

# Vendor Information Session: Human Services Disclosure Reform

MOCS Vendor Integrity Unit

April 3, 2025



# About the Mayor's Office of Contract Services (MOCS)

## MOCS Balances Citywide Service and Oversight Responsibilities



### AGENCY SUPPORT

Full-scale support for procurement leaders and agency executives



### PASSPORT

Central Platform: Streamlining compliance and collaboration



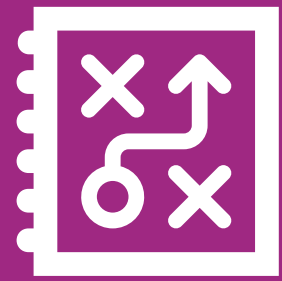
### TRANSPARENCY

Leads to improved service and performance



### VENDOR PARTNERSHIP

Partner with vendors to level playing field and adopt smart City policies



### IMPROVEMENT

Leverage data to drive continuous improvement within Agencies and Citywide

Introduction

Current State

HS Disclosure Reform

Guidance for Providers

Resources & Support

Q&A

# Introduction

# Introduction

## HS Disclosure Reform

OBJECTIVES

#1

CREATE NEW  
DISCRETIONARY PQL  
FOR NONPROFITS THAT  
ONLY GET COUNCIL  
DISCRETIONARY  
AWARDS

#2

OFFER 30-DAY  
EXTENSION FOR LATE  
FINANCIAL  
STATEMENT AUDITS &  
990 FILINGS IN BOTH  
PQLS

#3

ADDITIONAL QUESTIONS  
IN HHS  
ACCELERATOR PQL FOR A  
STREAMLINED COLLECTION  
OF CONFLICT OF INTEREST  
AND RPT DISCLOSURES



Lead procurement transformation



Equitable procurement



Ensure NYC procurement is  
simple and accessible



Safeguard tax-payer dollars and  
commitment to high quality service

# Current State

# By The Numbers: Discretionary Overview

1,138

DISCRETIONARY  
VENDORS WITH NO  
PROGRAMMATIC  
CONTRACTS



646

DISCRETIONARY  
VENDORS PENDING  
PQL COMPLETION



\$60 MIL

VALUE OF  
DISCRETIONARY  
AWARDS  
PENDING PQL



2,518

OF PQLS  
SUBMITTED  
2024



# Human Services Disclosure Reform



# "One Size Does Not Fit All" : Right Sizing Disclosures

**Problem:** Fifty percent of providers are so small they struggle with existing requirements. However, the City doesn't ask questions to identify noncompliance at significant human services providers.

