

CSEC STAFF REPORT

SUBJECT:

Update on Compliance Program and Monitoring Activities

DATE: October 6, 2000

ASSIGNED STAFF: Kelli Merriweather

BACKGROUND:

In response to recent legislation and revisions to Chapter 771 of the Health and Safety Code enacted by the 76th Texas Legislature, and pursuant to the State Auditor's Report on the Statewide 9-1-1 System (July 1998), the CSEC has established a formal monitoring program in relation to the participating Regional Planning Councils (RPCs) and the provisioning and funding of 9-1-1 and related services. In October 1999, the Commission adopted Rule 251.11, *Monitoring Policies and Procedures*, and published the 9-1-1 Program Compliance Guidelines to provide structure and formalize monitoring activities. Between November 15, 1999 and July 13, 2000, sixteen (16) of the twenty-four (24) RPCs had been reviewed under these policies and procedures. At the July 2000 Commission meeting, staff reported findings for fourteen (14) of these RPCs, and received direction from the Commission regarding the presentation and review of future monitoring reports and findings. The Commission directed staff to present monitoring reports to the board after the individual reports had been communicated to the RPC, and the RPC had provided an official management response to staff. Commission members also requested a streamlined and succinct reporting format for these presentations.

STATUS:

Monitoring reports and management responses for the following RPCs are provided as attachment to this report: North Central Texas Council of Governments (NCTCOG), Brazos Valley Council of Governments (BVCOG), Heart of Texas Council of Governments (HOTCOG), and Lower Rio Grande Valley Development Council (LRGVDC).

Monitoring activities are conducted according to rule and written guidelines to determine the RPC's compliance with CSEC rules and policies, and their effectiveness in administering 9-1-1 services in the regions. Staff has also created a companion document entitled Compliance Assessment Criteria (CAC). This document is based upon on review of the information gathered through the questions in the compliance

guidelines. Compliance findings are objectively assessed then weighed according to criteria established by CSEC in order to determine a risk score and commensurate need for follow up activity. The chart below provides more specific information on the individual RPCs included in this staff report. Monitoring summaries and CAC ratings are provided later in this report for your information.

RPC	CAC Risk Factor
NCTCOG	Moderate
BVCOG	Low
HOTCOG	Low
LRGVDC	Low
Maximum (CAC score = 0 – 18 points)	Monthly Follow Up
High (CAC score = 19 – 23 points)	Quarterly Follow Up
Moderate (CAC score = 24 – 27 points)	Semi-Annual Follow Up
Low (CAC score = 28 – 31 points)	Annual Monitoring

Proposed Monitoring Schedule

The following regional planning councils were notified earlier this year that the original dates for monitoring activities within their regions had been temporarily postponed until further notice. CSEC proposes the following dates to complete the initial round of compliance reviews to include all twenty-four (24) RPCs. Staff is working with the RPCs to schedule the reviews as follows.

RPC	Proposed Monitoring Activities
MRGDC	Week of October 9, 2000
WCTCOG	Week of October 16, 2000
GCRPC	Week of October 23, 2000
STDC	Week of November 6, 2000
ARKTEX	Week of November 13, 2000
HGAC	Week of December 4, 2000
SETRPC	Week of December 4, 2000
TEXOMA	Week of December 11, 2000

RECOMMENDATION:

This is an informational item that does not require Commission action at this time. Staff will continue to present monitoring reports and responses as they are completed.

COMPLIANCE ASSESSMENT CRITERIA (CAC)

Council of Government Being Monitored

Compliance Specialist

North Central Texas Council of Government

Laquetta Mills, Patsy Greiner & Roel Garcia

Date Monitored:
5/9-11/00

Date of Report
5/30/00

Activity	Weight	x	% of Points	=	Risk Score
Program Administration					
1 Regional Strategic Plans	5		88%		4.42
2 Changing Service Arrangements	N/A*		N/A*		N/A*
3 Addressing & Addressing Maintenance	5		78%		3.89
4 Use of Equipment & Replacement	4		56%		2.24
5 Strategic Plan Amendments & Surcharge	3		100%		3.00
6 Integration/Accessibility	3		88%		2.63
Fiscal Administration					
1 Administrative Planning & Reporting	2		29%		0.57
2 Contracts & Interlocal Agreements	2		91%		1.83
3 Procurement	3		78%		2.33
4 Wireless Implementation & Maintenance	N/A*		N/A*		N/A*
5 Local Monitoring	4		83%		3.33
Totals	31		63%		24.24

x	Degree of Risk**	Score	Level of Monitoring Required**
	Maximum Risk	0-18	Requires Maximum Monitoring and Supervision
	High Risk	19-23	Requires Close Monitoring
X	Moderate Risk	24-27	Requires Review and Interview
	Low Risk	28-31	Requires Little or No Assistance and Monitoring

