



July 8, 2025

Ms. Anne Kato  
State Controller's Office  
Local Government Programs and  
Services Division  
3301 C Street, Suite 740  
Sacramento, CA 95816

Mr. Arthur Palkowitz  
Law Offices of Arthur M. Palkowitz  
12807 Calle de la Siena  
San Diego, CA 92130

*And Parties, Interested Parties, and Interested Persons (See Mailing List)*

**Re: Proposed Statewide Cost Estimate**

*Public School Restrooms: Menstrual Products*, 22-TC-04  
Statutes 2021, Chapter 664 (AB 367); Education Code Section 35292.6; effective  
January 1, 2022

Dear Ms. Kato and Mr. Palkowitz:

The Proposed Statewide Cost Estimate for the above-captioned matter is enclosed for your review.

**Hearing:** This matter is set for hearing on **Friday, July 25, 2025, in person at 10:00 a.m., at California Department of Food and Agriculture (CDFA), First Floor Auditorium, 1220 N Street, Sacramento, California, 95814 and via Zoom.**

The Commission is committed to ensuring that its public meetings are accessible to the public and that the public has the opportunity to observe the meeting and to participate by providing written and verbal comment on Commission matters whether they are physically appearing at the in-person meeting location or participating via Zoom. If you want to speak during the hearing and you are in-person, please come to the table for the swearing in and to speak when your item is up for hearing. If you are participating via Zoom, you must use the "Raise Hand" feature in order for our moderators to know you need to be unmuted.

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This matter is proposed for the Consent Calendar. Please let us know in advance if you oppose having this item placed on consent and wish to testify at the hearing or have a representative testify on your behalf, and if other witnesses will appear.

In that case, please notify Commission staff not later than noon on the Tuesday prior to the hearing, on July 22, 2025. Please also include the names of the people who will be speaking for inclusion on the witness list and the names and email addresses of the people who will be speaking both in person and remotely to receive a hearing panelist link in Zoom. When calling or emailing, identify the item you want to testify on and the entity you represent. The Commission Chairperson reserves the right to impose time limits on presentations as may be necessary to complete the agenda.

If you plan to file any written document, please note that Commission staff will include written comments filed at least 15 days in advance of the hearing in the Commissioners' hearing binders, a copy of which is available for public viewing at the Commission meeting. Additionally, written comments filed more than five days in advance of the meeting shall be included in the Commission's meeting binders, if feasible, or shall be provided to the Commission when the item is called, unless otherwise agreed by the Commission or the executive director. (Cal. Code Regs., tit. 2, § 1181.10(b)(1)(A-B).

However, comments filed less than five days in advance of the meeting, the commenter shall provide 12 copies to Commission staff at the in-person meeting. In the case of participation by teleconference, a PDF copy shall be filed via the Commission's dropbox at <https://www.csm.ca.gov/dropbox.shtml> at least 24 hours prior to the meeting.

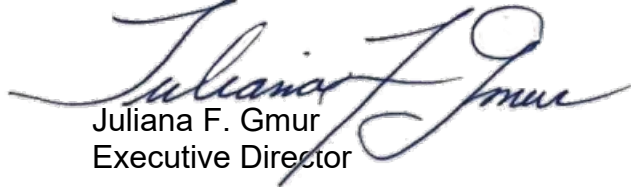
Commission staff shall provide copies of the comments to the Commission and shall place a copy on a table for public review when the item is called or, in the case of participation via teleconference, shall provide an electronic copy to the Commission and post a copy on the Commission's website, and may share the document with the Commission and the public using the "share screen" function. (Cal. Code Regs., tit. 2, § 1181.10(b)(1)(C)).

If you would like to request postponement of the hearing, please refer to section 1187.9(b) of the Commission's regulations.

Ms. Kato and Mr. Palkowitz  
July 8, 2025  
Page 3

**Special Accommodations:** For any special accommodations such as a sign language interpreter, an assistive listening device, materials in an alternative format, or any other accommodations, please contact the Commission Office at least five to seven *working* days prior to the meeting.

Very truly yours,

A handwritten signature in blue ink, reading "Juliana F. Gmur". The signature is fluid and cursive, with the first name "Juliana" and last name "Gmur" clearly legible.

Juliana F. Gmur  
Executive Director

## ITEM 5

### PROPOSED STATEWIDE COST ESTIMATE

**\$2,362,580 - \$19,759,203**

**Initial Claim Period, January 1, 2022 to June 30, 2022, and  
Fiscal Year 2022-2023**

**\$1,076,162 - \$19,428,754 [Plus the Implicit Price Deflator]  
Fiscal Year 2023-2024 and Following**

Education Code Section 35292.6

As Amended by Statutes 2021, Chapter 664, Sections 1 and 3 (AB 367)

*Public School Restrooms: Menstrual Products*

22-TC-04

The Commission on State Mandates (Commission) adopted this Statewide Cost Estimate by a vote of [vote count will be included in the adopted Statewide Cost Estimate] during a regularly scheduled hearing on July 25, 2025 as follows:

Member	Vote
Lee Adams, County Supervisor	
Deborah Gallegos, Representative of the State Controller, Vice Chairperson	
Karen Greene Ross, Public Member	
Renee Nash, School District Board Member	
William Pahland, Representative of the State Treasurer	
Michele Perrault, Representative of the Director of the Department of Finance, Chairperson	
Alexander Powell, Representative of the Director of the Office of Land Use and Climate Innovation	

### STAFF ANALYSIS

#### Summary of the Mandate, Eligible Claimants, and Period of Reimbursement

This Statewide Cost Estimate addresses increased costs arising from the Menstrual Equity for All Act of 2021 (Stats. 2021, ch. 664, Ed. Code, §35292.6), effective January 1, 2022. The Act requires public schools, including a school operated by a school district, a county office of education, or a charter school, that maintain any combination of classes from grades 6 through 12, inclusive, to stock all women's restrooms, all-gender restrooms, and at least one men's restroom with menstrual products (defined as tampons and menstrual pads), free of cost, on or before the start of the 2022-2023

school year. The Act also requires these public schools to post a notice regarding these statutory requirements in a prominent and conspicuous location in every restroom required to be stocked with menstrual products.<sup>1</sup>

