II. ORGANIZATIONAL ADMINISTRATION	
II.1 Staff	***2013 MTARS Finding (1)***
The Director shall hire, supervise, and annually evaluate the staff of the Council. Sec. 125(c)(9)	The Council Director (not the Governor) should hire Council staff and supervise and annually evaluate them. Instead the: • Council Director submits hiring recommendations to the Governor and the Governor has the final authority to hire two deputy level staff. • The Council has the final approval for the hiring of other staff.

California State Council on Developmental Disabilities Response

AIDD had conversations with HHS OGC, Council leadership, and Catherine Blakemore (CA P&A Director) to develop and offer technical assistance on Lanterman amendments.

IMMEDIATE NEXT STEPS:

- AIDD present our feedback/guidance highlights to Council at 5/29 meeting
- LA must pass full House Assembly by 5/30
- LA must pass Senate Health & Human Services Committee by 6/27
- LA must pass Senate Appropriations by 8/15
- Sent to the Governor by 8/31
- Governor sign by 8/31
- Law effected on 1/1/15

CORRECTIVE ACTION SUMMARY (1): Lanterman will be amended to give Executive Director hiring authority for all Council staff. The Governor's office has indicated its support for relinquishing hiring authority in order to come into compliance with the DD Act.

III. MEMBERSHIP	
III.1 Membership policies	***2013 MTARS Finding (2)***
Membership recommendations solicited by Governor from a broad range of organizational sources including non-state agency members of the Council. Sec125(b)(1)(B)	The Council's membership nomination and appointment process has been historically inhibited by state bureaucracy. It is unclear if and how membership recommendations are solicited from a broad range of DD/ID organizational sources and non-state agency members of the Council.

CORRECTIVE ACTION SUMMARY (2) : The Council will amend its bylaws to establish a Membership Committee to recruit, solicit and advise the Governor on appointments to the Council. Its membership will consist exclusively of self-advocates and family advocates who are community leaders and who may or may not be Council members. The Committee will consist of at least three members, a majority of whom are Council members. Consistent with Council Bylaws, the Chair shall be a Council member. Membership Committee will, at least quarterly, solicit recommendations for candidates. The Chair of the Membership Committee will be charged with submitting the Committee's recommendations to the Governor's Appointment Office.

IMMEDIATE NEXT STEP: Amended bylaws will be enacted at the 5/29 meeting. First meeting scheduled for June

III.1 Membership policies (continued)	***2013 MTARS Finding (3)***
Members reflect the state's diverse geographic locations, race, and ethnicity. Sec.125(b)(1)(C)	The appointment process for obtaining new Council members has hindered compliance with the DD Act. Currently, SCDD's membership composition does not meet the requirements for geographic, racial, and ethnic diversity.

CORRECTIVE ACTION SUMMARY (3):

Council currently has **four vacancies** for positions recommended by area boards (regional offices). The current non-agency diversity is 21% Latino, 7% black, and 7% Asian. Membership Committee will lead community solicitation, outreach, and executing an appointment process that continues to promote geographic, racial and ethnic diversity. Council anticipates that revisions to the Lanterman Act will preserve the geographic diversity by assuring that there will be at least one Council member from the geographic area encompassing each of the Council's regional offices. The local regional advisory committees will be encouraged to recommend potential candidates, but the Governor retains authority to select the Council membership.

IMMEDIATE NEXT STEP: Membership Committee holding first meeting by June 2014. Based on conversations with the Governor's Appointment staff, Council is optimistic all vacancies will be filled by July 2014

III.1 Membership policies (continued)	***2013 MTARS Finding(4)***
The Council has provisions to rotate membership. Sec.125(b)(2)	Each regional office (i.e. Area Board) representative has to be nominated by the governor. Membership rotation has been historically inhibited by the state's bureaucratic appointment process. For example, one regional office has not had representation on the Council for two years.

CORRECTIVE ACTION SUMMARY (4): Lanterman amendments are anticipated to streamline the appointment process significantly. Language is revised so that a member's term begins on the date of their appointment. Additional statutory language will be crafted so that members can continue to serve while awaiting replacement. Language also added the give Governor authority to appoint any resident from the geographic areas of the regional offices without interfering with Council's ability to determine regional office numbers and location.

