



CENTERS FOR INDEPENDENT LIVING COMPLIANCE REVIEW REPORT

Independent Living Resource Center of San Francisco

Grant Award Numbers: H132A970023 (Chinatown)
H132A970024 (Mission Street)
H132A970007 (Original)

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REHABILITATION SERVICES ADMINISTRATION

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I. PURPOSE OF THE ON-SITE MONITORING REVIEW

Sections 706(c) and 722 of the *Rehabilitation Act of 1973, as amended* (Rehabilitation Act) mandate that the Rehabilitation Services Administration (RSA) conduct on-site reviews of centers for independent living (CILs) funded under Title VII, Part C, Section 722. The objectives of on-site reviews are to:

- assess compliance with the requirements of Section 725(b) and (c)(3) of the Rehabilitation Act and 34 CFR 366.60-366.63;
- study program operations, organizational structure and administration of the CIL under Section 725(c)(1), (2), (5) and (6) of the Rehabilitation Act and 34 CFR 366.2 and 366.50;
- review documentation sufficient to verify the accuracy of the information submitted in the most recent 704 Annual Performance Report;
- verify that the CIL is managed in accordance with federal requirements in the Education Department General Administrative Regulations (EDGAR);
- assess CIL conformance with its work plan, developed in accordance with Section 725(c)(4) of the Rehabilitation Act and 34 CFR 366.50(d)(2), conditions of the CIL's approved application, and consistency with the State Plan for Independent Living (SPIL);
- identify areas of suggested or necessary improvements in the CIL's programmatic and fiscal operation and provide technical assistance resources available on the local, state, regional and national level;
- identify areas of exemplary work, projects and coordination efforts and make this information available to the larger CIL community; and
- provide an opportunity to share information with experienced nonfederal individuals involved in the operations of CILs and make available technical assistance to enhance CIL operations or to minimize or to eliminate problem areas.

II. METHODOLOGY

The on-site review of the Independent Living Resource Center of San Francisco (ILRC-SF) was conducted from October 29 to November 2, 2012. The program review covered the independent living (IL) operations and activities and the financial review examined the center's participation in Title VII, Part C, of the Rehabilitation Act. RSA used the On-Site Review Guide (ORG) to conduct the on-site review. During the review, interviews were conducted with the center's management, staff, consumers and members of the board of directors. In addition to the interviews, program and financial documents were reviewed in accordance with the protocol required by RSA's ORG, including written policies and procedures, a sample of consumer service records (CSRs), and other documents that verified compliance with standards and indicators. CSRs were selected for review on a random basis. RSA conducted an exit conference at the conclusion of the review to provide feedback on initial impressions from the review.

The RSA review team included the following individuals:

- Elizabeth Akinola, RSA program specialist;
- Daniel G. Kessler, nonfederal reviewer; and
- Paul DeMange and Michelle Davis, representatives, designated state unit.

III. MISSION AND DESCRIPTION

ILRC-SF's mission is to ensure that people with disabilities are full social and economic partners within their families and within a fully accessible community. ILRC-SF receives three Part C grants from RSA. The initial grant was awarded in 1995 to meet the IL needs of individuals with psychiatric disabilities in the San Francisco area; the second in 1995 to provide outreach to members of the Latino community in the Mission Street area; and the third in 1996 to meet the IL needs of individuals with disabilities of Chinese descent in the Chinatown area of San Francisco who, at that time, were underserved. Both the second and third Part C awards were referred to as "outreach grants." ILRC-SF has offices on Mission Street and Chinatown, San Francisco, California and serves San Francisco County. The three grants share the same governing board and management staff, including the executive director, human resource director, and program manager. IL specialists are assigned to each Part C grant.

In addition to the four core services, ILRC-SF is involved in the below projects on behalf of individuals with significant disabilities.