On March 22, 2024, the Commission on State Mandates (Commission) adopted the Test Claim Decision,<sup>2</sup> finding that the test claim statute (Ed. Code, § 35292.6, Stats. 2021, ch. 664), imposes a reimbursable state-mandated program within the meaning of article XIII B, section 6 of the California Constitution and Government Code section 17514, beginning January 1, 2022, on school districts, including county offices of education, for their schools that maintain any combination of classes from grades six through 12, inclusive, to do the following:

1. For schools that met the 40-percent pupil poverty level that were required to comply with prior law (former Ed. Code, § 35292.6, Stats. 2017, ch. 687), to stock an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils, in additional restrooms, defined as the sum of all women's restrooms and all-gender restrooms, and at least one men's restroom, *minus* 50 percent of all restrooms (which is not new because it was required by prior law).
2. For schools that did **not** meet the 40-percent pupil poverty level under prior law, to stock all women's restrooms and any all-gender restrooms, and at least one men's restroom, at all times with an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils.
3. For all schools to post a notice regarding the requirements of the statutory section in a prominent and conspicuous location in every restroom required to stock menstrual products, available and accessible, free of cost. The notice shall include the text of the statutory section and contact information, including an email address and telephone number, for a designated individual responsible for maintaining the requisite supply of menstrual products.<sup>3</sup>

The Commission adopted the Decision and Parameters and Guidelines on July 26, 2024,<sup>4</sup> approving reimbursement for school districts, including county offices of education, for their grade 6-12 schools.<sup>5</sup>

The initial reimbursement period is January 1, 2022 to July 1, 2022 and fiscal year 2022-2023. Eligible claimants were required to file initial claims with the State

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<sup>1</sup> The Act was amended by Statutes 2023, chapter 421 to expand the requirements to schools with pupils in grades 3 through 12, inclusive. The Commission has no jurisdiction on the amended Act because no Test Claim was filed on it.

<sup>2</sup> Exhibit A, Test Claim Decision.

<sup>3</sup> Exhibit B, Decision and Parameters and Guidelines, pages 1-2.

<sup>4</sup> Exhibit B, Decision and Parameters and Guidelines.

<sup>5</sup> Exhibit B, Decision and Parameters and Guidelines, pages 7-8, 23.

Controller's Office (Controller) by February 27, 2025. Late initial reimbursement claims may be filed until February 27, 2026, but will incur a 10 percent late filing penalty of the total amount of the initial claim without limitation.<sup>6</sup>

### **Reimbursable Activities**

The Commission approved the following for this program, which is reimbursable for school districts, including county offices of education, for their schools that maintain any combination of classes from grades six through 12, inclusive:

#### **A. Stocking an Adequate Supply of Menstrual Products Free of Cost for Pupils**

1. For schools that met the 40-percent pupil poverty level that were required to comply with prior law (former Ed. Code, § 35292.6, Stats. 2017, ch. 687),<sup>7</sup> to stock an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils, in *additional* restrooms, defined as the sum of all women's restrooms and all-gender restrooms, plus one men's restroom, **minus** 50 percent of all restrooms (which is not new because it was required by prior law).

Eligible claimants are **not** entitled to reimbursement under these Parameters and Guidelines for the activities and costs approved by the Commission in *Public School Restrooms: Feminine Hygiene Products*, 18-TC-01, which addressed Education Code section 35292.6 (Stats. 2017, ch. 687). Those costs may be claimed under *Public School Restrooms: Feminine Hygiene Products*, 18-TC-01.

2. For schools that did **not** meet the 40-percent pupil poverty level subjecting them to the *Feminine Hygiene Products* mandate under prior law, to stock all women's restrooms and all-gender restrooms, plus one men's restroom, at all times with an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils.
3. Purchase and install (or retrofit or repair) a sufficient number of suitable dispensers for menstrual products (defined only as tampons and sanitary napkins) in the new or additional restrooms identified in nos. 1 and 2 above.

Reimbursement to purchase and install new dispensers is required to the extent that a school is not already equipped with a sufficient number of dispensers in their restrooms to comply with the mandate,

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<sup>6</sup> Government Code section 17561(d)(3).

<sup>7</sup> These schools are those that are eligible for Title I, Part A funds and meet the second test identified in section 6314(a)(1)(A) of Title 20 of the United States Code, in which not less than 40 percent of the children *enrolled* in the school are from low-income families. Exhibit B, Decision and Parameters and Guidelines, pages 20, 25, footnotes 50, 53, respectively.

or cannot repair or retrofit a sufficient number of existing dispensers to comply with the mandate, whichever is more cost effective.

***Reimbursement is not required to stock any products other than menstrual pads and tampons for pupils, or to stock menstrual products in more than one men's restroom per school.<sup>8</sup>***

An adequate supply of menstrual products and dispensers to comply with Section IV.A.1 and 2 of the Parameters and Guidelines may be determined based on the enrollment of female, transgender, nonbinary, and gender nonconforming pupils in grades 6 to 12 that may use those products each claim year, the estimated number of products those pupils may use each claim year; and the number of restrooms now required to be stocked.

