

**Office of Operations
2014 Fall Conference
Collaboration for Success
October 7 - 9**

Building a Strong Foundation in Invitation for Bid

Kate Brenner

Mia Graham

Jenny Fung

Paula Shappy



New York State Office of the State Comptroller
Thomas P. DiNapoli, Comptroller

Office of Operations

John Traylor, Executive Deputy Comptroller

Division of Contracts and Expenditures

Margaret Becker, Deputy Comptroller

Charlotte Breeyear, Director, Bureau of Contracts

AGENDA

- Approval Thresholds
- Online Resources
- Planning Overview
- State Finance Law
Purchasing Requirements
- Formulate the IFB
- Method of Award
- Weights, Estimated Usage
and Additions
- Develop the IFB
- Advertising
- Bid Tabulations
- Agency Responsibilities
 - Awarding the Contract
 - Vendor Responsibility
 - Exceptions/Deviations
 - Debriefings/Protests
 - Rejected Bids
 - Price Justification
- The Contract Agreement
- OSC Submission
- Contract Approval



OFFICE OF THE STATE COMPTROLLER (OSC) APPROVAL THRESHOLDS

- State Finance Law (SFL) §112

Before any contract shall be executed or become effective, it shall first be approved by the comptroller when it exceeds:

- \$50,000: State agency, department, board, officer, commissioner, or institution
- \$85,000: Office of General Services (OGS)
- \$10,000: Revenue contracts



- ❖ Except centralized contracts through OGS, purchase orders issued under centralized contracts, and SUNY commodity and construction contracts



ONLINE RESOURCES

The Office of the State Comptroller:

<http://www.osc.state.ny.us/>

Open Book New York:

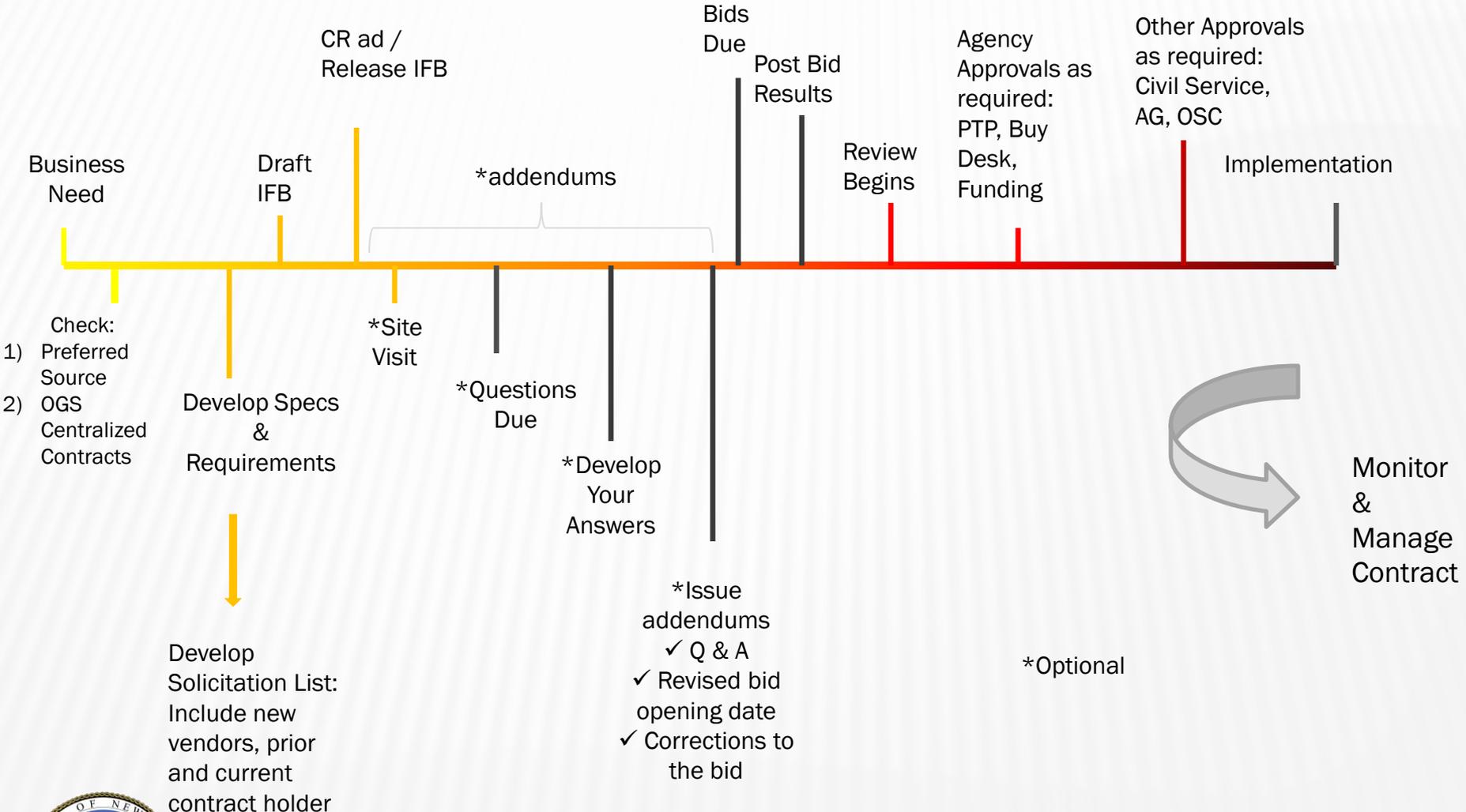
<http://www.openbooknewyork.com/>

Guide to Financial Operations (GFO):