## Solution:

### New and simplified Discretionary PQL

- 3 questions to verify legal filing requirements

### Grace for hard-working nonprofits

- 30-day extension for financial statement audits and 990 filings

### Additional disclosures under RPT/COI Policy

- 7 questions to identify unallowable transactions

**SIMPLIFY  
ACCOUNTABILITY**



**REDUCE BARRIERS  
AND TARGET  
RESOURCES TO  
PROVIDERS**



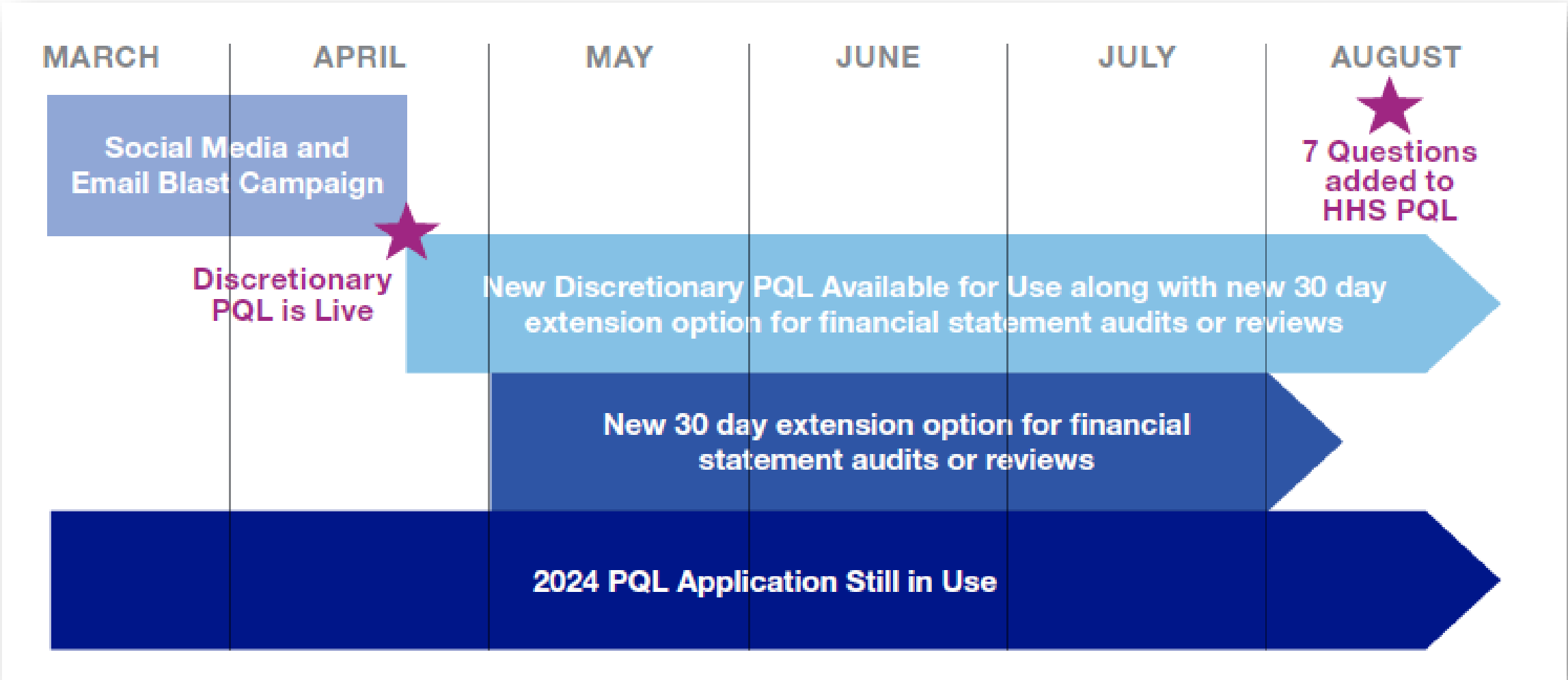
**REDUCE TIME  
FOR SMALL  
NFPS TO GET  
PAID**



**SAFEGUARD  
TAXPAYER  
DOLLARS**



# Timeline



# Guidance for Providers

# Discretionary Prequalification Application

# Step 1: Log into PASSPort

1

Login

Email Address \*

Password \*

Login

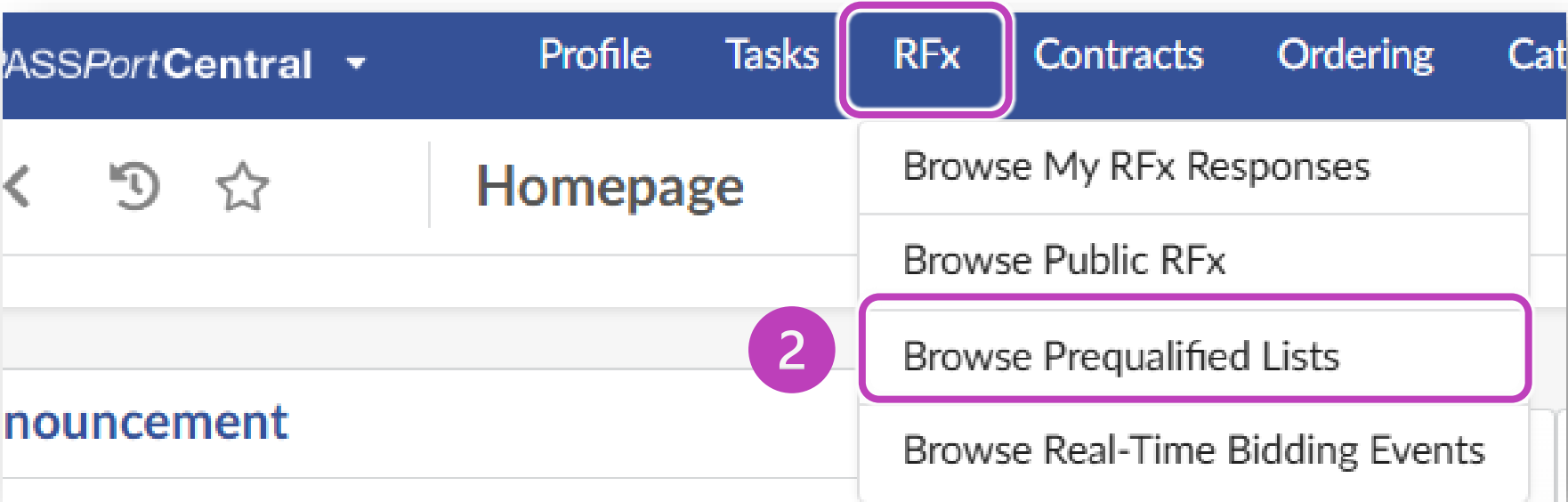
Forgot Password

Create Account

Report an Issue

1. Log in to PASSPort with your organization credentials.

# Step 2: Rfx Tab



2. Hover over the Rfx tab and then click on **Browse Prequalified Lists**.

# Step 3 and Step 4: Keywords Tab

PASSPortCentral

VendorsCatalogRequisitionSourcingContractsOrderingReceivingFinancials

ReportingSupport

<↶☆

Browse Prequalified Lists

Q

3

Keywords

dis

Industry

Commodity

Q Search

Source

Open Date

From

To

Availability Status

Open

Closed

Citywide Only

Prerequisite PQL

Filters

Keywords : dis

Availability Status : Open

Closed

4

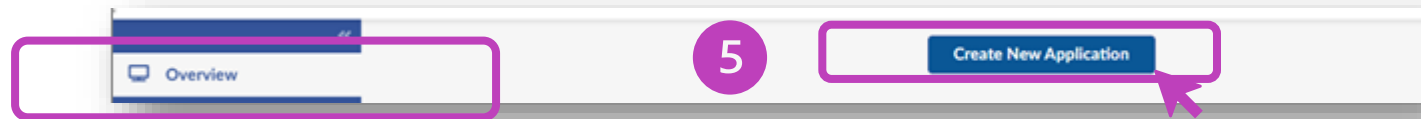
PQL ID	PQL Label	Prerequisite PQL	Citywide	Industry	Commodity	Open Date	Availability
PQL000164	Discretionary Prequalification	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Human/Client Service		4/1/2025	Open

3. Type 'dis' in the Keywords tab.

4. Click on Discretionary Prequalification.



## Step 5: Create a new PQL



5. In the Overview tab, click the **Create New Application** button located at the top of the page.

## Step 6: Organization Information Tab

Questionnaire's answer : Discretionary Prequalification Application

Overview << Organization Information 0 / 3

Please upload the organization's Board of Directors List.  
*Under New York State law Not-for-Profit organizations must have at least three board members.*

Answer\*

① Click or Drag to add a file

Please upload the organization's Conflict of Interest Policy.  
*Under New York State law, Not-for-Profit organizations are required to adopt a Conflict of Interest Policy with specific procedures detailed in Not-for-Profit corporation law, 715-A.*

Answer\*

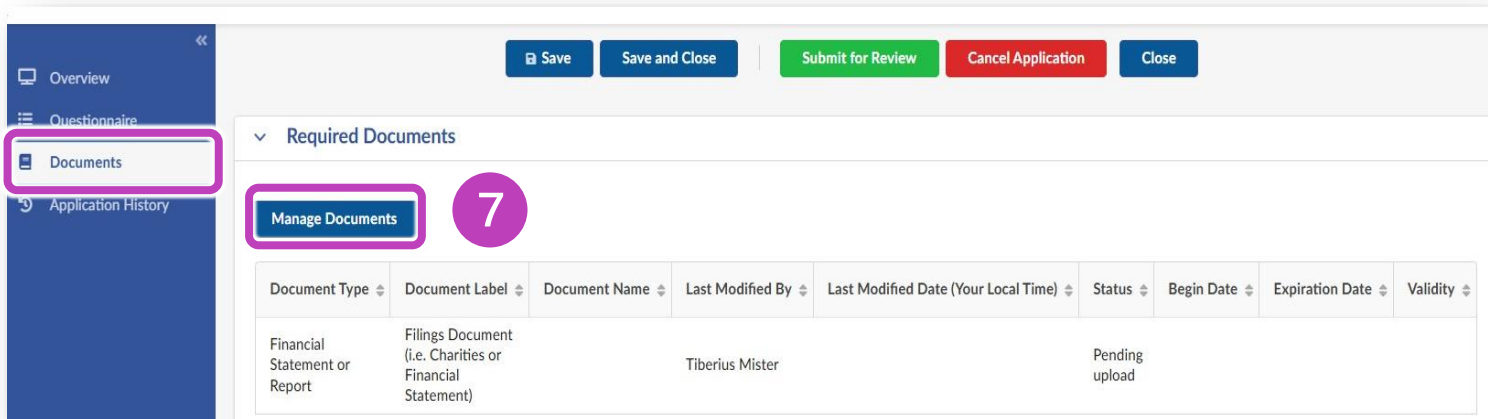
① Click or Drag to add a file

Close

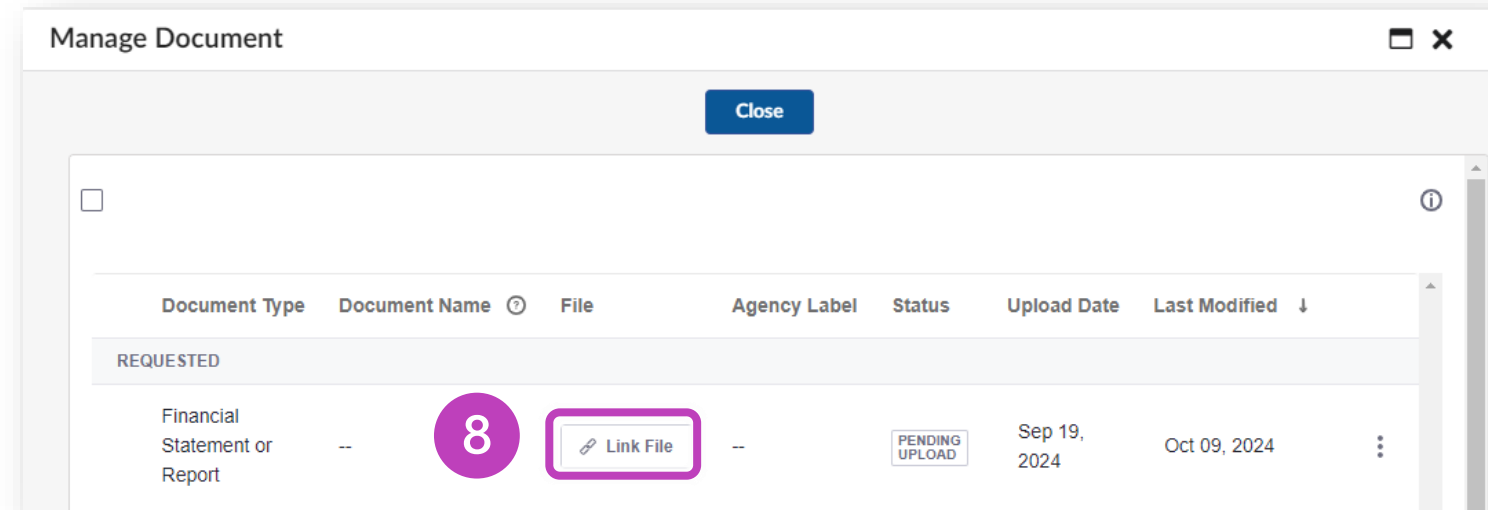
6. Click on the **Organization Information** tab on the left to answer the questions in the *Discretionary Prequalification Application*.

- **Question 1** asks to upload the organization's Board of Directors List.
- **Question 2** asks to upload the organization's Conflict of Interest Policy.
- Click or drag document to add a file.

# Step 7 and Step 8: Documents Tab and Manage Document Window



7. Click the **Documents** tab on the left to view the Required Documents section. Click the **Manage Documents** button to upload the Required Document in this PQL application.



8. The **Manage Document** window will open. Here you will be able to link an existing file in the Vault or upload a file from your computer to the application. You must upload all required documents in a combined pdf as certified in the questionnaire.