Based on categorical scoring, the following strengths & weaknesses were recognized:

Strengths

- Strategic Plan Amendments & Surcharge
- Contracts & Interlocal Agreements
- Regional Strategic Plans

Weaknesses

- Administrative Planning & Reporting
- Use of Equipment & Replacement

* Weight adjustments were incorporated in order to reflect the total possible score, based on sections that were applicable.

** An explanation of the Risk and Level of Monitoring required is provided on the attached sheet

Explanation of Risk and Level of Monitoring Required

Wireless Implementation will not be scored until such a time as wireless service contracts have been implemented.

- Maximum Risk** - If a Council of Government scores between 0 and 18 points, it will be categorized as a maximum risk; requiring monthly follow-up consisting of either site visits and/or correspondence.
- High Risk** - If a Council of Government scores between 19 and 23 points, it will be categorized as a high risk; requiring quarterly follow-up, consisting of either site visits and/or correspondence.
- Moderate Risk** - If a Council of Government scores between 24 and 27 points, it will be categorized as a moderate risk; requiring semi-annual follow-up, consisting of either site visits and/or correspondence.
- Low Risk** - If a Council of Government scores 28 points to a maximum of 31 points, it will be categorized as a low risk; requiring little or no assistance with compliance activities. Only annual monitoring visits will be scheduled unless future scores cause changes in risk patterns.

COMMISSION ON STATE EMERGENCY COMMUNICATIONS
 Austin, Texas
 Compliance Report – North Central Texas Council of Governments
 Review of Fiscal Year 1999

Dates of Visit/ Report/ Response	Program	Findings/Recommendations	Status (Implemented, Partially Implemented, Action Delayed, No Action Taken)	Fiscal Impact/Other Impact
5/9/00 – Visit 6/26/00 – Report	Regional Strategic Plans and Amendments	<p>Findings NCTCOG has not submitted amendments to correct discrepancies on addressing reports and financial status reports dating back to 2nd quarter FY 1999. Notification amendments to shift funds among line items on addressing cost estimate worksheets have not been submitted. CSEC has not received amendment or addressing reports to match expenditures shown on county level worksheet for FY 1999, 2nd or 4th quarters. NCTCOG Strategic Plan wireless component requires tandem routing and centralized database.</p> <p>Recommendation CSEC recommends the elimination of direct trunks and on-site HP database at Sache PD. An amendment should be submitted by 7/31/00 to correct line item overruns on addressing cost estimate worksheets. On or before 8/11/00, NCTCOG needs to designate a 9-1-1 financial staff contact.</p>		To ensure compliance with the Strategic Plan.
8/9/00 – Response		<p>Response NCTCOG concurs with the recommendations and has submitted a request to GTE for a contract for tandem routing services for the PSAP at Sache PD. Upon tandem implementation, Sache PD will convert to the SCC database. CSEC is in receipt of an amendment correcting addressing line item overruns. NCTCOG designated Molly Rendon as financial staff person responsible for 9-1-1.</p>	Partially Implemented	
5/9/00 – Visit	Changing Service Arrangements	<p>Findings Rule 251.2 requires any agreement with a service provider to change or extend 9-1-1 service to be contingent upon final approval of a regional strategic plan amendment. NCTCOG converted to the SCC database platform, constituting a change in their service arrangement. No amendment was submitted to reflect this change.</p>		To ensure compliance with the CSEC rules.