<http://www.osc.state.ny.us/agencies/guide/MyWebHelp/>



SUCCEED WITH IFB PLANNING



STATE FINANCE LAW §163 – PURCHASE OF COMMODITIES AND SERVICES

Statutory preference is accorded in the following order:

- 1st Preferred Sources
- 2nd OGS Centralized Contracts
- 3rd Agency or Multi-Agency Contracts
- 4th Procurement Methods Prescribed by SFL



SFL §162 – PREFERRED SOURCES

Commodities

1st Corcraft

2nd Industries for the Blind

3rd NYSID, “BUY OMH”, Qualified Veterans’ Workshops



Preferred Source Listing:

<http://www.ogs.state.ny.us/procurecounc/pdfdoc/pslist.pdf>

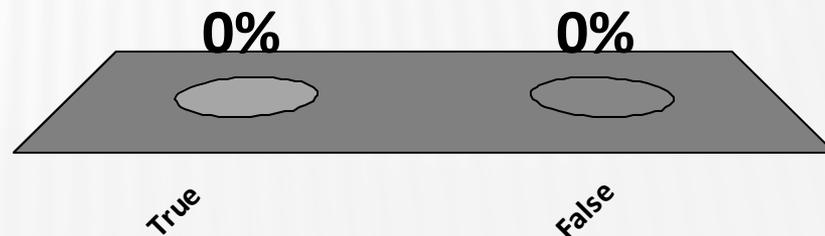


TRUE OR FALSE: PREFERRED SOURCE SERVICE PROVIDERS HAVE EQUAL PRIORITY

Services

- Industries for the Blind
- NYSID
- “BUY OMH”
- Qualified Veterans’ Workshops

- ✓ A. True
- B. False



OGS CENTRALIZED CONTRACTS

- State Finance Law requires agencies to use contracts let by the Office of General Services (OGS) to purchase commodities and services that meet the agencies' requirements in respect to form, function, and utility.



OGS CENTRALIZED CONTRACTS

- ❖ **For agency transactions submitted to OSC where an OGS statewide agreement exists for the same commodity or service, the agency must include in the procurement record documentation detailing why the OGS contract does not meet the agency's form, function, and utility.**



SFL §163 – METHOD OF PROCUREMENT



- Competitive Bids
 - Invitation for Bid (IFB)
 - Request for Proposal (RFP)
- Sole/Single Source
- Piggybacking
- Emergency Purchases
- Discretionary Purchases



WHEN DO YOU USE AN IFB?

- Typically used when requirements can be translated into exact specifications
- Award will be made based on lowest price among responsive & responsible vendors
- Must be used for commodity purchases
- May be used for the purchase of services and technologies



FORMULATE THE IFB

- Confirm the specifications with the end user
 - Must meet program needs
- Review records of previous contracts, if possible, to review historical usage (estimates), contract deliverables and problems encountered
- Clearly describe the commodity/service needed
- Be clear, unambiguous and all inclusive
- Specify if the commodity, service, or technology must meet certain standards - use industry standards where applicable

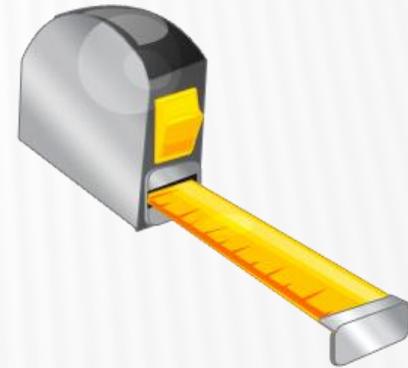


FORMULATE THE IFB

- When referencing a brand name for commodities, be sure to include “or equal” in the specifications
- Specify how the vendor is to bid

Examples:

- Hourly rate
 - Square foot
 - Specified size
- Specify if the service requires licensing or certification



FORMULATE THE IFB

- Specify criteria to provide reasonable assurance the vendor will be able to provide the commodity or service required
- Use only criteria that can be verified or measured
- Be prepared to justify criteria selected - ensure requirements are not so restrictive that only one vendor meets the criteria
- Mandatory requirements must be pass/fail
- Be careful when using words such as “must, shall, will, may not, minimum, maximum,” to describe requirements
- List specific delivery requirements that reflect actual need
 - Must be FOB Destination



EXAMPLE #1

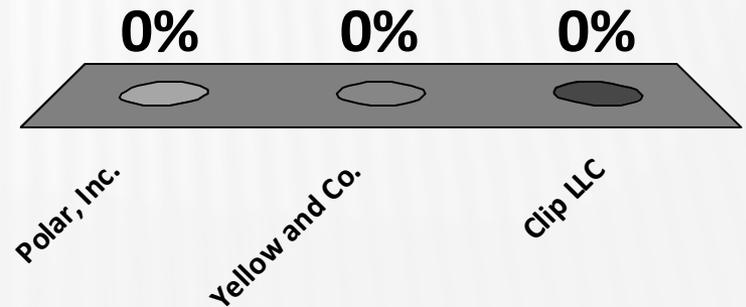
The Contract Reporter advertisement and the bid specifications state the winning vendor must be located within 15 miles of the agency's location. The agency received three bids. Who does the agency have to award to based on the stated requirements?