In the reimbursement claims, claimants shall identify:

- a. The total number of schools in the claimant's jurisdiction that maintain any combination of classes from grades 6 through 12, inclusive.
- b. For *each* school identified in a. above, provide the total enrollment of female, and estimated total enrollment of transgender, nonbinary, and gender nonconforming pupils in grades 6 to 12 in the claim year that may use the menstrual products required by the test claim statute.
- c. The total number of Title 1 schools in the claimant's jurisdiction identified in a. above, that met the 40 percent pupil poverty level and were required to comply with former Education Code section 35292.6 (Stats. 2017, ch. 687).
- d. For *each* Title 1 school that met the 40-percent pupil poverty level, as defined, and were required to comply with former Education Code section 35292.6 (Stats. 2017, ch. 687), please identify:
  - the total number of all restrooms in the school,
  - the total number of women's restrooms in the school,
  - the total number of all-gender restrooms in the school.
- e. For *each* school that did **not** meet the 40-percent pupil poverty level under prior law, please identify:
  - the total number of women's restrooms in the school, and
  - the total number of all-gender restrooms in the school.<sup>9</sup>

## **B. Posting a Notice**

1. For all schools to post a notice regarding the requirements of the statutory section in a prominent and conspicuous location in every restroom required to

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<sup>8</sup> Exhibit B, Decision and Parameters and Guidelines, pages 21, 25.

<sup>9</sup> Exhibit B, Decision and Parameters and Guidelines, pages 21, 26.

be stocked with menstrual products, available and accessible, free of cost. The notice shall include the text of the statutory section and contact information, including an email address and telephone number, for a designated individual responsible for maintaining the requisite supply of menstrual products.<sup>10</sup>

### **Offsetting Revenues and Reimbursements**

As stated in the Parameters and Guidelines, any offsetting revenue the claimant experiences in the same program as a result of the same statutes or executive orders found to contain the mandate shall be deducted from the costs claimed. In addition, reimbursement for this mandate from any source, including but not limited to, state and federal funds, any service charge, fee, or assessment authority to offset all or part of the costs of this program, and any other funds, shall be identified and deducted from any claim submitted for reimbursement.<sup>11</sup>

The claimants did not identify offsetting revenue in the initial reimbursement claims.

### **Statewide Cost Estimate**

Staff reviewed 121 unaudited reimbursement claims submitted by 74 school districts, as compiled by the Controller (although four of these claims were not counted because they are under the minimum claiming amount of \$1,000).<sup>12</sup> Staff developed the Statewide Cost Estimate based on the assumptions and methodology discussed herein.

**Table 1. Initial Reimbursement Period (2021-2022, 2022-2023) Cost Estimate**

Activity A.1. For school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, with schools that met the 40-percent pupil poverty level that were required to comply with prior law (former Ed. Code, § 35292.6, Stats. 2017, ch. 687), to stock an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils, in <i>additional</i> restrooms, defined as the sum of all women's restrooms and all-gender restrooms, plus one men's restroom, minus 50 percent of all restrooms (which is not new because it was required by prior law).	\$443,565 - \$3,720,322
Activity A.2. For school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, with schools that	\$219,259 - \$2,351,173

<sup>10</sup> Exhibit B, Decision and Parameters and Guidelines, pages 21, 26.

<sup>11</sup> Exhibit B, Decision and Parameters and Guidelines, page 28.

<sup>12</sup> Government Code section 17564(a). The removed claims are from the following Districts: Petaluma City Elementary (2021-2022), Roseville City Elementary (2022-2023), Gold Trail Union (2023-2024), and Roseville City Elementary (2023-2024).

did <b><i>not</i></b> meet the 40-percent pupil poverty level subjecting them to the <i>Feminine Hygiene Products</i> mandate under prior law, to stock all women's restrooms and all-gender restrooms, plus one men's restroom, at all times with an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils.	
Activity A.3. For school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, to purchase and install (or retrofit or repair) a sufficient number of suitable dispensers for menstrual products (defined only as tampons and sanitary napkins) in the new or additional restrooms identified in nos.1 and 2 above. Reimbursement to purchase and install new dispensers is required to the extent that a school is not already equipped with a sufficient number of dispensers in their restrooms to comply with the mandate, or cannot repair or retrofit a sufficient number of existing dispensers to comply with the mandate, whichever is more cost effective.	\$1,606,528 - \$14,910,775
Activity B. For school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, for their schools to post a notice regarding the requirements of the statutory section in a prominent and conspicuous location in every restroom required to be stocked with menstrual products, available and accessible, free of cost. The notice shall include the text of the statutory section and contact information, including an email address and telephone number, for a designated individual responsible for maintaining the requisite supply of menstrual products.	\$2,893 - \$45,173
Indirect Costs identified	\$90,335 - \$927,227
Offsetting Revenues or Other Reimbursements	(\$0 - \$0)
10 Percent Late Filing Penalty	(\$0 - \$2,195,467)
<b>Total Costs</b>	<b>\$2,362,580 - \$19,759,203</b>

**Table 2. Estimated Annual Costs for 2024-2025 and Following**

Activity A.1. For school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, with schools that met the 40-percent pupil poverty level that were required to comply with prior law (former Ed. Code, § 35292.6, Stats. 2017, ch. 687), to stock an adequate supply of menstrual products (defined as menstrual pads and	\$504,301 - \$7,745,826
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tampons), available and accessible, free of cost for pupils, in additional restrooms, defined as the sum of all women's restrooms and all-gender restrooms, plus one men's restroom, minus 50 percent of all restrooms (which is not new because it was required by prior law).	
Activity A.2. For school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, with schools that did <b>not</b> meet the 40-percent pupil poverty level subjecting them to the <i>Feminine Hygiene Products</i> mandate under prior law, to stock all women's restrooms and all-gender restrooms, plus one men's restroom, at all times with an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils.	\$137,874 - \$1,544,415
Activity A.3. For school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, to purchase and install (or retrofit or repair) a sufficient number of suitable dispensers for menstrual products (defined only as tampons and sanitary napkins) in the new or additional restrooms identified in nos.1 and 2 above. Reimbursement to purchase and install new dispensers is required to the extent that a school is not already equipped with a sufficient number of dispensers in their restrooms to comply with the mandate, or cannot repair or retrofit a sufficient number of existing dispensers to comply with the mandate, whichever is more cost effective.	\$390,669 - \$11,304,974
Activity B. For school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, for their schools to post a notice regarding the requirements of the statutory section in a prominent and conspicuous location in every restroom required to be stocked with menstrual products, available and accessible, free of cost. The notice shall include the text of the statutory section and contact information, including an email address and telephone number, for a designated individual responsible for maintaining the requisite supply of menstrual products.	\$6,281 - \$250,193
Indirect Costs identified	\$37,037 - \$742,096
Offsetting Revenue	(\$0 - \$0)
Late Filing Penalty	(\$0 - \$2,158,750)
<b>Total Costs</b>	<b>\$1,076,162 - \$19,428,754</b>