COMMISSION ON STATE EMERGENCY COMMUNICATIONS
 Austin, Texas
 Compliance Report – North Central Texas Council of Governments
 Review of Fiscal Year 1999

Dates of Visit/ Report/ Response	Program	Findings/Recommendations	Status (Implemented, Partially Implemented, Action Delayed, No Action Taken)	Fiscal Impact/Other Impact
6/26/00 – Report		<p>Recommendation CSEC requires an amendment be submitted to update the NCTCOG network database to reflect the SCC conversion.</p>		
8/9/00 – Response		<p>NCTCOG Response NCTCOG concurs with the recommendation and on 7/31/00 submitted an amendment for the SCC database service provider change.</p>	Implemented	
5/9/00 – Visit	Inventory and Capital Recovery Plan	<p>Findings Rule 251.5 requires a complete inventory of all equipment purchased with 9-1-1 funds together with a comprehensive Capital Asset Recovery Schedule. NCTCOG did not have an inventory, and their capital asset recovery schedule was incomplete.</p>		To ensure compliance with the CSEC rules.
6/26/00 – Report		<p>Recommendation CSEC requires an inventory to be submitted no later than July 31, 2000 as well as a revised capital recovery schedule on or before August 11, 2000. CSEC recommends training for NCTCOG financial staff regarding 9-1-1 reporting and record retention.</p>		
8/9/00 – Response		<p>NCTCOG Response NCTCOG concurs with the recommendation and on 7/31/00 provided CSEC with an inventory. To date, CSEC has not received the revised capital asset recovery schedule. CSEC staff has tentatively scheduled training with NCTCOG financial staff for November 2, 2000.</p>	Partially Implemented	
5/9/00 – Visit	Contracts and Interlocal Agreements	<p>Findings Rule 251.5 requires interlocal agreements delineating ownership of equipment purchased with 9-1-1 funds. There was no delineation of equipment ownership in the NCTCOG interlocal agreements. Rule 251.12 requires a contract administration system. There was no documented contract administration system in use at NCTCOG.</p>		To ensure compliance with the CSEC rules.
6/26/00 – Report		<p>Recommendation CSEC requires supplements to the interlocal agreements designating ownership of 9-1-1 equipment be executed. In addition, CSEC requires implementation of a contract administration system for NCTCOG contracts for products or services.</p>		

COMMISSION ON STATE EMERGENCY COMMUNICATIONS
 Austin, Texas
 Compliance Report – North Central Texas Council of Governments
 Review of Fiscal Year 1999

Dates of Visit/ Report/ Response	Program	Findings/Recommendations	Status (Implemented, Partially Implemented, Action Delayed, No Action Taken)	Fiscal Impact/Other Impact
/9/00 - Response		NCTCOG Response NCTCOG concurs with the recommendation and on 8/10/00 submitted both the supplements and the contract administration system.	Implemented	
5/9/00 – Visit	Procurement	Findings Rule 251.8(1) requires a comprehensive code of ethics be included in the NCTCOG procurement policy. The NCTCOG policy lacked one of the required sections of the code of ethics.		To ensure compliance with the CSEC rules.
6/26/00 – Report		Recommendation CSEC recommends the missing section of the code of ethics be included in the NCTCOG procurement policy.		
8/9/00 – Response		NCTCOG Response NCTCOG concurs with the recommendation and on 8/10/00 submitted the revised procurement policy amending Section 3 as executed by their Board.	Implemented	
5/9/00 – Visit	Addressing and Addressing Maintenance	Findings Rule 251.3 requires county addressing status reports to measure the completion of the project. CSEC requested completed report forms for each county. Completed forms had not been submitted for all NCTCOG counties. Rule 251.9 requires counties in addressing maintenance to submit an amendment, plan, and budget. County level plans had not been submitted for all counties in the maintenance phase of addressing.		To ensure compliance with the CSEC rules.
6/26/00 – Report		Recommendation CSEC requires addressing status reports for Palo Pinto and Wise Counties. CSEC further requires the county level plans for all other counties currently in the addressing maintenance phase.		
8/9/00 - Response		NCTCOG Response NCTCOG concurs with the recommendation and on 5/29/00 submitted the status reports for Palo Pinto and Wise Counties. County level addressing maintenance plans were submitted for the balance of the counties on 8/10/00.	Implemented	

COMMISSION ON STATE EMERGENCY COMMUNICATIONS
 Austin, Texas
 Compliance Report – North Central Texas Council of Governments
 Review of Fiscal Year 1999

