

ITEM 12- REVISED
SUPPLEMENTAL STAFF ANALYSIS
PROPOSED AMENDMENTS TO PARAMETERS AND GUIDELINES

Government Code Sections 7570-7588

Statutes 1984, Chapter 1747 (Assem. Bill No. 3632);
Statutes 1985, Chapter 1274 (Assem. Bill No. 882)

California Code of Regulations, Title 2, Sections 60000-60610 (Emergency Regulations filed
December 31, 1985, designated effective January 1, 1986 (Register 86, No. 1)
and refiled June 30, 1986, designated effective July 12, 1986 (Register 86, No. 28))

Counties of Los Angeles and Stanislaus, Requestors

Handicapped & Disabled Students (CSM 4282)
00-PGA-03; 00-PGA-04

EXECUTIVE SUMMARY

This item was last heard by the Commission on December 4, 2006. The Commission continued the hearing for further analysis and to obtain evidence regarding the fiscal impact of potential claims being filed and/or re-filed if the Commission amends the parameters and guidelines for the potential reimbursement period of this request; fiscal years 2000-2001 through 2003-2004.

Background

This is a request to amend the original parameters and guidelines for *Handicapped and Disabled Students (CSM 4282)* by the Counties of Los Angeles and Stanislaus pursuant to Government Code section 17557. Government Code section 17557 gives the Commission discretion to amend or modify parameters and guidelines. If the Commission approves any of the Counties' requests and amends the parameters and guidelines, the State Controller's Office will have 60 days after the receipt of the revised parameters and guidelines to prepare and issue revised claiming instructions. (Gov. Code, § 17558, subd. (c).) Eligible claimants then have 120 days following the issuance of the revised claiming instructions to file reimbursement claims for costs incurred during fiscal years 2000-2001 through 2003-2004. (Gov. Code, § 17560, subd. (c).)

As indicated in the staff analysis for the December 2006 hearing, staff finds that Counties' requests to add to or amend the reimbursable activities are not consistent with the Statement of Decision. Staff recommends that the Commission deny the requests to amend the reimbursable activities.

Staff further finds that the proposed indirect cost language does not identify any additional costs that could not have been previously claimed by counties and, thus, it is not necessary to amend section VI, regarding Claim Preparation, as requested. Staff recommends that the Commission deny the request to amend the indirect cost language.

Finally, the County of Stanislaus requests that the Commission amend the Offsetting Revenue section of the parameters and guidelines to specifically identify offsetting revenue. The County argues that the amendment is necessary since various counties did not claim costs for this program because they were under the impression that realignment funds received under the Bronzan-McCorquodale Act would be considered an offset. Statutes 2002, chapter 1167, section 38, provides, however, that beginning in fiscal year 2001-2002, counties are not required to provide any share of costs from realignment funds for psychotherapy or other mental health treatment services. Statutes 2004, chapter 496, section 6, further provides that counties are authorized to use realignment funds for any part of the Handicapped and Disabled Students program and, if the realignment funds are used by a county, the county is still eligible for reimbursement from the state for all allowable costs without being required to deduct the realignment funds as an offset. Statutes 2004, chapter 496, section 6 is declaratory of existing law and, if these parameters and guidelines are amended, would affect reimbursement claims filed for costs incurred in fiscal years ~~2000-2001~~ 2001-2002 through 2003-2004.

At the hearing in December, representatives from both the Counties of Stanislaus and Los Angeles testified that they would not re-file reimbursement claims if the parameters and guidelines were amended.¹ However, they were aware of smaller counties that would likely file claims.

The State Controller's Office opposes the request to amend the Offsetting Revenue section of the parameters and guidelines. The Controller contends that counties should not be allowed to file new claims for the period between July 1, 2000, through June 30, 2004, since no changes have been made to the reimbursable activities.

