	II. ORGANIZATIONAL ADMINISTRATION								
	II.1 Staff	***2013 MTARS Finding***	***Other Key Areas of Concern***	***Documentation/Evidence of Progress***	***Comments***	***Task* (CA #1)**	***When***	***Who***	***Status***
A	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.	N/A	1. Policies and/or procedures (with other documentation as necessary) providing evidence of the Council Directors responsibilities of hiring, supervising and evaluating staff 2. Demonstration of the Director's ability to hire, supervise and annually evaluate the staff of the Council	Sufficient evidence must be provided to adequately meet this finding and be considered for special terms and conditions to be lifted	1. AB 1595, Bylaws 2. ED job description	1. 12/1/14 2. 1/1/15	1. ED, Legal, Council 2. HR	**1.Compliance MET 12/1/14** **2. Compliance Not MET** (address continuously, submitted 1/1/15)
	III. MEMBERSHIP								
	III.1 Membership policies	***2013 MTARS Finding***	***Other Key Areas of Concern***	***Documentation/Evidence of Progress***	***Comments***	***Task* (CA #2, 3)**	***When***	***Who***	***Status***
B	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.	N/A	1 Policies and/or procedures (with other documentation as necessary) providing evidence of the Council's membership nomination and appointment process and procedures 2. Direct evidence that the appointment process procedures are being implemented	Sufficient evidence must be provided to adequately meet this finding and be considered for special terms and conditions to be lifted	1. Bylaws 2. Membership Committee meeting minutes & report to Council, list of organizations on distribution list, recruitment materials,	1. 12/1/14 2. 4/1/15	1. ED, Legal, Council 2. ED, Comm	**1. Compliance MET 12/1/14** 2. No

C	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.	N/A	1. Policies and/or procedures (with other documentation as necessary) providing evidence of outreach efforts to recruit members that reflect the state's diverse geographic locations, race and ethnicity 2. Direct evidence that the Council's membership reflects the state's diverse geographic locations, race and ethnicity	Sufficient evidence must be provided to adequately meet this finding and be considered for special terms and conditions to be lifted	1. Bylaws 2. Demographic analysis of Governor's appointees to the Council	1. 12/1/14 2. 12/1/14	1.ED, Legal, Council 2. HR	1. **Compliance MET 12/1/14** 2.**Compliance NOT Met** (submitted 12/1/14, address continuously)
	III.1 Membership policies	***2013 MTARS Finding***	***Other Key Areas of Concern***	***Documentation/Evidence of Progress***	***Comments***	***Task* (CA #4, 5, 6)**	***When***	***Who***	***Status***
D	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.	N/A	1. Policies and/or procedure with other documentation as necessary) providing evidence of Council provisions to rotate membership 2. Direct evidence that the Council is rotating its members per the Council's policy	Sufficient evidence must be provided to adequately meet this finding and be considered for special terms and conditions to be lifted	1. AB 1595, Bylaws 2. Council roster showing membership and changes for 2015	1. 12/1/14 2. 1/1/16	1. ED, Legal, Council 2. ED	1.**Compliance MET 12/1/14** 2. No
E	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.	N/A	1. Policies and/or procedures (with other documentation as necessary) providing evidence of Council provisions that allow continuation of membership until a new member is appointment	Sufficient evidence must be provided to adequately meet this finding and be considered for terms and conditions status	1. AB 1595, Bylaws.	1. 12/1/14	1. ED, Legal, Council	1.**Compliance MET 12/1/14**

				2. Direct evidence that the Council is following its members membership policy		2. Council roster showing membership and changes for 2015	2. 1/1/16	2. ED	2. No
F	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.	N/A	1. Policies and/or procedures (with other documentation as necessary) providing evidence of appointment process to notify Governor of membership and vacancies 2. Direct evidence of notifying Governor of membership recommendations and vacancies	Sufficient evidence must be provided to adequately meet this finding and be considered for special terms and conditions to be lifted	1. Bylaws, administrative procedure 2. Membership Committee reports to Council	1. 12/1/14 2. 4/1/15	1. ED, Legal, CDD, Council 2. ED, Comm	1.**Compliance MET 12/1/14** 2. No