# Step 9: Documents Tab Certification – Charities Filing or Exemption Documentation

Overview

Organization Information 0 / 3

Close

### Documents Tab Certification - Charities Filing or Exemption Documentation

To become prequalified, all nonprofits are required to submit their most recent New York State (NYS) Charities Bureau Annual Filing, including required attachments, such as IRS 990 and CPA Review/Audit as one electronic file. If your organization is exempt from filing with the NYS Charities Bureau, your organization is required to submit an Exemption Letter from NYS Charities or a letter on your business letterhead explaining why your organization is exempt and your organization's 12-month Financial Statement. Please refer to the NYS Charities Bureau to see what is required for your organization. The HHS Prequalification requirements align with the requirements of the NYS Charities Bureau.

**How to upload Filings Document or Exemption Letter:**  
Please visit the [Resources Library](#) on the MOCS website, find the section called **Show the City Who You Are** and read the **Submit the HHS Prequalification (PQL) Application** guide.

**Filings Document Validity Start and End Dates:**  
In the Documents tab, nonprofits are required to add the Required Document (Annual Filing or Exemption) either by (1) uploading from their computer or (2) linking from the PASSPort Vault. The Validity **Start Date** should be the **Discretionary PQL application submission date**. The **End Date** should be the organization's **next Charities Bureau Filing Due Date**. To determine the Due Date of the organization's next annual filing, contact the NYS Charities Bureau or review the Annual Filing Schedule in the Submit the Discretionary Prequalification (PQL) Application guide in the [Resources Library](#).

**Exemption Letter:** If adding an Exemption Letter, the Validity End Date for the document is three years from the HHS PQL application submission date.

**Note:** If the Required Document is to be **linked** from the PASSPort Vault to the PQL application, it's required to change the Validity Start and End Dates via the PASSPort Vault **prior to linking**. Refer to the [Resources Library](#) for instructions to change the document's Start and End Dates.

**Important:** When the document's Validity expires, your organization's Discretionary PQL Application status will change from Approved to Expired.

9

9. **Question 3** asks for an upload of the organization's most recent Charities Bureau Annual Filing or supporting documentation for filing an exemption and certify that the documents was uploaded.

# Step 10: Answer Drop-Down

## Filings Document Validity Start and End Dates:

In the Documents tab, nonprofits are required to add the Required Document (Annual Filing or Exemption) either by (1) uploading from their computer or (2) linking from the PASSPort Vault. The Validity **Start Date** should be the **Discretionary PQL application submission date**. The **End Date** should be the organization's **next Charities Bureau Filing Due Date**. To determine the Due Date of the organization's next annual filing, contact the NYS Charities Bureau or review the Annual Filing Schedule in the Submit the Discretionary Prequalification (PQL) Application guide in the [Resources Library](#).

**Exemption Letter:** If adding an Exemption Letter, the Validity End Date for the document is three years from the HHS PQL application submission date.

**Note:** If the Required Document is to be **linked** from the PASSPort Vault to the PQL application, it's required to change the Validity Start and End Dates via the PASSPort Vault **prior to linking**. Refer to the [Resources Library](#) for instructions to change the document's Start and End Dates.

**Important:** When the document's Validity expires, your organization's Discretionary PQL Application status will change from Approved to Expired.

From the drop-down menu, please certify which of the required Charities documentation has been uploaded in the Documents tab of this Discretionary PQL application.

10. Question 3 requires the organization to certify their documentation by clicking on the **Answer** drop-down.

10

Answer\*

# Step 11: Answer Drop-Down (continued)

**Filings Document Validity Start and End Dates:**

In the Documents tab, nonprofits are required to add the Required Document (Annual Filing or Exemption) either by (1) uploading from their computer or (2) linking from the PASSPort Vault. The Validity **Start Date** should be the **Discretionary PQL application submission date**. The **End Date** should be the organization's **next Charities Bureau Filing Due Date**. To determine the Due Date of the organization's next annual filing, contact the NYS Charities Bureau or review the Annual Filing Schedule in the Submit the Discretionary Prequalification (PQL) Application guide in the [Resources Library](#).

**Exemption Letter:** If adding an Exemption Letter, the Validity End Date for the document is three years from the HHS PQL application submission date.

**Note:** If the Required Document is to be **linked** from the PASSPort Vault to the PQL application, it's required to change the Validity Start and End Dates via the PASSPort Vault **prior to linking**. Refer to the [Resources Library](#) for instructions to change the document's Start and End Dates.

11. The **Answer** drop-down will include one of eight available options based on whether your organization:

- is new to filing,
- requests a 30-day extension to file a copy of the financial statement, or
- the amount of revenue your organization annually makes and the associated compliance report.

11

I certify that the organization's revenue is between \$25,000 and \$250,000 and I have uploaded a copy of the filed CHAR500 and IRS 990 in the Documents tab.

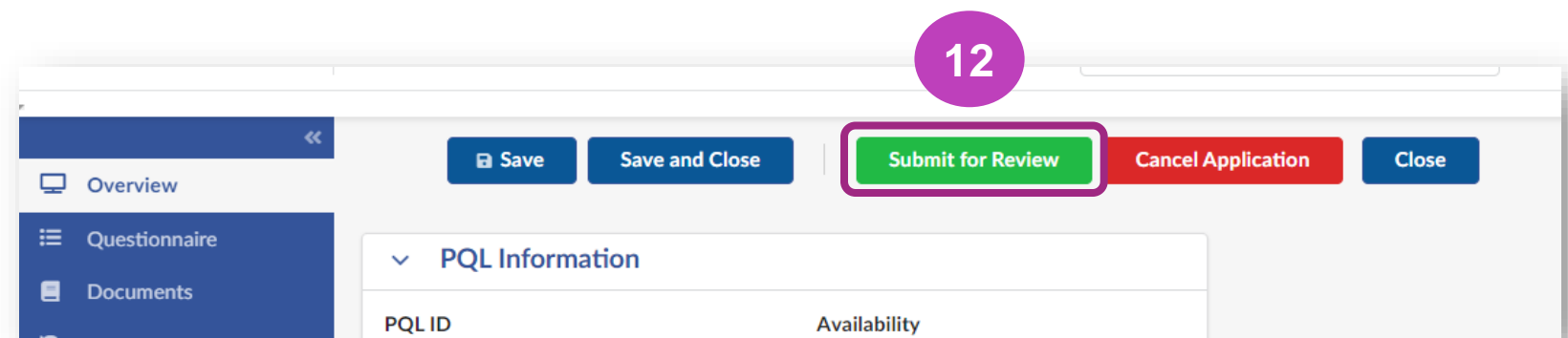
I certify that the organization's revenue is between \$250,000 and \$1 million and I have uploaded a copy of the filed CHAR500, IRS 990, and CPA reviewed financial statements in the Documents ta

I certify that the organization's revenue is over \$1 million and I have uploaded a copy of the filed CHAR500, IRS 990, and CPA audited financial statements in the Documents tab.

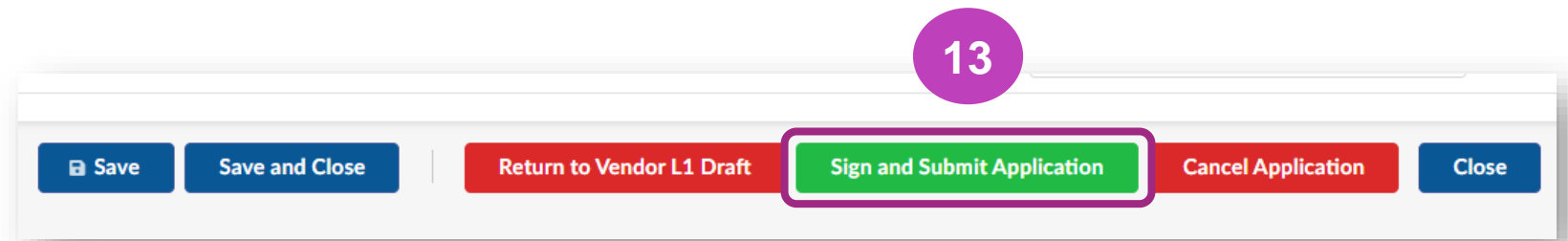
Request for CPA Review Report 30-day Extension: I certify that the organization's revenue is between \$250,000 and \$1 million and I have uploaded a copy of the filed CHAR500, IRS 990, and a let

Request for Audit Report 30-day Extension: I certify that the organization's revenue is over \$1,000,000 and I have uploaded a copy of the filed CHAR500, IRS 990, and a request for a 30-day ext

# Step 12 and Step 13: Submit the Discretionary Prequalified Application






12. In the Discretionary PQL, click the **Submit for Review** button.



13. Click the **Sign and Submit Application** button to proceed to the Electronic Signature.

# Step 14: Electronic Signature

ELECTRONIC SIGNATURE



Save

Save and Close

Close

By submission of this Prequalified List Application ("Application"), I hereby certify:

1. I am an authorized representative of the submitting entity;

2. All contents of this submission are accurate;

3. I have read and reviewed all documents and information contained within the Application, including any instructions and terms and conditions.