As indicated in the staff analysis for the December 2006 hearing, staff recommended that the Commission approve the request to amend the language regarding offsetting revenue. The proposed language amends the section to correct a legal error found by the Commission when it reconsidered the original Handicapped and Disabled Students program as directed by the Legislature for costs incurred beginning July 1, 2004. The original parameters and guidelines incorrectly states that Medi-Cal and private insurance proceeds cannot be used as offsetting revenue. As determined by the Commission when it reconsidered the original program, federal law, under specified circumstances, allows agencies to use these proceeds to pay for this program.² Counties were authorized to use Medi-Cal funds and private pay insurance during the reimbursement period in question. Thus, if available and used by a county, this revenue would be required to be identified in the reimbursement claim as an offset to reduce costs.

After receiving testimony, the Commission continued the item to obtain evidence regarding the fiscal impact of potential claims being filed and/or re-filed if the Commission amends the parameters and guidelines for the potential reimbursement period of this request; fiscal years 2000-2001 through 2003-2004.

¹ Exhibit B, Transcript, December 4, 2006 Commission Hearing, page 191.

² Exhibit A, Staff Analysis, Item 14, December 4, 2006 Commission Hearing, pages 28-30.

Analysis

Attached to this analysis are tables summarizing public records on this program maintained by the State Controller's Office, the Department of Mental Health, and the Department of Education.

Table 1 identifies the claimed amount and offset/realignment funds reported by claimants on their original reimbursement claims filed with the State Controller's Office for fiscal years 2000-2001 through 2003-2004. The last column of Table 1 shows the State General Fund amounts reported by counties to the Department of Mental Health on the "MH 1912" form for fiscal year 2004-2005. The Department of Mental Health "MH 1912" form includes the costs reported by counties for special education activities that are eligible for reimbursement under other mandated programs, however; namely, *Reconsideration of Handicapped and Disabled Students* (04-RL-4282-10), *Handicapped and Disabled Students II* (02-TC-40/49) and *Seriously Emotionally Disturbed Pupils, Out-of-State Mental Health Services* (97-TC-05). Table 2 further summarizes this information.

Tables 3a and 3b identify the State General Fund amount reported by counties to the Department of Mental Health for fiscal year 2004-2005. The numbers not reported by counties to the Department of Mental Health are designated as "n/a."

Tables 4a and 4b are special education enrollment figures reported by county provided by the Department of Education's website's "Data Quest" function (<http://dq.cde.ca.gov/dataquest/>). Table 4a provides the number per fiscal year of enrolled students classified with "emotional disturbance" in the 13 counties that did not file any reimbursement claims for fiscal years 2000-2001 through 2003-2004. Table 4b provides the number per fiscal year of enrolled students classified with "emotional disturbance" in the 28 counties that did not file claims in every fiscal year during the reimbursement period in question.

These records suggest that if the parameters and guidelines are amended, the state could be required to provide additional reimbursement to counties that did not file claims during the reimbursement period in question and to counties that claimed realignment funds as an offset. This information is summarized below.

Counties that did not file claims for fiscal years 2000-2001 through 2003-2004 will be allowed to file claims if the parameters and guidelines are amended

As indicated above, if the parameters and guidelines are amended, eligible claimants are entitled to file new reimbursement claims or amended reimbursement claims for costs incurred during fiscal years 2000-2001 through 2003-2004. The tables show as follows:

- 28 of the 58 counties in California did not file a mandate reimbursement claim in every fiscal year between fiscal years 2000-2001 through 2003-2004. (Tables 1, 3a, and 3b.)
- Of the 28 counties that did not file in every fiscal year, 13 counties did not claim reimbursement in *any* fiscal year during the relevant reimbursement period. The other 15 counties made a claim in at least one fiscal year during the relevant reimbursement period. (Tables 3a and 3b.)
- 8 of the 13 counties that did not claim reimbursement in any fiscal year during the relevant reimbursement period reported State General Fund costs to the Department of Mental Health for special education services in the amount of \$544,218 in fiscal year

2004-2005. (Table 3a.) If the parameters and guidelines are amended and these counties file new reimbursement claims, the total amount claimed for fiscal years 2000-2001 through 2003-2004 will be less than \$544,218 because that number includes the cost for special education activities included in other mandated programs; namely, *Reconsideration of Handicapped and Disabled Students* (04-RL-4282-10), *Handicapped and Disabled Students II* (02-TC-40/49) and *Seriously Emotionally Disturbed Pupils, Out-of-State Mental Health Services* (97-TC-05).