	III.2 Membership requirements	***2013 MTARS Finding***	***Other Key Areas of Concern***	***Documentation/Evidence of Progress***	***Comments***	***Task* (CA #7)**	***When***	***Who***	***Status***
G	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	1. The Council does not have a standard orientation or mentoring process for the Chair or new members. Council members expressed the need for training on the DD Act, the Council program federal mandate, and organization governance 2. State agency representatives lack understanding of their role at Council meetings. While	1. Since the MTARS visit, documentation of Council compliance with membership composition requirement, standard orientation or mentoring process for Chair and new members, including training in the DD Act, the Council program federal mandate, and organization governance. 2. Direct evidence of state agency representatives understanding their role and actively engaging in Council	Sufficient evidence must be provided to adequately meet this finding and be considered for special terms and conditions to be lifted	1a. Orientation binder, welcome letter, 1b. Annual Councilmember training materials 2. Welcome letter for Agency	1. 1/1/15 1b. 4/1/15 2. 2/1/15	1a. ED, Comm, TA 1.b. ED, TA 2. ED, TA	**1a. Compliance MET 1/1/15** 1b. No 2. **Submitted 2/1/15**

Key: CA= Corrective Action Plan Corrective Action, ED= Executive Director, CDD=Chief Deputy Director, DDPP=Deputy Director of Policy and Planning, Comm=Council Committee, TA=Technical Assistance

		to AIDD to ensure compliance.	representatives attend full Council meetings, they do not actively engage with the committees. 3. The review team observed lack of supports for some of the self-advocate members of the Council. The review team could not determine if the events were isolated or an overall issue.	meetings 3. Direct evidence of supports for engaging self-advocate members of the Council in council meetings and council activities.		reps 3a. Facilitation Policy 3b. SAAC packets and materials for 2015, evidence of facilitator attendance for 2015	3a. 1/1/15 3b. 1/1/16	3a. ED, Comm Council 3b. ED	**3a. Compliance MET 1/1/15** 3b. No
	IV. PROGRAM ADMINISTRATION								
	IV.1. Five Year State Plan	***2013 MTARS Finding***	***Other Key Areas of Concern***	***Documentation/Evidence of Progress***	***Comments***	***Task (CA #8)***	***When***	***Who***	***Status***
H	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	N/A	1.Evidence of activities, process and/or procedures (with other documentation as necessary) to develop a 5 year strategic plan that addresses systems change, capacity building and advocacy on a statewide basis	This will require ongoing technical assistance and monitoring into the next state plan cycle (2016-2021) before considering whether to special terms and conditions are lifted	1a. State Plan Development process 1b. Documentation of public outreach, meetings, surveys, use of available data sources (NCI, ICI, CDER, etc). Copies of	1a. 10/1/15 1b. 10/1/16	1. DDPP, Comm, Council, TA	1. No

		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.		2. Direct evidence of process and/or procedures (with other documentation as necessary) for the Council to make data driven decisions and evaluate the progress and impact of state plan implementation		staff products submitted to committees and Council to support integration of data and public input. Various other documents showing committee work and council review and revisions of state plan. 2. Same as 1b	2. 10/1/16	2. DDPP, Comm, Council, TA	2. No
	IV.1. Five Year State Plan	***2013 MTARS Finding***	***Other Key Areas of Concern***	***Documentation/Evidence of Progress***	***Comments***	***Task* (CA #9)**	***When***	***Who***	***Status***
I	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*	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	1. The DSA plays a vital role supporting the development and implementation of the Council's budget. AIDD highly recommends the Council and DSA enter into a Memorandum of Understanding in support of the Council	1. Direct evidence/documentation of MOU between the Council and the DSA in support of the Council	Sufficient evidence must be provided to adequately meet this finding and be considered for special terms and conditions to be lifted	1. MOU	1. 7/1/15	1. Legal	1. No