## **Assumptions**

1. The total amount claimed for the initial reimbursement period may increase as a result of late or amended initial claims. Only 74 school districts filed claims of an estimated 937 eligible districts that maintain any combination of grades 6-12, inclusive.<sup>13</sup> The low filing rate is likely due to the number of districts that will choose to opt into the K-12 Mandate Block Grant rather than filing claims (see assumption #9 below).
2. Offsetting revenue will be \$0 because that was the amount identified in all the reimbursement claims filed, and no specific offsetting revenue was identified in the Decision and Parameters and Guidelines. Moreover, the test claim statute states the menstrual products must be provided “free of cost for pupils.”<sup>14</sup>
3. Four Districts’ claims were removed from the cost calculations because the amount claimed in each totaled less than \$1,000, the minimum required to file a claim.<sup>15</sup> The removed claims are from the following Districts: Petaluma City Elementary (2021-2022), Roseville City Elementary (2022-2023), Gold Trail Union (2023-2024), and Roseville City Elementary (2023-2024).
4. There are about 9,997 public schools in California.<sup>16</sup> Of these, 7,241 estimated schools are expected to comply with the mandated program because they maintain any combination of grades 6-12, inclusive.<sup>17</sup>

The actual number of schools statewide required to comply with the *Feminine Hygiene Products* mandate (18-TC-01) (requiring free menstrual products in schools that maintain any combination of classes from grade six to grade 12, inclusive, and are eligible for Title I, Part A funds with at least 40 percent of the pupils enrolled from low-income families) is unknown. This mandate now requires these schools to stock an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free for pupils, in *additional* restrooms, defined as the sum of all women’s restrooms and all-gender restrooms, plus one men’s restroom, minus 50 percent of all restrooms that were previously required to be stocked.

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<sup>13</sup> Exhibit D (6), California Department of Education, List of School Districts, <https://www.cde.ca.gov/re/lr/do/schooldistrictlist.asp> (accessed on January 22, 2025).

<sup>14</sup> Education Code, section 35292.6 (a), (c) (Stats. 2021, ch. 664).

<sup>15</sup> Government Code section 17564(a).

<sup>16</sup> Exhibit D (4), California Department of Education, Fingertip Facts on Education in California, <https://www.cde.ca.gov/ds/ad/ceffingertipfacts.asp> (accessed on January 17, 2025).

<sup>17</sup> Exhibit D (7), California Department of Education, Public Schools and Districts Data Files, <https://www.cde.ca.gov/ds/si/ds/pubschls.asp> (accessed on January 22, 2025).

However, the California Department of Education (CDE) annually publishes Student Poverty Free and Reduced Price Meals (FRPM) data on pupils eligible for FRPMs. The data is certified by local educational agencies as part of the California Longitudinal Pupil Achievement Data System Fall 1 data submission.<sup>18</sup> Under federal law, local educational agencies can use several measures of poverty to determine a school's eligibility for Title 1, Part A funds, one of which is the number of students enrolled and eligible for the free or reduced price lunch program.<sup>19</sup> The CDE's Student Poverty FRPM reports provide unduplicated data for fiscal years 2021-2022, 2022-2023, and 2023-2024, by school, with the grade levels identified, and the percentage of students enrolled on Census Day (the first Wednesday in October) eligible to receive free or reduced price meals under federal law. This list was filtered to exclude non-public, nonsectarian schools; preschool, kindergarten, and adult schools; schools that do not maintain any combination of grades six to 12, inclusive; and include schools in which 40 percent or more of the students are eligible for free or reduced-price meals. Based on this data, the number of schools required to comply with the *Feminine Hygiene Products* mandate (18-TC-01) is estimated to be:

- In 2021-2022, 5,530 schools;
- In 2022-2023, 5,695 schools;
- In 2023-2024, 5,852 schools.<sup>20</sup>

In analyzing the costs for this (Menstrual Products) program, legislative staff used the Commission's Statewide Cost Estimate for the *Feminine Hygiene Products* (18-TC-01) mandate. The legislative committees estimated:

One-time Proposition 98 GF costs of about \$2 million to LEAs to install or modify menstrual product dispensers and ongoing Proposition 98 GF costs of about \$1.3 million to provide free menstrual products. This estimate use [sic] assumptions from the Commission on State Mandates (CSM) evaluation of the cost per female student at certain K-12 schools to provide free menstrual products in 50% of restrooms, as required by current law (described in more detail below). According to that evaluation, costs are \$3.70 per female student one-time to install or retrofit menstrual

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<sup>18</sup> Exhibit D (5), California Department of Education, Free or Reduced Price Meals (Student Poverty) Data, <https://www.cde.ca.gov/ds/ad/filessp.asp> (accessed on January 21, 2025).

<sup>19</sup> 20 United States Code section 6313(a)(5)(A).