WHO MUST BE AWARDED?

Vendor	Distance	Price
Polar, Inc	44 miles	\$14.00
Yellow and Co.	16.2 miles	\$12.00
Clip LLC	13 miles	\$28.00

- a. Polar, Inc.
- b. Yellow and Co.
-  c. Clip LLC



DISCUSSION

- The requirement to be located within 15 miles was mandatory.
- What other issues do you see?



SOLUTION

What could've been done to avoid this situation?

- Conduct an internet search prior to soliciting bids
- Conduct a request for information
- Scan the document for must, shall, will and decide are they necessary



METHOD OF AWARD

- Determine your method of award
 - Must be clearly stated
- Awards can be based on
 - Item
 - Lot
 - Region
 - Grand Total
 - Multiple Award
- Indicate the potential for multiple awards
- Indicate how tie bids will be decided



QUESTIONS TO ASK...



...when determining the **method of award**:

- Can similar products be grouped together?
- Are all items unique?
- Is there a benefit or disadvantage for contracting with a single vendor?
- Is delivery to a particular geographic location a consideration?
- Consider historical usage



EXAMPLE #2

An agency is going out to bid for air filters (Item A) and bed bug treatment (Item B). The agency includes the following method of award in the bid. Which item(s) is awarded by the agency?

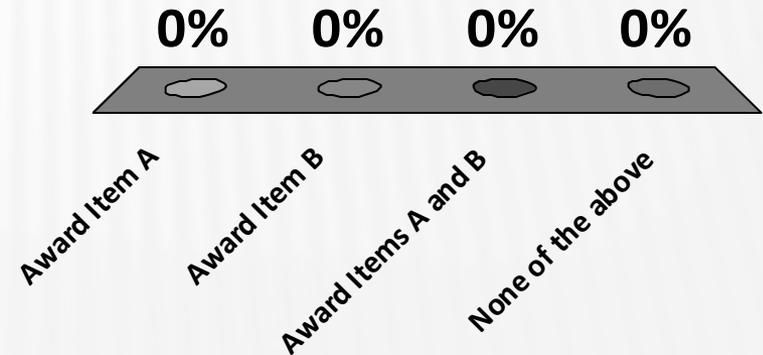
“Agency reserves the right to award the bid based on any of the following criteria, whichever is in the best interest of the State”

- Total of Item A
- Total of Item B
- Total of Item A plus Item B”



HOW DOES THE AGENCY PROCEED?

- A. Award Item A
- B. Award Item B
- c. Award Items A and B
- 😊 D. None of the above



DISCUSSION

- What drives the decision on how to award the contract?
- Would all vendors be able to determine how the contract will be awarded?



SOLUTION

- Award to the preferred source provider that offers the products meeting your agency's needs
- If the items were not on the preferred source list, the method of award should be:

“Award will be made by item to the lowest responsive and responsible vendor or vendors. Agency reserves the right to make no award on any individual item.”

OR

“Award will be made by grand total to the lowest responsive and responsible bidder.”



WEIGHTS AND ESTIMATED USAGE

- When determining the Method of Award, you may assign a weight to the cost based on estimated usage
 - If certain services or commodities will be used more frequently, the associated costs must be weighted accordingly in the evaluation
 - Should be a reasonable estimate – based on historical usage when possible
 - Reasonable estimates may be percentages or actual units



EXAMPLE #3

The method of award states:

“Award will be made based on the lowest average of the three titles shown below.”

Apprentice	\$ _____
Service Technician	\$ _____
Foreperson	\$ _____
Average	\$ _____



VENDOR A VS. VENDOR B

The following represents two bids received:

Title	Vendor A Hourly Rate	Vendor B Hourly Rate
Apprentice	\$50	\$50
Service Technician	\$90	\$70
Foreperson	\$1	\$80
Average	\$47	\$66.67

Vendor A is the low vendor according to the method of award; however, they only send service technicians when work is required and the IFB did not specify who determines the skill level required for a job.



DISCUSSION

1. Does this create an even playing field?
2. How could this be altered to better reflect the agency's need?
3. What problems do you foresee when bids are received?



SOLUTION

Title	Hours	Vendor A Hourly Rate	Extension	Vendor B Hourly Rate	Extension
Apprentice	100	\$50	\$5,000	\$50	\$5,000
Service Technician	75	\$90	\$6,750	\$70	\$5,250
Foreperson	5	\$1	\$5	\$80	\$400
Grand Total			\$11,755		\$10,650

The agency must indicate on the bid page the number of hours each service person will be needed based on historical usage, and the method of award is by grand total. The IFB and contract state the agency will determine which skill level is required for each job. Vendor B is awarded.



