questions will be added in August 2025 and human services contractors will have to answer them once their 2024 HHS PQL expires.

#### 2. Question: What do I have to do as a human services contractor?

**Answer:** If you are a nonprofit that only receives City Council discretionary awards, you can become prequalified with a new, simple discretionary PQL instead of the HHS PQL. If you are a Contractor that doesn't receive City Council discretionary awards but wants to become prequalified for human services contracts, you must answer additional disclosure questions in the HHS PQL depending on when your 2024 HHS PQL expires. The additional disclosure questions will be added in August 2025.

#### 3. Question: What is a PQL?

**Answer:** PQL means prequalification.

#### 4. Question: Is HHS Accelerator shut down? Why does my prequalification application say 'HHS Accelerator'?

**Answer:** Yes, it was, however in PASSPort the name of the Prequalification Application is the "HHS Accelerator Prequalification Application."

5. **Question:** Is this reform just for reducing the administrative burden for the HHS prequalification application on PASSPORT? Or does it also apply to disbursement of funds through my contracting agency? We have already received pre-qualification approval but also need to submit many forms for discretionary contracting process.

**Answer:** This reform is focused on the prequalification clearance step and will not affect the agency contracting process.

6. **Question:** we also receive BP Discretionary and private funding, do we have to go through this process?

**Answer:** That is correct, BPs and private funders do not require an Approved PASSPort Prequalification Application. However, please be aware that all charities operating and fundraising in New York State must comply with Charities Bureau filing requirements.

7. **Question:** Can we go in and submit our PQL now, or must we wait?

**Answer:** You do not need to wait! This function is available in PASSPort now!

8. **Question:** How do we get access to the passport portal?

**Answer:** You will first need to submit an Account Request - <https://www.nyc.gov/site/mocs/passport/articles/create-passport-account.page>

9. **Question:** What is the PASSPort website?

**Answer:** PASSPort is the City of New York's digital procurement platform. Register an account for your business/organization to do business with the City. Login here: <https://passport.cityofnewyork.us/page.aspx/en/usr/login?ReturnUrl=%2Fpage.aspx%2Fen%2Fbuy%2Fhomepage> To access PASSPort FAQs click here: [PASSPort Frequently Asked Questions | MOCS](#)

10. **Question:** If I have trouble with MOCS/PASSPORT who can I contact?

**Answer:** If you are getting errors while following the PASSPort guidance documents, please go to the MOCS Service Desk and enter a ticket to get assistance: <https://mocssupport.atlassian.net/servicedesk/customer/portal/8>

11. **Question:** Will there be guidance or trainings on this reform?

**Answer:** Yes, MOCS hosted an information session on April 3<sup>rd</sup> and those materials can be found here: [Contract Compliance Support | MOCS](#). MOCS also created instructional guides on how to complete the new [Discretionary PQL](#) and updated the existing [HHS PQL guide](#). To

find more information on upcoming MOCS events, please use the following link: [NYC Mayor's Office of Contract Services Events - 17 Upcoming Activities and Tickets | Eventbrite](#)

**12. Question: Can we complete the PQL this year even if our PQL hasn't been approved yet?**

**Answer:** You can apply and be approved under both prequalification lists if you want.

## **New Discretionary Prequalification Application (Discretionary PQL)**

**1. Question: How can I find the new discretionary PQL?**

**Answer:** The new discretionary PQL is available in PASSPort.

To locate from the PASSPort Homepage, or anywhere in PASSPort Central, click (or hover over) RFX in the top navigation and select Browse Prequalified Lists from the drop-down menu. The Browse Prequalified Lists page displays with all open and closed prequalified lists. To search for the Discretionary Prequalification list, type "dis" in the Keywords field. Click the Search button and the list will display in the table below the search parameters. Click the PQL ID or PQL Label to view the returned Discretionary PQL application. The Discretionary PQL Application appears showing the Overview tab. The Current Status column refers to your organization's status in relation to the PQL.

**2. Question: Does this mean that organizations with only Discretionary awards no longer will use the HHS PQL?**

**Answer:** Organizations can choose to be prequalified under one or both lists, but if the organization only received discretionary awards and does not intent to respond to solicitations, we recommend applying under the new Discretionary PQL Application.

**3. Question: How can I find out when my HHS accelerator prequalification expires? Will we receive an email from MOCS reminding us to complete the questionnaire?**

**Answer:** PASSPort sends automated messages when a PQL is about to expire.

**4. Question: If an organization receives City Council Discretionary, and Borough President Discretionary, are we still eligible for the Discretionary PQL process?**

**Answer:** Yes.

**5. Question: What is the difference between a Discretionary PQL and HHS PQL?**

**Answer:** The discretionary PQL is only for nonprofits that only receive City Council discretionary awards. The HHS PQL is for both nonprofits and for profits with human services contracts. City Council discretionary award clearance will use either Discretionary PQL approved status or HHS Accelerator PQL Approved status. Organizations do not need to be approved under both PQLs; organizations should choose to be prequalified under the list that best fits the organization's NYC funding.

**6. Question: If we receive both Discretionary and contracts pertinent to the HHS agencies, do we just submit for PQL under HHS Accelerator and get prequalified for both Discretionary and HHS, or do we have to separately complete both PQL processes?**

**Answer:** If you want the organization to be able to apply for new human service contracts, please continue to use the HHS Accelerator PQL Application.

**7. Question: Is the new discretionary PQL live yet?**

**Answer:** yes, the new Disclosure PQL Application and the addition of the 30-day extension on the HHS Accelerator PQL Application are live in PASSPort. The additional questions in the HHS PQL will not be added until August 2025.