<sup>20</sup> Exhibit D (5), California Department of Education, Free or Reduced Price Meals (Student Poverty) Data, <https://www.cde.ca.gov/ds/sd/sd/filessp.asp> (accessed on January 24, 2025).

product dispensers and about \$2.36 per female student annually to provide free menstrual products<sup>21</sup>

Both the Senate and Assembly Appropriations Committees used the Commission's estimate, but the Assembly Committee added 10 percent because this mandate requires stocking menstrual products in any all-gender restrooms and one male restroom per school.<sup>22</sup> The Senate Appropriations Committee merely concluded that the costs "could be higher" for this program.<sup>23</sup>

5. The following number of schools (that maintain any combination of classes from grades six through 12, inclusive, that did **not** meet the 40-percent pupil poverty level subjecting them to the *Feminine Hygiene Products* mandate under preexisting law (18-TC-01)) are required to stock all women's restrooms and all-gender restrooms, plus one men's restroom, at all times with an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils, is estimated at:
  - In 2021-2022: 1,711 schools
  - In 2022-2023: 1,546 schools
  - In 2023-2024: 1,389 schools<sup>24</sup>
6. Statewide costs may increase if the cost of materials and supplies and labor increases. The claimant submitted receipts with the Test Claim indicating \$347.49 per dispenser purchased.<sup>25</sup> The average cost per dispenser for the claimants that filed initial reimbursement claims is \$384.23.<sup>26</sup> Moreover, employee salaries may increase or decrease in the future, thereby increasing or decreasing labor costs to comply with the mandate.

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<sup>21</sup> Exhibit D (3), Assembly Committee on Appropriations, Analysis of AB 367 (2021-2022) page 2. Exhibit D (8), Senate Committee on Appropriations, Analysis of AB 367 (2021-2022) page 2.

<sup>22</sup> Exhibit D (3), Assembly Committee on Appropriations, Analysis of AB 367 (2021-2022) page 2.

<sup>23</sup> Exhibit D (8), Senate Committee on Appropriations, Analysis of AB 367 (2021-2022) page 2.

<sup>24</sup> These figures were estimated by subtracting the estimated number of public schools that maintain any combination of grades 6-12, inclusive, from the grade 6-12 schools required to comply with the *Feminine Hygiene Products* mandate (schools that met the 40 percent pupil poverty threshold that maintain any combination of grades 6-12 that are required to provide free menstrual products in 50 percent of their restrooms).

<sup>25</sup> Exhibit D (1), Test Claim, pages 13, 27, 29, 30.

<sup>26</sup> Exhibit D (2), Spreadsheet of Claimant Data.

7. Initial costs are likely to be higher in the initial reimbursement period because of the costs to install or retrofit dispensers. As dispensers are installed in the required restrooms, these initial costs would diminish and the ongoing costs would be primarily for stocking the menstrual products. For example, claims for the *Feminine Hygiene Products* mandate (18-TC-01), that requires stocking menstrual products in dispensers in half of restrooms at all Title 1 schools, have diminished as follows:

- 2017-2018: \$959,286
- 2018-2019: \$715,194
- 2019-2020: \$310,292
- 2020-2021: \$99,676
- 2021-2022: no data
- 2022-2023: \$28,543
- 2023-2024: \$15,089<sup>27</sup>

A sufficient number of dispensers to comply with the mandate is unknown. The Parameters and Guidelines state “An adequate supply of menstrual products and dispensers to comply with Section IV.A.1 and 2 of these Parameters and Guidelines may be determined based on the enrollment of female, transgender, nonbinary, and gender nonconforming pupils in grades 6 to 12 that may use those products each claim year, the estimated number of products those pupils may use each claim year; and the number of restrooms now required to be stocked.”

Based on the requirement “to stock all women’s restrooms and all-gender restrooms, plus one men’s restroom, at all times with an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils,”<sup>28</sup> there are enough dispensers in the restrooms if they can hold enough products to make them available at all times. A school may choose to place multiple dispensers in each restroom required to be stocked if it determines they are necessary to comply with the mandate to stock the products at all times. If restrooms are stocked multiple times a day, fewer dispensers per restroom are required. However, if they are only stocked one or two times per day, more dispensers may be necessary, especially in multi-stall restrooms in larger schools.

In their reimbursement claims, the claimants must identify: 1) the total number of schools in the claimant’s jurisdiction that maintain any combination of classes from grades 6 through 12, inclusive; 2) For *each* school the claimant identified, the total enrollment of female, and the estimated total enrollment of

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<sup>27</sup> Exhibit D (9), State Controller’s Office, State-Mandated Program Cost Report of Unpaid Claims and Deficiencies, as of April 1, 2025, pages 21-24. The other reason for the diminishing claims is that this program was added to the K-12 Mandate Block Grant (Gov. Code, § 17581.6 (f)(36)).

<sup>28</sup> Exhibit B, Decision and Parameters and Guidelines, pages 20, 25.

transgender, nonbinary, and gender nonconforming pupils in grades 6 to 12 in the claim year that may use the menstrual products; 3) The total number of Title 1 schools in the claimant's jurisdiction that met the 40 percent pupil poverty level and were required to comply with former Education Code section 35292.6 (Stats. 2017, ch. 687); 4) *each* Title 1 school that met the 40-percent pupil poverty level, as defined, and were required to comply with prior law (former Ed. Code, § 35292.6, Stats. 2017, ch. 687), the total number of all restrooms in the school, and the total number of women's restrooms in the school, and the total number of all-gender restrooms in the school; 5) For *each* school that did **not** meet the 40-percent pupil poverty level under prior law, the total number of women's restrooms in the school, and the total number of all-gender restrooms in the school.<sup>29</sup>

We assume that the Title 1 schools that were required to comply with the *Feminine Hygiene Products* mandate (18-TC-01) already had dispensers in all of their restrooms that were required to be stocked with menstrual products except for one men's restroom and any all-gender restrooms, and that all other schools maintaining any combination of grades 6-12, inclusive, have installed or retrofitted dispensers in all their restrooms required to stock menstrual products. The claims data do not identify how many dispensers were already in place in compliance with the mandate without retrofitting. As indicated in the Parameters and Guidelines, "Reimbursement to purchase and install new dispensers is required to the extent that a school is not already equipped with a sufficient number of dispensers in their restrooms to comply with the mandate, or cannot repair or retrofit a sufficient number of existing dispensers to comply with the mandate, whichever is more cost effective."<sup>30</sup>

Accordingly, although a sufficient number of dispensers to comply with the mandate statewide is not known and will vary by school district, it is assumed that the dispensers purchased and retrofitted during the initial period of reimbursement was determined to be the number necessary and sufficient for the claiming school districts to comply with the mandate.

