

COMMISSION ON STATE MANDATES

980 NINTH STREET, SUITE 300
SACRAMENTO, CA 95814
TE: (916) 928-8682
(916) 445-0278
E: csminfo@csm.ca.gov



February 14, 2005

Mr. Keith Petersen
SixTen and Associates
5252 Balboa Avenue, Suite 807
San Diego, CA 92117

And Interested Parties and Affected State Agencies (See Enclosed Mailing List)

RE: Draft Staff Analysis, Proposed Parameters and Guidelines, and Hearing Date
Integrated Waste Management, 00-TC-07
Santa Monica and South Lake Tahoe Community College Districts, Co-Claimants
Public Resources Code Sections 40148, 40196.3, 42920-42928
Public Contract Code Sections 12167 and 12167.1
Statutes 1999, Chapter 764; Statutes 1992, Chapter 1116
Manuals of the California Integrated Waste Management Board

Dear Mr. Petersen:

The draft staff analysis and proposed parameters and guidelines are enclosed for your review.

Written Comments

Any party or interested party may file written comments on the draft staff analysis and proposed parameters and guidelines by **February 28, 2005**. The Commission's regulations require comments filed with the Commission to be simultaneously served on the parties and interested parties and to be accompanied by a proof of service. To request an extension of time to file comments, please refer to section 1183.01, subdivision (c), of the Commission's regulations.

Hearing

The proposed parameters and guidelines are tentatively set for hearing on **March 30, 2005** at 9:30 a.m. at the **Department of Social Services Auditorium, 744 P Street, First Floor, Sacramento, California**. Please let us know in advance if you or a representative of your agency will testify at the hearing, and if other witnesses will appear. If you would like to request postponement of the hearing, please refer to section 1183.01, subdivision (c), of the Commission's regulations.

Mr. Keith Petersen

Page 2

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.

If you have any questions on the above, please contact Eric Feller at (916) 323-8221.

Sincerely,



NANCY PATTON
Assistant Executive Director

Enc. Draft Staff Analysis
cc. Mailing List (current mailing list attached)

MAILED: WORKING BINDER: _____
DATE: 2/14/05 CHRON: _____
INITIAL: YS FILE: _____
FAXED:

**DRAFT STAFF ANALYSIS
PROPOSED PARAMETERS AND GUIDELINES**

Public Resources Code Sections 40148, 40196.3, 42920-42928
Public Contract Code Sections 12167 and 12167.1

Statutes 1999, Chapter 764 (A.B. 75)
Statutes 1992, Chapter 1116 (A.B. 3521)

State Agency Model Integrated Waste Management Plan (February 2000)

Integrated Waste Management (00-TC-07)

Santa Monica and South Lake Tahoe Community College Districts, Co-claimants

EXECUTIVE SUMMARY

The Executive Summary will be included in the Final Staff Analysis.

STAFF ANALYSIS

Claimants

Santa Monica and South Lake Tahoe Community College Districts

Chronology

- 03/25/04: Commission on State Mandates (Commission) adopted Statement of Decision
- 04/23/04: Claimants submitted proposed parameters and guidelines.
- 06/17/04: The California Integrated Waste Management Board (Board) submitted comments
- 07/12/04: The State Controller's Office (SCO) submitted comments
- 09/30/04: Commission conducted a pre-hearing conference
- 10/13/04: The Board submitted additional comments
- 10/18/04: Claimants submitted a rebuttal to state agency comments
- 02/14/05: Commission issued draft staff analysis

Summary of the Mandate

On March 25, 2004, the Commission adopted its Statement of Decision¹ finding that Public Resources Code sections 40148, 40196.3, 42920-42928; Public Contract Code sections 12167 and 12167.1; and the State Agency Model Integrated Waste Management Plan (February 2000) ("model plan") require specific new activities, which constitute new programs or higher levels of service for community college districts within the meaning of article XIII/B, section 6, of the California Constitution, and impose costs mandated by the state pursuant to Government Code section 17514.

Discussion

Staff reviewed the claimants' proposal² and the comments received.³ At the request of the Board, the Commission conducted a pre-hearing conference on September 30, 2004. On October 13, 2004, the Board submitted additional comments.⁴ The claimants submitted a rebuttal to state agency comments on October 18, 2004.⁵ Staff made non-substantive, technical changes for purposes of clarification, consistency with language in parameters and guidelines adopted since January 2003, and conformity to the Statement of Decision and statutory language. Substantive changes are discussed below.

III. Period of Reimbursement

The claimants proposed that the reimbursement period for this program begins on July 1, 1999. This is true for the activity to submit recycled material reports to the board, pursuant to Public

¹ Exhibit A.

² Exhibit B.

³ Exhibits C, D, E, and F.

⁴ Exhibit E.

⁵ Exhibit F.

Contract Code section 12167.1 (Stats., 1992, ch. 1116); and for the one-time activities of developing policies and procedures and training.

The other activities, however, were codified by Statutes 1999, chapter 764. This statute has an operative date of January 1, 2000. Accordingly, those activities required by the Public Resources Code are reimbursable beginning January 1, 2000. Additionally, seeking an alternative diversion goal or time extension (Pub. Resources Code, §§ 42922, 42923, and 42927) is reimbursable until December 31, 2005, as the law sunsets January 1, 2006. Staff revised the language to reflect the correct reimbursement periods.

IV. Reimbursable Activities

One-Time Activities

The claimants proposed that preparing and updating policies and procedures and training district staff as ongoing reimbursable activities.

In a letter received on July 12, 2004, the SCO argued that, "the model plan contains procedures for implementing the integrated waste management plan under the discretion of an approved solid waste and recycling coordinator."⁶ Therefore, the SCO suggests that costs incurred for additional policies and procedures are discretionary and are not reimbursable. Regarding training, the SCO asserts that it should be limited to a one-time activity for staff directly involved in implementing the plan, and that the scope of the training be limited to the Board's model plan.

The claimants asserted in their rebuttal submitted on October 18, 2004, that policies and procedures and training were implicit costs of implementing a new program.⁷ Moreover, they argue that limiting training to a one-time event is inappropriate because of possible staff turnover and changes in the waste management plan.

Staff Findings

Staff finds that developing the necessary policies and procedures for the implementation of the integrated waste management plan and training district staff on the requirements and implementation of the district's integrated waste management plan are reasonably necessary to comply with the mandated program. In fact, the instructions for completing the model plan indicates that "workshops [were] conducted in March and April 2000 to help State agencies^[8] determine diversion rates and complete [a plan],"⁹ Therefore, staff included as reimbursable the one-time development of policies and procedures, and one-time training per employee working directly on the community college's integrated waste management plan.

⁶ Exhibit D, page ____.

⁷ Exhibit F, page ____.

⁸ As noted in footnote 2 of the Statement of Decision (Exhibit A): "State agency" is "every state office, department, division, board, commission, or other agency of the state, including the California Community Colleges and the California State University. ... (Pub. Resources Code, § 40196.3).

⁹ Exhibit C, page ____.

Ongoing Activities

The claimants identified six other activities related to the integrated waste management plan: plan development and approval, program coordinator, waste diversion, alternative compliance, accounting system, and annual report.

The SCO recommends¹⁰ revising these activities to correlate with the activities approved in the Commission's Statement of Decision.

The Board noted several issues in a letter submitted on June 17, 2004.¹¹ Regarding the proposed reimbursable activities, the Board asserted that none of the activities listed under "Promotional Programs" or "Procurement Activities" are required as part of the mandate. The Board maintains that only the time spent in answering the questions in the report may be claimed, not time spent implementing the activities. Further, the Board states that it made a legal determination that procurement activities do not apply to community colleges.