IMMEDIATE NEXT STEP
By June 30th via the Membership Committee as its vehicle, it is anticipated that the Council will enjoy a collaborative and shared mission with the Governor's office in constituting the Council.

III.1 Membership policies	***2013 MTARS Finding(5)***
The Council has provisions that allow continuation of membership until a new member is appointed. Sec.125(b)(2)	The Council did not provide evidence of a policy for allowing the continuation of Council membership until a replacement member could be appointed.

CORRECTIVE ACTION SUMMARY (5): Lanterman amendment will clarify that Council members may continue serving until a new member is appointed.

III.1 Membership policies (continued)	***2013 MTARS Finding(6)***
The Council has a process to notify Governor re: membership and vacancies. Sec. 125(b)(2)	The Council did not provide evidence of a transparent and effective process to notify Governor regarding membership vacancies.

CORRECTIVE ACTION SUMMARY (6): The Membership Committee will propose to the Council a formalized process to: 1) Notifying the Governor six months in advance when feasible; 2) Submitting multiple recommendations to the Governor for consideration; 3) Soliciting support from the DSA when vacancies remain for more than four months; 4) Reporting persistent vacancies to AIDD through the PPR process; 5) Soliciting technical assistance from AIDD when persistent vacancies exist.

IMMEDIATE NEXT STEP: Membership Committee to propose revisions to bylaws by December 31, 2014.

III.2 Membership requirements	***2013 MTARS Finding(7)***
60% of membership represent individuals with DD in the following categories: Sec.125(b)(3); Sec.125(b)(5) • 1/3 individuals with DD • 1/3 parents and guardians of children with developmental disabilities or immediate relatives of guardians of adults with developmental disabilities • 1/3 combination • At least one is immediate relative or guardian of an individual with developmental disabilities who resides or previously resided in an institution or an individual with developmental disabilities who currently/previously resided in an institution in the State. Sec.125(b)(6)	Historically the Council has had long term vacancies. Several membership rosters have been submitted since last year and four membership vacancies were filled just prior to the on-site monitoring visit. An updated membership roster is requested as part of the FY14 State Plan Amendment to AIDD to ensure compliance.

CORRECTIVE ACTION SUMMARY (7): With the creation of the Membership Committee the Council will actively involve itself in seeking out and promoting candidates for the Governor's consideration. The Chair of the Membership Committee and the staff assigned to support that Committee will be working with the Governor's Office to rapidly fill existing vacancies. The Governor's Assistant Appointment Secretary, Sarah Greenseid, sits on the MTARS Committee with the commitment of the Governor's office to ensure the state's compliance with the DD Act.

IMMEDIATE NEXT STEP: The Council will conduct ongoing calls to Governor's office bi-monthly, at minimum. A follow-up email will be sent to document the contact.

Project Officer Note: Get vacancy status update on the monthly CAP calls

IV. PROGRAM ADMINISTRATION

IV.1. Five Year State Plan	***2013 MTARS Finding(8)***
The plan shall focus on Council efforts to bring about the purpose of this subtitle, by specifying 5-year goals, as developed through data driven strategic planning, for advocacy, capacity building, and systemic change related to the areas of emphasis, to be undertaken by the Council. Sec.124(c)(4)(A)	There was inadequate evidence that the: • Council engages in data-driven strategic planning to develop the State Plan and takes the primary role in the planning process. • State Plan is the Council's Plan and that activities are undertaken by the Council versus the State Plan being one that is configured by and for the Area Boards.

	• Council is free from state interference in the development of the State Plan. The state's DD agency awarded the Council two contracts: (1) Client Rights Advocacy and (2) Volunteer Advocacy Services. This state supported work is documented in the Goal 2 in the Council's State Plan which states: "local offices provide assistance that include systems navigation, technical assistance, attendance to Individualized Education Plan meetings and assistance with due process". The review team heard more about these two projects during interviews and public forum testimony than any other Council supported activity. While AIDD does not question the merit of the projects and the quality of the work being done by Council staff, it raises serious questions about whether the state is directing the Council's State Plan or whether the Council is developing the State Plan.

CORRECTIVE ACTION SUMMARY (8): The Council will re-establish the State Plan Committee as a Standing Committee to both oversee implementation of the current State Plan, draft and submit to the Council the annual PPR, recommend State Plan Amendments as necessary, and begin planning for each subsequent 5 Year State Plan. It will be the job of the State Plan Committee to present to the Council at each Council meeting a document that demonstrates the Council's progress toward the specific goals and objectives.