SUGGESTIONS FOR IMPROVEMENT

- Require the per hour amounts must be equal to or greater than prevailing wages
 - Prevailing wage document or a Prevailing Rate Case (PRC) # must be provided

Link to request a PRC Number from the Department of Labor:

www.labor.state.ny.us/workerprotection/publicwork/PWReqforOWS.shtm



ADDITIONS DURING THE CONTRACT PERIOD

- Agencies must estimate the volume needed for the life of the contract
- Do not invite vendors to include prices for additional services or commodities
- Anticipated additions and pricing options must be evaluated in the method of award



EXAMPLE #4

An IFB was conducted for lab testing services where vendors were asked to submit a per sample price. In addition, the agency requested the vendors provide hourly rates for data review and expert testimony. These additional services are used infrequently and no estimated number of hours were provided in the bid document. The method of award states: “Award will be made to the bidder meeting all of the mandatory bid requirements and submitting the lowest per sample price.”



VENDOR A VS. VENDOR B

The following represents two bids received:

	Vendor A	Vendor B
Per Sample Price	\$99.00	\$100.00
Hourly Review	\$100.00	\$50.00
Hourly Testimony	\$200.00	\$100.00

Using the method of award stated, Vendor A would be awarded.



DISCUSSION

- Do the vendors have enough information to submit reasonable prices for the additional services?
- Does the method of award clearly reflect the agency's need?
- What information may help bidders formulate their bids most appropriately?
- What information may help the agency identify the true low bid?



SOLUTION

	Vendor A		Vendor B	
500 Samples	\$99.00	\$49,500.00	\$100.00	\$50,000.00
10 hrs. Review	\$100.00	\$1,000.00	\$50.00	\$500.00
10 hrs. Testimony	\$200.00	\$2,000.00	\$100.00	\$1,000.00
Grand Total		\$52,500.00		\$51,500.00

Optional/additional items should be estimated based on historical usage and incorporated into the method of award to ensure the State is obtaining the best price. The award is made on grand total; Vendor B is awarded.



DEVELOP THE IFB

Administrative Process

- Date, time and place of bid opening
- Requirements for submitting electronic, faxed or sealed bids
- Timeline for process
- Name, phone, fax and email address of the contact person(s) for questions, Lobby Law and debriefings
- Timeframe for submitting and responding to written questions relating to the IFB, if applicable
- Description of how bidders will be informed of potential addendums to the IFB



PRICE ADJUSTMENT CLAUSES

- Must be clearly defined, relevant to the item/service being procured, and identify frequency of adjustments that will be allowed
- Consumer Price Index (CPI) must include the index, region, base period and item - see <http://stats.bls.gov/cpi>
- Producer Price Index (PPI) must include the proper series ID - see <http://stats.bls.gov/ppi>
- May use other items such as prevailing wages, fuel indices, etc.
 - Fuel indices may be found at the US Energy Information Administration website at www.eia.gov
- Price adjustments will affect bids; therefore, must be included in the solicitation document in order to be included in the contract.



SAMPLE ESCALATION CLAUSE

Vendor, or the State, may request a price increase or decrease based on changes in the CPI. CPI to be used is “CPI - All Urban Consumers – Northeast All Items” for the 12 months ended 90 days prior to the anniversary date of the contract. Requests for changes must be initiated 60 days prior to the anniversary date of the contract. Only one price adjustment per year will be granted on the anniversary date of the contract.



RENEWALS AND TERMINATION PROVISIONS

- OSC standard policy is the contract term and subsequent renewals cannot exceed five years
- Termination Provisions
 - Unilateral termination by the vendor is unacceptable
 - Consequences of default (i.e. liquidated damages)
 - Lobby Law violations
 - Agency's convenience
 - Termination for cause
 - ST220 violations
 - Iran Divestment Act violations



SITE VISITS

- If the site visit is mandatory, it cannot be waived for any vendor unless specified in the solicitation
- Provide OSC with a sign-in sheet for verification
- Bids received from vendors who did not attend the mandatory site visit must be rejected
- Site visits should be conducted on one day at one time so all vendors have the same information
- Questions and answers generated as a result of the site visit must be distributed to all attendees



ADVERTISING

- NYS Agencies are required to publish bid solicitations over \$50,000
- Must appear in the Contract Reporter at least 15 business days prior to the proposal due date
- Make sure to include an “or equal” in your advertisement to avoid restricting competition
- Agencies must use due diligence to identify potential bidders



*Guide to Financial Operations Chapter XI,
Procurement and Contract Management, Section
14.A. – Publication of Procurement Opportunities*



DISCRETIONARY ADVERTISING

SFL §163 (6)(b)

- Obligates state agencies to aggregate expected purchases for the same commodities or services within twelve months from the date of purchase to determine whether the procurement falls within the discretionary threshold
- Expressly prohibits split ordering
- A change to or a renewal of a discretionary purchase shall not be permitted if the change or renewal would bring the aggregate amount of all purchases of the same commodity or service from the same provider within the twelve month period over the discretionary threshold and should have been reasonably expected prior to the date of first purchase
- For the various methods of discretionary purchasing, see Discretionary Purchasing Guidelines at www.ogs.ny.gov/procurecounc/Bulletins.asp