The claimants argued in a letter submitted on October 18, 2004,¹² that the Commission's Statement of Decision includes the entire scope of the model plan, of which implementing promotional programs and procurement activities is a part. The claimants assert that the mandate is not limited to disposal reduction. Regarding the Board's legal determination that procurement activities do not apply to community colleges, the claimants request evidence of the determination.

Staff Findings

Maintain reduction: The claimants' proposal under "Waste Diversion" included the activity to maintain the required level of reduction according to the model plan, and identified methods such as source reduction, recycling, composting, and special waste.

The law requires that each state agency and each large state facility shall divert at least 50 percent of all solid waste from landfill disposal or transformation facilities through source reduction, recycling, and composting activities on and after January 1, 2004. The Commission's Statement of Decision specifically states:

Subdivision (i) of section 42922 states that a community college that is granted an alternative requirement "shall continue to implement source reduction, recycling, and composting programs, and shall report the status of those programs in the report required pursuant to Section 42926." This provision merely reaffirms the requirements of section 42921 and the more specific requirements in section 42926.¹³

Therefore, staff finds that maintaining the required level of reduction, as approved by the Board, is reasonably necessary to comply with the waste diversion requirement.

¹⁰ Exhibit D, page ____.

¹¹ Exhibit C, page ____.

¹² Exhibit F, page ____.

¹³ Exhibit A, (page 26 of Statement of Decision).

Moreover, the claimants listed each of the methods identified in the model plan in the proposed parameters and guidelines. Staff finds that it is more efficient to simply reference the model plan in the proposed parameters and guidelines. Therefore, staff deleted the model plan methods, and instead referenced the model plan and attached it to the proposed parameters and guidelines.

Promotional & procurement activities; Staff further finds that implementing promotional programs or procurement activities is not reimbursable, although reporting on them is.

Promotional programs and procurement activities were listed in claimants' parameters and guidelines. However, the Board stated that none of the activities listed under "Promotional Programs" or "Procurement Activities" are required as part of the mandate, and that only the time spent in answering the questions in the report is reimbursable. The Board also stated that it made a legal determination that procurement activities do not apply to community colleges. However, the legal determination was not submitted as part of the record, so staff does not rely on it.

Reimbursement for procurement and promotional activities is based on the model plan. The plain language of the model plan only requires community colleges to report on procurement and promotional activities. As stated on page 37 of the Statement of Decision,

A community college must comply with the Board's model integrated waste management plan, which includes ... completing and submitting to the Board the following: ... (3) state agency waste reduction and recycling program worksheet, including the sections on program activities, promotional programs, and procurement activities ...

In its June 2004 comments, the Board represented that procurement activities and promotional programs do not apply to community colleges. The Board's interpretation of the model plan is entitled to deference by the Commission. The model plan was adopted at a public meeting of the Board in January 2000,¹⁴ so it is tantamount to a Board regulation. Therefore, the Board's interpretation that community colleges do not need to implement the procurement and promotional programs in the model plan is entitled to deference. The Commission, like a court, accords great weight to the agency's interpretation of its statutes and regulations. (*Yamaha Corp. v. State Bd. of Equalization* (1998) 19 Cal.4th 1; 12).

Staff finds, therefore, that reporting on promotional programs and procurement activities when submitting the model plan or preparing the required annual reports is reimbursable because this was found to be reimbursable in the Statement of Decision. Language was added to the proposed parameters and guidelines to make this clear.

Responding to the Board: Staff added, "Respond to any Board reporting requirements during the approval process" to be consistent with the Commission's Statement of Decision. Staff finds that responding to any Board reporting requirements during the approval process is an activity that is reasonably necessary for achieving compliance with the model plan. Therefore, this activity was retained in the proposed parameters and guidelines, as proposed by the claimants.

¹⁴ <<http://www.ciwmb.ca.gov/Agendas/agenda.asp?RecID=235#AG2425>> as of February 1, 2005.

Accounting System: The claimants also proposed that developing, implementing, and maintaining an accounting system is reimbursable to enter and track the college's source reduction, recycling, and composting activities, as well as costs and revenues.

Given the requirement to track cost savings (§ 42925) and the requirement to include information on tonnage diverted in the annual reports (§ 42926), staff finds that the accounting system is a reasonable method of implementing the test claim statute,¹⁵ and retained it as proposed by claimants. Staff notes that only the pro-rata portion of the costs incurred to implement the reimbursable activities can be claimed.

VII. Offsetting Savings and Reimbursements

In its comments submitted on June 17, 2004, the Board argued that the claimants did not identify offsetting savings, which "may be so great that there will be an overage to be allocated to other activities being claimed for reimbursement." The Board also argued that an allocation formula or uniform allowance was neither reasonable nor possible as the basis for reimbursement "because each campus operates in significantly different ways, and the programs chosen to comply will vary significantly...." Moreover, the Board asserts that this program is "particularly cumbersome because the subject matter requires a comprehensive analysis of economic life cycles for the waste streams chosen by the potential claimants, which could only be based on the specific operation in place at the particular Community College."¹⁶ Therefore, the Board suggests that the parameters and guidelines provide appropriate tools to assure that all costs and cost savings are identified.

The Board submitted additional comments on October 13, 2004,¹⁷ reiterating its position that "any programs implemented as a result of the test claim statute will inevitably result in cost savings to claimants" and again recommending that the parameters and guidelines and SCO require information on cost savings in any claim submitted. The Board proposes a costs/savings worksheet be attached to the parameters and guidelines to be used as guidance for collecting relevant information.¹⁸ The Board also states that claimants should be required to report direct and indirect cost savings when claiming direct and indirect costs for reimbursement.

The Board's proposed worksheet provides a list of expense and revenue items. Columns are provided for "pre AB 75 program," "current program," and "net difference." The expense items, as defined by the Board, are listed below:

- *Staffing.* Through the implementation of the program being claimed a reduction in staff hours (PYs) can be achieved. In order to determine any cost increases or decreases the claimants will need to evaluate the total staff required to implement the program being claimed prior to AB 75 and the staff needed to implement and operate the current program. All values identified must be calculated based on a conversion to the dollar values for the particular year being claimed.

¹⁵ California Code of Regulations, title 2, section 1183.1, subdivision (a)(4).

¹⁶ Exhibit C, pages ____.

¹⁷ Exhibit E.

¹⁸ Exhibit E, page ____.

- *Overhead.* Costs incurred for overhead, such as benefits, for the PY's identified under "staffing."
- *Materials.* Through the implementation of the program being claimed a reduction or elimination of supplies and materials may have been achieved. This could include, and is not limited to: white office paper, mixed office paper, cardboard, printed catalogs, postage, envelopes, and other office supplies.
- *Storage.* Through the implementation of the program being claimed a reduction or elimination of storage of supplies and materials may have been achieved. The elimination of storage is a cost savings that must be allocated to offset any costs associated to the implementation of the identified program(s) being claimed by the claimants.
- *Transportation costs:* The transportation of supplies and waste materials has a cost. The claimants should determine how many trips staff was making to purchase, pick-up and deliver supplies needed for the program being claimed and the current level of the activity. It should be calculated based on a conversion of the previous programs' activities being converted to the dollar values for the particular year for which a claim is being submitted.

Claimants should also consider the cost incurred for the collection of waste materials associated with the activity being claimed.

