



DEPARTMENT OF
FINANCE

ARNOLD SCHWARZENEGGER, GOVERNOR

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RECEIVED

February 13, 2004

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**COMMISSION ON
STATE MANDATES**

Ms. Paula Higashi
Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814

Dear Ms. Higashi:

The Department of Finance respectfully requests an extension to file comments on various test claims and other filings related to reimbursable state mandated costs submitted by school and community college districts as indicated on Attachment A. Previously, the Commission granted us an extension until February 7, 2004 to file comments on an extensive list of filings. At the Commission's request, we continued to submit comments on a flow basis to the extent possible and prioritized matters that were closer to conclusion.

Although we have now submitted comments on a number of the filings, we were unable to complete our review for several mandates due to our budget-related workload, the complexity and scope of particular filings, and a reduction in staffing. We therefore request extensions on those filings, as specified on the attached list. In most cases, we request an additional 30-day extension to March 8, 2004 to allow us to resolve remaining issues identified during our review.

For a select number of filings, we request an additional 180-day extension to August 9, 2004 in order to invest the significant time required to review these submissions. These filings, mostly new test claims, are either: (1) extensive in length, ranging in the several hundreds of pages; (2) broad in scope, citing numerous statutes that may or may not be directly relevant to the asserted reimbursable mandates; or (3) lacking any clear, concise explanation or evidence to justify the claimants' assertions that the statutes contain mandated activities that are new or material increases in the level of service. Review of these mandates requires significant time for extensive researching of statutes and regulations and development of information on the actual impact of any changes on school district and community college operations. As always, we will continue to submit comments on a flow basis, and would welcome the Commission's suggestions as to the relative priority of test claims that remain pending.

As we have indicated in prior comments for various filings, we believe that such broad-based claims that fail to clearly identify alleged mandated activities by specific statute should not constitute complete test claims, and should be returned by the Commission for refinement. Additionally, we believe that comments should not be solicited from all interested parties until a

Attachment A

**REQUEST TO COMMISSION ON STATE MANDATES
FOR EXTENSION TO FILE COMMENTS**

Request for 30-day extension

Number	Title	Due Date	Claimant
02-TC-21	Tuition Fee Waivers	2/7/2004	Contra Costa CCD
02-TC-37	Adult Education Enrollment Reporting	2/7/2004	Berkeley and Sacramento City USD
02-TC-46	Discrimination Complaint Procedures	2/7/2004	Santa Monica CCD
02-TC-51	CA Public Records Act (K-14)	2/7/2004	Riverside USD
03-TC-05	CCC Budget and Accounting Manual	2/7/2004	Santa Monica CCD
03-TC-09	Teacher Credentialing	2/7/2004	San Diego COE
03-TC-16	Parental Involvement Programs	2/7/2004	San Jose USD
03-TC-17	California Environmental Quality Act	2/7/2004	Clovis USD
03-TC-02	Uniform Complaint Procedures	2/7/2004	Solano Beach School District
02-TC-32	School Accountability Report Cards III	2/7/2004	Empire Union USD and Bakersfield City USD
03-TC-06	California English Development Test	2/7/2004	Castro Valley USD

Request for 180-day extension

Number	Title	Due Date	Claimant
02-TC-22	Disabled Student Programs and Services	2/7/2004	West Kern CCD
02-TC-24	Reporting Improper Governmental Activities	2/7/2004	San Juan USD and Santa Monica CCD
02-TC-25	Notice to Students	2/7/2004	Los Rios CCD
02-TC-27	Employment of College Faculty and Administrators	2/7/2004	Santa Monica CCD
02-TC-28	Cal Grants	2/7/2004	Long Beach CCD
02-TC-31	Minimum Conditions for State Aid	2/7/2004	Santa Monica CCD
02-TC-34	Student Records	2/7/2004	Riverside USD and Palomar CCD

E-08
State Board of Education
Attention: Rae Belisle
721 Capitol Mall, Room 558
Sacramento, CA 95814

A-08
Office of Planning and Research
Attention: Tal Finney
P.O. Box 3044
Sacramento, CA 95812-3044

C-34
State Architect of California
Attention: Stephen Castellanos
1130 K Street, Suite 101
Sacramento, CA 95814

T-01
Department of Toxic Substances Control
Attention: Antonette Cordero
P.O. Box 806
Sacramento, CA 95812-0806

P-08
Mr. Kenneth J. O'Brien
Commission on Peace Officers
Standards & Training
Administrative Services Division
Attention:
1601 Alhambra Blvd.
Sacramento, CA 95816-7083

Education Mandated Cost Network
C/O School Services of California
Attention: Dr. Carol Berg, PhD
1121 L Street, Suite 1060
Sacramento, CA 95814

Clovis Unified School District
Attention: Bill McGuire
1450 Herndon
Clovis, CA 93611-0599

Centration, Inc.
Attention: Beth Hunter
8316 Red Oak Street, Suite 101
Rancho Cucamonga, CA 91730

D-08
Department of Justice
Attention: Louis R. Mauro
1300 I Street, 17th Floor
Sacramento, CA 95814

A-09
Commission on Teacher Credentialing
Attention: Sam Swofford
1900 Capitol Avenue
Sacramento-County, CA 95814-4213

C-27
California Student Aid Commission
Attention: Diana Fuentes-Michel
P.O. Box 419026
Rancho Cordova, CA 95741-9026

B-04
Environmental Protection Agency
Attention: Deborah Barnes
1001 I Street
Sacramento, CA 95812

P-08
Mr. Richard W. Reed
Commission on Peace Officers
Standards & Training
Administrative Services Division
Attention:
1601 Alhambra Blvd.
Sacramento, CA 95816-7083

Spector, Middleton, Young, Minney, LLP
Attention: Paul Minney
7 Park Center Drive
Sacramento, CA 95825

Shields Consulting Group, Inc.
Attention: Steve Shields
1536 36th Street
Sacramento, CA 95816

Mandated Cost Systems, Inc.
Attention: Steve Smith
11130 Sun Center Drive, Suite 100
Rancho Cordova, CA 95670

San Jose Unified School District
Attention: William A. Doyle
1153 El Prado Drive
San Jose, CA 95120

Centration, Inc.
Attention: Cindy Sconce
12150 Tributary Point Drive, Suite 140
Gold River, CA 95670

San Diego County Office of Education
Attention: Lora Duzyk
6401 Linda Vista Road
San Diego, CA 92111-7309

Castro Valley Unified School District
Attention: Jerry Macy
4400 Alma Avenue
Castro Valley, CA 94546

Spector, Middleton, Young & Minney, LLP
Attention: David E. Scribner
7 Park Center Drive
Sacramento, CA 95825

Berkeley Unified School District
Attention: Margaret Kirkpatrick
2134 Martin Luther King, Jr. Way
Berkeley, CA 94704-1180

Sacramento City Unified School District
Attention: Joan Polster
5735-47th Avenue
Sacramento, CA 95824

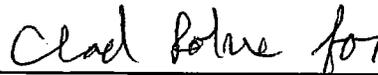
Bakersfield City School District
Attention: Michael Lingo
1300 Baker Street
Bakersfield, CA 93305-4399

Empire Union School District
Attention: Donald Kiger
116 N. McClure Road
Modesto, CA 95357

Sweetwater Union High School District
Attention: Lawrence Hendee
1130 Fifth Avenue
Chula Vista, CA 91911-2896

Solana Beach School District
Attention: Ellie Topolovac
309 North Rios Avenue
Solana Beach CA 92075-1298

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on February 13, 2004, at Sacramento, California.



Jennifer Nelson