



JOHN CHIANG
California State Controller

January 13, 2012

Ms. Nancy Patton
Acting Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814

Re: Proposed Parameters and Guidelines
Developer Fees 02-TC-42
Government Code Sections 65970, et al
Clovis Unified School District, Claimant

Dear Ms. Patton:

We have reviewed the proposed parameters and guidelines submitted by the Clovis Unified School District. Below are our comments and recommendations. Proposed additions are underlined and deletions are indicated with a strikethrough as follows:

V. CLAIM PREPARATION AND SUBMISSION

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3. Contracted Services

Report the name of the contractor and services performed to implement the reimbursable activities. ~~Attach a copy of the contract to the claim. If the contractor bills for time and materials, report the number of hours spent on the activities and all costs charged. If the contract is a fixed price, report the dates when services were performed and itemize all costs for those services.~~ If the contractor bills for time and materials, report the number of hours spent on the activities and all costs charged. If the contract is a fixed price, report the services that were performed during the period covered by the reimbursement claim. If the contract services were also used for purposes other than the reimbursable activities, only the pro-rata portion of the services used to implement the reimbursable activities can be claimed. Submit contract consultant and attorney invoices with the claim and a description of the contract scope of services.

COMMENT: Please use the current boilerplate language for consistency.

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B. Indirect Cost Rates

~~School districts must use the J-380 (or subsequent replacement) non-restrictive indirect cost rate provisionally approved by the California Department of Education.~~

~~County offices of education must use the J-580 (or subsequent replacement) non-restrictive indirect cost rate provisionally approved by the California Department of Education.~~

School districts and county offices of education must use indirect cost rates from the Restricted Indirect Cost Rates for K-12 Local Educational Agencies (LEAs) Five Year Listing issued by the California Department of Education (CDE) School Fiscal Services Division, for the fiscal year of costs.

COMMENT: The J-380 and J-580 forms previously used by school districts and county offices of education respectively have become obsolete.

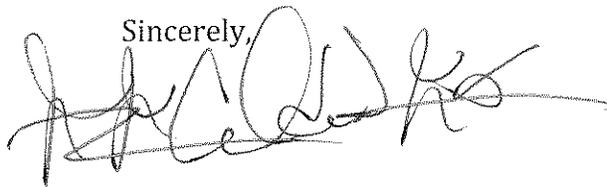
VIII. STATE CONTROLLER'S CLAIMING INSTRUCTIONS

Pursuant to Government Code section 17558, subdivision (b), the Controller shall issue claiming instructions for each mandate that requires state reimbursement not later than ~~60~~ 90 days after receiving the adopted parameters and guidelines from the Commission, to assist local agencies and school districts in claiming costs to be reimbursed.

COMMENT: Pursuant to Chapter 144, Statutes of 2011, the Controller's time limit to issue claiming instructions has been extended from 60 days to 90 days after receiving notice from the Commission on State Mandates or Department of Finance.

Should you have any questions regarding the above, please contact Steve Purser at (916) 324-5729, or e-mail to spurser@sco.ca.gov.

Sincerely,



JL JAY LAL, Manager
Local Reimbursements Section