ON THE COUNCIL'S TWO CONTRACTS as of May 1st:

The Council maintains its position which is:

- The CRA/VAS contract is limited in scope to providing advocacy and training to the residents, families and staff of California's five state-operated facilities, including self-advocacy assistance.
- There are twelve Council employees throughout the state who work on the CRA/VAS contract and they are solely assigned to that contract and solely paid via that contract.
- These funds are identified in the Budget Section of the PPR as non-federal funds.
- The Council entered into this contract voluntarily as it was seen as a means for having a voice in the state's policies and long term service planning especially as it relates to the planned closure of California's remaining institutions. As with any contract, either party, DDS or SCDD, may terminate the contract.

We discussed the unusual scope of Council authorities outlined in Lanterman with Council leadership and the CA P&A Director. These conversations help build understanding within state context; however this will continue to be an area of review for AIDD. The Council is proposing Lanterman language that explicitly identifies Council federal activities as "shalls" (paid with federal dollars) and state activities as "mays" which are paid with state dollars.

IV.1. Five Year State Plan	***2013 MTARS Finding(9)***
Plan must include assurances related to: ➢ (B) USE OF FUNDS - *At the request of any State, a portion of such funds provided to such State under this subtitle for any fiscal year shall be available to pay up to 1 /2 (or the entire amount if the Council is the designated State agency) of the expenditures found to be necessary by the Secretary for the proper and efficient exercise of the functions of the designated State agency, except that not more than 5 percent of such funds provided to such State for any fiscal year, or $50,000, whichever is less, shall be made available for total expenditures for such purpose by the designated State agency* ➢ (C) STATE FINANCIAL PARTICIPATION.—*The plan shall provide assurances that there will be reasonable State financial participation in the cost of carrying out the plan.* ➢ (D) CONFLICT OF INTEREST.—*The plan shall provide an assurance that no member of such Council will cast a vote on any matter that would provide direct financial benefit to the member or otherwise give the appearance of a conflict of interest.* ➢ (K) STAFF ASSIGNMENTS.—*The plan shall provide assurances that the staff and other personnel of the Council, while working for the Council, will be responsible solely for assisting the Council in carrying out the duties of the Council under this subtitle and will not be assigned duties by the designated State agency, or any other agency, office, or entity of the State.* ➢ (L) NONINTERFERENCE.—*The plan shall*	The Council did not provide adequate evidence that the plan is supported by the assurances in Section 125(c)(5)(B - D) and (K - L). Regarding (B) *Use of Funds*, the review team could not draw any conclusions about the Council based on the information provided about the expenditures for the DSA. It was stated during interviews that: • The DSA charges the Council an indirect rate for the services it provides. • The rate stated by Council staff was in excess of the 5% or $50,000 limit. • Staff did not know the DSA's indirect policy and no written policy was provided. • The Council is required to pay the indirect rate. The Council staff stated it does so from two contracts the state awards to the Council. In regards to (C) *State Financial Participation*, when the review team inquired about how the state provides match, there were comments about state contract funds being factored in but there was a tremendous lack of clarity on this matter. In regards to (D) *Conflict of Interest*, the majority of the Council is comprised of non-agency representatives who are Area Board representatives. There are 13 Areas Board representatives on the Council and 7 "at large" members. The Area Board representatives sit on the State Council and on the Advisory Committee to the Area Boards. This dual role presents a conflict of interest and gives the appearance of a conflict of interest. The Council does not have a policy or procedure to address this. In regards to (K) *Staff Assignments*, it appears that Council

provide assurances that the designated State agency, and any other agency, office, or entity of the State, will not interfere with the advocacy, capacity building, and systemic change activities, budget, personnel, State Plan development, or plan implementation of the Council, except that the designated State agency shall have the authority necessary to carry out the responsibilities described in section 125(d)(3). Sec.124(c)(5)	staff is carrying out work directed by the state and not necessarily the Council through the state funded Client Rights Advocacy and Volunteer Advocacy Services projects. Through these contracts, Council staff conducts assessments and monitoring in the State's developmental centers. Providing direct services is outside the purview of the Council's responsibilities. Furthermore, this work is in support of the two state contracts and therefore directs the work carried out by Council staff located in the regional office. Since it is work created by and for the state, it raises questions as to whether the Council staff is assisting the Council or the state. In regards to (L) *Noninterference,* it is very difficult to conclude whether the Council is free of interference: • To avoid duplication, issues related to interference with the budget process are described under *VI.1 Fiscal Requirements* • To avoid duplication, issues related to interference with personnel are described under *II.1 Staff* • To avoid duplication, issues related to interference with State Plan development are described in the Section above *IV.1. Five Year State Plan*.