Dates of Visit/ Report/ Response	Program	Findings/Recommendations	Status (Implemented, Partially Implemented, Action Delayed, No Action Taken)	Fiscal Impact/Other Impact
<p>5/9/00 – Visit</p> <p>6/26/00 – Report</p> <p>8/9/00 – Response</p>	<p>Public Safety Answering Points</p>	<p>Findings Rule 251.7 defines software eligible for integration on 9-1-1 customer premise equipment (CPE). CSEC staff observed ineligible applications of Internet Explorer on CPE in the NCTCOG region.</p> <p>Recommendation CSEC requires all ineligible software applications be removed from existing operating systems. CSEC further recommends adoption of standard operating procedures and a PSAP monitoring item on the existing checklist to guard against future ineligible integrations.</p> <p>NCTCOG Response NCTCOG concurs with the recommendation and reminded telephone company providers about Rule 251.7 at the 8/1/00 telco meeting held in their region. NCTCOG further requested the telco technicians check this regularly. NCTCOG reported on 8/10/00 that NCTCOG staff will also check for ineligible integrations during regular monitoring visits, including a spreadsheet in the performance report for the 1st quarter of FY 2001 designating the status of each PSAP. NCTCOG stated that the "Security" section of the interlocal agreements addresses this issue and formal operating procedures for PSAPs were not required.</p>	<p>Implemented</p>	<p>To ensure compliance with the CSEC rules.</p>

COMPLIANCE ASSESSMENT CRITERIA (CAC)

Council of Government Being Monitored
Brazos Valley Council of Governments

Compliance Specialist
 Laquetta Mills, Patsy Greiner & Roel Garcia

Date Monitored:
 5/16-17/2000

Date of Report
 5/22/00

Activity	Weight	x	% of Points	=	Risk Score
Program Administration					
1 Regional Strategic Plans	5		100%		5.00
2 Changing Service Arrangements	3		100%		3.00
3 Addressing & Addressing Maintenance	5		100%		5.00
4 Use of Equipment & Replacement	4		100%		4.00
5 Strategic Plan Amendments & Surcharge	3		100%		3.00
6 Integration/Accessibility	3		100%		3.00
Fiscal Administration					
1 Administrative Planning & Reporting	2		100%		2.00
2 Contracts & Interlocal Agreements	2		100%		2.00
3 Procurement	3		100%		3.00
4 Wireless Implementation & Maintenance	N/A*		N/A		N/A
5 Local Monitoring	4		100%		4.00
Totals	34		100%		34.00

x	Degree of Risk**	Score	Level of Monitoring Required**
	Maximum Risk	0-18	Requires Maximum Monitoring and Supervision
	High Risk	19-23	Requires Close Monitoring
	Moderate Risk	24-29	Requires Review and Interview
X	Low Risk	30-34	Requires Little or No Assistance and Monitoring

Based on categorical scoring, the following strengths & weaknesses were recognized:

Strengths

- Excellent organization
- Contracts and Interlocals complete
- Strong overall management of E9-1-1 Program

Weaknesses

- None
-
-

* Weight adjustments were incorporated in order to reflect the total possible score, based on sections that were applicable.

** An explanation of the Risk and Level of Monitoring required is provided on the attached sheet

Commission on State Emergency Communications
 Austin, Texas
 Compliance Report – Brazos Valley Council of Governments
 Review of Fiscal Year 1999

Compliance Findings/Recommendations/Response

Dates of Visit/ Report/ Response	Program	Findings/Recommendations	Status (Implemented, Partially Implemented, Action Delayed, No Action Taken)	Fiscal Impact/Other Impact
5/16/00 – Visit 6/26/00 – Report 8/7/00 – Response	Changing Service Arrangements	<p>Findings Rule 251.2 requires any agreement with a service provider to change or extend 9-1-1 service to be contingent upon final approval of a regional strategic plan amendment. BVCOG converted to the SCC database platform, constituting a change in service arrangement. No amendment was submitted to reflect this change.</p> <p>Recommendation CSEC requires an amendment be submitted to update the BVCOG network database to reflect the SCC conversion.</p> <p>BVCOG Response BVCOG concurs with the recommendation and on 7/20/00 submitted an amendment for the SCC database change.</p>	Implemented	To ensure compliance with the CSEC rules.
5/16/00 – Visit 6/26/00 – Report 8/7/00 – Response	Contracts and Interlocal Agreements	<p>Findings Rule 251.5 requires interlocal agreements delineating ownership of equipment purchased with 9-1-1 funds. It further requires the designated owner to safeguard the equipment. There was no capital asset management system in place at BVCOG to ensure adequate safeguards to prevent loss, damage, or theft of the equipment.</p> <p>Recommendation CSEC recommends BVCOG obtain an agreement from the PSAPs regarding insurance coverage of ancillary equipment as ownership of this equipment has been transferred to the local agencies.</p> <p>BVCOG Response BVCOG concurs with the recommendation and on 8/7/00 provided CSEC with copies of letters submitted to the PSAPs requesting documentation of property and casualty insurance on the inventoried 9-1-1 equipment.</p>	Implemented	To ensure compliance with the CSEC rules.