	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*	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 were 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	2. Staff expressed a great need for training to better understand the DD Act, the DD Council's federal mandate to conduct and support advocacy, capacity building, and systemic change on a statewide level.	2. Direct evidence/documentation of DSA's indirect policy 3. Direct evidence that the DSA rates are charged to the Council consistent with documents 4. Direct evidence that DSA provided match to the Council 5. Policies and procedures (with other documentation as necessary) providing evidence of how the Council addresses Conflict of Interest, particularly findings in the MTARS 6. Direct evidence that the Council is following its policy and procedures with regards to conflict of interest 7. Policies and/or procedures (with other documentation as necessary) regarding : (a) Council staff carrying out solely the responsibilities duties of the Council as described in the DD Act; (b) training on the DD Act, the		2. MOU 3. DSS Invoices 4. DSS Invoices 5. AB 1595, Bylaws 6. Bylaws, Form 700, Gov't Codes 1090 & 87100 7. Bylaws	2. 7/1/15 3. 2/1/15 4. 2/1/15 5. 12/1/14 6. 12/1/14 7. 12/1/14	2. Legal 3. CDD 4. CDD 5. ED 6. ED, Legal 7. CDD, Legal, HR	2. No 3. **Submitted 2-1-15** 4. **Submitted 2-1-15** 5. **Compliance MET 12/1/14** 6. **Compliance MET 1/1/15** 7. **Compliance MET 12/1/14** (additional clarification requested)

	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 provide assurances that the designated State agency, and any other agency, office, or entity of the State, will not interfere with the advocacy, capacity*	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 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*		DD Council's federal mandate to conduct and support advocacy, capacity building, and systemic change on a statewide level; (c) state plan implementation, data collection and analysis, supports to engage self-advocate members in council meetings and activities; (d) standard orientation tools for staff, policy manuals and trainings to learn Council programs and administrative requirements 8. Direct evidence that the policies and procedures above are being carried out consistent with the policy		8. Breakdown of staff by funding source, training materials, staff orientation binder	8. 7/1/15	8. CDD, CCPP, HR	8. No

	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)	• 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.*		9. Direct evidence the Council is functioning free of DSA interference as identified in the MTARS findings		9. See A (Staff), H (Five Year State Plan), and M (Fiscal Requirement)	9. 10/1/16	9. ED, CDD, DDPP, Legal, Comm, Council, TA	9. No
	IV.2 State Plan Implementation	***2013 MTARS Finding***	***Other Key Areas of Concern***	***Documentation/Evidence of Progress***	***Comments***	***Task* (CA #10)**	***When***	***Who***	***Status***
J	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 <u>state level</u>. 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	1. Partnership efforts are evident however, there are no plans for collaboration between the DD Network Partners (the Council, the three UCEDDs and the P&A)	1. Policies and/or procedures (with other documentation as needed) providing evidence of how the Council will develop and address state plan goals on a statewide basis; plans for collaboration with the DD Network Partners 2. For the remainder of the 2011-2016 state plan, evidence of amended and implemented goals on a statewide basis 3. Approval of new state plan for FY 2016 – 2021	This will require ongoing technical assistance and monitoring into the next state plan cycle (2016-2021) before considering whether to special terms and conditions are lifted	1a. State Plan work plan 1b. Evidence of periodic meetings and joint activities 2. Amended Plan and supporting documentation 3. Approval of new plan.	1a. 9/1/15 1b. 7/1/15 2. 1/1/16 3. 1/1/17	1a. ED, DDPP, Comm, TA 1b. ED 2. DDPP, Comm, Council, TA 3. DDPP, Comm, Council, TA	1a. No 1b. No 2. No 3. No

