DEPARTMENT OF FINANCE
ARNOLD SCHWARZENEGGER, GOVERNOR
915 L STREET ■ SACRAMENTO CA ■ 95814-3706 ■ WWW.DOF.CA.GOV

RECEIVED
FEB 18 2004
COMMISSION ON
STATE MANDATES

February 13, 2004

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

complete test claim is filed. However, since you have indicated that the Commission staff does not share this view, we will attempt to analyze the claims as they are.

As required by the Commission's regulations, we are including a "Proof of Service" indicating that the parties included on the mailing lists which accompanied your letters have been provided with copies of this letter via either United States Mail or, in the case of other State agencies, Interagency Mail Service.

If you have any questions regarding this letter, please contact Matt Aguilera, Principal Program Budget Analyst, at (916) 445-0328.

Sincerely,

Jeannie Oropeza
Program Budget Manager

Attachment

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

PROOF OF SERVICE

Test Claim Name: See Attached List
Test Claim Number: See Attached List

I, the undersigned, declare as follows:
I am employed in the County of Sacramento, State of California, I am 18 years of age or older and not a party to the within entitled cause; my business address is 915 L Street, 7th Floor, Sacramento, CA 95814.

On February 13, 2004, I served the attached recommendation of the Department of Finance in said cause, by facsimile to the Commission on State Mandates and by placing a true copy thereof: (1) to claimants and nonstate agencies enclosed in a sealed envelope with postage thereon fully prepaid in the United States Mail at Sacramento, California; and (2) to state agencies in the normal pickup location at 915 L Street, 7th Floor, for Interagency Mail Service, addressed as follows:

A-16
Ms. Paula Higashi, Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814

B-29
Legislative Analyst's Office
Attention: Marianne O'Malley
925 L Street, Suite 1000
Sacramento, CA 95814

A-17
Office of Public School Construction
Attention: Luisa M. Park
1130 K Street, Suite 400
Sacramento, CA 95814

G-01
California Community Colleges
Chancellor's Office
Attention: Mark Drummond
1102 Q Street, Suite 300
Sacramento, CA 95814-6549

D-01
Department of Justice
Attention: Gary Cooper
4949 Broadway, Room G111
Sacramento, CA 95820

B-8
State Controller's Office
Division of Accounting & Reporting
Attention: Michael Havey
3301 C Street, Room 500
Sacramento, CA 95816

E-08
Mr. Gerald Shelton
Department of Education
Fiscal and Administrative Services Division
1430 N Street, Suite 2213
Sacramento, CA 95814

D-08
Office of the Attorney General
Attention: Jill Bowers
1300 I Street, Suite 125
Sacramento, CA 95814

B-08
State Controller's Office
Division of Audits
Attention: Jim Spano
300 Capitol Mall, Suite 518
Sacramento, CA 95814

D-08
Office of the Attorney General
Attention: Leslie R. Lopez
1300 I Street, 17th Floor
Sacramento, CA 95814

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

Sixten & Associates
Attention: Keith Petersen
5252 Balboa Avenue, Suite 807
San Diego, CA 92117

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

San Jose Unified School District
Attention: Patrick Day
855 Lenzen Avenue
San Jose, CA 95126-2736

Reynolds Consulting Group, Inc.
Attention: Sandy Reynolds, President
P.O. Box 987
Sun City, CA 92586

Santa Monica Community College District
Attention: Thomas J. Donner
1900 Pico Blvd.
Santa Monica, CA 90405-1628

Riverside Unified School District
Attention: Michael H. Fine
3380 14th Street
Riverside, CA 92501

West Kern Community College District
Attention: William Duncan
29 Emmons Park Drive
Taft, CA 93268

San Juan Unified School District
Attention: Diana Halpenny
3738 Walnut Avenue
Carmichael, CA 95608

Public Resource Management Group
Attention: J. Bradley Burgess
1380 Lead Hill Boulevard, Suite #106
Roseville, CA 95661

MAXIMUS
Attention: Allen Burdick
4320 Auburn Blvd., Suite 2000
Sacramento, CA 95841

Mandate Resource Services
Attention: Harmeet Barkschat
5325 Elkhorn Blvd., Suite 307
Sacramento, CA 95842

San Diego Unified School District
Attention: Arthur Palkowitz
4100 Normal Street, Room 3159
San Diego, CA 92103-2682

Napa County Office of Education
Attention: Jill Cadloni
1015 Kaiser Road
Napa, CA 94558-6257

Los Rios Community College District
Attention: Jon Sharpe
1919 Spanos Court
Sacramento, CA 95825

Long Beach Community College District
Attention: Victor R. Collins
4901 East Carson Street
Long Beach, CA 90808

Palomar Community College District
Attention: Jerry R. Patton
1140 West Mission Road
San Marcos, CA 92069

Santa Monica Community College District
Attention: Cheryl Miller
1900 Pico Blvd.
Santa Monica, CA 90405-1628

Contra Costa Community College District
Business Services
Attention: John E. Hendrickson
500 Court Street
Martinez, CA 94553

Lake Tahoe Unified School District
Attention: Jon Stephens
One College Drive
South Lake Tahoe, CA 96150

Cost Recovery Systems
Attention: Annette Chinn
705-2 East Bidwell Street, #294
Folsom, CA 95630

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

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

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

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

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

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

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

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

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

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

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

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.

Chad Rohre for

Jennifer Nelson