- **Options Counseling:** This program provides assistance to individuals with significant disabilities regarding long term care needs, how to continue to live in their homes sustainably, and how to receive necessary services in the community. The program is also available to individuals with disabilities residing in nursing homes who want to know more about their options for transitioning back into the community. Options Counseling is a decision-support process in which a counselor assists consumers map out their goals and provides them with referrals to take action.
- **Housing and Advocacy Services:** This program provides individual housing information and guidance with a focus on tenants' rights, fair housing, and advocacy, in addition to assisting consumers in the application for emergency rental assistance funds. Available to consumers are several ILRC-SF produced publications relative to housing and disabilities. Tenants and housing providers are invited to attend the fair housing training workshops, provide low-income housing information for distribution to other ILRC-SF partners or participate in one of the monthly housing skills search sessions.
- **Assistive Technology (AT):** This program provides information on AT tools for living that enhance the freedom, functionality, and ability of individuals with disabilities to live independently. Staff empowers consumers to advocate for themselves using information received from ILRC-SF to enable them find and obtain the AT solutions that might work for them. Periodic workshops are held for individuals and groups living in the community, as well as individuals with disabilities who are transitioning from institutional settings. Workshops introduce and illustrate the importance of AT in successful independent living.
- **Device Lending Library:** This program, which receives funding support from the California Department of Rehabilitation, offers individuals with disabilities the opportunity to try out the latest technology and even bring it home on a trial basis. ILRC-SF has a wide variety of devices available to borrow, including iPads, laptops, one touch can openers, and pocket assistive listening devices. ILRC-SF is a Device Lending Library program center, one of 13 California Assistive Technology exchange centers throughout the state.

IV. ORGANIZATIONAL STRENGTHS AND EMERGING PRACTICES

Economic Empowerment Workshops: These workshops, conducted approximately once a month, focus primarily on work incentive programs and the employment rights of persons with disabilities as provided under the Americans with Disabilities Act. Primary attention is given to workshop presentations and individual consumer meetings for those considering a return to the workforce in order that these individuals may better understand both the financial and health impact such a decision may have upon an individual and his/her benefits. Additional services include information about applying for disability and other benefits. ILRC-SF also maintains an employment bulletin board with updated job postings, fairs and training opportunities. These workshops are an information resource for consumers on topics such as personal finance, job readiness/employment search strategies, continuing education, workplace rights and accommodations for people with disabilities. Specific topics are chosen by consumers and are usually led by guest speakers with expertise in their specific topic. Past workshop leaders have included professionals from banking and finance, the San Francisco Treasury, the California Department of Rehabilitation, Habitat for Humanity, and other groups and organizations. In FY 2012, eight consumers participated in this program, one of whom was able to repair his credit and is now able to apply his budgeting skills efficiently.

V. OBSERVATIONS AND RECOMMENDATIONS

During its review activities, RSA identified the observations below and made recommendations that ILRC-SF may consider. In addition, the completed ORG is attached to the report.

1. Maintenance of Consumer Service Records

Observation: RSA randomly selected and reviewed 25 Consumer Service Records (CSRs) for ILRC-SF's three grants: 17 active and 8 inactive. All CSRs reviewed contained complete and specific information about services requested, services provided, IL goals or objectives established, and IL goals and objectives achieved; independent living plans (ILPs) and waivers. However, the CSR information and accompanying narratives lacked quality and consistency as described below.

- None of the release of information forms contained permission for use of consumer photographs for center activities and publications.
- Not all records reviewed contained sufficient information about the role of center staff in helping consumers achieve their IL goals.
- In three CSRs, the CSR was closed after the consumer indicated that he or she had used the information provided by the center to help achieve a housing goal and that he or she had been given an appointment for an interview at an apartment building. The case notes indicated that the consumer had achieved the housing goal even though there was no assurance that the interview would result in that consumer being assigned an apartment. Therefore, the actual goal was not achieved. Discussion with IL specialists indicated that a review of a larger sampling of CSRs would have the same result, indicating a lack of clear understanding of the IL goal achievement process.
- In 11 ILPs, services such as I&R and peer counseling were listed as goals rather than services, indicating the lack of a clear understanding on the part of the IL specialists

regarding the difference between an IL service that the center provides to assist a consumer to achieve an IL goal in a significant life area such as self-empowerment and the actual IL goal.

Recommendation: RSA recommends that ILRC-SF:

- 1.1 review and revise its training, supervision and quality assurance procedures related to case management and CSR documentation; and
- 1.2 develop and use release of consumer information forms that contain permission for use of consumer photographs for center activities and publications.