- In the fiscal years that counties did not file reimbursement claims, the counties *may* have had “severe emotional disturbance” caseload to support a reimbursement claim. (Tables 4a and 4b.) Staff notes that Tables 4a and 4b derive from Department of Education data that indicates only the students with “emotional disturbance” that are enrolled in each county’s school districts. The numbers do not show how many enrolled special education students with “emotional disturbance” were provided or eligible for county services under the Handicapped and Disabled Students program.

In addition, there does not appear to be a correlation between the number of enrolled special education students with “emotional disturbance” and fiscal years in which a county files a claim. For example, the only fiscal year that Amador County did not file a claim is the fiscal year that the county had its highest enrollment of special education students with “emotional disturbance.” (Table 4b.)

Finally, there may not be a correlation between the amount claimed and the number of enrolled special education students with “emotional disturbance.” For example, Yolo County claimed \$999,483 in fiscal year 2002-2003 with 125 enrolled special education students with “emotional disturbance.” However, in fiscal year 2003-2004, Yolo County claimed \$289,141 with 118 enrolled special education students with “emotional disturbance.” The cost would depend on the activities performed and the services provided to each student under the student’s Individual Education Plan (IEP). (Table 1 and 4b.)

- The total number of enrolled students with “emotional disturbance” in the 28 counties that did not file a reimbursement claim in every fiscal year between fiscal years 2000-2001 through 2003-2004 constitutes less than four (4) percent of the statewide total of special education students with “emotional disturbance” each year as follows:

2000-2001	$844/22,348 = .038$
2001-2002	$433/24,554 = .018$
2002-2003	$424/26,144 = .016$
2003-2004	$903/27,292 = .033$ (Tables 4a and 4b)

The total number of enrolled students with “emotional disturbance” in the 13 counties that did not file any reimbursement claim during the relevant reimbursement period was a less than one (1) percent of the total number of students with “emotional disturbance” statewide as follows:

2000-2001	$179/22,348 = .008$
2001-2002	$195/24,554 = .008$
2002-2003	$213/26,144 = .008$

2003-2004 223/27,292 = .008
 2004-2005 242/27,912 = .009 (Tables 4a and 4b)

- Of the 13 counties that did not file any reimbursement claims for fiscal years 2000-2001 through 2003-2004, 7 counties had 8 or less enrolled special education students with “emotional disturbance” during the fiscal years in question. These counties include Alpine, Colusa, Inyo, Modoc, Plumas, Sierra, and Trinity. Alpine County never exceeded more than 1 student during this time period. (Table 4a.)

Therefore, this data suggests that the eight counties that never filed a reimbursement claim during the reimbursement period in question have few emotionally disturbed pupils and, thus, the potential costs for new claims filed if the parameters and guidelines are amended may be relatively low.

Some counties deducted realignment funds as an offset and will be allowed to file amended claims without deducting the realignment funds if the parameters and guidelines are amended

As indicated above, the County of Stanislaus argues that a parameters and guidelines amendment is necessary since various counties did not claim costs for this program because they were under the impression that realignment funds received under the Bronzan-McCorquodale Act would be considered an offset.

According to the records of the State Controller’s Office, several counties that filed reimbursement claims for the period of reimbursement in question deducted realignment funds from their claims as an offset.