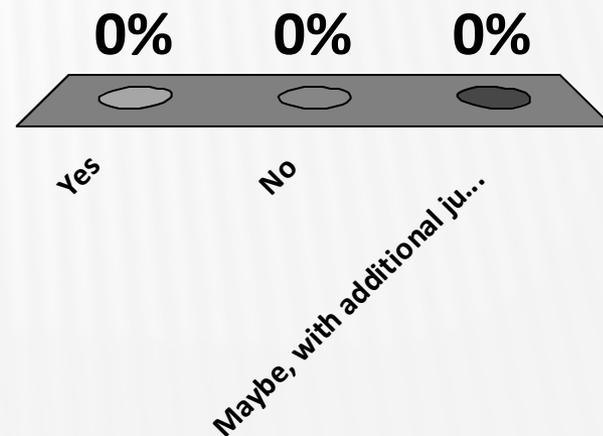
EXAMPLE #5

An agency advertises in the Contract Reporter and sends a bid package to their incumbent and a bid clearinghouse organization. In the cover memo sent with the contract package, the agency states no other vendors exist to provide the required item. Internet searches conducted by OSC auditors find potential bidders that may be able to supply similar items. Can the submitted contract be approved?



IS THIS AN APPROVABLE TRANSACTION?

- A. Yes
- B. No
- c. Maybe, with additional justification



DISCUSSION

- What issues do you see with this contract transaction?
- What can the agency do at this point to obtain OSC approval?



SOLUTION

- If other potential bidders exist, the agency must include them on the mailing list
- If the research was not done to determine other vendors do not exist that may be able to supply a similar item meeting the agency's needs, or does not conclusively show the incumbent is the only viable bidder, OSC may require a re-solicitation.



EXEMPTIONS FROM ADVERTISING

- State agencies shall conduct formal competitive procurements to the maximum extent practicable and minimize the use of single source contracts
- Shall only be used when a formal competitive process is not feasible
- Shall only be made under unusual circumstances
- Shall include a determination that the specifications have been designed in a fair and equitable manner
- Resulting approved exemption and contract shall be limited to the minimum time necessary to alleviate the circumstance that created the request



EXEMPTIONS FROM ADVERTISING

- Contract Reporter exemption requests must be submitted to and approved by OSC prior to entering into a contract
- Request must include:
 - Reason why agency can't bid
 - Justification of need
 - Justification for the selection of the vendor
 - Justification for reasonableness of price



BID TABULATIONS

At the time of the bid opening:

- Ensure all bids are available to be opened
- Reflect all bids received
- Signed and certified by the agency on the day of the bid opening



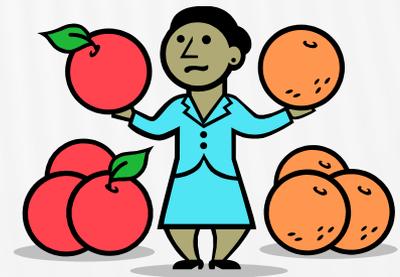
Before sending it to OSC:

- Indicate any rejections
- Indicate the winning bidder based on the method of award



AWARDING THE CONTRACT

- Award to the lowest responsive and responsible bidder
- Award in accordance with the method of award
- Ensure the product/service being offered meets the minimum specifications of the bid
- Compare the minimum specifications of the product offered with those of the brand name referenced, if applicable
- Investigate large variations in bid prices to ensure the low bidder understands the scope of work
- Verify the vendor's calculations



VENDOR RESPONSIBILITY

- Verify the vendors meet the minimum requirements stated in the IFB
- Review vendor responses/questionnaire and analyze results
- Conduct other independent research to identify undisclosed issues
- Verify the vendor is not present on the Workers Compensation or Labor Law debarred lists - for more information see:
 - www.labor.state.ny.us/workerprotection/publicwork/PWDebarmentInformation.shtm
 - www.wcb.ny.gov/content/main/Employers/debarmentList_np.jsp



EXCEPTIONS/DEVIATIONS

- Exceptions/deviations to the bid specifications should be acknowledged and included in the procurement record
- Include a memo for OSC and the procurement record indicating the following:
 - How the agency determined the exceptions/deviations are immaterial
 - How were other bidders and potential bidders not harmed by accepting the exception or deviation



EXAMPLE #6

Regarding the qualifications of the vendor, the agency indicates only the following:

“Vendor must provide evidence of proper licensing and necessary training with the submission of the bid.”