ILRC-SF Response:

Staff has been instructed to access the following training on line:

http://wiki.ilru.net/index.php?title=Four_Core_Services and to register for and complete the Rapid Course on Consumer Service Records and Documentation at <http://www.ilru.org/html/training/rapidCourses/index.html>

Deadlines will be established for what to complete monthly and follow-up discussion will occur in regular staff meetings.

Technical Assistance: ILRC-SF may use the information in Subpart III, Section B of the 704 report instrument regarding goals in significant life area, and the information in Subpart III, Section A regarding IL services as a training tool to help center staff understand the difference between IL goals that can be developed by the consumer, and the IL services that the center can provide to the consumer to help them achieve those IL goals.

ILRC-SF staff may take the CSR rapid course located at the ILRU website (<http://www.ilru.org/>). This module, the first in a three-part series, is offered by the Independent Living Resource Utilization and covers the CSRs and ILPs, fundamental federal requirements for record keeping and reporting, the importance of CSRs in meeting the reporting requirements for the annual federal 704 Report of services and activities, and useful practices for gathering consumer information, developing ILPs, and maintaining complete and accurate records. The primary audience is front line workers in centers and it is designed to be used in orientation and training for new center staff and as a refresher for existing staff.

The executive director and staff indicated their interest in and intent to participate in any training that will enable them to better comply with CSR documentation and management requirements.

2. Policies and Procedures and Job Descriptions

Observation: RSA made the below observations related to ILRC-SF's policies and procedures and job descriptions.

- The organizational chart and staff interviews indicated that the Development and Communications Director supervises six program staff. These duties are not listed in her job description. Further discussions with the executive director indicated that she is responsible for the determination and promotional process for staff to management

positions without having established criteria, policies or procedures for promotions or job reassignments. Several job descriptions in personnel files were not current.

- ILRC-SF has a policy to allow current employees to apply for job openings at the CIL before announcements are made to recruit externally. However, several staff has been reassigned to other job positions or assigned additional duties rather than being provided the opportunity to apply to fill job openings when those occur.
- ILRC-SF has a records retention policy to keep personnel actions in personnel files for set periods of time. However, based on interviews with the board, the review team found that not all personnel actions had been retained in the file.
- ILRC-SF has a policy to conduct annual evaluations for all levels of staff. However, documentation in personnel files indicated that this policy was last implemented in August, 2010. Staff reported that some recent evaluations had occurred but these were not documented.
- Neither ILRC-SF accounting policies nor personnel policies provide guidelines to employees on what information is required in their time and attendance sheets. RSA observed that CIL employees included hours worked but not activities conducted during those hours in their time and attendance sheets.
- ILRC-SF has travel policies for staff but not for board members.

Recommendation: RSA recommends that ILRC-SF:

- 2.1 review and revise job descriptions to reflect actual job duties, and consider placing in personnel files statements signed and dated by staff indicating they have received their job description and understand their job duties;
- 2.2 consider developing and implementing criteria used to assess staff promotions and reassignments, and consistently implement all personnel policies and procedures including the hiring policies and record retention policies on personnel action for all levels of staff;
- 2.3 maintain written (signed and dated) documentation in each personnel file as evidence that the center implements its annual staff evaluation policy;
- 2.4 revise personnel policies to include specific information required for completing timesheets such as due dates, time allocations and time spent on each activity to provide clear guidance;
- 2.5 develop and implement a written policy and procedures regarding board member travel (The center may also use the federal travel policies and procedures outlined in OMB Circular A-122, Item 56, regarding travel costs for trustees and directors.);
- 2.6 review all policies and procedures for adequacy and sufficiency of specific guidelines and revise those that lack specificity, including those identified in the observation; and
- 2.7 provide board, management and staff training to ensure that all procedures are consistently followed.

ILRC-SF Response:

The staff of ILRC-SF belongs to a Union, and as such items 2.1 through 2.4 of these processes must be developed in collaboration with the Union. Following the completion of agreed upon changes to job descriptions, policies and procedures, ILRC-SF will provide training to

management and staff regarding the new procedures so that they are consistently followed. These discussions are currently in progress between Management, the Union, and the Shop Steward.

The written policy and procedures for travel reimbursement have been expanded to address travel for members of the Board, and are based on the federal travel policies and procedures outlined in OMB Circular A-122, Item 56 regarding travel costs for trustees and directors. Board members have received a copy of the new policy and procedure. This change will be incorporated into our upcoming Board Training curriculum, to assure consistent follow up.