As noted by the Commission when it reconsidered this program, Statutes 2002, chapter 1167, section 38, states, however, that beginning in fiscal year 2001-2002, counties are not required to provide any share of costs from realignment funds for psychotherapy or other mental health treatment services. Statutes 2004, chapter 496, section 6, further provides that counties are authorized to use realignment funds for *any* part of the Handicapped and Disabled Students program and, if the realignment funds are used by a county, the county is still eligible for reimbursement from the state for all allowable costs without being required to deduct the realignment funds as an offset. Statutes 2004, chapter 496, section 6 is declaratory of existing law. Thus, if these parameters and guidelines are amended, eligible claimants will be allowed to file amended reimbursement claims for all allowable costs, even if they used realignment funds to pay for the reimbursable activities, for fiscal years 2001-2002 through 2003-2004.

Tables 1 and 2 identify the counties that filed mandate reimbursement claims and the claimed amounts for the reimbursement period in question. The “Offset/Realign” column in Table 1 is comprised of amounts reported by claimants on their original reimbursement claims as realignment funds that were deducted as offsets. The offsets were reported as follows:

2000-2001, 13 counties	\$20,271,830
2001-2002, 13 counties	\$11,768,367
2002-2003, 7 counties,	\$11,802,175
2003-2004, 8 counties	<u>\$14,024,192</u>
TOTAL	\$57,866,564

If the parameters and guidelines are amended, these counties can file amended reimbursement claims and not deduct these amounts for fiscal years 2001-2002 through 2003-2004, based on Statutes 2002, chapter 1167 and Statutes 2004, chapter 496, leaving the total potential liability for increased costs at \$37,594,734. Staff notes, however, that the total of ~~\$57,866,564~~ \$37,594,734 may be reduced if amended claims are filed since Medi-Cal proceeds and private pay insurance, if obtained by the county, will be required to be deducted as an offset. In addition, other offsets, including categorical funds appropriated to counties for this program in the amount of \$12,334,000 in ~~2000-2001 and~~ 2001-2002, may be included in the ~~\$57,866,564~~ \$37,594,734 number.³

CONCLUSION

If the Commission adopts the parameters and guidelines amendment, the additional evidence suggests that there will be increased costs to the state. However, staff is unable to calculate how much will be claimed and eligible for reimbursement.

If the Commission does not adopt the parameters and guidelines amendment, the parameters and guidelines will contain an error of law with respect to offsetting revenue. Counties eligible to be reimbursed for realignment funds that were deducted in their fiscal year ~~2000-2001-~~ 2001-2002 through 2003-2004 reimbursement claims will not be able to amend their claims and recover these costs.

Staff Recommendation

Staff recommends that the Commission adopt the proposed amendment to the parameters and guidelines to incorporate the language regarding offsetting revenue and correct the errors of law. The proposed amendments are effective for the reimbursement period beginning July 1, 2000, through and including June 30, 2004.

Staff further recommends that the Commission authorize staff to make any non-substantive, technical corrections to the parameters and guidelines following the hearing.

³ See pages 1065 and 1066 of the record, which identifies the allocation of the categorical funds to the counties for fiscal year 2001-2002.