8. The Controller may conduct audits and reduce any claim it deems to be excessive or unreasonable.<sup>31</sup> Thus, the total amount for this program may be lower than the Statewide Cost Estimate based on the Controller's audit findings.
9. The future annual costs for this program may be lower than this estimate if this program is added to the K-12 Mandate Block Grant (as was the Feminine

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<sup>29</sup> Exhibit B, Decision and Parameters and Guidelines, pages 21, 26.

<sup>30</sup> Exhibit B, Decision and Parameters and Guidelines, pages 10, 18-19.

<sup>31</sup> Government Code section 17561.

Hygiene Products mandate (18-TC-01)),<sup>32</sup> in which school districts voluntarily participate. Districts that participate in a program added to the block grant cannot claim through the State's reimbursement process.<sup>33</sup> The block grant allows school districts to receive a per pupil allocation to carry out reimbursable mandated activities. Thus, if this program is added to the block grant, it could result in future annual costs that are lower than the Statewide Cost Estimate.

## **Methodology**

The low estimate for all activities is the amount claimed, based on 117 unaudited reimbursement claims (20 for 2021-2022, 56 for 2022-2023, and 41 for 2023-2024) filed by 74 school districts, as compiled by the Controller. These totals do not include four claims filed for under the minimum \$1,000 threshold.<sup>34</sup> Petaluma City Elementary (2021-2022), Roseville City Elementary (2022-2023), Gold Trail Union (2023-2024), and Roseville City Elementary (2023-2024), as stated above under assumption 3.

### **A. Initial Reimbursement Period (2021-2022, 2022-2023) Cost Estimate**

Activity A.1., requires school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, with Title 1 schools that met the 40-percent pupil poverty level that were required to comply with prior law (former Ed. Code, § 35292.6, Stats. 2017, ch. 687), to stock an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils, in additional restrooms, defined as the sum of all women's restrooms and all-gender restrooms, plus one men's restroom, minus 50 percent of all restrooms (which is not new because it was required by prior law).

The high estimate, which assumes all eligible claimants will file claims, is calculated by multiplying the average costs claimed per Title 1 school (costs claimed divided by the number of schools in districts that claimed costs for Activity A.1.) by the number of Title 1 schools in districts not claiming costs (the difference between the number of Title 1 schools [5,695] and the number of Title 1 schools in districts that filed claims [679] = [5,016] Title 1 schools) then adding the amount claimed.

Activity A.1. actual costs claimed [\$443,564.54] / schools in claiming districts [679] = \$653.261 average cost per school

Activity A.1. average cost per school [\$653.261] \* number of Title 1 schools in districts not claiming costs 5,695 – 679 = 5,016) = [\$3,276,757.18]

Cost for districts not filing claims [\$3,276,757.18] + cost of claims filed [\$443,564.54] = Total potential Activity A.1. cost [\$3,720,322]

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<sup>32</sup> Government Code section 17581.6(f)(36).

<sup>33</sup> Government Code section 17581.6(c)(3).

<sup>34</sup> Government Code section 17564(a).

Activity A.2., requires school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, with schools that did **not** meet the 40-percent pupil poverty level subjecting them to the *Feminine Hygiene Products* mandate under prior law (non-Title 1 schools), to stock all women's restrooms and all-gender restrooms, plus one men's restroom, at all times with an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils.

The high estimate for Activity A.2. is calculated by multiplying the average costs claimed per non-Title 1 school by the number of eligible non-Title 1 schools in districts that have not yet filed claims. (Based on the assumptions above, the statewide number of non-Title 1 schools that maintain grades six through 12 is estimated at 1,711 in 2021-2022, and 1,546 in 2022-2023.) Then add the amount claimed.

Activity A.2. average cost per non-Title 1 school, costs claimed \$219,259.48 / 224 Non-Title 1 schools in districts that claimed A.2. costs = \$978.84

Activity A.2. average cost per non-Title 1 school [\$978.84] \* ((856 Non-Title 1 schools, or half of 2021-2022 schools) + 1,546 Non-Title 1 schools (2022-2023) = 2,402 Non-Title 1 schools, minus 224 Non-Title 1 schools that filed claims) = [2,178] Non-title 1 Schools [\$2,131,913.52] + \$219,259.48 amount claimed = Total potential Activity A.2. cost [\$2,351,173]

Activity A.3., requires school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, to purchase and install (or retrofit or repair) a sufficient number of suitable dispensers for menstrual products (defined only as tampons and sanitary napkins) in the new or additional restrooms identified in nos. 1 and 2 above. Reimbursement to purchase and install new dispensers is required to the extent that a school is not already equipped with a sufficient number of dispensers in their restrooms to comply with the mandate, or cannot repair or retrofit a sufficient number of existing dispensers to comply with the mandate, whichever is more cost effective.

The high estimate for Activity A.3. is calculated by multiplying the average costs claimed per Non-Title 1 school in districts that claimed costs for A.3., by the number of non-Title 1 schools statewide. (Based on the assumptions above, the statewide number of non-Title 1 schools that maintain grades six through 12 is estimated at 1,711 in 2021-2022, and 1,546 in 2022-2023.) Then add the amount claimed.

Activity A.3. actual costs claimed [\$1,606,527.56] / the number of Non-Title 1 schools in the claiming districts [263] = average Activity A.3. cost per Non-Title 1 school [\$6,108.47]

Average Activity A.3. cost per Non-Title 1 school [\$6,108.47] \* number of non-Title 1 schools (856 Non-Title 1 schools, or half of 2021-2022 schools) + 1,546 Non-Title 1 schools (2022-2023) minus 224 Non-Title 1 schools in the districts that filed claims) = 2,178 Non-Title 1 schools = [\$13,304,247.66]

Activity A.3. estimated Activity A.3. costs [\$13,304,247.66] statewide estimated costs + [\$1,606,527.56] amount claimed = Total potential Activity A.3. cost [\$14,910,775]

The high estimate for Activity B. (purchase and install signs) is calculated by multiplying the average costs claimed per school (costs claimed divided by the number of districts that filed reimbursement claims) by the estimated number of districts that have not yet filed claims. Then add the costs claimed. The estimated number of districts that maintain any combination of grades six through 12 is 937.