- *Equipment:* Any costs associated with new/replacement equipment, including any costs avoided for maintenance of obsolete equipment.
- *Disposal fees.* Costs associated to the disposal of materials prior to the implementation of the specific program being implemented. Since the intent and impact of the legislation is to divert materials from the landfill, a direct savings is seen.
- *Other expenses related to program.* The claimants should take into consideration the specific program being claimed for reimbursement and identify all areas that have been impacted.

The Board also defined the following revenue items:

- *Sale of commodities.* This would include any and all revenues generated due to the sale of materials collected through the implementation of the specific program being claimed. This could include, but is not limited to, white office paper, mixed office paper, cardboard, beverage containers, ferrous and nonferrous metals, glass, plastic, re-sale of used text books, compost, mulch, and firewood.
- *Avoided disposal fees.* Through the implementation of the AB 75 program(s) a facility will see a direct reduction in the amount of materials that would have been placed into a landfill or a trash dumpster on the campus. These direct savings are to be credited to the program based on today's disposal costs.
- *Sale of obsolete equipment.* Proceeds of any sales of obsolete equipment.
- *Other revenue related to program.* Dependent on the particular program or activity being submitted to the Commission for reimbursement several other

factors can and will generate a cost savings. It is suggested that the claimants be required to identify all savings associated to the particular program or activity as per the findings of the Commission.

In the claimants' rebuttal comments submitted on October 18, 2004, they argued that there was nothing in the record to substantiate the Board's assertions that offsetting savings would exceed new costs. Further, the claimants note that the Commission did not find cost savings in an amount sufficient to preclude mandate reimbursement; but acknowledged that it was appropriate to identify at the parameters and guidelines stage sources of other government funding and local income that may reduce the mandate's cost. Regarding the Board's proposed worksheet to measure program cost savings, the claimants maintain that it is in violation of Government Code section 17565, as noted below.¹⁹

Staff Findings

Subsequently mandated costs: Claimants raised Government Code section 17565, which states:

If a local agency or a school district, at its option, has been incurring costs which are subsequently mandated by the state, the state shall reimburse the local agency or school district for those costs incurred after the operative date of the mandate.

The plain meaning of this provision applies to the community college's "costs" prior to the test claim statute. Thus, the identified "costs" in the Board's AB 75 program worksheet, to the extent incurred by community colleges, are reimbursable regardless of the college's activities prior to the test claim statute. Claimants, therefore, are not required to show costs savings from any programs engaged in prior to the test claim statute.

Staff cannot require claimants to submit this cost savings worksheet as recommended by the Board. Only the activities expressly stated in the Statement of Decision are required. The cost savings worksheet is not mentioned in the Statement of Decision or the test claim statute, nor is it reasonably necessary to comply with the mandate.

Finally, Government Code section 17517.5, as added by Statutes 2004, chapter 890, defines "cost savings authorized by the state" to mean "any decreased costs that a... [community college] realizes as a result of any statute enacted or any executive order adopted that permits or requires the discontinuance of or a reduction in the level of service of an existing program that was mandated before January 1, 1975." The test claim statute that initiated the program was enacted in 2000, so there is no evidence of discontinuance or reduction in service levels based on section 17517.5.

Staff notes that the Commission adopted its Statement of Decision finding that the test claim statutes and executive order require specific new activities, which impose increased costs mandated by the state. Accordingly, the Commission can only identify sources of savings and other reimbursements that could be offset from the reimbursement claims.

Reduced costs: In its October 2004 comments, the Board stated that there will be avoided disposal costs that likely would result in net savings to claimants.

Subdivision (a) of section 42925 of the test claim statute states:

¹⁹ Exh. F, pages _____
Exhibit

Any cost savings realized as a result of the state agency [community college's] integrated waste management plan shall, to the extent feasible, be redirected to the agency's [college's] integrated waste management plan to fund plan implementation and administration costs, in accordance with Sections 12167²⁰ and 12167.1²¹ of the Public Contract Code.

In spite of the Board's assertions, there is no direct evidence in the record that reduced disposal costs will necessarily occur as a result of this program, or occur in an amount sufficient to offset the costs of the program. Rather, as reflected in the Statement of Decision, the record contains evidence of community colleges incurring increased costs due to the test claim statutes.

Requiring community colleges to redirect their cost savings in the manner required by section 42925 merely reduces the costs claimed, which is covered by the boilerplate language under Section VII, Offsetting Savings and Reimbursements. Section 42925 was enacted as part of the test claim legislation. Therefore, staff finds that claimants must comply with section 42925 by redirecting cost savings (if they occur), or revenues to the integrated waste management plan to fund plan implementation and administration costs in accordance with Public Contract Code sections 12167 and 12167.1.

Student center fee: Education Code section 76375 authorizes community colleges to charge a fee for "financing, constructing, enlarging, remodeling, refurbishing, and operating a student body center..." The fee must be authorized after a favorable vote of two-thirds of the students

²⁰ Public Contract Code section 12167 states:

Revenues received from this plan or any other activity involving the collection and sale of recyclable materials in state and legislative offices located in state-owned and state-leased buildings, such as the sale of waste materials through recycling programs operated by the California Integrated Waste Management Board or in agreement with the board, shall be deposited in the Integrated Waste Management Account in the Integrated Waste Management Fund and are hereby continuously appropriated to the board, without regard to fiscal years, until June 30, 1994, for the purposes of offsetting recycling program costs. On and after July 1, 1994, the funds in the Integrated Waste Management Account may be expended by the board, only upon appropriation by the Legislature, for the purpose of offsetting recycling program costs.

²¹ Public Contract Code section 12167.1 states:

Notwithstanding Section 12167, upon approval by the California Integrated Waste Management Board, revenues derived from the sale of recyclable materials by state agencies and institutions that do not exceed two thousand dollars (\$2,000) annually, are hereby continuously appropriated, without regard to fiscal years, for expenditure by those state agencies and institutions for the purposes of offsetting recycling program costs. Revenues that exceed two thousand dollars (\$2,000) annually shall be available for expenditure by those state agencies and institutions when appropriated by the Legislature. Information on the quantities of recyclable materials collected for recycling shall be provided to the board on an annual basis according to a schedule determined by the board and participating agencies.

voting, and cannot exceed \$1 per credit hour to a maximum of \$10 per student per fiscal year, and students on specified forms of public assistance are exempt. As stated in the Commission's Statement of Decision, staff finds that this fee is also an offset to the extent the revenues from it are applied to the test claim statutes or executive order.²²

Based on Public Contract Code sections 12167 and 12167.1, and Education Code section 76375, subdivision (a), staff finds that the offsets for this program may include the following:

1. Subject to the approval of the Board, revenues derived from the sale of recyclable materials by community colleges that do not exceed two thousand dollars (\$2,000) annually are continuously appropriated for expenditure by the community colleges for the purpose of offsetting recycling program costs. Revenues exceeding two thousand dollars (\$2,000) annually may be available for expenditure by the community colleges only when appropriated by the legislature.
2. Revenues from a building operating fee imposed pursuant to Education Code section 76375, subdivision (a).

Staff Recommendation

Staff recommends that the Commission adopt the proposed parameters and guidelines, beginning on page 12.

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

²² See Statement of Decision, Exhibit A, page ____.