## **30-Day Extension Option in Prequalification (PQL) Application**

**1. Question: What is the 30-day extension?**

**Answer:** The 30-day extension is an option human services contractors can select, in either the new discretionary PQL or existing HHS PQL, to request an extension for financial statement audits or reviews that have not been completed by a Certified Public Accountant when the PQL is due.

**2. Question: As a Contractor, what would I have to do to select the 30-day extension?**

**Answer:** To select the 30-day extension option in the PQL, you would need to first go to the *Documents Tab Certification – Filings Documents – Charities Filing or Exemption Documentation* in the PQL. This will be the final prompt in the PQL, and you will be asked to certify that your organization has uploaded the **most recent Charities Bureau Annual Filing or supporting documentation for filing exemption** into the Documents tab of this PQL application. To certify, click the **Answer** drop-down and select **one of eight available options** which will include a request for a 30-day extension to file a copy of the financial statement.

**3. Question: Where can I find the 30-day extension option?**

**Answer:** You can find the 30-day extension in both the new discretionary PQL and existing HHS PQL. This option will be available in May 2025.

**4. Question: What happens after 30-days if we still don't have the documentation?**

**Answer:** You may request a second and a third extension; however the number of extensions is limited to three 30-day extensions.

**5. Question: Is the 30-day extension eligible for orgs above \$250k revenue?**

**Answer:** The 30-day extension is only for CPA review reports and audits, which are not required below \$250k.

**6. Question: What is the advantage of requesting the extension, rather than just waiting until we have the documentation to complete the new application?**

**Answer:** If your organization has City Council awards pending clearance and the organization has the rest of the filing ready, and is just waiting on the CPA to complete a review report or audit, an extension will allow those awards to be cleared for processing.

**7. Question: What is the deadline we are asking to extend?**

**Answer:** The validity end date of the organization's annual Charities Bureau filing. In other words, the next annual filing due date.

**8. Question: To request an extension, do we have to submit the request through the PQL?**

**Answer:** Yes, the 30-day extension can be requested in both the HHS Accelerator PQL and the Discretionary PQL, both within PASSPort.

**9. Question: My PQL expires on 5/14/2025. When can I start working on the new one?**

**Answer:** You can start now to avoid the organization's Approved PQL status lapsing.

**10. Question: How do I know when new PQLs are due and what filings are required?**

**Answer:** Contractors must know the organization’s fiscal year to determine their specific annual filing due dates. Please refer to the table in the Appendix of the guides:

- **Submit the HHS PQL application:** [https://www.nyc.gov/assets/mocs/downloads/PASSPort/learning-to-use-passport/SubmitHHSPQLApplication\\_PDF.pdf](https://www.nyc.gov/assets/mocs/downloads/PASSPort/learning-to-use-passport/SubmitHHSPQLApplication_PDF.pdf)
- **Submit The Discretionary Application:** [Submit the Discretionary Prequalification \(PQL\) Application](#)

## Citywide Related Party Transaction and Conflicts of Interest Policy & Additional Disclosure Questions in the HHS PQL

### 1. Question: What are the best practices for nonprofit board members signing Conflict of Interest Policy?

**Answer:** Directors must provide signed statements on an annual basis disclosing any possible conflicts of interest in compliance with an organizations conflict of interest policy and NYS NPCL: <https://codes.findlaw.com/ny/notforprofit-corporation-law/npc-sect-715-a.html>

### 2. Question: What is an example of a related party transaction?

**Answer:** A board member leasing office space to the organization.

### 3. Question: Is the grandchild of an executive director considered a ‘related party’?

**Answer:** Yes. See the definitions in the policy.

### 4. Question: Where can I access the Cost Manual updates?

**Answer:** <https://www.nyc.gov/assets/mocs/downloads/Opportunities/icr/HHSCostPoliciesProceduresManual.pdf> which was also included in the September 2024 Vendor Newsletter.

### 5. Question: My PQL is due by June 30<sup>th</sup>, 2025. Is MOCS extending June 2025 recertification to align with the seven new PQL questions being added “by August 2025”?

**Answer:** When you update your HHS Accelerator PQL this June your application will not include the seven new questions. You will see and answer the seven new questions when you next update the HHS Accelerator PQL Application in June 2026. This extended timeline provides plenty of notice!

6. **Question: Do these instructions about not-for-profit disclosures apply to organizations who only receive Discretionary funding? If so, are they part of the 3 PQL questions that you described before?**

**Answer:** Related Party Transaction and Conflict of Interest disclosure questions will not be included in the Discretionary PQL Application. If an organization only receives City Council Discretionary funding it can meet the City Council prequalification requirement by having an approved Discretionary PQL Application.

### **Quick Links to Resources**

- **Submit the HHS PQL application:**  
[https://www.nyc.gov/assets/mocs/downloads/PASSPort/learning-to-use-passport/SubmitHHSPQLApplication\\_PDF.pdf](https://www.nyc.gov/assets/mocs/downloads/PASSPort/learning-to-use-passport/SubmitHHSPQLApplication_PDF.pdf)
- **Submit the Discretionary Application:** [Submit the Discretionary Prequalification \(PQL\) Application](#)
- **Related Party Transaction And Conflict of Interest Policy:**  
<https://www.nyc.gov/assets/mocs/downloads/Opportunities/COI-RelatedPartyTransactionsPolicyGuidanceContractorsHS.pdf>
- **PASSPort:**<https://passport.cityofnewyork.us/page.aspx/en/usr/login?ReturnUrl=%2Fpage.aspx%2Fen%2Fbuy%2Fhomepage>