**Table 1. State Controller's Office
Report on County Reimbursement Claims for FY 2000/01 - 2003/04**

Counties	2000/2001 FY		2001/2002 FY		2002/2003 FY		2003/2004 FY		2004/2005 FY	
	Line #10HDS-3	Line #10HDS-3	Line #10HDS-3	Line #10HDS-3	Line #10HDS-3	Line #10HDS-3	Line #10HDS-3	TOTAL GF RPTD		
	Offsets/Realign	Claimed Amount	Offsets/Realign	Claimed Amount	Offsets/Realign	Claimed Amount	Offsets/Realign	TO DMH		
9838785	City & Co of San Fran	\$0	\$4,281,685	\$0	\$4,228,985	\$0	\$6,996,972	\$1,009,991	\$4,923,375	\$2,012,371
9901	Alameda	\$4,822,194	\$6,375,606	\$5,799,276	\$5,301,799	\$6,517,858	\$5,339,891	\$0	\$4,471,525	
	Alpine									
9903	Amador	\$0	\$122,930	\$0	\$132,454	\$0	\$0	\$0	\$48,085	\$22,708
9904	Butte	\$0	\$934,697	\$0	\$864,058	\$0	\$695,379	\$0	\$147,844	\$319,259
	Calaveras									\$12,692
	Colusa									\$0
9907	Contra Costa	\$1,189,490	\$1,929,799	\$864,986	\$1,601,707	\$0	\$3,549,925	\$0	\$3,790,954	\$757,390
9908	Del Norte	\$12,883	\$6,296	\$12,883	\$3,819	\$0	\$0	\$0	\$20,688	\$20,880
9909	El Dorado	\$0	\$374,288	\$20,919	\$378,998	\$0	\$570,361	\$0	\$560,030	
9910	Fresno	\$258,004	\$64,151	\$0	\$2,313,507	\$0	\$2,230,844	\$0	\$1,320,964	\$909,276
	Glenn									\$25,031
9912	Humboldt	\$0	\$0	\$0	\$12,378	\$0	\$13,030	\$0	\$29,522	\$0
9913	Imperial	\$0	\$0	\$0	\$272,748	\$0	\$353,075	\$0	\$26,380	\$100,916
9914	Inyo	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$95,744
9915	Kern	\$0	\$1,548,661	\$0	\$2,373,340	\$0	\$1,933,960	\$520,302	\$179,107	\$557,534
9916	Kings	\$0	\$400,610	\$0	\$38,555	\$0	\$147,127	\$0	\$167,055	\$369,395
9917	Lake	\$0	\$0	\$0	\$0	\$0	\$3,783	\$0	\$0	\$102,754
	Lassen									\$65,720
9919	Los Angeles	\$0	\$18,418,003	\$0	\$20,637,808	\$0	\$21,388,671	\$0	\$4,293,621	\$6,044,691
	Madera									\$108,700
9921	Marin	\$0	\$2,025,210	\$0	\$2,478,583	\$0	\$2,691,673	\$0	\$1,705,289	\$939,596
9922	Mariposa	\$0	\$0	\$0	\$0	\$0	\$55,004	\$0	\$53,516	\$0
9923	Mendocino	\$0	\$0	\$1,311,520	\$623,471	\$1,501,701	\$611,185	\$1,878,957	\$369,924	
9924	Merced	\$0	\$0	\$0	\$78,618	\$0	\$234,346	\$0	\$430,092	\$218,830
	Modoc									\$2,537
9926	Mono	\$0	\$0	\$0	\$0	\$0	\$2,328	\$0	\$0	\$3,992
9927	Monterey	\$0	\$3,394,829	\$0	\$2,771,867	\$0	\$3,162,765	\$0	\$2,297,380	
9928	Napa	\$81,685	\$252,185	\$0	\$665,033	\$0	\$1,041,970	\$296,099	\$858,003	\$556,458