PROPOSED PARAMETERS AND GUIDELINES

Public Resources Code Sections 40148, 40196.3, 42920-42928

Public Contract Code Sections 12167 and 12167.1

Statutes 1999, Chapter 764 (A.B. 75)

Statutes 1992, Chapter 1116 (A.B. 3521)

State Agency Model Integrated Waste Management Plan (February 2000)

Integrated Waste Management (00-TC-07)

Santa Monica and South Lake Tahoe Community College Districts, Co-claimants

I. SUMMARY OF THE MANDATE

Per Statement of Decision

On March 25, 2004, the Commission on State Mandates (Commission) adopted its Statement of Decision finding that Public Resources Code sections 40148, 40196.3, 42920-42928; Public Contract Code sections 12167 and 12167.1; and the State Agency Model Integrated Waste Management Plan (February 2000) require new activities, as specified below, which constitute new programs or higher levels of service for community college districts within the meaning of article XIII B, section 6, of the California Constitution, and impose costs mandated by the state pursuant to Government Code section 17514.

Specifically, the Commission approved this test claim for the increased costs of performing the following specific new activities:

- Comply with the model plan (Pub. Resources Code, § 42920, subd. (b)(3) & State Agency Model Integrated Waste Management Plan, February 2000): A community college must comply with the California Integrated Waste Management Board's (Board) model integrated waste management plan, which includes consulting with the Board to revise the model plan, as well as completing and submitting to the Board the following: (1) state agency or large state facility information form; (2) state agency list of facilities; (3) state agency waste reduction and recycling program worksheet, including the sections on program activities, promotional programs, and procurement activities; and (4) state agency integrated waste management plan questions.
- Designate a solid waste reduction and recycling coordinator (Pub. Resources Code, § 42920, subd. (c)): A community college must designate one solid waste reduction and recycling coordinator to perform new duties imposed by chapter 18.5 (Pub. Resources Code, §§ 42920 - 42928), including implementing the community college's integrated waste management plan, and acting as a liaison to other state agencies (as defined by section 40196.3) and coordinators.

- Divert solid waste (Pub. Resources Code, §§ 42921 & 42922, subd. (i)): A community college must divert at least 25 percent of all its solid waste from landfill disposal or transformation facilities by January 1, 2002, through source reduction, recycling, and composting activities, and divert at least 50 percent of all solid waste from landfill disposal or transformation facilities by January 1, 2004, through source reduction, recycling, and composting.

A community college unable to comply with this diversion requirement may instead seek until December 31, 2005, either an alternative requirement or time extension (but not both) as specified below:

- Seek an alternative requirement (Pub. Resources Code, §§ 42927 & 42922, subds. (a) & (b)): A community college that is unable to comply with the 50-percent diversion requirement must: (1) notify the Board in writing, detailing the reasons for its inability to comply; (2) request of the Board an alternative to the 50-percent requirement; (3) participate in a public hearing on its alternative requirement; (4) provide the Board with information as to (a) the community college's good faith efforts to effectively implement the source reduction, recycling, and composting measures described in its integrated waste management plan, and demonstration of its progress toward meeting the alternative requirement as described in its annual reports to the Board; (b) the community college's inability to meet the 50-percent diversion requirement despite implementing the measures in its plan; (c) the alternative source reduction, recycling, and composting requirement represents the greatest diversion amount that the community college may reasonably and feasibly achieve, and (d) relate to the Board circumstances that support the request for an alternative requirement, such as waste disposal patterns and the types of waste disposed by the community college.
- Seek a time extension (Pub. Resources Code, §§ 42927 & 42923 subds. (a) & (c)): A community college that is unable to comply with the January 1, 2002 deadline to divert 25 percent of its solid waste, must do the following pursuant to section 42923, subdivisions (a) and (c): (1) notify the Board in writing, detailing the reasons for its inability to comply; (2) request of the Board an alternative to the January 1, 2002 deadline; (3) provide evidence to the Board that it is making a good faith effort to implement the source reduction, recycling, and composting programs identified in its integrated waste management plan; and (4) provide information to the Board that describes the relevant circumstances that contributed to the request for extension, such as lack of markets for recycled materials, local efforts to implement source reduction, recycling and composting programs, facilities built or planned, waste disposal patterns, and the type of waste disposed of by the community college. (5) The community college must also submit a plan of correction that demonstrates that it will meet the requirements of Section 42921 [the 25 and 50 percent diversion requirements] before the time extension expires, including the source reduction, recycling, or composting steps the community college will implement, a date prior to the expiration of the time extension when the requirements of Section 42921 will be met, the existing programs that it will modify, any new programs that will be implemented to meet those requirements, and the means by which these programs will

be funded.

- Report to the Board (Pub. Resources Code, §§ 42926, subd. (a) & 42922, subd. (i)): A community college must annually submit, by April 1, 2002 and by April 1 each subsequent year, a report to the Board summarizing its progress in reducing solid waste. The information in the report is to encompass the previous calendar year and shall contain, at a minimum, the following as outlined in section 42926, subdivision (b): (1) calculations of annual disposal reduction; (2) information on the changes in waste generated or disposed of due to increases or decreases in employees, economics, or other factors; (3) a summary of progress implementing the integrated waste management plan; (4) the extent to which the community college intends to use programs or facilities established by the local agency for handling, diversion, and disposal of solid waste. (If the college does not intend to use those established programs or facilities, it must identify sufficient disposal capacity for solid waste that is not source reduced, recycled or composted.) (5) For a community college that has been granted a time extension by the Board, it shall include a summary of progress made in meeting the integrated waste management plan implementation schedule pursuant to section 42921, subdivision (b), and complying with the college's plan of correction, before the expiration of the time extension. (6) For a community college that has been granted an alternative source reduction, recycling, and composting requirement by the Board pursuant to section 42922, it shall include a summary of progress made towards meeting the alternative requirement as well as an explanation of current circumstances that support the continuation of the alternative requirement.
- Submit recycled material reports (Pub. Contract Code, § 12167.1): A community college must annually report to the Board on quantities of recyclable materials collected for recycling.

II. ELIGIBLE CLAIMANTS

Community college districts ~~which~~ that incur increased costs as a result of this mandate are eligible to claim reimbursement.

III. PERIOD OF REIMBURSEMENT

Per Statement of Decision and Commission boilerplate: The test claim was filed on March 9, 2001, so reimbursement begins July 1999.

Government Code section 17557 states that a test claim must be submitted on or before June 30 following a given fiscal year to establish eligibility for that fiscal year. The test claim for this mandate was filed on March 9, 2001. Therefore, costs incurred for compliance with Public Contract Code sections 12167 and 12167.1 (Stats. 1992, ch. 1116) are eligible for reimbursement on or after July 1, 1999. However, because of the statute's operative date, all other costs incurred pursuant to Statutes 1999, chapter 764 are eligible for reimbursement on or after January 1, 2000.

Seeking an alternative diversion goal or time extension (Pub. Resources Code, §§ 42922, 42923, and 42927) is reimbursable until December 31, 2005.

Actual costs for one fiscal year should be included in each claim. Estimated costs for the subsequent year may be included on the same claim, if applicable. Pursuant to Government Code section 17561, subdivision (d), all claims for reimbursement of initial years' costs shall be

submitted within 120 days of the issuance of the claiming instructions by the State Controller.
If the total costs for a given fiscal year do not exceed \$1000, no reimbursement shall be allowed, except as otherwise allowed by Government Code section 17564.

IV. REIMBURSABLE ACTIVITIES

To be eligible for mandated cost reimbursement for any fiscal year, only actual costs may be claimed. Actual costs are those costs actually incurred to implement the mandated activities. Actual costs must be traceable and supported by source documents that show the validity of such costs, when they were incurred, and their relationship to the reimbursable activities. A source document is a document created at or near the same time the actual cost was incurred for the event or activity in question. Source documents may include, but are not limited to, employee time records or time logs, sign-in sheets, invoices, receipts, and the community college plan approved by the Board.