14

☐ I certify all of the above ⓘ




Cancel

14. Read the statement and click the 'I Certify All of the Above' checkbox.



# Step 15: Electronic Signature (continued)

ELECTRONIC SIGNATURE



Save

Save and Close

Close

By submission of this Prequalified List Application ("Application"), I hereby certify:

1. I am an authorized representative of the submitting entity;

2. All contents of this submission are accurate;

3. I have read and reviewed all documents and information contained within the Application, including any instructions and terms and conditions.

15

☒ I certify all of the above ⓘ

✔ Sign

Cancel

15. The window refreshes and the **Sign** button appears to the left of the **Cancel** button. Click the green **Sign** button.

# 30-day Extension Option

# 30-day Extension Option

All human services contractors (existing HHS PQL or new Discretionary PQL) will have the option to request a 30-day extension for financial statement audits or reviews.

To request an extension, human services contractors should:



Certify the organization's revenue (\$250,000 or more)



upload a copy of the filed CHAR500 and IRS 990



upload a letter requesting a 30-day extension on letterhead to file a copy of the CPA or audited reviewed financial statement.

# Step 1: Log into PASSPort

1

Login

Log in using your NYC account

Email Address or Username \*

Password \*

Login

Log in using one of these options

NYC Employees

or

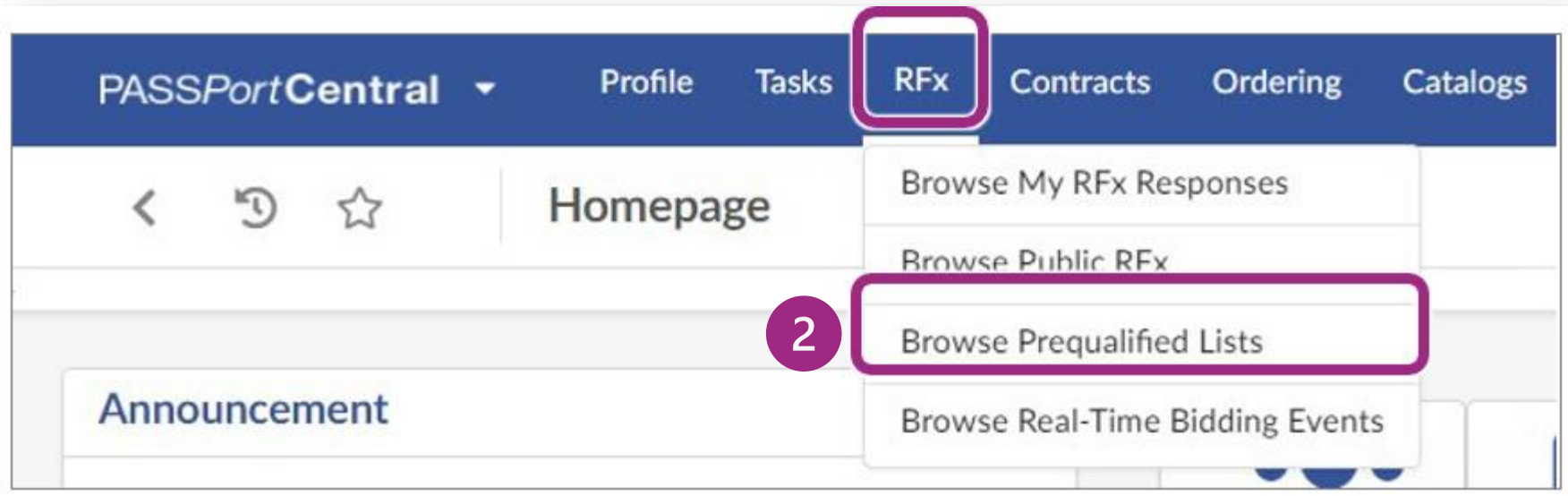
Forgot Password

Create Account

Report an Issue

1. Log in to PASSPort with your organization credentials.

# Step 2: Rfx Tab



2. Hover over the ‘Rfx’ tab and then click on **Browse Prequalified Lists**.

# Step 3 and Step 4: Keywords Tab

PASSPortCentral

ProfileTasksRFxContractsOrderingCatalogsFinancialsPerformanceSupport

Hhs I.

Browse Prequalified Lists

Keywords

hhs

Industry

Commodity

Q Search

Reset

Open Date

From

To

Availability Status

Open

Closed

Approval Required

Citywide Only

Prerequisite PQL

Current Status

Application Activity

Source

Alerts

Filters

Keywords : hhs

Availability Status : Open

Closed

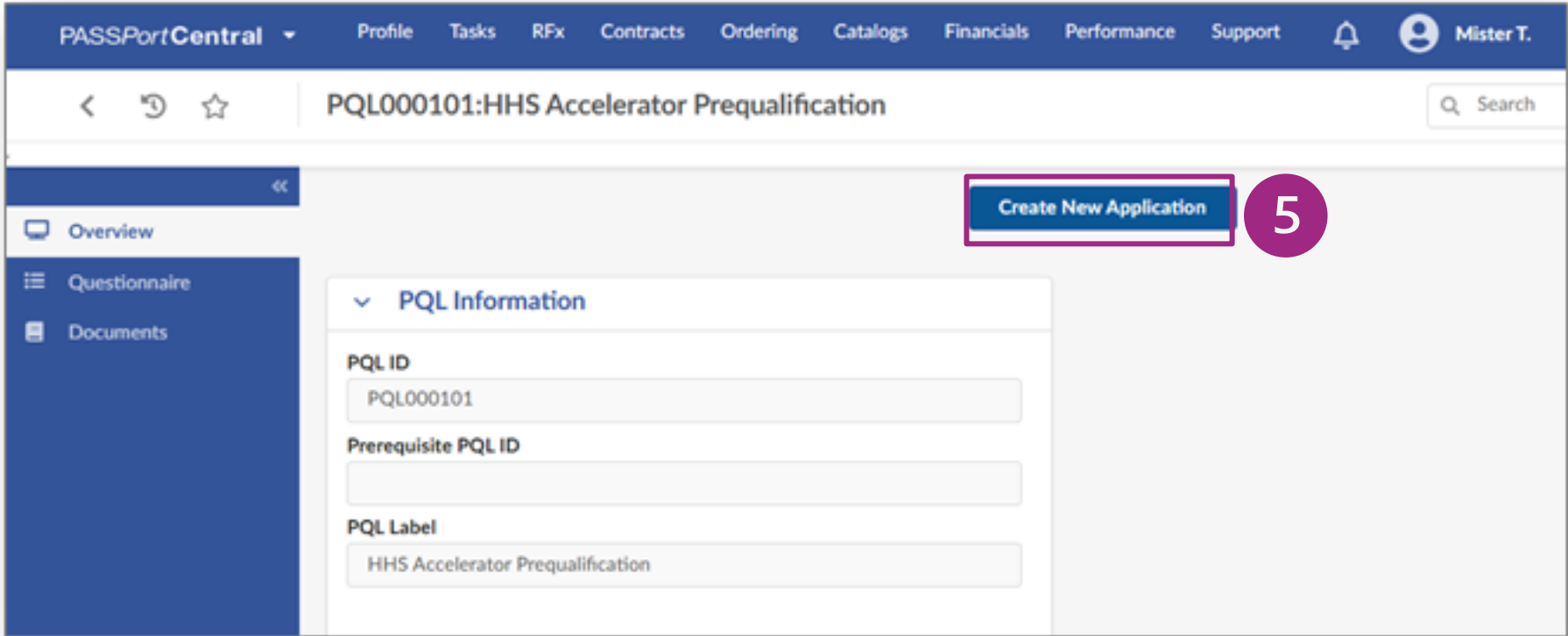
PQL ID	PQL Label	Prerequisite PQL	Citywide	Industry	Commodity	Open Date	Availability	Approved Vendors	Source	Current Status
<div></div> PQL000101	HHS Accelerator Prequalification	<div></div>	<div></div>	Human/Client Service		8/26/2021	Open	0	PASSPort	Approval Required

1 Result(s)

3. Type 'hhs' in the Keywords tab.

4. Click on HHS Accelerator Prequalification.

# Step 5: Create a new PQL



5. In the Overview tab, click the **Create New Application** button located at the top of the page.

## Step 6 and Step 7: Overview and Business Information Tab

PQA001282:HHS Accelerator Prequalification

Overview | Questionnaire | Documents | Application History

Save | Save and Close | Close | Submit for Review | Cancel Application | Close

Overview

Business Information 0 / 1

Response Overview

PQL Label	Label
HHS Accelerator Prequalification	HHS Accelerator Prequalification-Vendor 02 June
Respondent	

Creation By Import

- Download in Excel 2007-2010 format (xlsx)
- Download in Excel 97-2003 format (xls)

Drop here your answer (in Excel format)

Click or Drag to add a file

6

Access Questionnaire

6. In the HHS PQL, go to the **Questionnaire** tab. In the Questionnaire tab's Overview, click the green **Access Questionnaire** button to view the initial prompt in the Questionnaire's Business Information section.

