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November 29, 2025

Ed Harrington, Chair
Commission Streamlining Task Force
c/o City Administrator's Office
City Hall, Room 316
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4694

"The Health Commission is one of the bodies under consideration for being moved to the Admin Code — but it shouldn't still be in the 'Deferred Decisions' in the Decisions Log!"

Re: Don't Move the Health Commission Out of the City Charter to the Administrative Code

Dear Chair Harrington and Commission Streamlining Task Force,

During the Task Force's October 15 meeting, Task Force member Sophia Kittler introduced a motion that passed to keep the Health Commission as a governance body and keep it in the Charter.

The Streamlining Task Force should not revisit that initial decision now, because the entire context of the initial discussion and review of the Governance Bodies template discussion will not recur.

During the Streamlining Task Force's September 3 meeting regarding "*Public Safety*" bodies, Task Force Chair Ed Harrington:

"... voiced his belief that certain bodies, like the Fire Commission, are in the Charter because San Franciscans do not want them to change and should a change be sought, the public must authorize it," per the meeting minutes. The minutes also report "Chair Harrington affirmed his understanding that core City functions should not be altered by moving [them] out of the Charter."

As a reminder, the City Administrator's Project Director, Rachel Alonso, had specifically stated in the "*Public Health and Wellbeing Bodies*" recommendations memo, that the Health Commission "*Fulfills legal requirements impractical to be handled elsewhere.*"

The "*Staff Discussion*" section of the memo reported:

*"The Task Force should keep the Health Commission; although, legally, the Board of Supervisors or another body could assume its duties, in practice, **no other body has the capacity or subject matter expertise required to oversee the Department of Public Health (DPH).** DPH is the City's largest department with over 7,626 employees (FTEs) and a \$3.4 **billion** budget in FY26. It is also one of the City's most complex departments, operating [two public] hospitals and [a network of 14 neighborhood health] clinics, emergency medical services, and a wide array of public health programs in communities across the City."*

Importantly, the Health Commissioner ensures specialized oversight of this work.

The memo noted the Health Commission fulfils functions required by state or federal law, including Federal regulations for General Acute Care Hospitals [42 C.F.R. §482.12, Health & Safety §1250(a), and 22 C.C.R. §70701] and Federal regulations for Skilled Nursing Facilities [42 C.F.R. §483.70(d)].

The Health Commission serves as the governing body of the San Francisco Department of Public Health (DPH), the governing body of San Francisco General Hospital, and the governing body of Laguna Honda Hospital and Rehabilitation Center (LHH).

If the Streamlining Task Force were to move the Health Commission to the City's Administrative code, you would be placing LHH at great risk for once again being decertified by the U.S. Centers for Medicare and Medicaid Services (CMS).

"Indeed, Commission Streamlining Task Force Chair Ed Harrington voiced his belief on September 3 that certain bodies ... 'are in the Charter because San Franciscans do not want them to change' ... and ... 'core City functions should not be altered by moving [them] out of the Charter.'"

The Health Commission, especially, is a body that must be kept in the Charter because it performs a **core City function over **public health**, as important as — and should be considered as — **public safety!**"**

During LHH's 26-month decertification (and continuing to this day) the Health Commission resumed reviewing LHH's policies and procedures, which it had slid into neglecting to review, and had been cited over. Since the decertification began in April 2022, the Health Commission has reviewed at least 4,571 pages of 760 highly technical policies and procedures (some more than once including revisions), a task no other board or commission in the City has the bandwidth to assume performing. Certainly, the Board of Supervisors cannot be expected to take on this volume of work from the Health Commission, and at any rate the Board of Supervisors clearly do **not** have the expertise to do so.

Discussion

Margaret Brodtkin, the current President of the Juvenile Probation Commission, has made some great observations to the Streamlining Task Force, including [emphasis added]:

"There are other bodies that may not oversee departments or be decision-makers but are important and should be long-term statements about what San Francisco believes and who we want to have a formal voice in governing the city. The Youth Commission and the Commission on the Status of Women are examples of bodies that reflect our values and are so important that they should remain in the charter."

Lastly, moving a body from the charter to the administrative code does nothing to achieve the alleged streamlining goals. It does not save money, staff time, or make planning more effective, coordinated, or efficient. *The body still needs administrative and staff support and still needs to do its work in the context of the department's and city's broader goals ...*

credibility of the recommendations of the Commission

Streamlining Task Force "The lack of rationale and consistency about what is removed from the charter, as well as the important San Francisco values reflected on the list for removal, (to say nothing of the failure to achieve any efficiency) diminishes the overall credibility of the recommendations of the Commission Streamlining Task Force. Please reconsider these decisions."

"Lastly, moving a body from the charter to the administrative code does nothing to achieve the alleged streamlining goals. It does not save money, staff time, or make planning more effective, coordinated, or efficient'." — Margaret Brodtkin

The Streamlining Task Force **must** keep the Health Commission in the City Charter; it deserves to remain there. As Chair Harrington acknowledged, it performs a key City function.

This bears repeating: The Health Commission, especially, is a body that must be kept in the Charter because it performs a core City function over public health, that's just as important as — and should be considered a part of — public safety!

"Don't further diminish the credibility of the Commission Streamlining Task Force. Keep the Health Commission in the City Charter!"

It's the least this Task Force could do to help protect the City's most vulnerable patients who rely on a fully functioning governance body over San Francisco's entire health network and our two public hospitals.

Sincerely,

/s/

Patrick Monette-Shaw

cc: Rachel Alonso, Project Director, City Administrator's Office