# ELITE ROOT CONTROL

Sewer Cleaning • Root Control • CCTV Inspection • Kansas City, Missouri

## TEN RECOMMENDATIONS FROM INSIDE THE CURRENT PROGRAM

Submitted with public comment on Ordinances 260688–260692 | August 10, 2026

This is written by a contractor who has worked inside the City's participation program for over fifteen years, with twenty-six years in this industry. Elite Root Control is certified as an MBE/DBE and as a Small Local Business Enterprise, so we will be operating under whatever program this Council adopts. Every item below comes from something we watched happen. None of it is theory. If the new program is built without these, it will produce the same results under a different name.

## 1. Graduation should reward growth, not punish one good year

A firm should not lose its standing because of a single strong year. One large contract can double a small company's revenue and tell you nothing about whether that company is stable.

**Recommendation:**

Measure eligibility on income averaged over multiple years. A firm should graduate out only after sustaining income above the standard for roughly five consecutive years. That is long enough to show a company has actually built something that will hold. The purpose of the program is to grow firms that eventually do not need it — but you must let them finish growing first.

## 2. Size limits mean nothing without affiliation rules

If size is the only test, a large company can create or acquire a small entity and qualify through it. The dollars go to a small firm on paper and to a large company in fact.

**Recommendation:**

Adopt affiliation and control rules similar to federal small business standards. Count ownership, shared management, shared equipment, and revenue from related entities when applying the size test.

## 3. Credit should follow the work actually performed

This is the single biggest hole in the current program. A firm can receive credit for work it does not perform. Sewer cleaning and CCTV inspection is a trade with equipment, trained operators, and real overhead. When that work is credited to a company that does not do it, the participation number looks fine and no small contractor gains anything.

**Recommendation:**

Require a commercially useful function standard. Credit counts only for work the certified firm actually performs with its own workforce and equipment, and only within the categories the firm is certified to perform.

## 4. Payment timelines must be watched

Small firms live on cash flow. We have performed work in August and not been paid until February. A six-month wait does not show up anywhere in a participation report, but it is the difference between making payroll and laying people off.

The Disparity Study measured this. Among subcontractors surveyed, only 16.4 percent were paid within thirty days, while 17.5 percent waited ninety days, 3.7 percent waited 120 days, and 5.3 percent waited longer than that. The study also notes that the City has no formal payment timeline in its own written policies.

**Recommendation:**

Track and report the time between work performed and subcontractor payment. Make prompt payment a condition of good standing for prime contractors. Your own Disparity Study recommended auditing invoice processing — this is that recommendation with teeth on it.

## 5. Before participation is reduced, verify it and tell the firm

Under the current ordinance, a prime contractor can request a reduction in participation, and the city can approve it without the affected firm ever knowing. A written paragraph is accepted at face value. By the time the firm learns of it, the work is gone and the appeal window has already run.

**Recommendation:**

Before approving any reduction or substitution: contact the affected firm directly, verify the prime contractor's claims independently, provide written notice before approval, and allow a real window to respond. If there is a dispute, hear it before the change is approved — not after.

## 6. There must be a consequence for a false statement

The City's compliance form already says that falsifying it is grounds for disciplinary action. In practice, nothing follows. A rule with no consequence is not a rule, and everyone working under it learns that quickly.

**Recommendation:**

Create a written complaint process with a named decision maker, a deadline to respond, and a stated consequence for false statements on a compliance form. Publish the outcomes.

## 7. Protect firms that speak up

A subcontractor who raises a concern should not find its crews cut days later. When that happens once, every other firm on every other contract watch and stays quiet. That silence is why problems in this program go unseen for years.

**Recommendation:**

Include a retaliation provision. A firm that files a complaint or participates in a review should be protected from reduction in work, delayed payment, or removal without documented cause.

## 8. Do not create a certification gap

If currently certified firms must reapply, there is a period where we cannot bid. For a small contractor, a few months without the ability to bid is not an inconvenience. It is the end.

**Recommendation:**

Carry existing certifications into the new program automatically, with renewal on the normal cycle. Publish the transition timeline before the program takes effect.

## 9. Report the numbers every year

Five years is a long time to wait for the next disparity study. It took us months of records requests to see a pattern that annual reporting would have shown on one page.

**Recommendation:**

Publish annual participation and payment data by contract — goals set, goals modified, dollars committed, dollars actually paid, and time to payment. Patterns are only visible when someone is counting.

## 10. Build the checks into the process, not into someone's discretion

Most of what went wrong for us did not require anyone to break a rule. It required a step to be skipped. A form was accepted without verification. A firm was not contacted. A notice was not sent. Each of those was a step someone could choose to take or not take, and when it was not taken, nothing flagged it.

The fix is not more people. It is making the steps mandatory and checkable, so the program does not depend on who happens to be handling the file.

**Recommendation:**

Build required checkpoints into the process itself. A modification cannot be approved until verification with the affected firm is documented. A contract cannot close out until payment records are confirmed. Credit cannot be counted until the performing firm is confirmed. Require sign-off at the leadership level on each one and make the completed checklist part of the contract file.

The rules are the rules. When compliance depends on someone remembering to do it, it eventually stops happening. When the file cannot move forward without it, it happens every time.

## The bottom line

Every item here would have cost the city very little, and every one of them would have kept a working company whole. That is the real cost of a program that measures participation on paper without checking whether the work and the money ever reached the firm.

Build the new program so the next contractor does not have to learn this the way we did.

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