COMPLIANCE ASSESSMENT CRITERIA (CAC)

Council of Government Being Monitored
Heart of Texas Council of Governments

Compliance Specialist
 Laquetta Mills, Patsy Greiner & Roel Garcia

Date Monitored:
 5/18-19/2000

Date of Report
 5/23/00

Activity	Weight	x	% of Points	=	Risk Score
Program Administration					
1 Regional Strategic Plans	5		96%		4.80
2 Changing Service Arrangements	3		100%		3.00
3 Addressing & Addressing Maintenance	5		96%		4.81
4 Use of Equipment & Replacement	4		83%		3.33
5 Strategic Plan Amendments & Surcharge	3		100%		3.00
6 Integration/Accessibility	3		100%		3.00
Fiscal Administration					
1 Administrative Planning & Reporting	2		100%		2.00
2 Contracts & Interlocal Agreements	2		100%		2.00
3 Procurement	3		100%		3.00
4 Wireless Implementation & Maintenance	N/A*		N/A		N/A
5 Local Monitoring	4		100%		4.00
Totals	34		98%		32.94

x	Degree of Risk**	Score	Level of Monitoring Required**
	Maximum Risk	0-18	Requires Maximum Monitoring and Supervision
	High Risk	19-23	Requires Close Monitoring
	Moderate Risk	24-29	Requires Review and Interview
X	Low Risk	30-34	Requires Little or No Assistance and Monitoring

Based on categorical scoring, the following strengths & weaknesses were recognized:

Strengths

- Communication is strong within RPC
- Organization and documentation
-

Weaknesses

-
-
-

* Weight adjustments were incorporated in order to reflect the total possible score, based on sections that were applicable.

** An explanation of the Risk and Level of Monitoring required is provided on the attached sheet

COMMISSION ON STATE EMERGENCY COMMUNICATIONS
 Austin, Texas
 Compliance Report – Heart of Texas Council of Governments
 Review of Fiscal Year 1999

Compliance Findings/Recommendations/Response

Dates of Visit/ Report/ Response	Program	Findings/Recommendations	Status (Implemented, Partially Implemented, Action Delayed, No Action Taken)	Fiscal Impact/Other Impact
<p>5/18/00 – Visit</p> <p>6/29/00 – Report</p> <p>7/26/00 – Response</p>	<p>Changing Service Arrangements</p>	<p>Findings Rule 251.2 requires any agreement with a service provider to change or extend 9-1-1 service to be contingent upon final approval of a regional strategic plan amendment. HOTCOG converted to the SCC database platform and implemented selective routing, constituting changes in their service arrangements. No amendments were submitted to reflect these changes.</p> <p>Recommendation CSEC requires an amendment be submitted to update the HOTCOG network database to reflect the SCC conversion and selective routing implementation.</p> <p>HOTCOG Response HOTCOG concurs with the recommendation and on 7/26/00 submitted an amendment for the SCC database service provider change and selective routing implementation.</p>	<p>Implemented</p>	<p>To ensure compliance with the CSEC rules.</p>
<p>5/18/00 – Visit</p> <p>6/29/00 – Report</p>	<p>Contracts and Interlocal Agreements</p>	<p>Findings Rule 251.5 requires interlocal agreements delineating ownership of equipment purchased with 9-1-1 funds. It further requires the designated owner to safeguard the equipment. There was no delineation of equipment ownership nor was there a capital asset management system in place at HOTCOG to ensure adequate safeguards to prevent loss, damage, or theft of the equipment. The contract between CSEC and HOTCOG requires a contract administration system. HOTCOG's system does not incorporate vendor contracts.</p> <p>Recommendation CSEC requires supplements to the interlocal agreements designating ownership of 9-1-1 equipment. CSEC recommends that all PSAP equipment be included on HOTCOG's insurance policy. In addition, CSEC recommends vendor contracts be included on the HOTCOG contract administration system.</p>		<p>To ensure compliance with the CSEC rules.</p>