PQA001282:HHS Accelerator Prequalification

Overview | Questionnaire | Documents | Application History

Save | Save and Close | Submit for Review | Cancel Application | Close

Overview

Business Information 0 / 1

Business Information

Corporate Structure

Answer\*

Nonprofit

For Profit

7

7. The **Business Information** section displays with the prompt to identify your organization's Corporate Structure. Click the **Answer** drop-down and select Nonprofit or For Profit.



# Step 8 and Step 9: Business Information Tab and Documents Tab

Questionnaire's answer : HHS Accelerator Prequalification

Overview

Business Information 1 / 10

8

Instructions for Documents Tab Certification - Charities Filing or Exemption Documentation

**Instructions for Documents Tab Certification - Filings Documents - Charities Filing or Exemption Documentation**

To become prequalified, all nonprofits are required to submit their most recent New York State (NYS) Charities Bureau Annual Filing, including required attachments, such as IRS 990 and CPA Review/Audit as one electronic file. If your organization is exempt from filing with the NYS Charities Bureau, your organization is required to submit an Exemption Letter from NYS Charities or a letter on your business letterhead explaining why your organization is exempt and your organization's 12-month Financial Statement. Please refer to the NYS Charities Bureau to see what is required for your organization. The HHS Prequalification requirements align with the requirements of the NYS Charities Bureau.

**How to upload Filings Document or Exemption Letter:**

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**Filings Document Validity Start and End Dates:**

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**Exemption Letter:** If adding an Exemption Letter, the Validity End Date for the document is three years from the HHS PQL application submission date. **Example:** If the submission date is March 4, 2025, the Validity End Date for an Exemption Letter is March 4, 2028.

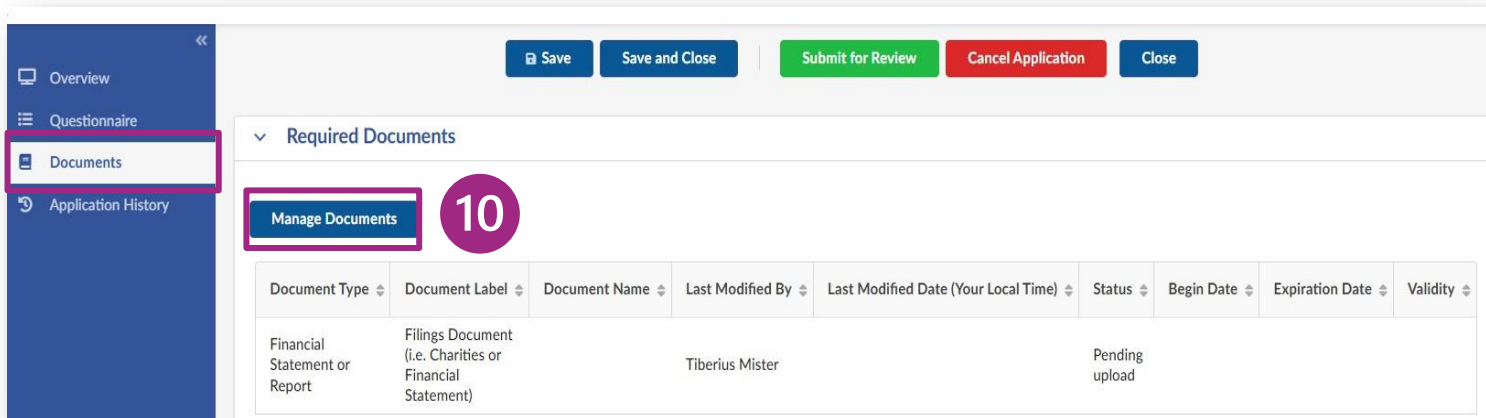
9

Close

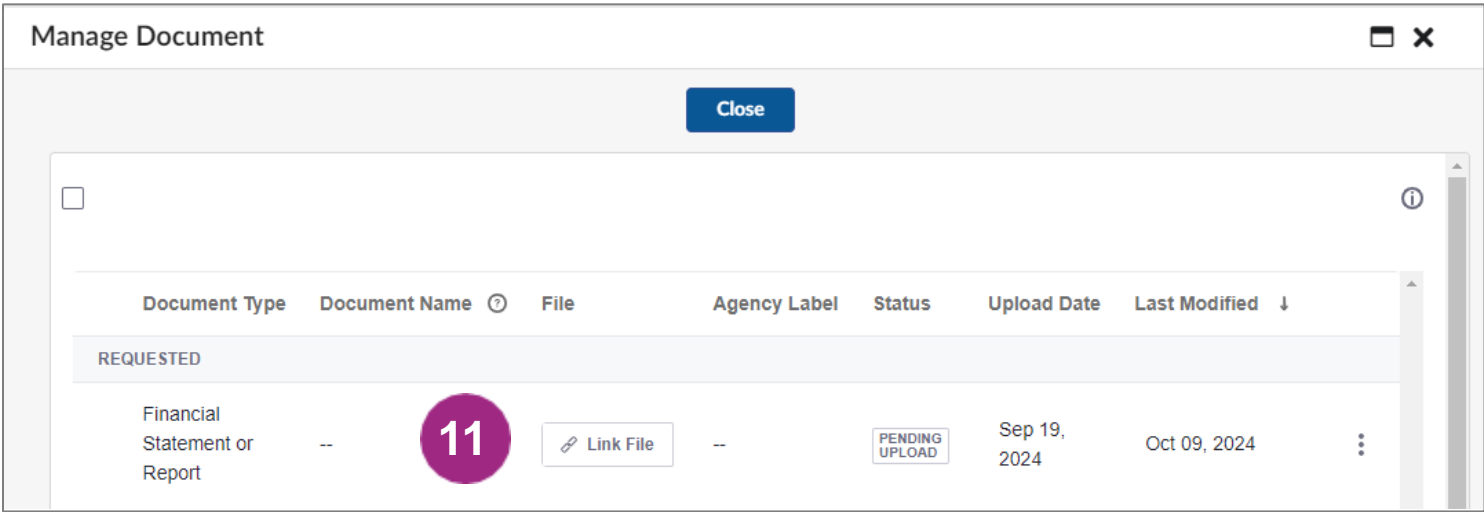
8. Click on the **Business Information** tab on the left and then scroll to the **Documents Tab Certification** Section to find the 30-day extension.

9. You will be asked to **upload** the organization's most recent Charities Bureau Annual Filing or supporting documentation for filing an exemption.

# Step 10 and Step 11: Documents Tab and Manage Document Window



10. Click the **Documents** tab on the left to view the Required Documents section. Click the **Manage Documents** button to edit the Required Document in this PQL application.



11. The **Manage Document** window will open. Here you will be able to link an existing file in the Vault or upload a file from your computer to the application. You must upload all required documents in a **combined pdf** as certified in the questionnaire.

# Step 12: Answer Drop-Down

**Filings Document Validity Start and End Dates:**  
In the Documents tab, nonprofits are required to add the Required Document (Annual Filing or Exemption) either by (1) uploading from their computer or (2) linking from the PASSPort Vault. The Validity **Start Date** should be the **HHS PQL application submission date**. The **End Date** should be the organization's **next Charities Bureau Filing Due Date**. To determine the Due Date of the organization's next annual filing, contact the NYS Charities Bureau or review the Annual Filing Schedule in the Submit the HHS Prequalification (PQL) Application guide in the [Resources Library](#).

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**Note:** If the Required Document is to be **linked** from the PASSPort Vault to the PQL application, it's required to change the Validity Start and End Dates via the PASSPort Vault **prior to linking**. Refer to the Submit the HHS Prequalification (PQL) Application guide for instructions to change the document's Start and End Dates in the [Resources Library](#).