This finding is a blend of Lanterman Amendments and P3

PROJECT OFFICER SUMMARY CORRECTIVE ACTION (9): The Council agreed on lack of clarity on the two issues of (B) Use of Funds; and (C) State Financial Participation. *This is a technical assistance area requested by the Council.*

The Council has an Interagency Agreement (IA) in the amount of $390,000 with the California Department of Social Services (CDSS) to provide administrative support services in the areas of accounting; some IT support; some human resources services; procurement; and contracting.

The Council assigned $50,000 of these costs to the DSA functions. However, the scope of administrative work performed by the Department of Social Services far exceeds the required duties of the DSA. For example, the Council does not have state-approved delegated purchasing authority. Its purchasing authority is held by DSS and therefore, all contracts are encumbered by DSS on behalf of SCDD.

The Council believes it is appropriate for the Council to assign some of the cost of the CDSS Interagency Agreement as General Management costs. If not for this Interagency Agreement, the Council would have to bring these functions in-house, at substantially greater cost. The $390,000 CDSS IA is broken down as

follows:

$50,000……DSA Functions

$136,960…… Council General Management costs

$92,040……Funds from State CRA/VAS contract

$111,000……Funds from State QA (NCI) contract

The CDSS states that the cost of providing the support services as outlined in the IA, far exceeds the $390,000 paid by SCDD. According to the CDSS, the services more accurately cost $620,000. Therefore, the difference between the $620,000 worth of support services provided to the Council versus the $390,000 paid for these services, represents California's State Financial Participation.

The Council states it implements its State Plan through staff activities which requires no match. In Fiscal Year 2013, the Council awarded $580,414 in grants, which represents 9% of our allotment. The grantees did provide matching/in-kind funds for a total match of $284,276 or nearly 50% of the funds awarded.

Regarding Conflict of Interest
Lanterman Act amendments are intended to result in an appointment process that eliminates the perceived conflict of interest. The local regional advisory committees will be encouraged to recommend potential candidates to the Council's Membership Committee and directly to the Governor's Appointment Office, but the Governor retains authority to select the Council membership.

Regarding Staff Assignments: It is the position of the Council that staff who implement the CRA/VAS contract are carrying out work that is consistent with the Council's role and mission, with leveraged state funds.

We've discussed the unclarity between federal vs. state expenditures, perceived conflict of interest, and the unusual scope of the CRA/VAS contract activities with Council leadership and the CA P&A Director. These conversations help build our understanding within state context; however this will continue to be an area of review

IV.2 State Plan Implementation	***2013 MTARS Finding(10)***
The Council shall implement the State Plan by conducting and supporting advocacy, capacity building, and systemic change activities Sec.125(c)(5)	The Council's 5-year plan implementation does not promote advocacy, capacity building, and systemic change at the state level. As discussed above, the review team heard more about the two state funded projects implemented by the Area Boards. Since so much attention was paid to the two state funded projects, the review team did not hear about a coherent set of activities implemented by the Council at the state level. The Council is providing direct services through the two state contracts. This type of activity is outside the

	purview of the Council's responsibilities and appears to overlap with P&A functions.

CORRECTIVE ACTION SUMMARY (10): *This is a technical assistance area requested by the Council.*

The reconstituted State Plan Committee is scheduled to hold its first meeting in June and will develop a template that captures data on state plan implementation at both the local and statewide level. It will be distributed on at least a quarterly basis to the full Council and utilized to complete the PPR.

The Council provided additional information on its state systems change, capacity building and advocacy activities. ***Two strong areas are making integrated competitive employment*** *an option in the state and partnering with the Regional Centers to implement* ***Self Determination*** *pilot projects*

AIDD will continue to review local area quarterly reports and Council update reports to determine if the Council is carrying out systems change, capacity building, and advocacy at the state wide level and; gain better understanding of how the local area offices implement the Council plan. We discussed the unclarity between the State Council vs. Area Board roles with Council leadership and the CA P&A Director. These conversations helped build our understanding within state context; however this will continue to be an area of review.