9929	Nevada	\$0	\$17,880	\$0	\$61,893	\$0	\$143,534	\$0	\$478,361	\$25,170
9930	Orange	\$5,998,426	\$12,831,341	\$0	\$19,301,631	\$0	\$20,223,229	\$0	\$5,501,852	\$1,050,999
9931	Placer	\$0	\$1,514,142	\$0	\$1,599,911	\$0	\$2,332,712	\$0	\$1,853,580	\$0
	Plumas									\$77,515
9933	Riverside	\$0	\$4,275,303	\$0	\$4,402,560	\$0	\$5,005,418	\$0	\$766,142	\$369,587
9934	Sacramento	\$0	\$2,497,118	\$0	\$2,639,639	\$0	\$3,673,760	\$0	\$2,815,980	\$0
9935	San Benito	\$0	\$0	\$0	\$46,886	\$0	\$162,642	\$0	\$162,204	
9936	San Bernardino	\$0	\$877,779	\$0	\$887,672	\$0	\$1,884,861	\$0	\$1,503,801	\$667,303
9937	San Diego	\$5,937,799	\$1,297,338	\$21,970	\$5,993,431	\$1,430,054	\$7,271,033	\$5,002,511	\$2,328,865	\$341,046
9939	San Joaquin	\$518,739	\$242,057	\$789,137	\$800,594	\$784,524	\$963,305	\$0	\$703,475	\$647,843
9940	San Luis Obispo	\$0	\$461,980	\$614,311	\$759,644	\$558,256	\$696,650	\$416,383	\$0	\$533,740
9941	San Mateo	\$0	\$4,069,186	\$3,999	\$3,387,701	\$3,626	\$4,227,509	\$4,321,810	\$5,065,320	\$1,436,280
9942	Santa Barbara	\$1,329,844	\$1,112,662	\$0	\$2,687,693	\$0	\$1,441,983	\$0	\$1,284,838	\$2,104,493
9943	Santa Clara	\$0	\$8,621,447	\$0	\$11,966,549	\$0	\$12,174,092	\$0	\$6,742,221	\$1,228,770
9944	Santa Cruz	\$9,106	\$467,228	\$0	\$916,148	\$0	\$1,094,269	\$0	\$388,967	\$0
9945	Shasta	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$220,617	\$0
	Sierra									\$0
9947	Siskiyou	\$0	\$307,708	\$0	\$79,086	\$0	\$237,601	\$0	\$23,960	\$0
9948	Solano	\$47,348	\$230,592	\$1,075,024	\$1,365,145	\$0	\$3,112,165	\$0	\$2,886,038	(\$1,178,942)
9949	Sonoma	\$0	\$903,155	\$0	\$1,525,709	\$0	\$1,315,834	\$578,139	\$0	
9950	Stanislaus	\$0	\$2,370,913	\$1,188,031	\$2,662,946	\$1,006,156	\$2,437,318	\$0	\$1,109,144	\$0
9951	Sutter-Yuba	\$66,312	\$342,988	\$66,311	\$112,060	\$0	\$242,885	\$0	\$242,885	\$769,843
9952	Tehama	\$0	\$0	\$0	\$0	\$0	\$201,458	\$0	\$128,294	\$0
	Trinity									\$0
	Tulare									\$156,279
9955	Tuolumne	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
9956	Ventura	\$0	\$4,124,968	\$0	\$4,498,685	\$0	\$4,647,025	\$0	\$2,010,313	\$75,057
9957	Yolo	\$0	\$0	\$0	\$890,552	\$0	\$994,483	\$0	\$289,141	
		\$20,271,830	\$86,714,735	\$11,768,367	\$111,363,863	\$11,802,175	\$125,506,055	\$14,024,192	\$62,199,352	\$21,551,457