Evidence corroborating the source documents may include, but is not limited to, worksheets, cost allocation reports (system generated), purchase orders, contracts, agendas, training packets, and declarations. Declarations must include a certification or declaration stating, "I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct," and must further comply with the requirements of Code of Civil Procedure section 2015.5. Evidence corroborating the source documents may include data relevant to the reimbursable activities otherwise in compliance with local, state, and federal government requirements. However, corroborating documents cannot be substituted for source documents.

The claimant is only allowed to claim and be reimbursed for increased costs for reimbursable activities identified below. Increased cost is limited to the cost of an activity that the claimant is required to incur as a result of the mandate.

For each eligible claimant, the following activities are eligible for reimbursement reimbursable:

A. One-Time Activities

1. Policies and Procedures

Prepare and update as ~~Develop~~ the necessary district policies and procedures for the implementation of the integrated waste management plan.

2. Staff Training

Training district staff on the requirements and implementation of the district-integrated waste management plan (one-time per employee). Training is limited to the staff working directly on the plan.

B. Ongoing Activities (Pub. Resources Code, § 42920, subd. (b)(3) & State Agency Model Integrated Waste Management Plan, February 2000)

3. Plan Development and Approval

1. ~~Completing~~ and submitting to the Integrated Waste Management Board for each college in the district the following as part of the State Agency Model Integrated Waste Management Plan (Pub. Resources Code, § 42920, subd. (b)(3) & State Agency Model Integrated Waste Management Plan, February 2000.):

- a. state agency or large state facility information form;
- b. state agency list of facilities;
- c. state agency waste reduction and recycling program worksheets which that describe program activities, promotional programs, and procurement activities; and other questionnaires. Responding to any Board reporting requirements during the approval process; and
- d. state agency integrated waste management plan questions.

NOTE: Although reporting on promotional programs and procurement activities in the model plan is reimbursable, implementing promotional programs and procurement activities is not.

- 2. Respond to any Board reporting requirements during the approval process. (Pub. Resources Code, § 42920, subd. (b)(3) & State Agency Model Integrated Waste Management Plan, February 2000.)
- 3. Consult with the Board to revise the model plan, if necessary,¹ (Pub. Resources Code, § 42920, subd. (b)(3) & State Agency Model Integrated Waste Management Plan, February 2000.)

4. Program Coordinator

Designate one solid waste reduction and recycling coordinator ("coordinator") Appointing an employee for each college in the district as the waste reduction and recycling coordinator to perform new duties imposed by chapter 18.5 (Pub. Resources Code, §§ 42920 - 42928), and for the coordinator to administer and The coordinator shall implement the integrated waste management program plan, and to The coordinator shall act as a liaison to the other state agencies (as defined by section 40196.3) and other coordinators. (Pub. Resources Code, § 42920, subd. (c).)

5. Waste Diversion

Diverting at least 25% percent of all solid waste from landfill disposal or transformation facilities by January 1, 2002, and at least 50% percent of all solid waste from landfill disposal or transformation facilities by January 1, 2004, through source reduction, recycling, and composting activities, and maintaining Maintain the required level of reduction, as approved by the Board. (Pub. Resources Code, §§ 42921 & 42922, subd. (i).) according to the state model plan which includes, but is not limited to the following methods:

PART 1. PROGRAM ACTIVITIES

A. Source Reduction

- 1. Use of reusable cups
- 2. Use of electronic forms
- 3. Use of electronic media

¹ Attachment A, State Agency Model Integrated Waste Management Plan (February 2000).

4. ~~Double sided copying~~
5. ~~Property re-utilization~~
6. ~~Utilizing CalMAX~~
7. ~~Utilizing a food exchange~~
8. ~~Salvage yards~~
9. ~~Xeriscaping/grass-cycling~~
10. ~~Other programs~~

~~B. Recycling~~

1. ~~Beverage containers~~
2. ~~Cardboard~~
3. ~~Glass~~
4. ~~Newspaper~~
5. ~~Office paper~~
6. ~~Plastics~~
7. ~~Scrap Metal~~
8. ~~Other material~~
9. ~~Special collection programs~~
10. ~~Clean-up events~~

~~C. Composting~~

1. ~~Commercial pick-up of green waste~~
2. ~~Commercial self-haul of green waste~~
3. ~~Food waste composting~~
4. ~~Other composting programs~~

~~D. Special Waste~~

1. ~~Construction/demolition recycling~~
2. ~~Concrete/rubble reuse~~
3. ~~Concrete/asphalt recycling~~
4. ~~Rendering/grease recycling~~
5. ~~Tires~~
 - a. ~~Use of retreads~~
 - b. ~~Tire Reuse~~
 - c. ~~Tire Recycling~~

- ~~(1) Use of rubberized asphalt~~
- ~~(2) Use of tire-derived products~~
- ~~(3) Collection Program~~
- ~~6. Drop-off at landfills~~
- ~~7. Used Oil/antifreeze~~
- ~~8. White and brown goods recycling~~
- ~~9. Wood waste~~
 - ~~a. Chipping for mulch or compost~~
 - ~~b. Brush/wood waste chipping~~
- ~~10. Other special waste:~~
 - ~~a. Batteries~~
 - ~~b. Paint~~
 - ~~c. Scrap metal~~

PART 2: PROMOTIONAL PROGRAMS

- ~~A. Web Page~~
- ~~B. Newspaper articles/ads~~
- ~~C. Brochures, Newsletters, Publications~~
 - ~~1. Fliers~~
 - ~~2. Office Paper Recycling Guide~~
 - ~~3. Fact Sheets~~
 - ~~4. New Employee Package~~
- ~~D. Outreach~~
 - ~~1. Seminars~~
 - ~~2. Workshops~~
 - ~~3. Waste information exchange~~
 - ~~4. Recycled goods procurement training~~
 - ~~5. Awards program/public awareness~~
 - ~~6. Speakers~~
 - ~~7. Technical Assistance~~
 - ~~8. College Curriculum~~
- ~~E. Waste audits~~
- ~~F. Waste evaluations/survey~~

G. Other promotional programs

PART 3: PROCUREMENT ACTIVITIES

~~A. SABRC State Agency Buy Recycled Campaign~~

~~B. College/district recycled content procurement policy~~

~~C. Exceeding SABRC goals~~

~~D. College/district automated procurement tracking system~~

~~E. Requiring recycled content product certification for all purchases~~

~~F. Annual SABRC report~~

~~G. Staff training~~

~~H. Participating in the General Services task force~~

~~I. Pro-actively working with recycled product supplies~~

~~J. Sharing success stories with SABRC~~

~~K. Joint purchase pools~~

~~L. Other procurement activities~~

6. Alternative Compliance

Seek either an alternative requirement or time extension if a community college is unable to comply with the January 1, 2002 deadline to divert 25 percent of its solid waste, by doing the following: (Pub. Resources Code, §§ 42927 & 42923 subds. (a) & (c).) (Reimbursement period ends December 31, 2005.)