Program Performance Report	***2013 MTARS Finding(11)***
The Council annually prepares and transmits to the Secretary a report containing information about the progress made in achieving the goals. The report includes: • Extent to which each goal of Council was achieved. Sec.125(c)(7)(A) • Description of strategies that contributed to achieving goals. Sec.125(c)(7)(B) • Extent to which each goal was not achieved, describes factors that impeded goal achievement. Sec.125(c)(7)(C) • Separate information on self-advocacy goal. Sec.125(c)(7)(D)	Overall the Council's Program Performance Report does not specifically describe how each Area Board is contributing to State Plan implementation. Because there are 13 regional offices implementing different parts of the Council State Plan, it is difficult to determine how State Plan achievement is being measured and evaluated. Some Area Boards referenced using "mini-plans" to document which parts of the Council State Plan they were implementing. Other Area Boards did not provide evidence of having "mini-plans". Without consistent use of Area Board "mini-plans" or some other tool it is unclear how the Council can assess progress made in achieving goals.

CORRECTIVE ACTION SUMMARY (11): *This is a technical assistance area requested by the Council.* The Council Executive Director is in the process of filling the Planning Specialist position, having identified a qualified candidate who has not begun employment. The State Plan Committee will be charged with reviewing the individual Activity forms and based on that data, developing a matrix that illustrates the Council's progress in implementing the State Plan. The chart will be provided to the Council at least quarterly. The information will be used by the Program Development Committee (PDC) to assist in determining priorities for grants. It will be used by the Administrative Committee to help guide fiscal priorities. *The Project Officer will continue to review the FY14 State Plan Amendment, local area office quarterly reports, and regional mini plans to inform provide technical assistance on developing effective planning and reporting systems.*	
An accounting of the manner in which funds paid to the State for a fiscal year were expended. Sec.125(c)(7)(G)	The Council presented several documents that detailed different aspects of how the federal allotment is being spent, but overall the review team could not determine how the budget is developed and executed and how expenditure data is calculated.
VI. FISCAL	
VI.1 Fiscal Requirements	***2013 MTARS Finding(12)***
Council has authority to prepare, approve, and implement a budget to fund programs, projects, and activities. Sec125(c)(8)	The Council did not provide adequate evidence on how it developed or implemented its budget to fund programs, projects, and activities. Council members expressed a strong need for more fiscal transparency and training on state versus federal fiscal policy and the Council's budget development/implementation process. In addition, the Lanterman continues to include language that is inconsistent with the DD Act, posing challenges for the Council to be in compliance with the federal law: • The Lanterman Act requires the Council to provide funding to Area Boards. • The Lanterman Act provisions require the Council to hire staff at the deputy director level thereby interjecting a line item in the Council's budget and limiting its authority to develop a budget.

CORRECTIVE ACTION SUMMARY (12):

Lanterman amendments will delete requirements for the Council to provide funding to Area Boards and governor hiring authority for deputy level staffing.

The Council made progress in establishing the Administrative Committee (meets monthly) to begin establishing procedures to ensure Council members are well informed on fiscal and budget processes. The Council now receives quarterly expenditure reports, develops and approves the annual budget. The Administrative Committee will continue to meet monthly.

The Administrative Committee has set the following priorities for its work in 2014:

1. Ensure that all MTARS noncompliance findings of a fiscal/administrative nature are resolved.
2. Take a more active role in **developing the Council's 2015 budge**t. (Presented at May 2014 Council meeting)
3. Ensure that the Council has a comprehensive **Policies and Procedures Manual**. (Completion by December 31, 2014)
4. Oversee the process of establishing an **MOU with the DSA** and evaluating the functions of the DSA. (Evaluation completed by May 2014. MOU completed by November 30, 2014.)

This is a technical assistance area requested by the Council

This this will continue to be an area of concern to support SCDD translating Lanterman amendments to practice. Heightened oversight will include review of budget development/execution processes and how funds area allocated to the local offices to implement the state plan.