**Important:**

- I certify that the organization's revenue is between \$25,000 and \$250,000 and I have uploaded a copy of the filed CHAR500 and IRS 990 in the Documents tab.
- I certify that the organization's revenue is between \$250,000 and \$1 million and I have uploaded a copy of the filed CHAR500, IRS 990, and CPA reviewed financial statements in the Documents ta
- I certify that the organization's revenue is over \$1 million and I have uploaded a copy of the filed CHAR500, IRS 990, and CPA audited financial statements in the Documents tab.
- Request for CPA Review Report 30-day Extension: I certify that the organization's revenue is between \$250,000 and \$1 million and I have uploaded a copy of the filed CHAR500, IRS 990, and a let
- Request for Audit Report 30-day Extension: I certify that the organization's revenue is over \$1,000,000 and I have uploaded a copy of the filed CHAR500, IRS 990, and a request for a 30-day ext

12. The **Answer** drop-down will include one of eight available options based on whether your organization:
- 1) is new to filing,
  - 2) requests a 30-day extension to file a copy of the financial statement, or
  - 3) the amount of revenue your organization annually makes and the associated compliance report.

12

# Step 13 and Step 14: Submit the HHS Accelerator Prequalification

Navigation icons: back, refresh, star

PQA001266:HHS Accelerator Prequalification

Search

Buttons: Save, Save and Close, **Submit for Review**, Cancel Application, Close

13

PQL Information

PQL ID	Availability
PQL000101	Open

13. In the HHS PQL Application, click the **Submit for Review** button.

PQA001266:HHS Accelerator Prequalification

Search




Buttons: Save, Save and Close, Return to Vendor L1 Draft, **Sign and Submit Application**, Cancel Application, Close

14

14. Click the **Sign and Submit Application** button to proceed to the Electronic Signature.

# Step 15: Electronic Signature

ELECTRONIC SIGNATURE



Save

Save and Close

Close

By submission of this Prequalified List Application ("Application"), I hereby certify:

1. I am an authorized representative of the submitting entity;

2. All contents of this submission are accurate;

3. I have read and reviewed all documents and information contained within the Application, including any instructions and terms and conditions.

15




☐ I certify all of the above ⓘ

Cancel

15. Read the statement and click the '**I Certify All of the Above**' checkbox.

# Step 16: Electronic Signature (continued)

ELECTRONIC SIGNATURE



Save

Save and Close

Close

By submission of this Prequalified List Application ("Application"), I hereby certify:

1. I am an authorized representative of the submitting entity;

2. All contents of this submission are accurate;

3. I have read and reviewed all documents and information contained within the Application, including any instructions and terms and conditions.

16

☒ I certify all of the above ⓘ

✓ Sign

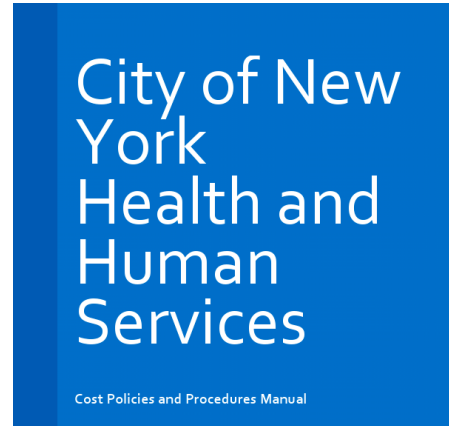
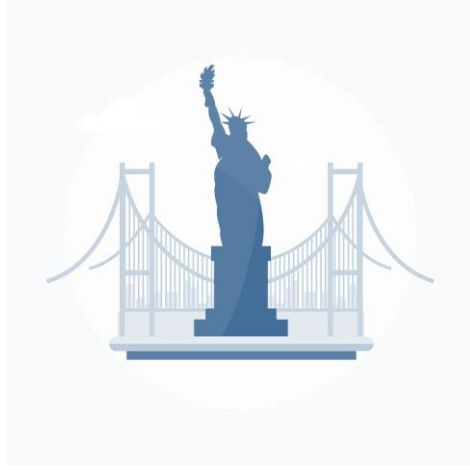
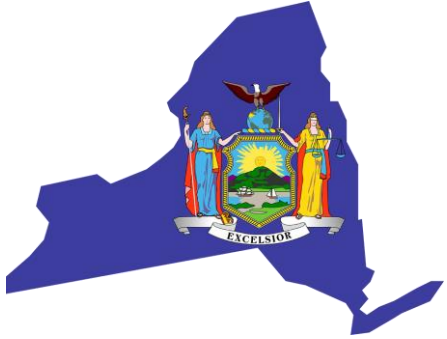
Cancel

16. The window refreshes and the **Sign** button appears to the left of the **Cancel** button. Click the green **Sign** button.

# NYC Conflict of Interest and Related Party Transactions Policy and Guidance for Contractors of Human Services



# Compliance Elements



CONFLICT  
OF INTEREST



- New York State Not-for-Profit Corporation Law

- Standard Contract Terms
- Appendix A
- New York City Charter

- HHS Cost Policy and Procedure Manual

- Conflict of Interest and Related Party Transaction Policy and Guidance for Contractors of Human Services

- New Disclosure Questions in HHS Accelerator Prequalification Application
- August 2025



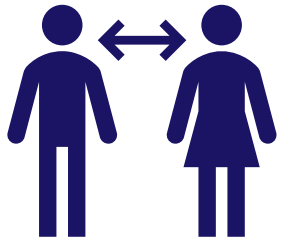
# Related Party Transactions

- Must be disclosed by related party
- Must be fair, reasonable, and in the NFP's best interest
- Must be approved by independent board members
  - Consider alternatives
  - Document process in minutes and/or resolutions
  - Majority of board should vote to approve, not including related party with interest

## Unallowable Costs



Improper Related Party Transactions



Conflicts of Interest

# Additions to the Cost Manual

- Covered Person Definition
- Less-than-arm's length Definition
- Conflict of Interest Definition
- New Unallowable Provision for multiple costs
- Clarified certain rental costs as unallowable

## Additions to the Cost Manual

- **New Unallowable Provision:** Costs in which a Covered Person has any individual interest that constitutes or presents a Conflict of Interest
- **Conflict of Interest:** Exists when the Provider or a Covered Person has an interest (whether in property, management/control, a transaction, or a legal entity) that could reasonably be viewed as adverse to
  - (1) the Provider's obligation to deliver cost-efficient services or
  - (2) the City's interest in prudently disbursing public funds only for reasonable and necessary expenses which the Provider incurs while providing services pursuant to the terms of its City contract and this fiscal manual.
- **Less-than-arm's length Agreement:** An agreement under which one party to the agreement is able to control or substantially influence the actions of the other and is defined further in 2 CFR Law §200.465 (c). For the purposes of this definition 2 CFR Law §200.465 (c) applies to all "less-than-arm's length" agreements (including leases).

# NYC Conflict of Interest and Related Party Transactions Policy and Guidance for Contractors of Human Services

This Policy clarifies that conflicts of interest and improper related party transactions are disallowable costs and may not be charged to NYC agencies by Human Service Contractors.



# New Disclosures in HHS Accelerator Prequalification

# Step 1: Business Information Section

PQA001282:HHS Accelerator Prequalification

Save

Save and Close

Submit for Review

Cancel Application

Close

Overview

Questionnaire

Documents

Application History

Overview

Business Information 0 / 1

Business Information

Corporate Structure

Answer\*

Nonprofit

For Profit

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1. In the '**Business Information**' Section, nonprofits and for-profits will need to identify their corporate structure. Once corporate structure is identified, nonprofits and for-profits will be asked different disclosure questions.

# Not-For-Profit Contractor Disclosures: Related Party Transactions

## Question:

From the beginning of the last IRS Form 990 reporting period to the present, did the Contractor have any business transactions, make any payments, and/or enter into any Related Party Transaction with a Related Party, or Related Organization?

**Answer:** Yes or No

## Disclosure Details:

- name of related party or related organization,
- amount of payment,
- purpose of payment,
- funding sources, and
- the written agreements, if applicable.



## Question:

From the beginning of the last IRS Form 990 reporting period to the present, did any of the Contractor's Directors, Officers, Key Persons, and/or their Relatives receive Compensation from any Related Party or Related Organization in addition to Compensation from the Contractor?