~~A. 25% Diversion Requirement~~

~~For those colleges unable to timely comply with the 25% diversion requirements, to:~~

- ~~1a. Notify the Board in writing, detailing the reasons for its inability to comply,~~
- ~~2b. Request of the Board an alternative to the January 1, 2002 deadline,~~
- ~~3c. Provide evidence to the Board that the college is making a good faith effort to implement the source reduction, recycling, and composting programs identified in its integrated waste management plan, waste reduction program~~
- ~~4d. Provide information that describes the relevant circumstances that contributed to the request for extension, such as lack of markets for recycled materials, local efforts to implement source reduction, recycling and composting programs, facilities built or planned, waste disposal patterns, and the type of waste disposed of by the community college.~~
- ~~5e. Submit a plan of correction that demonstrates that the college will meet the requirements of Section 42921 [the 25 and 50 percent diversion requirements] before the time extension expires, including the source reduction, recycling, or composting steps the community college will implement, a date prior to the expiration of the time extension when the requirements of Section 42921 will be met, the existing programs that it will~~

modify any new programs that will be implemented to meet those requirements, and the means by which these programs will be funded.

B7. Seek either an alternative requirement or time extension if a community college is unable to comply with the January 1, 2004 deadline to divert 50 percent of its solid waste, by doing the following: (Pub. Resources Code, §§ 42927 & 42922, subds. (a) & (b).) (Reimbursement period ends December 31, 2005.) 50% Diversion Requirement

For those colleges unable to comply with the 50% diversion requirements, to:

- 1a. Notify the Board in writing, detailing the reasons for its inability to comply.
- 2b. Request of the Board an alternative to the 50% compliance 50-percent requirement.
- 3c. Participate in a public hearing on its alternative requirement.
- 4d. Provide the Board with information as to:
 - (ai) the community college's good faith efforts to implement the waste reduction and source reduction, recycling, and composting measures described in its integrated waste management plan, and demonstration of its progress toward meeting the alternative requirement as described in its annual reports to the Board;
 - (bij) the community college's inability to meet the 50% percent diversion requirement despite implementing the measures in its plan;
 - (eiii) how the alternative methods source reduction, recycling, and composting requirement represents the greatest diversion amount that the community college may reasonably and feasibly achieve; and,
 - (diiv) relate to the Board the circumstances that support the request for an alternative requirement, such as waste disposal patterns and the types of waste disposed by the community college.

68. Accounting System

Developing, implementing, and maintaining an accounting system to enter and track the college's source reduction, recycling and composting activities, the cost of those activities, the proceeds from the sale of any recycled materials, and such other accounting systems which will allow it to make its annual reports to the state and determine waste reduction.

Note: only the pro-rata portion of the costs incurred to implement the reimbursable activities can be claimed.

79. Annual Report

Annually preparing and submitting, by April 1, 2002, and by April 1 each subsequent year, a report to the Board summarizing its progress in reducing solid waste, which includes: The information in the report must encompass the previous calendar year and shall contain, at a minimum, the following as outlined in section 42926, subdivision (b): (Pub. Resources Code, §§ 42926, subd. (a) & 42922, subd. (i).)

- a. calculations of annual disposal reduction;
- b. information on the changes in waste generated or disposed of due to increases or

decreases in employees, economics, or other factors;

- c. ~~the amounts of materials collected for recycling,~~ a summary of progress made in implementing the integrated waste management plan;
- d. ~~The extent to which the community college intends to utilize use programs or facilities established by the local agency for handling, diversion, and the disposal of solid waste (If the college does not intend to use those established programs or facilities, it must identify sufficient disposal capacity for solid waste that is not source reduced, recycled or composted.);~~
- e. ~~a summary of progress made in meeting the integrated waste management plan of correction, and other relevant compliance information. For a community college that has been granted a time extension by the Board, it shall include a summary of progress made in meeting the integrated waste management plan implementation schedule pursuant to section 42921, subdivision (b), and complying with the college's plan of correction, before the expiration of the time extension;~~
- f. ~~For a community college that has been granted an alternative source reduction, recycling, and composting requirement by the Board pursuant to section 42922, it shall include a summary of progress made towards meeting the alternative requirement as well as an explanation of current circumstances that support the continuation of the alternative requirement.~~

9. Annually report to the Board on quantities of recyclable materials collected for recycling, (Pub. Contract Code, § 12167.1.) (See Section VII regarding the potential for offsetting savings.)

Note on recycling income: Subject to the approval of the California Integrated Waste Management Board, revenues derived from the sale of recyclable materials by community colleges that do not exceed two thousand dollars (\$2,000) annually are continuously appropriated for expenditure by the community college for the purpose of offsetting recycling program costs. Revenues exceeding two thousand dollars (\$2,000) annually may be available for expenditure by the community college only when appropriated by the legislature. To the extent so approved or appropriated and applied to the colleges, these amounts would be a reduction to the recycling costs mandated by the state to implement Chapter 764, Statutes of 1999.

V. CLAIM PREPARATION AND SUBMISSION

Commission boilerplate for the rest of the document. Claimant will respond to current boilerplate when it is drafted into the document by the Commission staff.

Each of the following cost elements must be identified for each reimbursable activity identified in Section IV, Reimbursable Activities, of this document. Each claimed reimbursable cost must be supported by source documentation as described in Section IV. Additionally, each reimbursement claim must be filed in a timely manner.

A. Direct Cost Reporting

Direct costs are those costs incurred specifically for the reimbursable activities. The following direct costs are eligible for reimbursement.

1. Salaries and Benefits

Report each employee implementing the reimbursable activities by name, job classification, and productive hourly rate (total wages and related benefits divided by productive hours). Describe the specific reimbursable activities performed and the hours devoted to each reimbursable activity performed.

2. Materials and Supplies

Report the cost of materials and supplies that have been consumed or expended for the purpose of the reimbursable activities. Purchases shall be claimed at the actual price after deducting discounts, rebates, and allowances received by the claimant. Supplies that are withdrawn from inventory shall be charged on an appropriate and recognized method of costing, consistently applied.

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.

4. Fixed Assets and Equipment

Report the purchase price paid for fixed assets and equipment (including computers) necessary to implement the reimbursable activities. The purchase price includes taxes, delivery costs, and installation costs. If the fixed asset or equipment is also used for purposes other than the reimbursable activities, only the pro-rata portion of the purchase price used to implement the reimbursable activities can be claimed.

5. Travel

Report the name of the employee traveling for the purpose of the reimbursable activities. Include the date of travel, destination point, the specific reimbursable activity requiring travel, and related travel expenses reimbursed to the employee in compliance with the rules of the local jurisdiction. Report employee travel time according to the rules of cost element A.1, Salaries and Benefits, for each applicable reimbursable activity.

6. Training

Report the cost of training an employee to perform the reimbursable activities, as specified in Section IV of this document. Report the name and job classification of each employee preparing for, attending, and/or conducting training necessary to implement the reimbursable activities. Provide the title, subject, and purpose (related to the mandate of the training session), dates attended, and location. If the training encompasses subjects broader than the reimbursable activities, only the pro-rata portion can be claimed. Report employee training time for each applicable reimbursable activity according to the rules of cost element A.1, Salaries and Benefits, and A.2, Materials and Supplies. Report the cost of consultants who conduct the training according to the rules of cost element A.3, Contracted Services.

B. Indirect Cost Rates

Indirect costs are costs that have been incurred for common or joint purposes. These costs benefit more than one cost objective and cannot be readily identified with a particular final cost objective without effort disproportionate to the results achieved. After direct costs have been determined and assigned to other activities, as appropriate, indirect costs are those remaining to be allocated to benefited cost objectives. A cost may not be allocated as an indirect cost if any other cost incurred for the same purpose, in like circumstances, has been claimed as a direct cost.