Technical Assistance: ILRC-SF may consider the below technical assistance in addressing the observations regarding policies and procedures and job descriptions.

- Establishing a procedure for promoting staff or reassignment of job duties provides a basis for rewarding qualified hard working staff, serves as an incentive to other staff to work hard and is a good administrative practice.
- Maintaining personnel files that contain current job descriptions and are up to date provides clear understanding to staff regarding what is expected of them.

VI. FINDINGS AND CORRECTIVE ACTIONS

RSA identified the compliance findings below. Within 30 days of receipt of the final report, ILRC-SF must submit a corrective action plan (CAP) to RSA for review and approval. The CAP should include: (1) the specific corrective actions that the CIL will undertake in response to each finding; (2) the methodology that the CIL will utilize to evaluate if each corrective action has been effective; and (3) the timetable for the implementation and evaluation of the corrective action.

RSA reserves the right to pursue enforcement action related to these findings as it deems appropriate, including the recovery of funds, draw down restrictions, funds withholding, or grant terminations, pursuant to 34 CFR 74.60 and 34 CFR 74.62 of the Education Department General Administrative Regulations (EDGAR).

Finding 1: CIL Work Plan

Legal Requirement:

34 CFR 366.50(d) To be eligible for assistance under this part, an eligible agency shall provide satisfactory assurances that—

... The applicant will establish clear priorities through—

- (1) Annual and three-year program and financial planning objectives for the center, including overall goals or a mission for the center;
- (2) A work plan for achieving the goals or mission, specific objectives, service priorities, and types of services to be provided; and
- (3) A description that demonstrates how the proposed activities of the applicant are consistent with the most recent three-year State Plan under section 704 of the Act;

Finding: ILRC-SF is required to develop a three-year work plan that meets the requirements in 34 CFR 366.50(d). ILRC-SF does not have a three-year program and financial plan in place. The center provided a copy of a draft work plan during the on-site review but the document does not meet the requirements outlined in 34 CFR 366.50(d). The draft work plan does not include specific objectives; the goals included are not measurable; and the work plan does not include strategies/action steps, responsible parties and timelines for achieving each goal, or the evaluation/method to measure goal performance. In addition, the work plan does not include plans for training governing board members, employees, volunteers, and consumers. Staff indicated that they have received varying amounts of on-the-job training and some personnel evaluations contain brief training assessments but there is no established program to regularly assess and document staff training needs or develop and execute plans for meeting those needs. Therefore, ILRC-SF is not in compliance with the requirements of 34 CFR 366.50(d) because it does not have a three-year program and financial plan that meets federal requirements.

Corrective Action: ILRC-SF must take corrective action to develop a three-year program and financial plan that meets the requirements of 34 CFR 366.50(d).

ILRC-SF Response:

ILRC-SF will develop a three-year program and financial plan meeting the requirements of 34 CFR 366.50(d). The board of directors is planning a board retreat to address the planning framework from a strategic standpoint. This will be completed by July, 2013. Following the retreat the Executive Director will work with staff to complete a financial and program plan flowing out of the Mission and Goals established by the board.

Technical Assistance: In implementing the corrective actions, RSA encourages ILRC-SF to use data from its 704 Part II reports and the goals/objectives and priority services outlined in the state plan for independent living to develop a three-year program and financial annual work plan that includes measurable goals and objectives, strategies/action steps, responsible parties and timelines for achieving each goal and objective, and the evaluation/method to measure goal performance. The center's work plan should include plans for training governing board members, employees, volunteers and consumers. The center should involve staff and consumers in the work plan development process and solicit their input.

Finding 2: Staff and Board Development

Legal Requirement:

34 CFR 364.24: The State plan must assure that the service provider establishes and maintains a program of staff development for all classes of positions involved in providing IL services and, if appropriate, in administering the CIL program. The staff development program must emphasize improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy.

34 CFR 366.50(l) - To be eligible for assistance under this part, an eligible agency shall provide satisfactory assurances that—

(l) Staff at centers will receive training on how to serve unserved and underserved populations, including minority groups and urban and rural populations.