Activity B. actual costs claimed [\$2,892.68] / the number of schools in districts that filed for Activity B [60] = average Activity B. cost per district [\$48.21]

Average Activity B. cost per school [\$48.21] \* number of non-filing districts 937-60 = 877 districts = [\$42,280]

Activity B. actual costs claimed [\$2,892.68] + estimated non-filer Activity B. costs that could be claimed in late claims [\$42,280] = Total potential Activity B. cost [\$45,173]

**Indirect Costs:** The low estimate is the indirect costs claimed. The high estimate, in addition to indirect costs actually claimed, assumes that all eligible claimants who have not yet filed claims will file claims for indirect costs at the same average rate claimed, which is calculated by dividing indirect costs claimed by direct costs claimed equals average indirect cost rate (as a percentage). Then multiply the average indirect cost rate by the estimated direct costs.

Indirect Costs Actually Claimed [\$90,335.39] / Direct Costs Actually Claimed [\$2,272,190.86] = Average Indirect Cost Rate [3.98%].

Indirect Cost Rate [3.98%] \* Estimated Direct Costs (sum of all estimated activity costs for the initial claim period) [\$21,027,438] = High Estimated Indirect Costs [\$836,892.03] + Indirect Costs Claimed [\$90,335.39] = Total potential Indirect Cost \$927,227.

**Offsetting Revenues:** The low estimate is \$0 because none of the initial claims compiled by the Controller reported offsetting revenues. The high estimate is also \$0 because there is no data upon which to make an estimate.

**Late Filing Penalties:** The low estimate is \$0 because none of the initial claims compiled by the Controller were assessed a late filing penalty. The high estimate assumes that all non-filers will file claims for the initial period of reimbursement, which will be subject to a late filing penalty, and that penalty is calculated by adding non-filer direct and indirect costs and subtracting offsets to get net costs. Then multiply the net costs by a ten percent late filing penalty to calculate estimated non-filer late filing penalties, which are added to the actual late filing penalties (as reported) to estimate the high-end late filing penalties.

Estimated Non-filer Direct and Indirect Costs [\$21,954,665] – Estimated Non-filer Offsets [\$0] = Estimated Non-filer Net Costs [\$21,954,665].

Estimated Non-filer Net Costs [\$21,954,665] \* (10% late filing penalty) =  
Estimated Non-filer Late Filing Penalties [\$2,195,467].

Actual Late Filing Penalties [\$0] + Estimated Non-filer Late Filing Penalties  
[\$2,195,467] = Total potential Late Filing Penalties [\$2,195,467].

**B. Projected Annual Costs for Fiscal Year 2023-2024 and Following**

Beginning in fiscal year 2023-2024, future statewide costs are estimated to range from \$1,076,162 to \$19,428,754 annually.

The low estimate assumes that the same claimants that filed reimbursement claims for the initial period of reimbursement will continue to file annual reimbursement claims for Activities A.1., A.2., A.3., and B.

Activity A.1., requires school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, with Title 1 schools that met the 40-percent pupil poverty level that were required to comply with prior law (former Ed. Code, § 35292.6, Stats. 2017, ch. 687), to stock an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils, in additional restrooms, defined as the sum of all women's restrooms and all-gender restrooms, plus one men's restroom, minus 50 percent of all restrooms (which is not new because it was required by prior law).

The high estimate, which assumes all eligible claimants will file claims, is calculated by multiplying the average costs claimed during 2023-2024 per Title 1 school (costs claimed divided by the number of schools in districts claiming costs for Activity A.1.) by the number of Title 1 schools in districts not claiming costs (the difference between the number of Title 1 schools [5,852] and the number of Title 1 schools in districts that filed claims for Activity A.1. [381] = [5,471] Title 1 schools) then adding the amount claimed.

Activity A.1. actual costs claimed for 2023-2024 [\$504,300.53] / schools in  
claiming districts [381] = \$1,323.62 average cost per school

Average A.1. average cost per school [\$1,323.62] \* number of Title 1 schools in  
districts not claiming costs 5,852 – 381 = [5,471]) = [\$7,241,525.02]

Cost of districts not filing claims [\$7,241,525.02] + amount claimed [\$504,300.53]  
= Total potential Activity A.1. cost [\$7,745,826]

Activity A.2., requires school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, with schools that did **not** meet the 40-percent pupil poverty level subjecting them to the *Feminine Hygiene Products* mandate under prior law (non-Title 1 schools), to stock all women's restrooms and all-gender restrooms, plus one men's restroom, at all times with an adequate supply of menstrual products (defined as menstrual pads and tampons), available and accessible, free of cost for pupils.

The high estimate for Activity A.2., which assumes that all eligible claimants will file claims, is calculated by multiplying the average costs claimed per non-Title 1 school (costs claimed divided by the number of non-Title 1 schools in districts claiming costs for Activity A.2.) by the number of eligible non-Title 1 schools in districts that have not

yet filed claims. (Based on the assumptions above, the statewide number of non-Title 1 schools that maintain grades six through 12 is estimated at 1,389 schools in 2023-2024.) Then add the amount claimed.