Dates of Visit/ Report/ Response	Program	Findings/Recommendations	Status (Implemented, Partially Implemented, Action Delayed, No Action Taken)	Fiscal Impact/Other Impact
7/26/00 – Response	Contracts and Interlocal Agreements (continued)	<p>HOTCOG Response HOTCOG concurs with the recommendation and on 7/26/00 provided CSEC with a revised version of the interlocal agreement clearly defining ownership of 9-1-1 equipment. Inventory listings of all PSAP equipment were sent to the Texas Municipal League for inclusion on HOTCOG's insurance policy. Also, on 7/26/00, HOTCOG provided contract administration documents that incorporated equipment maintenance provided by vendors.</p>	Implemented	
5/18/00 – Visit	Addressing and Addressing Maintenance	<p>Findings CSEC reviewed HOTCOG addressing status reports indicating all county addressing projects were complete. CSEC determined that Bosque County notification to residents is pending postal service dual notification.</p>		To ensure compliance with the CSEC rules and status of addressing as reported by HOTCOG.
6/29/00 – Report		<p>Recommendation CSEC recommends that HOTCOG pursue notifying residents in Bosque County of their 9-1-1 addresses independently of the postal service.</p>		
7/26/00 – Response		<p>HOTCOG Response HOTCOG concurs with the recommendation and will assist Bosque County with citizen notification with a target completion date of 9/30/00.</p>	In process of Implementing	

COMPLIANCE ASSESSMENT CRITERIA (CAC)

Council of Government Being Monitored
**Lower Rio Grande Valley Development
 Council**

Compliance Specialist

Patsy K. Greiner

Date Monitored:
 June 7-9, 2000

Date of Report
 6/14/00

	Activity	Weight	x	% of Points	=	Risk Score
	Program Administration					
1	Regional Strategic Plans	5		100%		5.00
2	Changing Service Arrangements	N/A*		N/A*		N/A*
3	Addressing & Addressing Maintenance	5		93%		4.67
4	Use of Equipment & Replacement	4		100%		4.00
5	Strategic Plan Amendments & Surcharge	3		80%		2.40
6	Integration/Accessibility	3		100%		3.00
	Fiscal Administration					
1	Administrative Planning & Reporting	2		100%		2.00
2	Contracts & Interlocal Agreements	2		96%		1.91
3	Procurement	3		89%		2.67
4	Wireless Implementation & Maintenance	N/A*		N/A*		N/A*
5	Local Monitoring	4		100%		4.00
	Totals	31		95%		29.65

x	Degree of Risk**	Score	Level of Monitoring Required**
	Maximum Risk	0-18	Requires Maximum Monitoring and Supervision
	High Risk	19-23	Requires Close Monitoring
	Moderate Risk	24-27	Requires Review and Interview
X	Low Risk	28-31	Requires Little or No Assistance and Monitoring

Based on categorical scoring, the following strengths & weaknesses were recognized:

Strengths

- Contract Administration System
- Local monitoring and call statistics
- Public education and training

Weaknesses

- Addressing completion

* Weight adjustments were incorporated in order to reflect the total possible score, based on sections that were applicable.

** An explanation of the Risk and Level of Monitoring required is provided on the attached sheet

COMMISSION ON STATE EMERGENCY COMMUNICATIONS
 Austin, Texas
 Compliance Report – Lower Rio Grande Valley Development Council
 Review of Fiscal Year 1999

Compliance Findings/Recommendations/Response

Dates of Visit/ Report/ Response	Program	Findings/Recommendations	Status (Implemented, Partially Implemented, Action Delayed, No Action Taken)	Fiscal Impact/Other Impact
<p>6/8/00 – Visit</p> <p>7/25/00 – Report</p> <p>8/25/00 – Response</p>	Public Education	<p>Findings LRGVDC provides Public Education services for the Cameron County District. There is no agreement in place for the provision and reimbursement of this service</p> <p>Recommendation CSEC requires the execution of a resolution by the Cameron County District agreeing to reimburse LRGVDC for Public Education materials and services.</p> <p>Response LRGVDC concurs with the recommendation on submitted a resolution adopted by the Cameron County District on 6/28/00 for cooperation action concerning public education materials and activities.</p>	Implemented	To ensure compliance with the Strategic Plan.
<p>6/8/00 – Visit</p> <p>7/25/00 – Report</p> <p>8/25/00 – Response</p>	Accessibility	<p>Findings Rule 251.4 states that the Commission will consider as part of the regional plan, equipment that will improve the effectiveness of 9-1-1 call delivery.</p> <p>Recommendation CSEC recommends the LRGVDC submit an amendment to provide for language line services throughout the region.</p> <p>LRGVDC Response LRGVDC concurs with the recommendation and agrees to submit an amendment to provide for language line services by 9/1/00.</p>	Partially Implemented	To ensure compliance with the CSEC rules.