Indirect costs include: (a) the indirect costs originating in each department or agency of the governmental unit carrying out state-mandated programs, and (b) the costs of central governmental services distributed through the central service cost allocation plan and not otherwise treated as direct costs.

Community colleges have the option of using: (1) a federally approved rate, utilizing the cost accounting principles from the Office of Management and Budget Circular A-21, "Cost Principles of Educational Institutions"; (2) the rate calculated on State Controller's Form FAM-29C; or (3) a 7% indirect cost rate.

VI. RECORD RETENTION

Pursuant to Government Code section 17558.5, subdivision (a), a reimbursement claim for actual costs filed by a local agency or school district pursuant to this chapter is subject to the initiation of an audit by the Controller no later than three years after the date that the actual reimbursement claim is filed or last amended, whichever is later. However, if no funds are appropriated or no payment is made to a claimant for the program for the fiscal year for which the claim is filed, the time for the Controller to initiate an audit shall commence to run from the date of initial payment of the claim. In any case, an audit shall be completed not later than two years after the date that the audit is commenced. All documents used to support the reimbursable activities, as described in Section IV, must be retained during the period subject to audit. If an audit has been initiated by the Controller during the period subject to audit, the retention period is extended until the ultimate resolution of any audit findings.

VII. OFFSETTING SAVINGS AND REIMBURSEMENTS

Any offsetting savings 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, services fees collected, federal funds, and other state funds allocated to any service provided under this program, shall be identified and deducted from this claim. Offsetting revenue shall include:

1. The revenues cited in Public Resources Code section 42925 and Public Contract Code sections 12167 and 12167.1;

Subject to the approval of the California Integrated Waste Management Board, revenues derived from the sale of recyclable materials by community colleges that do not exceed two thousand dollars (\$2,000) annually are continuously appropriated for expenditure by the community college for the purpose of offsetting recycling program costs. Revenues exceeding two thousand dollars (\$2,000) annually, may be available for expenditure by

the community college only when appropriated by the legislature. To the extent so approved or appropriated and applied to the colleges, these amounts are a reduction to the recycling costs mandated by the state to implement Statutes 1999, chapter 764.

In addition, revenue from a building operating fee imposed pursuant to Education Code section 76375, subdivision (a) if received by a claimant and the revenue is applied to this program, shall be deducted from the costs claimed.

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 days after receiving the adopted parameters and guidelines from the Commission, to assist local agencies and school districts in claiming costs to be reimbursed. The claiming instructions shall be derived from the test claim decision and the parameters and guidelines adopted by the Commission.

Pursuant to Government Code section 17561, subdivision (d)(1), issuance of the claiming instructions shall constitute a notice of the right of the local agencies and school districts to file reimbursement claims, based upon parameters and guidelines adopted by the Commission.

IX. REMEDIES BEFORE THE COMMISSION

Upon request of a local agency or school district, the Commission shall review the claiming instructions issued by the State Controller or any other authorized state agency for reimbursement of mandated costs pursuant to Government Code section 17571. If the Commission determines that the claiming instructions do not conform to the parameters and guidelines, the Commission shall direct the Controller to modify the claiming instructions and the Controller shall modify the claiming instructions to conform to the parameters and guidelines as directed by the Commission.

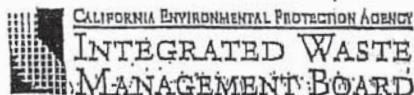
In addition, requests may be made to amend parameters and guidelines pursuant to Government Code section 17557, subdivision (d), and California Code of Regulations, title 2, section 183.2.

X. LEGAL AND FACTUAL BASIS FOR THE PARAMETERS AND GUIDELINES

The Statement of Decision is legally binding on all parties and provides the legal and factual basis for the parameters and guidelines. The support for the legal and factual findings is found in the administrative record for the test claim. The administrative record, including the Statement of Decision, is on file with the Commission.

State Agency Model Integrated Waste Management Plan

February 2000



STATE OF CALIFORNIA

Gray Davis
Governor

Winston Hickox
Secretary, California Environmental Protection Agency

INTEGRATED WASTE MANAGEMENT BOARD

Dan Eaton
Board Chairman

Steven R. Jones
Board Member

Linda Moulton-Patterson
Board Member

Daniel G. Pennington
Board Member

David A. Roberti
Board Member

Ralph E. Chandler
Executive Director

For additional copies of this publication, contact:

Integrated Waste Management Board
Public Affairs Office
8800 Cal Center Drive, MS 12
Sacramento, CA 95826

www.ciwmb.ca.gov/Publications/

(800) CA-WASTE (California only) or (916) 255-2296

Publication #321-00-006
Printed on Recycled Paper

Copyright 2000 by the Integrated Waste Management Board. All rights reserved.
This publication, or parts thereof, may not be reproduced in any form without permission.

The statements and conclusions of this document are those of the Integrated Waste Management Board.
The State makes no warranty, expressed or implied, and assumes no liability for the information
contained in the succeeding text.

The Integrated Waste Management Board (IWMB) does not discriminate on the basis of disability in access to its programs. IWMB publications are available in accessible formats upon request by calling the Public Affairs Office at (916) 255-2296. Persons with hearing impairments can reach the IWMB through the California Relay Service, 1-800-735-2929.

Table of Contents

Executive Summary.....	ii
------------------------	----

Instructions for Completing the State Agency Model Integrated Waste Management Plan

Part I-A: State Agency Information Form.....	1
Part I-B: Large State Facility Information Form.....	1
Part II: State Agency List of Facilities.....	2
Part III: State Agency Waste Reduction and Recycling Program Worksheet.....	2
Part IV: State Agency Integrated Waste Management Plan Questions.....	3

Forms, Worksheet, and Plan Questions

Part I-A: State Agency Information Form.....	4
Part I-B: Large State Facility Information Form.....	5
Part II: State Agency List of Facilities.....	6
Part III: State Agency Waste Reduction and Recycling Program Worksheet.....	8
Part IV: State Agency Integrated Waste Management Plan Questions.....	13

Appendices

Appendix 1: Glossary of Terms.....	A1-1
Appendix 2: Assembly Bill 75.....	A2-1

Executive Summary

Diversion is the process of reducing potential waste by means such as source reduction (reducing or eliminating the amount of materials used for any purpose before they become waste) recycling, and composting. AB 75 (Strom-Martin, Chapter 764, Statutes of 1999) added Sections 40148-42928 to the Public Resources Code (PRC). The legislation requires State agencies to meet waste diversion goals of 25 percent by 2002 and 50 percent by 2004 and to document their efforts in meeting these goals.

To disclose how they will meet these goals, PRC Section 42920 (b) (2) requires State agencies to submit an adopted integrated waste management plan (IWMP) to the California Integrated Waste Management Board (CIWMB) by July 15, 2000.

The Board is required by law to adopt a model integrated waste management plan that shall be available for use by State agencies in developing their plan. PRC Section 42920 (b) (3) requires that if a State agency has not submitted an adopted IWMP to the Board by January 1, 2001, or if the Board has disapproved the plan submitted by the agency, then the Board's model IWMP shall be implemented by the agency and become the agency's plan.

This document contains the following key sections:

- Instructions for completing the *State Agency Model Integrated Waste Management Plan*
- Forms, worksheet, and plan questions
- Appendices

You may prefer to complete the forms, worksheet, and plan questions on line and then print them out for the appropriate signature(s). Access them by going to the Board's Project Recycle Web page (www.ciwmb.ca.gov/ProjectRecycle/) and choosing the link entitled "New Requirements for State Agencies."