Source: All figures provided by the State Controller's Office (SCO) in document entitled "Prog 111 Realignment Offsets", except for the following additions:
1. The following counties were not included in the SCO's original document, and were added by the Commission staff: Alpine, Calaveras, Colusa, Glenn, Lassen, Madera, Modoc, Plumas, Sierra, Trinity, Tulare.
2. Column entitled "2004/05 FY TOTAL GF RPTD TO DMH". Figures added by the Commission staff and derived from the Department of Mental Health (DMH) "MH 1912" forms.

Table 2.
Summary of Table 1

	2000/2001 FY	2001/2002 FY	2002/2003 FY	2003/2004 FY	Total
Counties Filing Claims w/ Offsets/Realignment	13	13	7	8	41
Total Offsets/Realignment Amount	\$20,271,830	\$11,768,367	\$11,802,175	\$14,024,192	\$57,866,564
Counties Filing Claims	34	40	42	41	157
Total Claims Amount	\$86,714,735	\$111,363,863	\$125,506,055	\$62,199,352	\$385,784,005
Counties Not Filing Claims	24	18	16	17	75

Source: Table summarizes information from Table 1 provided by the State Controller's Office.

Table 3a.

2004/2005 FY State General Fund Reported to the Department of Mental Health (DMH)

13 Counties That Did Not Make Any Claim Between 2000/2001 FY - 2003/2004 FY

	2004/2005 FY
Alpine	n/a ¹
Calaveras	\$12,692
Colusa	\$0
Glenn	\$25,031
Inyo	\$95,744
Lassen	\$65,720
Madera	\$108,700
Modoc	\$2,537
Plumas	\$77,515
Sierra	\$0
Trinity	\$0
Tulare	\$156,279
Tuolumne	\$0
Total :	\$544,218

Source: DMH "MH 1912" forms.

¹For purposes here "n/a" means "not available"

Table 3b.

2004/2005 FY State General Fund Reported to the Department of Mental Health (DMH)

15 Counties That Did Not Make Claims In Every Fiscal Year Between 2000/2001 FY - 2003/2004 FY

	2004/2005 FY
Amador	\$22,708
Del Norte	\$20,880
Humboldt	\$0
Imperial	\$100,916
Lake	\$102,754
Mariposa	\$0
Mendocino	n/a
Merced	\$218,830
Mono	\$3,992
San Benito	n/a
San Luis Obispo	\$533,740
Shasta	\$0
Sonoma	n/a
Tehama	\$0
Yolo	n/a
Total:	\$1,003,820

Source: DMH "MH 1912" forms.

¹For purposes here "n/a" means "not available"

Table 4a.
**Number of Enrolled Special Education Students Classified with "Emotional
 Disturbance"**

13 Counties That Did Not Make Any Claim Between 2000/2001 FY - 2003/2004 FY

	2000/2001 FY	2001/2002 FY	2002/2003 FY	2003/2004 FY	2004/2005 FY	Total
Alpine	0	1	1	1	0	3
Calaveras	28	34	36	30	29	157
Colusa	5	5	6	7	10	33
Glenn	6	9	11	14	15	55
Inyo	4	6	7	6	3	26
Lassen	24	20	25	26	30	125
Madera	24	32	33	36	34	159
Modoc	3	6	9	8	6	32
Plumas	8	7	6	4	4	29
Sierra	5	4	4	3	4	20
Trinity	6	7	8	8	5	34
Tulare	14	13	23	40	49	139
Tuolumne	52	51	44	40	53	240
Total :	179	195	213	223	242	1052
State Total:	22,348	24,554	26,144	27,292	27,912	

Source: County and state enrollment figures provided by the California Department of Education (CDE) website's "Data Quest" function. (<http://dq.cde.ca.gov/dataquest/>)

Table 4b.
Number of Enrolled Special Education Students Classified with "Emotional Disturbance"

15 Counties That Did Not Make Claims In Every Fiscal Year Between 2000/2001 FY - 2003/2004 FY²

	2000/2001 FY	2001/2002 FY	2002/2003 FY	2003/2004 FY	2004/2005 FY	Total
Amador	15	17	27	24	25	108
Del Norte	19	26	24	24	29	122
Humboldt	52	58	64	36	36	246
Imperial	15	14	22	30	31	112
Lake	57	68	62	61	66	314
Mariposa	5	6	5	10	18	44
Mendocino	159	151	146	175	156	787
Merced	75	84	106	126	126	517
Mono	4	3	3	6	4	20
San Benito	22	36	41	43	42	184
San Luis Obispo	127	158	168	172	177	802
Shasta	122	136	160	151	149	718
Sonoma	372	387	413	441	422	2035
Tehama	18	25	37	38	38	156
Yolo	136	137	125	118	131	647
Total :	1198	1306	1403	1455	1450	6812
State Total:	<u>22,348</u>	<u>24,554</u>	<u>26,144</u>	<u>27,292</u>	<u>27,912</u>	

Combined Total
 Of Students When
 No Claims Made²

844 433 424 903

Source: County and state enrollment figures provided by the California Department of Education (CDE) website's "Data Quest" function. (<http://dq.cde.ca.gov/dataquest/>)

¹Excludes counties that did not make any claims during 2000/2001 FY - 2003/2004 FY (Table 4a counties). Numbers bolded in FY when no claims were made.

² Total from Table 4a and the bolded figures in Table 4b.