Finding: ILRC-SF is required to establish and maintain a program of staff development for all classes of positions involved in providing IL services, consistent with regulations at 34 CFR 364.24, and provide staff training on how to serve unserved and underserved populations, including minority groups and urban and rural populations, consistent with regulations at 34 CFR 366.50(1). ILRC-SF hires personnel who are specialists in the provision, development, support, and delivery of IL services. However, the center has not developed a plan for staff and board training and development that ties into its three-year work plan. In addition, members of the center's governing board have not received any formal training to help them in the performance of their oversight and other responsibilities. Finally, the executive director indicated that she has not received any formal training to prepare or assist her in performing her job duties. Therefore, ILRC-SF is not in compliance with the requirements of 34 CFR 364.24 and 34 CFR 364.50(1) because it does not have a plan for staff and board training and development.

Corrective Action: ILRC-SF must take the necessary steps to develop and implement a staff and board training and development plan consistent with the requirements in 34 CFR 364.24 and 34 CFR 364.50(1).

ILRC-SF Response:

ILRC-SF will develop a staff and board training plan so that both receive regular and on-going training consistent with the requirements in 34 CFR 364.24 and 34 CFR 364.50(1). The plan will address a wide range of topics to be included in regular or special meetings as a training component. Staff and board will also be directed to on-line resources for training.

Technical Assistance: ILRC-SF board and staff should develop a training plan for the governing board, executive director and staff. The plan should include training on such topics as CIL board roles and responsibilities, nonprofit governance, IL philosophy and history, program development and evaluation, as well as fundraising and resource development. Formal training would help the CIL avoid occurrences such as the one in which a board member was pursuing employment at the CIL while still on the governing board, improve administrative and management capabilities of the executive staff, and prevent situations such as those described in the observation regarding policies and procedures.

As part of its training and development process, RSA has made a referral for the center board and executive director to the training and technical assistance resources offered by the Independent Living and Resource Utilization and IL-NET.

Finding 3: Purchasing Procedures

Legal Requirement:

EDGAR section 74.44 Procurement procedures:

(a) All recipients shall establish written procurement procedures.

These procedures must provide for, at a minimum, that--

- (1) Recipients avoid purchasing unnecessary items;
- (2) Where appropriate, an analysis is made of lease and purchase alternatives to determine which would be the most economical and practical procurement for the Federal Government; or

- (3) Solicitations for goods and services provide for all of the following:
- (i) A clear and accurate description of the technical requirements for the material, product, or service to be procured. In competitive procurements, a description shall not contain features which unduly restrict competition.
 - (ii) Requirements which the bidder/offeror must fulfill and all other factors to be used in evaluating bids or proposals.
 - (iii) A description, whenever practicable, of technical requirements in terms of functions to be performed or performance required, including the range of acceptable characteristics or minimum acceptable standards.
 - (iv) The specific features of brand name or equal descriptions that bidders are required to meet when these items are included in the solicitation.
 - (v) The acceptance, to the extent practicable and economically feasible, of products and services dimensioned in the metric system of measurement.
 - (vi) Preference, to the extent practicable and economically feasible, for products and services that conserve natural resources and protect the environment, and are energy efficient.
- (b) Positive efforts shall be made by recipients to utilize small businesses, minority-owned firms, and women's business enterprises, whenever possible. Recipients of Federal awards shall take all of the following steps to further this goal:
- (1) Ensure that small businesses, minority-owned firms, and women's business enterprises are used to the fullest extent practicable.
 - (2) Make information on forthcoming opportunities available and arrange time frames for purchases and contracts to encourage and facilitate participation by small businesses, minority-owned firms, and women's business enterprises.
 - (3) Consider in the contract process whether firms competing for larger contracts intend to subcontract with small businesses, minority-owned firms, and women's business enterprises.
 - (4) Encourage contracting with consortiums of small businesses, minority-owned firms and women's business enterprises when a contract is too large for one of these firms to handle individually.
 - (5) Use the services and assistance, as appropriate, of organizations such as the Small Business Administration and the Department of Commerce's Minority Business Development Agency in the solicitation and utilization of small businesses, minority-owned firms and women's business enterprises.
- (c) The type of procuring instruments used (e.g., fixed price contracts, cost reimbursable contracts, purchase orders, and incentive contracts) shall be determined by the recipient but must be appropriate for the particular procurement and for promoting the best interest of the program or project involved. The "cost-plus-a-percentage-of-cost" or "percentage of construction cost" methods of contracting must not be used.
- (d) Contracts are made only with responsible contractors who possess the potential ability to perform successfully under the terms and conditions of the proposed procurement. Consideration is given to matters as contractor integrity, record of past performance, financial and technical resources or accessibility to other necessary resources. In certain circumstances, contracts with certain parties are restricted by E.O. 12549 (implemented by the Secretary in 34 CFR Part 85) and E.O. 12689--Debarment and Suspension.