**Answer:** Yes or No

## Disclosure Details:

- Identification of individual involved
- Name of director, officer, key person, or relative
- Name of related party or related organization that paid compensation
- EIN for related party or related organization that paid compensation
- Purpose or compensation, amount of compensation
- All funding sources of compensation.

# Not-For-Profit Contractor Disclosures: Financial Interest

## Question:

From the beginning of the last IRS Form 990 reporting period to the present, did any of the Contractor's Directors, Officers, Key Persons or any Relatives of a Director, Officer, or Key Person have any beneficial interest or financial interest, whether direct or indirect, in any transaction involving the Contractor, any Related Party or Related Organization?

**Answer:** Yes or No

## Disclosure Details:

- Identification of individual involved, name of director
- Officer, key person, or relative, nature of the financial/beneficial interest
- Name of entity involved in transaction
- EIN for entity involved in transaction
- transaction purpose
- All funding sources of compensation

# Not-For-Profit Contractor Disclosures: Ownership Interest

## Question:

From the beginning of the last IRS Form 990 reporting period to the present, did any of the Contractor's Directors, Officers, or Key Persons, or any Relatives of a Director, Officer, or Key Person have real property and/or an ownership interest of 5% or more, whether direct or indirect, in any entity doing business with the Contractor, any Related Party, or Related Organization, or beneficial ownership of any privately-held subcontractors and vendors for payments exceeding \$100,000 (including landlords, maintenance providers, food vendors and other major suppliers)?

**Answer:** Yes or No

## Disclosure Details:

- Identification of individual involved
- Name of director, officer, key person, or relative with ownership interest
- Name of entity doing business with the Contractor
- EIN for entity doing business with the Contractor
- Nature of the business and any transactions or payments, written agreement(s) governing the transactions
- Description of the beneficial ownership of the real property

# Not-For-Profit Contractor Disclosures: Compliance with COI Disclosure Statement Requirements

## Question:

In the last twelve months, did each Director complete a Conflicts of Interest disclosure statement in accordance with Not-for-Profit Corporation Law Section 715-a(c)?

**Answer:** Yes or No

## Disclosure Details:

- Explanation if any directors did not complete a conflicts of interest disclosure statement

# Not-For-Profit Contractor Disclosures: Competitive Bidding Requirements

## Question:

From the beginning of the last IRS Form 990 reporting period to the present, did the Contractor fail to comply with competitive bidding requirements in the NYC Human Services Standard Contract, Section 4.05(B) in connection with any transaction that has not been reported on in this prequalification application?

**Answer:** Yes , No, or Not Applicable (N/A)

## Disclosure Details:

- Description of the procurement of goods and/or services that did not comply with requirements
- Name of individual and/or entity that benefitted from the transaction
- Explanation on why the procurement was awarded in a manner that did not comply with requirements
- Program name that funded the transaction or if allocated to indirect cost rate
- Contract number, if applicable.

# Not-For-Profit Contractor Disclosures: Board Procedure Requirements

## Question:

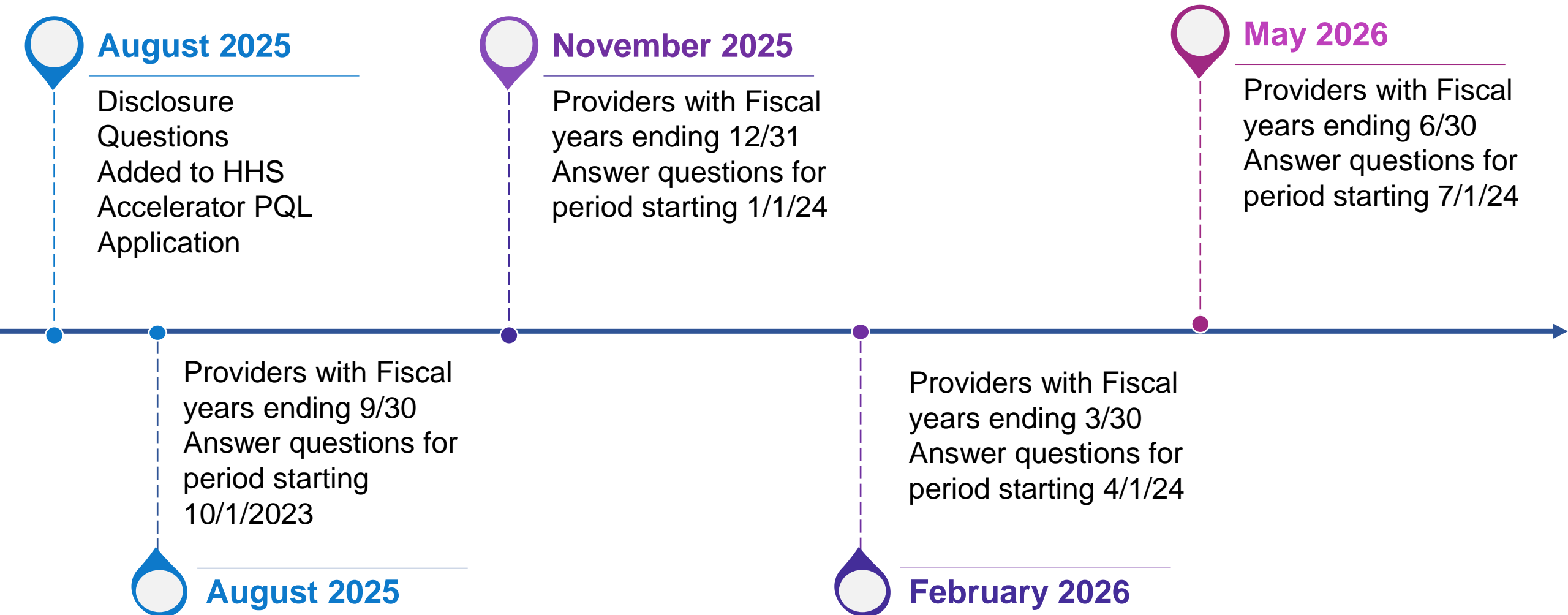
Did the Contractor fail to comply with the Not-for-Profit Corporation Law Section 715-a required procedures in connection with any transaction that has been reported in the prequalification application, including but not limited to disclosure of the potential conflict, recusal of the conflicted Director or Officer, board consideration of alternate transactions, board approval, and contemporaneous documentation of board actions?

**Answer:** Yes or No

## Disclosure Details:

- Date of board deliberation and vote
- Documentation and/or minutes for each board action
- Conflict of interest disclosure statements disclosing potential conflicts

# Disclosure Implementation Schedule for Most Nonprofit Providers



# For-Profit Contractor Disclosures: Conflict of Interest

## Question:

From the beginning of the last fiscal year to the present, did the Contractor or a Covered Person have any interest that presents or constitutes a Conflict of Interest in accordance with the City of New York Health and Human Services Cost Policies and Procedures Manual?

**Answer:** Yes or No

## Disclosure Details:

- Name of parties involved
- Purpose of payment
- All funding sources for the transaction
- Written agreements, if applicable.



# For-Profit Contractor Disclosures: Less-than-Arm's Length Agreement

## Question:

From the beginning of the last fiscal year to the present, did the Contractor enter into a “Less-Than-Arm's Length” Agreement?

**Answer:** Yes or No

## Disclosure Details:

- Name of parties involved
- Purpose of payment
- All funding sources for the transaction
- Written agreements, if applicable.

# Disclosure Implementation Schedule for For-Profit Providers



## August 2025

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- Disclosure Questions Added to HHS Accelerator PQL Application.



## Ongoing

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- For-profit Human Service Providers answer questions when their HHS Accelerator PQL Application expires.

# Resources & Support

NYC

Mayor's Office of Contract Services

Русский

Translate

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Text-Size

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Discretionary Award Process

Capacity Building Training

Discretionary Award Tracker

Returnable Grant Fund

Contract Compliance Support

Indirect Cost Rate Initiative

## Contract Compliance Support

Welcome to MOCS Nonprofits Contract Compliance Support! Here, you can find what you need to ensure your organization stays compliant and mitigates risk effectively. From interactive videos to new policy and instructional guides, we provide information to help you better understand NYC contract requirements and regulations.