		with P&A functions.		4. Review of PPRs to assess the extent to which the Council is conducting and supporting advocacy, capacity building and systemic change activities consistent with the DD Act		4. PPR	4. 1/1/18	4. DDPP, Comm, Council, TA	4. No
	V. EVALUATION AND REPORTS								
	Program Performance Report	***2013 MTARS Finding***	***Other Key Areas of Concern***	***Documentation/Evidence of Progress***	***Comments***	***Task* (CA #11)**	***When***	***Who***	***Status***
K	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.	N/A	1. Policies and/or procedures (with other documentation as needed) providing evidence for the Council to develop a high quality cohesive and comprehensive PPR as described in the guidance provided by ITACC and AIDD 2. Council evaluation plan submitted in the State Plan 3. Review of PPRs to assess whether the Council is utilizing its evaluation plan	This will require ongoing technical assistance and monitoring into the next state plan cycle (2016-2021) before considering whether to special terms and conditions are lifted	1. Documentation of TA received and products based on TA 2. Evaluation plan 3. PPR	1. 1/1/16 2. 10/1/16 3. 1/1/18	1. DDPP, TA 2. DDPP, Comm Council, TA 3. DDPP, TA	1. No 2. No 3. No
L	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	N/A	1. Policies and/or procedures (with other documentation as necessary) providing evidence of how the	Sufficient evidence must be provided to	1. State Accounting Policies, Budget	1. 2/1/15	1. CDD	1. **Submitted 2-1-15**

		is being spent, but overall the review team could not determine how the budget is developed and executed and how expenditure data is calculated.		Council's budget is developed, executed, and how the expenditure data is calculated 2. Review of fiscal documents to assess whether the Council is following its policies and procedures and federal grant requirements	adequately meet this finding and be considered for special terms and conditions to be lifted	Development Directives 2. Expenditures by Object Code for entire budget	2. 2/1/15	2. CDD	2. **Submitted 2-1-15**
VI. FISCAL									
	VI.1 Fiscal Requirements	***2013 MTARS Finding***	***Other Key Areas of Concern***	***Documentation/Evidence of Progress***	***Comments***	***Task* (CA #12)**	***When***	***Who***	***Status***
M	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. • 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	N/A	1. Policies and/or procedures (with other documentation as necessary) providing evidence of how the Council's budget is developed, executed, and how the expenditure data is calculated 2. Policies and/or procedures revised (with other documentation as necessary) as a result of the Lanterman Act 3. Direct evidence that the full Council is developing, approving and managing its budget	Sufficient evidence must be provided to adequately meet this finding and be considered for special terms and conditions to be lifted	1. State Accounting Policies, Budget Development Directives 2. AB 1595 3. Council reviews of Quarterly Budget Projections, Council votes on resource allocation, including cost-reductions	1. 2/1/15 2. 12/1/14 3. 7/1/15	1. CDD 2. ED, Legal 3. ED, CDD, Comm, Council	1. **Submitted 2-1-15** **2. Compli-ance MET 12/1/14** 3. No

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		item in the Council's budget and limiting its authority to develop a budget.							
	VI.2 Fiscal Policies	***2013 MTARS Finding***	***Other Key Areas of Concern***	***Documentation/Evidence of Progress***	***Comments***	***Task* (CA #13)**	***When***	***Who***	***Status***
N	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*)	N/A	1. Policies and/or procedures (with other documentation as necessary) providing evidence the Council carries out appropriate subcontracting activities, accurate financial accounting and record keeping 2. Direct evidence that the Council is following its subcontracting policies	Sufficient evidence must be provided to adequately meet this finding and be considered for special terms and conditions to be lifted	1. Contract Manual 2. RFP, Overview of RFP process, summary pages of selected vendor	1. 12/1/14 2. 1/1/16	1.CDD 2. CDD	**1. Compliance MET 12/1/14** 2. No

VII. DESIGNATED STATE AGENCY									
	VII.2 Responsibilities of DSA	***2013 MTARS Finding***	***Other Key Areas of Concern***	***Documentation/Evidence of Progress***	***Comments***	***Task* (CA #14)**	***When***	***Who***	***Status***
O	• 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. Sec125(d)(3)(G)	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 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.	N/A	1. Policies and/or procedures (with other documentation as necessary) providing evidence the DSA has promoted: 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; and 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 2. Direct evidence that the DSA is carrying out the policies and procedures	Sufficient evidence must be provided to adequately meet this finding and be considered for special terms and conditions to be lifted	1. State accounting policies 2. DSA Annual Evaluation (possibly CalSTARS reports)	1. 2/1/15 2. 7/1/15	1.CDD, Legal 2.CDD, Comm	1.**Submitted 2-1-15** 2. No