



REQUEST FOR INFORMATION

RFI NO. 040621
Corporate Compliance Program Redesign
Compliance Department
April 6, 2021

REVISED APRIL 9, 2021 (portions highlighted in yellow)

<p>RESPONSE SUBMISSION:</p> <p>Procurement Department Southwest Key Programs 6002 Jain Lane Austin, Texas 78721 OperationsProcurement@swkey.org</p>	<p>REFER INQUIRIES TO:</p> <p>Frank Garlitz Procurement Manager OperationsProcurement@swkey.org</p>
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RESPONSES ARE DUE: TUESDAY APRIL 20, 2021

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1 INTRODUCTION AND PURPOSE

1.1 PURPOSE OF THE REQUEST FOR INFORMATION (RFI)

It is the intent of Southwest Key Programs (SWK) to solicit a Request for Information (RFI) to gather critical key details that will assist in developing a scope of work for a comprehensive Compliance and Ethics Program redesign. Responses are required in both written and verbal submissions. Verbal submissions will be addressed via a presentation meeting.

1.2 BACKGROUND INFORMATION

SWK is a national nonprofit organization that exists to create opportunities and improve the quality of life for thousands of youth and families each day by providing safe shelter, alternatives to incarceration, career development and quality education. This is done through three areas of programming: Immigrant Children's Shelters, Youth and Family Services and Workforce Solutions. And, over the last ten years, SWK's operations have grown significantly. Accordingly, to ensure proper oversight and support of its mission and the population it serves, SWK seeks to strengthen its Compliance and Ethics Program.

1.3 NO CONTRACT RESULTS FROM THIS RFI

This RFI is issued solely for the purpose of obtaining information that may assist SWK in further development of a scope of services for Compliance Services. This RFI is not a Request for Proposal (RFP), purchase, solicitation, commitment to conduct procurement, or an offer of a contract or potential contract. SWK is under no obligation whatsoever to issue a solicitation. Respondent submission of a response or participation in a presentation is voluntary. Failure to respond to this RFI will not disqualify a vendor from receipt of any future contract.

2 REQUIREMENTS FOR RESPONDING TO RFI

2.1 NEED FOR INFORMATION

Responses to this RFI should help SWK in collecting information on best practices for redesigning its Compliance Department. Collected information will be used to craft a scope of services for a Request for Proposal (RFP) for compliance services.

Specifically, SWK seeks responses to this RFI to propose how to improve SWK's Compliance and Ethics Program in the following areas:

- **Define Program Mandate:** establish scope of program with goals, objectives, activities.
- **Mitigate and Monitor Risks:** strengthen method to identify and define high risk priorities and systematized approach to mitigate risks.
- **Establish Policies and Procedures:** offer approach to assess current state of policies and procedures and leverage for increased organizational compliance.
- **Oversee Allegations of Misconduct:** discuss framework for reporting channels, employee reports, and internal investigation procedures.
- **Provide Training and Communications:** offer vision for training and communication to increase knowledge and behavior to strengthen compliance culture at SWK.
- **Reinforce Behavioral Expectations:** establish improved metrics system, compliance campaign,

and revamp of disciplinary action procedures.

- **Manage the Function:** define critical staffing roles and responsibilities for a strong compliance program, with oversight functions including metrics, reporting, budget management, and cross-functional partnerships.

SWK is seeking input from qualified individuals, organizations (public, private, non-profit) and industry stakeholder organizations with experience in:

1. Managing corporate regulatory guidance.
2. Understanding compliance program's role and activities.
3. Establishing compliance program structure.
4. Creating an effective risk assessment process.
5. Developing policy management guidance.
6. Streamlining helpline and investigation procedures.
7. Tailoring compliance training and communication.
8. Reporting effective metrics to the Board of Directors.

2.2 NOTICE OF INTENT TO SUBMIT

Respondents intending to submit a response must provide a written letter of intent. See Attachment A.