Key documents: Quarterly expenditure reports and administrative committee meeting materials

VI.2 Fiscal Policies	***2013 MTARS Finding(13)***
Council has policies to carry out appropriate subcontracting activities. Sec.125(c)(8)(A) Council directs expenditures of funds for grants, contracts, interagency agreements that are binding contracts and other activities authorized by State Plan approval. Sec.125(c)(8)(C) Grantee shall keep records that disclose: • Amount and disposition of assistance by recipient • Total cost of project or undertaking in connection with assistance given • Amount of project costs supplied by other sources • Such other records that will facilitate an effective audit Sec.103	The Council did not provide adequate evidence of that is has accurate financial accounting and record keeping: • At the time of the on-site visit, the Administrative Services Manager position was vacant and the Council did not have a staff person dedicated to managing the Council's finances. • The Council could only provide limited information on the Council's fiscal policies during the on-site visit pertinent to the requirements in the DD Act. • The Council experienced fiscal impropriety under the previous Executive Director (Board Resource contract) • The state auditor's findings substantiate the immediate need for financial management systems. (Reference: *California Department of Finance Management Letter dated August 17,*

	2012)
California State Council on Developmental Disabilities Response	
CORRECTIVE ACTION SUMMARY (13): In December 2013, staff completed a draft Contract and Purchasing Manual that to a large degree is based upon the manual utilized by the Department of Social Services. The Manual focuses on the Council's procedures for contracting and procurement. The draft Manual was reviewed by the Administrative Committee in January 2014. It is anticipated that the Contract and Purchasing Manual will be one element of **a more comprehensive Policies and Procedures Manual to be developed throughout 2014**. Target completion date: December 31, 2014. The Council does continue to be hampered by staff management vacancies, especially that of the Chief Deputy for Administration. The Council was assured that the Governor's Appointment Office will cooperate with the Council's Interim Executive Director in filling these positions expeditiously during this transitional period while legislation is pending to remove the Governor's hiring authority. **The Council is advertising for a Chief Deputy for Administration and a Deputy for Area Board Operations.** *Project Officer Question: Should this position title be Deputy for Local Operations?* *Management staff capacity will continue to be an area of concern and technical assistance*	
VII. DESIGNATED STATE AGENCY	
VII.2 Responsibilities of DSA	***2013 MTARS Finding(14)***
• Receives, accounts for, and disburses funds under subtitle based on State Plan. Sec125(d)(3)(C)(i) • Provides the appropriate fiscal control and fund accounting procedures as may be necessary to assure proper disbursement of, and accounting for, funds paid to the state. Sec125(d)(3)(C)(ii) • Keeps and provides access to records as Secretary and Council may determine necessary and timely financial reports regarding status of expenditures, obligations, and liquidation by agency or Council, and use of Federal and non-Federal shares. Sec125(d)(3)(D) • Provides required non-Federal share. Sec125(d)(3)(E) • Assists in obtaining appropriate State Plan assurances and consistency with state law. Sec125(d)(3)(F) • Enters into MOU at request of Council.	As mentioned above the Council's recent experience with fiscal impropriety under the previous Executive Director (Board Resource contract) and the state auditor's findings substantiates the DSA's need to establish processes, policies, and procedures that promote: • Accurate receipt, accounting, and disbursement of funds • Provision of appropriate fiscal control and fund accounting procedures necessary to assure proper disbursement of, and accounting for, funds paid • Access to records as the Secretary and Council may determine necessary • Timely development and dissemination of financial reports regarding status of expenditures, obligations, and liquidation by agency or Council, and use of Federal and non-Federal shares The Council does not have a Memorandum of Understanding with the DSA. There was no evidence that the Council has conducted a

Sec125(d)(3)(G)	formal evaluation of the DSA at any point and time. Several Council staff position and DSA functions appear duplicative. Several DSA functions are performed by Council staff at the central office, specifically in the areas of: contracting, budget, fiscal, and personnel.
CORRECTIVE ACTION SUMMARY (14): The previous Interim Director and DSA Assistant Secretary conducted an evaluation of the DSA in April and will be presented to the full Council on 5/29. **The Council will develop and enter into a Memorandum of Understanding (MOU) with the DSA during calendar year 2014**. This effort will be coordinated by the Administrative Committee. The DSA is represented on the Administrative Committee by Kristopher Kent, Assistant Secretary, Health and Human Services Agency. The Council itself will approve the MOU and it will be signed by the Chairperson. *Key Document: DSA Review*	