## Conflict of Interest and Related Party Transactions Citywide Policy

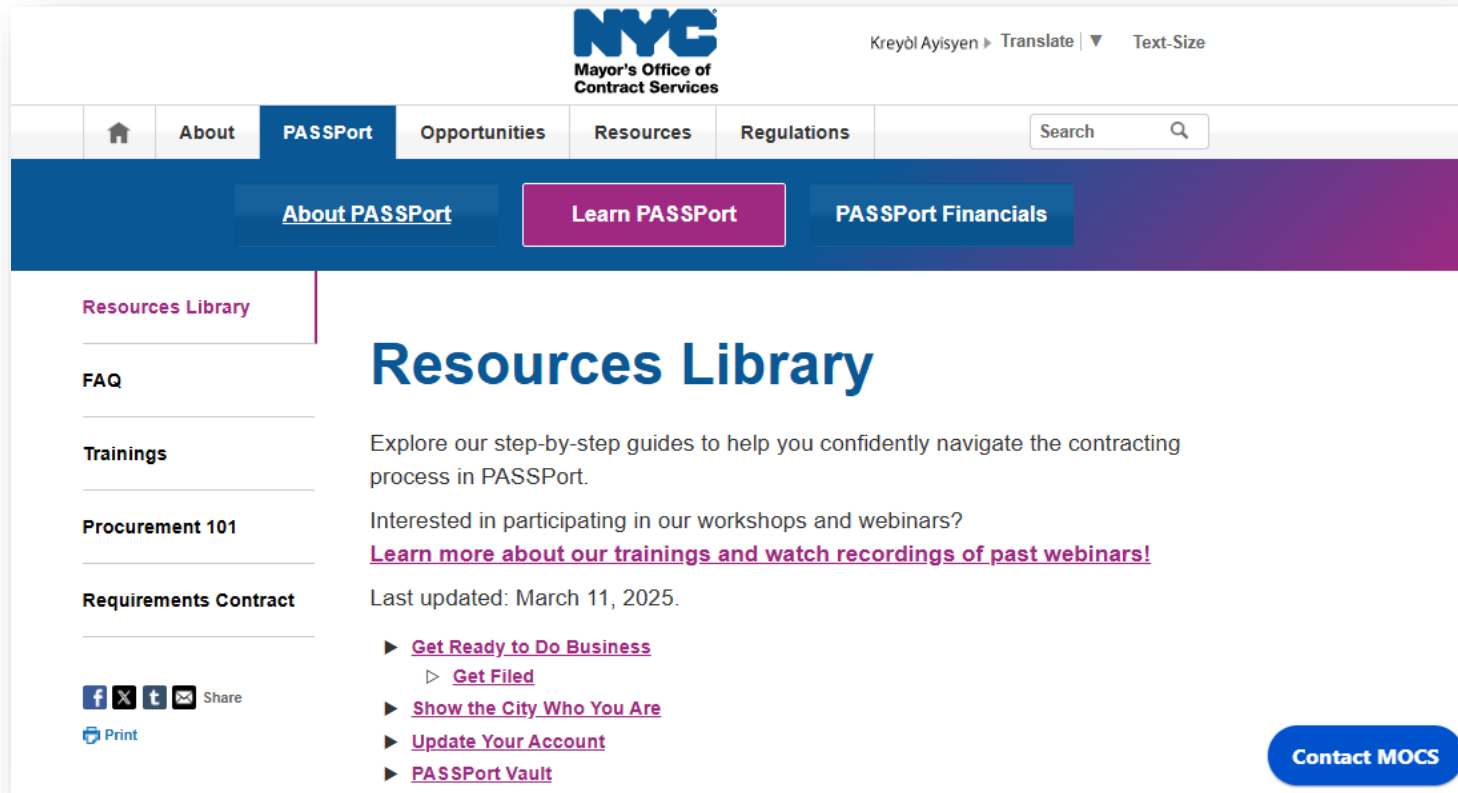
[NYC Conflict of Interest and Related Party Transactions Policy and Guidance for Contractors of Human Services \(PDF\)](#): This policy set forth, the citywide NYC Conflict of Interest and Related Party Transactions Policy and Guidance for Contractors of Human Services, governs: 1) City of New York Health and Human Services Cost Policies and Procedures Manual ("Cost Manual"), 2) New York City's standard human services contract, and 3) NYS Not-For-Profit Corporation Law in prohibiting City monies from being used for wasteful or fraudulent transactions

NYC

Mayor's Office of Contract Services

nyc.gov/tracker > Contract Compliance Support 60

# Learning to Use PASSPort Resource Library



- ▶ [Get Ready to Do Business](#)
  - ▷ [Get Filed](#)
- ▶ [Show the City Who You Are](#)
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- ▶ [Find Contract Opportunities](#)
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- ▶ [Get Paid](#)
- ▶ [End of Contract Tasks](#)

# Learning to Use PASSPort: Webinar Recordings

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**Resources Library**  
FAQs  
**Trainings**  
Procurement 101  
Requirements Contract

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## Trainings

MOCS hosts several in-person and online trainings to help vendors confidently navigate the path to contracting with New York City. [Follow us on Eventbrite](#) to stay updated on our latest events!

### MOCS In Your Neighborhood

The MOCS In Your Neighborhood program is one of the ways New York City is investing in small businesses, MWBEs, nonprofits, and the communities they serve.

Each month, MOCS meets businesses where they are and hosts events in a different location in the New York City Metropolitan Area. In our interactive **Workshops**, businesses develop practical strategies for becoming an NYC contractor. **Business Mixers** showcase upcoming contracting opportunities and connect business with City agencies and community organizations. **Office Hours** are one-on-one appointments where businesses receive personalized support for PASSPort troubleshooting.

[Register for an in-person event! →](#)

### Getting Started

This monthly webinar series covers the basics on how to use PASSPort and other topics related to City contracting.


[See upcoming webinars and sign up! →](#)

- ▶ [MOCS In Your Neighborhood](#)
- ▶ [Getting Started](#)
  - ▶ [Webinar Recordings](#)  
[Updated](#)
  - ▶ [In Spanish](#)
- ▶ [PASSPort Vendor Financials](#)
- ▶ [Vendor Subcontracting](#)

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**Webinar Recordings** [Updated](#)

### PASSPort Summer 2024 Release



Watch on [YouTube](#)

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[Updated](#)
  - ▶ [In Spanish](#)
- ▶ [PASSPort Vendor Financials](#)
- ▶ [Vendor Subcontracting](#)

**Webinar: Assigning User Roles in PASSPort**  
(34:46) →

**Webinar: Completing the Vendor Enrollment Package (MP4)**  
(1:03:00) →

**Webinar: Enrolling in Commodities and Self-Disclosing Business Certifications (MP4)**  
(42:18) →

**Webinar: Submitting the HHS PQL Application (MP4)**  
(58:45) →

**Webinar: Nonprofits Submitting Charities Filings in PASSPort**  
(48:16) →

**Webinar: Finding Contracting Opportunities (MP4)**  
(53:27) →

**Webinar: Understanding NYC Procurement Methods**  
(26:28) →

**Webinar: Completing Contract Award Tasks**  
(57:42) →

**Webinar: Subcontractor Approval and Updates** [New](#)  
(52:33) →

**Webinar: Award Clearance for NYC Council Discretionary Funding**  
(22:49) →

**In Spanish**

**Webinar: Encontrar Oportunidades de Contractación (MP4)**  
(53:05) →

**Webinar: Responder a Oportunidades de Contractación**  
(1:02:59) →

## MOCS Help

Need help or have a question? You've come to the right place.


MOCS supports PASSPort and NYC Nonprofits, and answers general City procurement questions.



- [PASSPort Login](#)
- [FAQ](#)
- [Learning Materials](#)



- [NYC Nonprofits Website](#)
- [City Council Discretionary Funding](#)
- [Capacity Building Training](#) **Note:** UDKE-BQAO is the current training code.
- [Indirect Cost Rate Initiative](#)



If you need assistance beyond what's available in the above resources, submit an inquiry to the [MOCS Service Desk](#).

# Submitting a Service Desk Ticket



## 1. Submit your Service Desk ticket.

- ✓ Make sure you include the correct contact information – especially a phone number if you want them to call you back.
- ✓ Choose the correct Category.
- ✓ Add details and explanations, along with screenshots.



## 2. Get the confirmation email

- ✓ Make note of your SD ticket number from the confirmation email. It will start with MH - #####.
- ✓ Remember to respond to the email sent by Service Desk after the confirmation.



## 3. Get response email or call.

- ✓ Response Time is 10 – 14 business days after confirmation email.



**Do not** submit multiple tickets for the same issue.



# Questions Regarding the Human Services Disclosure Reform?

Email MOCS VIU at  
[vendorintegrity@mocs.nyc.gov](mailto:vendorintegrity@mocs.nyc.gov)



