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 9 IN THE UNITED STATES DISTRICT COURT
 10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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 13 **MIKESHA MARTINEZ, by and through**
 14 **her husband and next friend Carlos**
 15 **Martinez, et al.,**

16 Plaintiffs,

17 v.

18 **ARNOLD SCHWARZENEGGER,**
 19 **Governor of the State of California, et al.,**

20 Defendants.

CV 09-2306 CW

**DECLARATION OF EILEEN CARROLL
 RE STATE DEFENDANTS'
 COMPLIANCE WITH COURT ORDER,
 DATED JULY 24, 2009**

Date:
 Time:
 Courtroom:
 Judge The Honorable Claudia Wilken
 Trial Date
 Action Filed: May 26, 2009

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 22 I, Eileen Carroll, declare as follows:

23 1. I am employed by the California Department of Social Services ("CDSS") as the
 24 Chief of the Adult Programs Branch in the Adult Programs Division. In my capacity as Branch
 25 Chief I am responsible for state oversight, policy, regulations, operations, litigation, technical
 26 assistance, legislation, and related matters for all Adult Programs, including the In Home
 27 Supportive Services (IHSS) program, which has a \$5.8 billion annual budget. I am also
 28 responsible for the Adult Protective Services, Supplemental Security Income/State

1 Supplementary Payment, Cash Assistance Program for Immigrants, California Veterans Cash
2 Benefit, among other matters, which collectively have annual budgets of nearly \$10 billion. I
3 have held this post since October of 2007. From October 2004 until I was promoted to my
4 current position, I was Bureau Chief for the Adult Programs Operations and Policy Bureau. I
5 have been at CDSS employed since September 1992, initially in the Office of Child Abuse
6 Prevention in the Children and Family Services Division and later as Project Director for the
7 Redesign of Child Welfare Services. Prior to joining CDSS, I worked for 13 years for the
8 California State Senate as a consultant to various committees and Legislators.

9 2. Within the IHSS program, I supervise three bureaus with over 65 employees,
10 including the Adult Program IHSS Operations and Quality Assurance Bureau, the Adult
11 Programs Policy Bureau, and the Adult Programs Fiscal, Administration and Systems Bureau.
12 The IHSS Program consists of three subprograms (Personal Care Services, IHSS Plus Waiver,
13 and IHSS Residual (IHSS-R)). My staff also oversees all pay-rolling activities (and vendors) for
14 the 376,000 providers in the IHSS Program.

15 3. I submit this declaration in response to this court's Order Further Clarifying
16 Injunction, dated July 24, 2009.

17 4. During the afternoon of July 24th, I met with staff from Electronic Data Systems
18 (EDS), the company that manages the Case Management, Information, and Payrolling System
19 (CMIPS) regarding this court's order that the State ensure that IHSS providers receive the court-
20 ordered "amount owed for the pay period ending July 15, 2009 in a check or checks that issue no
21 later than ten days after the provider submits his or her timesheet for that pay period, or seven
22 business days from the date of this order, whichever is later."

23 5. Through constant communications throughout the weekend of July 25-26 and the
24 week of July 27th, I worked closely with my staff and EDS to determine how many IHSS
25 providers and recipients (some recipients participate in the Advanced Payment part of the IHSS
26 program in which they receive a lump sum and manage their care and payment for their providers
27 themselves) required supplemental checks.

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GENERAL ORDER 45 ATTESTATION

I, Susan M. Carson, am the ECF user whose ID and password are being used to file this request for an order. In compliance with General Order 45, X.B., I hereby attest that declarant Eileen Carroll has concurred in the filing of this document with her electronic signature.

Dated: August 5, 2009

/s/ Susan M. Carson
Susan M. Carson

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