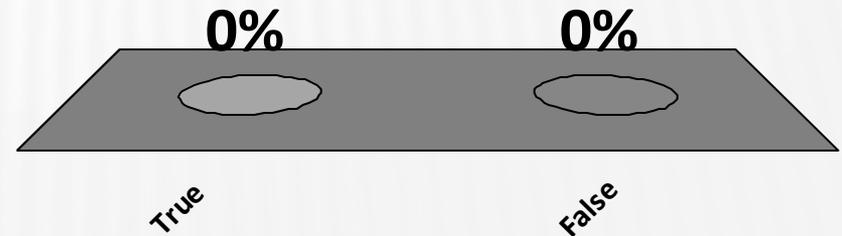
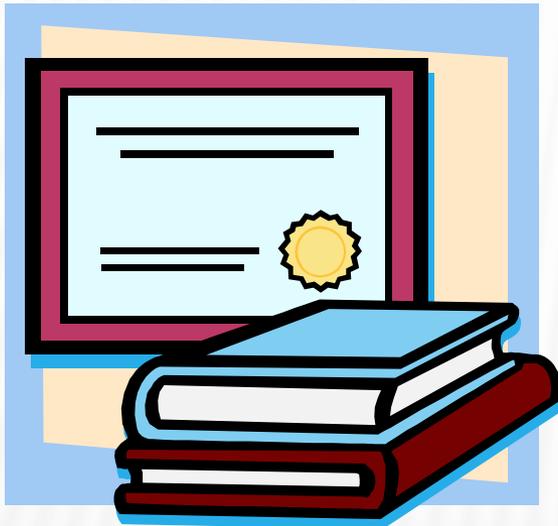
The agency received three bids including one from the incumbent. After the bid opening the agency discovers the equipment manufacturer requires annual courses be taken before technicians may work on the machinery. None of the bidders provides proof of having taken the classes this year. The agency awards to the incumbent, who takes the required classes prior to the start date of the contract.



TRUE OR FALSE: LACK OF PROOF OF COURSES TAKEN IS A MINOR DEVIATION

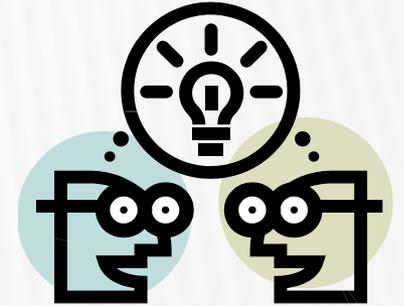
A. True

→ B. False



DISCUSSION

- Are the qualifications mandatory?
- Can the agency deem the incumbent's failure to provide proof of courses taken as a minor deviation?
- What problems might this present?
- What could the agency have done to avoid this?



SOLUTION

Prior to release of the IFB, scan the document for the words must, shall and will which indicate mandatory requirements.

An agency can determine a qualification or specification is a minor deviation if the agency can document that inclusion of the mandatory requirement did not advantage the winning vendor, cause any qualified potential vendor to refrain from submitting a bid, and did not otherwise disadvantage any bidder or potential bidder. When qualified potential bidders are referred to, this includes any vendor in the entire field of potential vendors, not only those submitting bids.



DEBRIEFINGS

State Finance Law §163 (9)(c)

“The opportunity for an unsuccessful offerer to seek a debriefing shall be stated in the solicitation, which shall provide a reasonable time for requesting a debriefing.”

- Include your procedures for debriefings in the solicitation document
- Respond when a debriefing is requested
- Discussion should be limited to the vendors bid only
- Include documentation with the procurement package submitted to OSC



BID PROTESTS

GFO, Chapter XI, Section 17. Protest Procedures



- Agencies should:
 - Establish their own protest procedures
 - Provide notice of their protest procedures in the solicitation documents
 - Notify non-selected bidders of the contract award
- If a protest is received, agencies must:
 - Respond appropriately to the protest (uphold or deny)
 - Include all documentation with the procurement package to OSC
- OSC bid protest decisions are now available online:
<http://wwe1.osc.state.ny.us/Contracts/decisionsearch.cfm>



REJECTED BIDS

Rejected bids should:

- Be supported by a memo
- Include the reason for the rejection
- Allow due process for non-responsible bidders
- Be included with the contract package submitted to OSC
 - ❖ Include all correspondence between the rejected vendor and the agency



OTHER CONSIDERATIONS

- Ensure all bidders receive written response to any questions and answers
- Ensure all bidders receive any addendums issued
- If less than three bids are received:
 - Canvass no-bids
 - Include price justification



PRICE JUSTIFICATION

When Less Than 3 Bids are Received

Price Reasonableness Comparison Tools:

- Purchase made by other state agencies (Check SFS & Open Book)
- Purchase made by other states (look at other state's websites)
- Purchase made by similar facilities (within your agency)
- GSA pricing (Available online at <http://www.gsaelibrary.gsa.gov/ElibMain/home.do>)
- Discounts from published price lists
- OGS pricing
- Historical cost
- Manufacturing costs plus profit
- Cost of similar projects or items
- Description of due diligence process



THE CONTRACT AGREEMENT

- Written agreement between the agency and the vendor
- Mutually agreed upon terms and conditions
- Formulate the contract based on the IFB and the winning vendor's bid, including, but not limited to:
 - Contract term including renewals
 - Price Adjustment Clause(s)
 - Terminations
- Iran Divestment Language must be included in every contract and renewal if original Contract was procured prior to the Act – GFO, Chapter XI, Section 18. F. The Iran Divestment Act of 2012.