COMMISSION ON STATE EMERGENCY COMMUNICATIONS
 Austin, Texas
 Compliance Report – Lower Rio Grande Valley Development Council
 Review of Fiscal Year 1999

Dates of Visit/ Report/ Response	Program	Findings/Recommendations	Status (Implemented, Partially Implemented, Action Delayed, No Action Taken)	Fiscal Impact/Other Impact
<p>6/8/00 – Visit</p> <p>7/25/00 – Report</p> <p>8/25/00 – Response</p>	<p>Contracts and Interlocal Agreements</p>	<p>Findings Rule 251.5 requires interlocal agreements delineating ownership of equipment purchased with 9-1-1 funds. There was no delineation of equipment ownership in the LRGVDC interlocal agreements.</p> <p>Recommendation CSEC requires supplements to the interlocal agreements designating ownership of 9-1-1 equipment be executed.</p> <p>LRGVDC Response LRGVDC concurs with the recommendation and agreed to provide executed supplemental interlocal agreement documents to include equipment ownership language to CSEC by 9/30/00.</p>	<p>Implemented</p>	<p>To ensure compliance with the CSEC rules.</p>
<p>6/8/00 – Visit</p> <p>7/25/00 – Report</p> <p>8/25/00 – Response</p>	<p>Addressing and Addressing Maintenance</p>	<p>Findings The County Road and Bridge Act authorizes commissioners courts to adopt uniform standards for naming roads and assigning address numbers. CSEC observed indecision in LRGVDC as to official road names and an addressing scheme. LRGVDC addressing status reports indicate the completion of addressing in the region. CSEC staff observed the need to assign addresses and notify citizens of their 9-1-1 addresses.</p> <p>Recommendation CSEC requires the submission of adopted addressing standards. CSEC further requires the completion of address assignment and citizen notification.</p> <p>LRGVDC Response LRGVDC reported the adoption of address standards. However, the documentation submitted did not delineate the standards to be used for address assignment. On 9/20/00, LRGVDC submitted adopted addressing standards for Hidalgo and Willacy Counties that define address assignment regulations. LRGVDC is in the process of completing address assignment and citizen notification. They propose to be complete by 10/1/00.</p>	<p>Partially Implemented</p>	<p>To ensure compliance with State law, RPC reports, and CSEC rules.</p>

COMMISSION ON STATE EMERGENCY COMMUNICATIONS
 Austin, Texas
 Compliance Report – Lower Rio Grande Valley Development Council
 Review of Fiscal Year 1999

Dates of Visit/ Report/ Response	Program	Findings/Recommendations	Status (Implemented, Partially Implemented, Action Delayed, No Action Taken)	Fiscal Impact/Other Impact
6/8/00 – Visit 7/25/00 – Report 8/25/00 – Response	Procurement	<p>Findings Rule 251.8(1) requires a comprehensive code of ethics be included in the LRGVDC procurement policy. The LRGVDC policy lacked one of the required sections of the code of ethics.</p> <p>Recommendation CSEC recommends the missing section of the code of ethics be included in the LRGVDC procurement policy.</p> <p>LRGVDC Response LRGVDC concurs with the recommendation and on 8/24/00 submitted the revised procurement policy incorporating the code of ethics section.</p>	Implemented	To ensure compliance with the CSEC rules.
6/8/00 – Visit 7/25/00 – Report 8/25/00 – Response	Public Safety Answering Points	<p>Findings Rule 251.7 defines software eligible for integration on 9-1-1 customer premise equipment (CPE). CSEC staff observed ineligible applications of Internet Explorer on CPE in the LGRVDC region.</p> <p>Recommendation CSEC requires all ineligible software applications be removed from existing operating systems. CSEC further recommends adoption of standard operating procedures and a PSAP monitoring item on the existing checklist to guard against future ineligible integrations.</p> <p>LRGVDC Response LRGVDC concurs with the recommendation and provided an inspection report on the removal of ineligible third party software on 8/25/00. LRGVDC also agrees to implement an applicable monitoring program to check the equipment periodically.</p>	Implemented	To ensure compliance with the CSEC rules.