- (e) Recipients shall, on request, make available for the Secretary, pre-award review and procurement documents, such as request for proposals or invitations for bids, independent cost estimates, etc., when any of the following conditions apply:
- (1) A recipient's procurement procedures or operation fails to comply with the procurement standards in this part.
 - (2) The procurement is expected to exceed the small purchase threshold fixed at 41 U.S.C. 403 (11) (currently \$25,000) and is to be awarded without competition or only one bid or offer is received in response to a solicitation.
 - (3) The procurement, which is expected to exceed the small purchase threshold, specifies a brand name" product.
 - (4) The proposed award over the small purchase threshold is to be awarded to other than the apparent low bidder under a sealed bid procurement.
 - (5) A proposed contract modification changes the scope of a contract or increases the contract amount by more than the amount of the small purchase threshold.

Finding: ILRC-SF must establish purchasing policies and procedures consistent with regulations at 34 CFR 74.44. The center does not have established written purchasing policies and procedures. As a result, the center has not implemented the required purchasing requirements including: written contract award and administration code of conduct; open and free competitions; cost and price analysis; records and files; and contractor conformance/performance. There is no separation of responsibility for the authorization for purchasing and the subsequent payment. Additionally, the center's purchasing practices are not consistent with its purchasing policies. For example, in practice, the executive director approves all items for purchases regardless of the amount, although the center's accounting policy states that the executive director approves all purchases over \$500. Therefore, ILRC-SF is not in compliance with the procurement requirements in EDGAR 74.44(a)-(e) because it does not have written purchasing policies and procedures.

Corrective Action: ILRC-SF must develop and implement written purchasing policies and procedures consistent with EDGAR requirements at Part 74.44(a)-(e) regarding the review and approval of its board of directors to ensure that the center complies with all federal requirements for making purchases using federal funds.

ILRC-SF Response:

ILRC-SF will assure that the written purchasing policies and procedures consistent with EDGAR requirements at Part 74.44(a)-(e) are developed, reviewed and approved by the board of directors, and implemented to ensure that the center complies with all federal requirements for making purchases using federal funds. A first draft of the purchasing policies and procedures are attached for your review.

Finding 4: Property Procedures

Legal Requirement:

EDGAR Sections 74.31 through 74.37: Establish uniform standards governing management and disposition of property furnished by ED whose cost was charged to a project supported by a

Federal award. Recipients shall observe these standards under awards. The Secretary does not impose additional requirements, unless specifically required by Federal statute. The recipient may use its own property management standards and procedures provided it observes the provisions of Sec. Sec. 74.31 through 74.37.

Finding: ILRC-SF is required to have property procedures consistent with EDGAR Parts 74.31-74.37. The center has a written property policy but the policy does not address disposition of property as required in EDGAR 74.34(g). ILRC-SF is not in compliance with the requirements of EDGAR Sections 74.31 through 74.37 because its property policy does not address federally established uniform standards governing disposition of property furnished by ED whose cost was charged to a project supported by a federal award.

Corrective Action: ILRC-SF must take the necessary steps to ensure that its property policy addresses all federally established uniform standards governing disposition of property furnished by ED whose cost was charged to a project supported by a federal award in accordance with EDGAR sections 74.31 through 74.37. The corrective action must include a review and revision of the applicable written policies as well as the corresponding staff and board training.

ILRC-SF Response:

ILRC-SF will assure that uniform standards governing the disposition of property furnished by federal funds will be handled in accordance with EDGAR requirements at Part 74.31 through 74.37. A first draft of the purchasing policies and procedures are attached for your review.