2.3 SCHEDULED PRESENTATIONS

A 1-hour presentation will be scheduled with each respondent to this RFI where a set of topic questions will be asked of each respondent company. Presentation meetings will be scheduled via an online platform like Microsoft Teams or Ring Central. Scheduling will be completed once the respondent company signs a non-disclosure agreement (see section 2.6). Presentations should be prepared in Microsoft PowerPoint for ease of presenting information and responding to the questions.

2.4 TOPICS TO BE DISCUSSED AT PRESENTATION

The following topics will be discussed at the presentation:

1. Critical elements of a well-designed compliance program
2. Definition of a gold-standard of compliance program under the Federal Sentencing Guidelines
3. Best practices re: staffing, structure, and roles

During the presentation, SWK may raise additional topics prepared in advance; to be sure, all respondents will have an equal opportunity to respond to any additional topics presented during the presentation meetings.

2.5 EXPECTED SEQUENCE OF EVENTS/CRITICAL DATES

DATE	EVENT
April 6, 2021	Publication of Request for Information in the RFP database at http://www.rfpdb.com/ .
April 13, 2021 by 12pm CST	Notice of Intent to submit a proposal is due to SWK Procurement Department (via email; OperationsProcurement@swkey.org) by date and time.
April 20, 2021 by 5pm CST	Respondents written responses and Non-disclosure agreements due by date and time.
April 23, 2021*	Presentations Scheduled with Respondents.

***NOTE:** Date of scheduled presentations may vary based on number of responses received.

Presentation will take place beginning on April 23rd and thereafter dependent on how many responses are received.

2.6 NON-DISCLOSURE AGREEMENTS

Respondent(s) must sign non-disclosure agreements prior to scheduling the presentation. All information and data furnished to the Respondent by SWK, and all other documents to which the Respondent Company employees have access during the term of this RFI, shall be treated as confidential to SWK. Any oral or written disclosure to unauthorized individuals is prohibited. **The non-disclosure agreement will be emailed to respondents who submit a letter of intent.**

2.7 NOT RESPONSIBLE FOR PREPARATION COSTS

Southwest Key Programs is not responsible for any costs incurred in the preparation and submittal of a response to this RFI.

2.8 DISCLOSURE OF CONTENT

Respondents are subject to the Freedom of Information Act (FOIA) at 5 U.S.C. 552. Pursuant to **2CFR200 §200.315**, respondents may protect trade secret and confidential information from public release. If the respondent asserts that information provided in the response to this RFI is trade secret or confidential, documentation must be clearly marked with boldface type that include the words “confidential” or “trade secret” at top of the document page.

3 REQUIRED RFI RESPONSE MATERIALS

3.1 RESPONSE FORMAT AND CONTENT

Responses must be submitted in an electronic format (i.e., Word, PDF) and include the sections referenced in section 3. The response must include the following details:



- a) Company's name and address
- b) Point of Contact information for respondent, to include name, title, telephone number, and email address.
- c) A summary, no more than three (3) to five (5) pages in total for all questions, responding to each of the questions in section ~~2.3~~ 2.4
- d) Any other supporting information that the respondent deems pertinent or relevant to this RFI (e.g., reports, research studies, or case literature, etc.)

3.2 RESPONSE SUBMISSION, DATE, AND TIME

Responses must be submitted via email to OperationsProcurement@swkey.org by 5:00 pm CST on Tuesday April 20, 2021.

4 APPENDIX

ATTACHMENT A – NOTICE OF INTENT TO SUBMIT A RESPONSE

NOTICE OF INTENT TO SUBMIT A RESPONSE

RFI # _____

Project Title: _____

The undersigned organization hereby files a notice of intent to submit a proposal:

Name of Organization:	
Mailing Address:	
Contact Person:	
E-Mail:	
Phone Number:	
FAX:	

- Filing of this notice is mandatory
- Filing this notice in no way binds the organization.

PLEASE SUBMIT THIS NOTICE BY E-MAIL PER INSTRUCTIONS IN THE RFI TO:

Southwest Key Programs
Procurement Department
OperationsProcurement@swkey.org