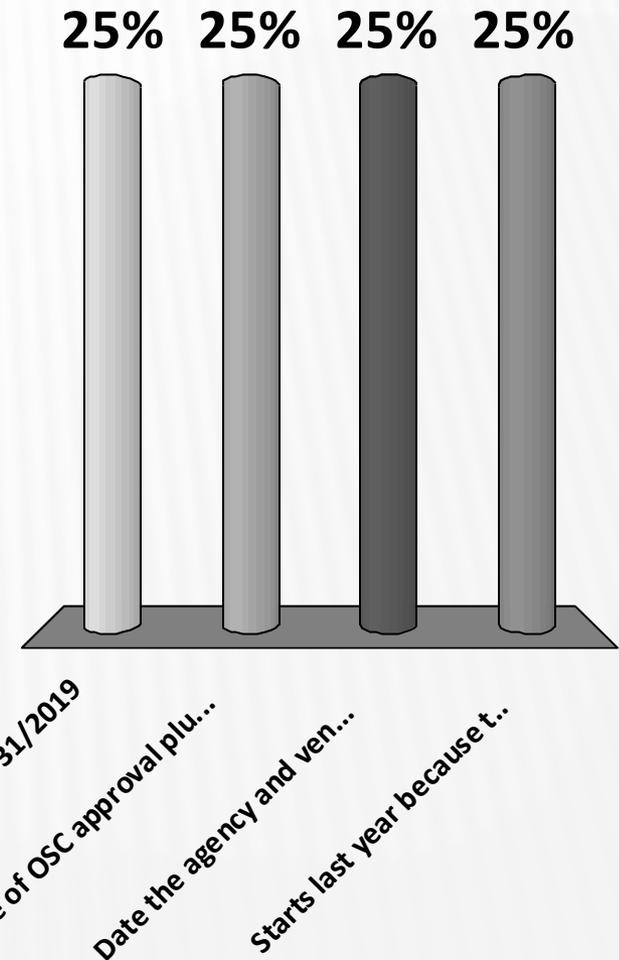
EXAMPLE #7

An agency issues an IFB with a term of 5 years beginning April 1, 2014. All attachments to the IFB also identify the start date as April 1, 2014. The Contract Reporter advertisement indicates the contract term is 5 years upon OSC approval. The contract states the term begins on OSC approval and continues for a period of 5 years. The agency representative informs you he wants the contract to begin on April 1.



WHAT IS THE CONTRACT TERM?

- A. 4/1/2014 – 3/31/2019
- B. Date of OSC approval plus 5 years
- C. Date the agency and vendor signed the contract plus 5 years
- D. Starts last year because the vendor has been doing the work for that long



DISCUSSION

- Why do you believe there were various terms indicated in the solicitation documents?
- What could the agency do to avoid this in the future?



SOLUTION

- The formal signed contract document is the deciding factor, barring any violation of law, policy or procedure. An amendment signed by all parties would be required in order to change the start of the contract term to anything other than OSC's approval date.
- Agencies should review the documents before sending out for signature or OSC approval; to ensure consistency in such things as the contract term, deliverables, contract pricing, terms and conditions, etc. Ideally, this employee should not be the same person who has written the contract up to that point.

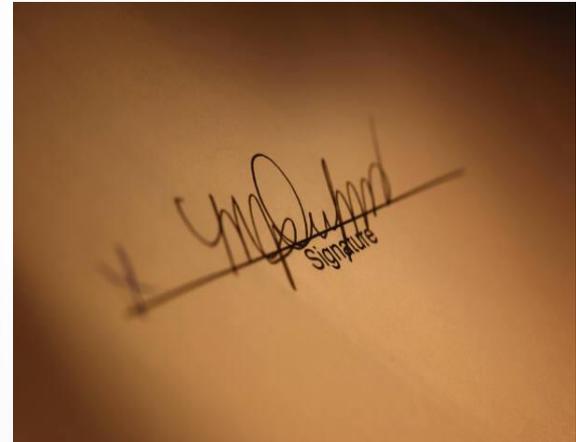


THE CONTRACT AGREEMENT

Required Signatures

GFO, Chapter XI, Section 2

- Vendor with acknowledgement
- Agency
- Attorney General
- OSC
- Other required by Law (e.g. Civil Service)



APPLICABLE CLAUSES, APPENDICES AND ATTACHMENTS

The following are attached to each contract, when applicable:

- Appendix A –(GFO, XI.2.J.)
- Agency specific appendices
- Order of Precedence clause
- Sales and Compensating Use Tax (ST220CA) (GFO, XI.18.D)
- Vendor Responsibility (GFO, XI.16)
- Consultant Disclosure (GFO, XI.18.C)
- Procurement Lobbying Act (GFO, XI.18.B)



APPLICABLE CLAUSES, APPENDICES AND ATTACHMENTS

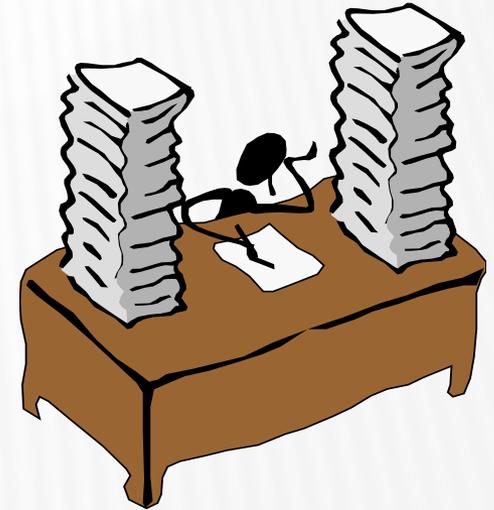
- Iran Divestment Act of 2012 (GFO, XI.18.F)
- Workers Compensation and Disability Insurance Coverage (GFO, XI.18.G)
- Division of Budget Bulletin B-1184 Attachment A or B if applicable (GFO, XI.11.A)
- MWBE Utilization (GFO, XI.18.A)
- Approved Contract Reporter Exemption (GFO XI.14.A)
- Prevailing Wages, if applicable
(<http://www.labor.state.ny.us/workerprotection/publicwork/PWContents.shtm>)