Activity A.2. average cost per non-Title 1 school, costs claimed for 2023-2024:  
 $\$137,873.84 / 124 \text{ Non-Title 1 schools in districts that claimed A.2. costs} = \$1,111.89$

Activity A.2. average cost per non-Title 1 school  $[\$1,111.89] * (1,389 - 124) = [1,265] \text{ Non-Title 1 schools} = [\$1,406,540.85] + [\$137,873.84 \text{ claimed}] = \text{Total potential Activity A.2. cost } [\$1,544,415]$

Activity A.3., requires school districts, including county offices of education, that maintain any combination of classes from grades six through 12, inclusive, to purchase and install (or retrofit or repair) a sufficient number of suitable dispensers for menstrual products (defined only as tampons and sanitary napkins) in the new or additional restrooms identified in nos. A.1. and A.2. above. Reimbursement to purchase and install new dispensers is required to the extent that a school is not already equipped with a sufficient number of dispensers in their restrooms to comply with the mandate, or cannot repair or retrofit a sufficient number of existing dispensers to comply with the mandate, whichever is more cost effective.

The high estimate for Activity A.3. is calculated by multiplying the average costs claimed per Non-Title 1 school in districts that claimed costs for Activity A.3., by the number of non-Title 1 schools statewide. (Based on the assumptions above, the statewide number of non-Title 1 schools that maintain grades six through 12 is estimated at 1,389 schools in 2023-2024.) Then add the amount claimed.

Activity A.3. actual costs claimed  $[\$390,668.70] / \text{the number of Non-Title 1 schools in the claiming districts } [48] = \text{average Activity A.3. cost per Non-Title 1 school } [\$8,138.93]$

Average Activity A.3. cost per Non-Title 1 school  $[\$8,138.93] * \text{number of non-Title 1 schools } (1,389 \text{ Non-Title 1 schools } (2023-2024) - 48 \text{ schools in districts that claimed A.3.} = 1,341 \text{ Non-Title 1 schools}) = [\$10,914,305.13]$

Activity A.3. estimated Activity A.3. costs  $[\$10,914,305.13] \text{ statewide estimated costs} + [\$390,668.70] \text{ costs claimed} = \text{Total potential Activity A.3. cost } [\$11,304,974]$

The high estimate for Activity B. (purchase and install signs) is calculated by multiplying the average costs claimed per school (costs claimed divided by the number of districts that filed reimbursement claims) by the estimated number of districts that have not yet filed claims. Then add the costs claimed. The estimated number of districts that maintain any combination of grades six through 12 is 937.

Activity B. actual costs claimed  $[\$6,281] / \text{the number of schools in districts that claimed costs for Activity B. } [24] = \text{average Activity B. cost per district } [\$261.708]$

Average Activity B. cost per school  $[\$261.708] * \text{number of non-filing districts } 937 - 5 = 932 \text{ districts} = [\$243,911.86]$

Activity B. actual costs claimed [\$6,281] + estimated non-filer Activity B. costs that could be claimed in late claims [\$243,911.86] = Total potential Activity B. cost [\$250,193]

**Indirect Costs:** The low estimate is the indirect costs claimed for 2023-2024. The high estimate, in addition to indirect costs actually claimed, assumes that all eligible claimants who have not yet filed claims will file claims for indirect costs at the same average rate actually claimed, which is calculated by dividing indirect costs claimed by direct costs claimed equals average indirect cost rate (as a percentage). Then multiply the average indirect cost rate by the estimated direct costs.

Indirect Costs Actually Claimed [\$37,036.98] / Direct Costs Actually Claimed [\$1,039,123.17] = Average Indirect Cost Rate [3.56%].

Indirect Cost Rate [3.56%] \* Estimated Direct Costs (sum of all estimated activity costs for the initial claim period) [\$20,845,405] = Total potential Indirect Cost [\$742,096].

**Offsetting Revenues:** The low estimate is \$0 because none of the initial claims compiled by the Controller reported offsetting revenues. The high estimate is also \$0 because there is no data upon which to make an estimate.

**Late Filing Penalties:** The low estimate is \$0 because none of the initial claims compiled by the Controller were assessed a late filing penalty. The high estimate assumes that all non-filers will file claims for the initial period of reimbursement, which will be subject to a late filing penalty, and that penalty is calculated by adding non-filer direct and indirect costs and subtracting offsets to get net costs. Then multiply the net costs by a ten percent late filing penalty to calculate estimated non-filer late filing penalties, which are added to the actual late filing penalties (as reported) to estimate the high-end late filing penalties.

Estimated Non-filer Direct and Indirect Costs [\$21,587,501] – Estimated Non-filer Offsets [\$0] = Estimated Non-filer Net Costs [\$21,587,501].

Estimated Non-filer Net Costs [\$21,587,501] x (10% late filing penalty) = Estimated Non-filer Late Filing Penalties [\$2,158,750].

Actual Late Filing Penalties [\$0] + Estimated Non-filer Late Filing Penalties [\$2,158,750] = Total potential Late Filing Penalties [\$2,158,750].

### **Draft Proposed Statewide Cost Estimate**

On June 4, 2025, Commission staff issued the Draft Proposed Statewide Cost Estimate.<sup>35</sup> No comments were filed on it.

### **Staff Recommendation**

Staff recommends that the Commission adopt this Statewide Cost Estimate of \$2,362,580 - \$19,759,203 for the Initial Claim Period that began on January 1, 2022 and ends on June 30, 2023.

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<sup>35</sup> Exhibit C, Draft Proposed Statewide Cost Estimate.

## **DECLARATION OF SERVICE BY EMAIL**

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On July 8, 2025, I served the:

- **Current Mailing List dated April 18, 2025**
- **Proposed Statewide Cost Estimate issued July 8, 2025**

*Public School Restrooms: Menstrual Products, 22-TC-04*

Statutes 2021, Chapter 664 (AB 367); Education Code Section 35292.6, effective January 1, 2022

by making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

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 July 8, 2025 at Sacramento, California.



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Jill Magee  
Commission on State Mandates  
980 Ninth Street, Suite 300  
Sacramento, CA 95814  
(916) 323-3562

# COMMISSION ON STATE MANDATES

## Mailing List

**Last Updated:** 4/18/25

**Claim Number:** 22-TC-04

**Matter:** Public School Restrooms: Menstrual Products

**Claimant:** Hesperia Unified School District

### TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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