OSC SUBMISSION - COVER LETTER

Transmittal Letter or Cover Memo to OSC explaining the nature of the contract should include the following:

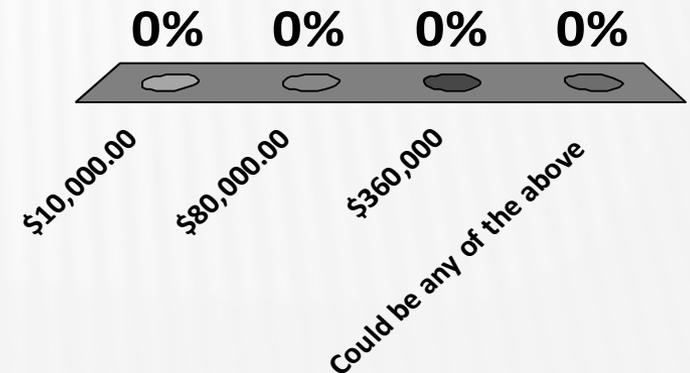
- **Contract Number**
- **Contractor's Name**
- **Total Contract Amount**
- **Description of Goods or Services**
- **Previous Contract Number**
- **Detailed Explanation of Rejected Bid or Protest**
- **Name of Contact Person and their Contact Information**
- **Explanation of Procurement Activities**



OSC SUBMISSION - ENCUMBRANCES

How much is needed for a \$360,000, three year contract beginning August 1st ?

- A. \$10,000.00
- B. \$80,000.00
- C. \$360,000
- D. Could be any of the above



THE CONTRACT PACKAGE

- Submit the complete procurement record to OSC
- The procurement record is documentation that carefully details the procurement process for compliance to all bidding requirements

REFER TO HANDOUT PROVIDED



CONTRACT APPROVAL

- How to determine your contract has been approved by OSC:
 - SFS
 - Open Book New York
- What you receive back from OSC upon approval:
 - AC-1552S OSC Transmittal Letter
 - Signature Pages with OSC approval
- How to determine your contract has been non-approved by OSC:
 - SFS
 - Non-approval notice



MONITOR & MANAGE THE CONTRACT

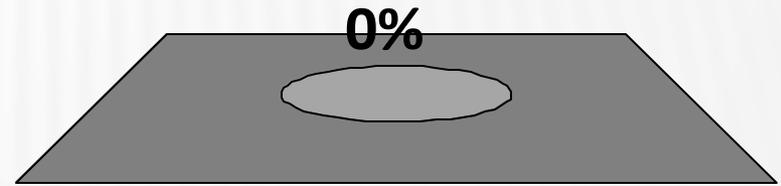
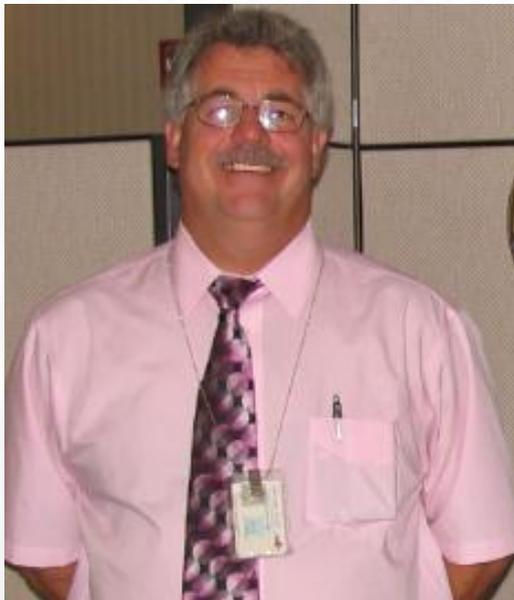


- The contract lives beyond the date of approval
- As noted in Appendix A, the vendor must maintain complete and accurate documents and other evidence directly related to the performance of the contract. Records must be kept for the balance of the calendar year in which they were made plus an additional 6 years thereafter.



WHO SHOULD YOU CALL FOR IFB QUESTIONS?

- 😊 A. Bill Hughes
- 😊 B. Bill Hughes
- 😊 C. Bill Hughes



ver Now

Bill Hughes

IFB CONTACTS

- **Bill Hughes** bhughes@osc.state.ny.us
- **Paula Shappy** pshappy@osc.state.ny.us

- **Erin Datri** edatri@osc.state.ny.us
- **Mia Graham** mgraham@osc.state.ny.us

- **Debbie Boettner** dboettner@osc.state.ny.us
- **Kate Brenner** kbrenner@osc.state.ny.us
- **Jenny Fung** jfung@osc.state.ny.us
- **Sandra Nolan** snolan@osc.state.ny.us