Two Board publications being distributed with this document are *Waste Reduction Policies and Procedures for State Agencies Conducting a Diversion Study—A Guide for California Jurisdictions*.

Note: To further document their efforts in achieving the goals of 25 percent and 50 percent waste diversion, State agencies and large State facilities as defined in statute are required by PRC Section 42926 (a) to provide annual reports to the CIWMB beginning April 1, 2002.

Instructions for Completing the State Agency Model Integrated Waste Management Plan

AB 75 (Strom-Martin, Chapter 764, Statutes of 1999—see Appendix 2) added Sections 40148, 42928 to the Public Resources Code (PRC). The legislation requires State agencies to meet waste diversion goals of 25 percent by 2002 and 50 percent by 2004 and to document their efforts in meeting these goals.

To satisfy the requirements of PRC Section 42920 (b) (2), each State agency must submit an adopted integrated waste management plan (IWMP) to the California Integrated Waste Management Board (CIWMB). The IWMP should specify an agency's plan for achieving mandated waste diversion goals of 25 percent by 2002 and 50 percent by 2004. (Diversion is the process of reducing potential waste by means such as source reduction [reducing or eliminating the amount of materials used for any purpose before they become waste], recycling, and composting.) This publication is provided to assist State agencies in preparing their plans.

All information called for in this document is required to be submitted to the Board. To complete the forms (Parts I-A, I-B, and II), worksheet (Part III), and plan questions (Part IV) on-line, go to the Board's Project Recycle Web page at www.ciwmb.ca.gov/ProjectRecycle/ and select the link entitled "New Requirements for State Agencies." After completing Parts I-A-IV, you will still need to print them out and obtain the appropriate signature(s).

Completed plans should be submitted to the following address:

Public Education and Programs Implementation
Branch
ATTN: AB 75 Review Team
California Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826

"State Agencies"—An IWMP must be completed for each State agency, which is defined in Public Resources Code (PRC) Section 40196.3 as every State office, department, division, board, commission, or other agency of the State. Each

State agency should aggregate data for all its applicable facilities, excluding large State facilities, described below.

"Large State Facilities"—PRC Section 40148 defines large State facilities as those campuses of the California State University and the California Community Colleges, prisons within the Department of Corrections, facilities of the State Department of Transportation, and facilities of other State agencies that the Board determines are primary campuses, prisons, or facilities.

The Board has determined that each of these large State facilities shall complete a separate integrated waste management plan, signed by the facility director. This IWMP must also be signed at the facility's State agency level by the chairman, commissioner, director, or president.

Example: The California Department of Corrections (CDC) has 33 prisons and numerous field offices. A separate IWMP must be completed and submitted for each of the 33 prisons, as well as one for CDC's headquarters and offices, as described above under "State Agencies." The department's director is responsible for approval of IWMPs for both the prisons and the agency headquarters and offices.

Modified IWMP—If a State agency has fewer than 200 total employees and generates less than 100 total tons of waste statewide per year, it may submit a modified IWMP. Agencies that meet this criteria must still complete "Part I-A: State Agency Information Form" and check the box indicating they are submitting a modified plan. In addition, the agency must complete Part II and Part IV, questions 1, 5, 6, and 7, and submit that information to the CIWMB by July 15, 2000.

Part I-A: State Agency Information Form (page 4)

State agencies must submit this completed form.

Part I-B: Large State Facility Information Form (page 5)

Large State facilities must submit this completed form.

Part II: State Agency List of Facilities (page 6)

All State agencies and large State facilities must provide information on all their facilities using this form. This information should include the name and address of each facility; a contact person's name, phone number, and e-mail address; and the number of employees at the facility.

If you are using hard copy from this manual and have insufficient space, use additional sheets.

Part III: State Agency Waste Reduction and Recycling Program Worksheet (pages 8-12)

State agencies and large State facilities should use the following instructions to complete Part III.

You may find the Board's publication entitled *Conducting a Diversion Study—A Guide for California Jurisdictions* helpful in determining tonnages for program activities. Workshops will be conducted in March and April 2000 to help State agencies determine diversion rates and complete an IWMP. For information about these workshops, call (916) 255-2385.

You do not need to submit your analyses used in arriving at diversion and generation figures entered on the worksheet. However, you are responsible for providing documentation and records if a review is needed by the CWRMB to verify your figures.

Remember: When identifying programs within your IWMP, a total diversion amount for all facility locations should equal or exceed 1 ton. You are not required to list any program activity that generates less than that amount, but you are encouraged to do so.

Diversion and disposal activities for all projects (e.g., construction, demolition, and park renovation) need to be included in the final calculation of total tonnage generated. The State agency with project authority is responsible for including these diversion and disposal tonnages, regardless of who performs the work (e.g., State agency, contractor, nonprofit organization).

Section 1: Program Activities, Rows 1-77, Pages 8-10

Columns B1, B2, B3, Rows 1-73, Pages 8-10

If your State agency or large State facility has programs other than those listed that are existing

or are proposed for implementation, note them in the blank rows under the appropriate program

activity areas in Column B1. Identify all your agency's existing programs with an "X" in Column B2. Identify the proposed programs with an "X" in Column B3.

Column C (Projected Tonnage, 2000), Rows 1-73, Pages 8-10

1. In Column C, Rows 1-73, enter the amount of material anticipated to be diverted for every existing program activity at your State agency or large State facility.

2. Row 74, Page 10 (Total Tonnage Diverted): Total all rows and enter the sum.

3. Row 75, Page 10 (Total Tonnage Disposed): Enter the amount of waste that is projected for disposal in calendar year 2000 by your State agency or large State facility at a disposal facility, or that is being collected by a waste hauler for disposal. Use any available actual data in calculating this amount.

4. Row 76, Page 10 (Total Tonnage Generated): Add figures from Row 76 and Row 77 (total tonnage generated = total tonnage diverted + total tonnage disposed).

5. Row 77, Page 10 (Overall Diversion Percentage): Divide the number in Row 74 (Total Tonnage Diverted) by the number in Row 76 (Total Tonnage Generated). Multiply the result by 100.

Columns D, F, H, J, L, N (Proposed Tonnage for 2001-2006), Rows 1-73, Pages 8-10

The purpose of estimating proposed diversion tonnage is to help State agencies and large State facilities focus on the programs that will achieve the greatest amount of diversion, while using the least amount of energy and resources. The achievement of the 50 percent diversion goal, therefore, becomes more readily attainable.

In arriving at figures for these columns, take into account the information entered into previous columns. For example, in determining the proposed tonnage diverted for recycling of beverage containers in 2002 (Row 16, Column F), take into account the projected tonnage for 2000 and the proposed tonnage for 2001.

It is important to complete the proposed diversion tonnage through the calendar year 2006 to show which programs the State agency/large State facility will emphasize to meet the waste diversion goals of 25 percent by 2002 and 50 percent by 2004.

1. In Columns D, F, H, J, L, and N, Rows 1-73 (pages 8-10), provide proposed tonnages for each identified diversion program.
2. Row 74, Page 10 (Total Tonnage Diverted): For each of the six columns, total all rows and enter the sum.
3. Row 75, Page 10 (Total Tonnage Disposed): For each of the six columns, subtract the figure in Row 74 (Total Tonnage Diverted) from the figure in Row 75, Column C (total projected tonnage disposed for 2000).
4. Row 76, Page 10 (Total Tonnage Generated): For each of the six columns, add figures from Row 74 and Row 75 (total tonnage generated = total tonnage diverted + total tonnage disposed).
5. Row 77, Page 10 (Overall Diversion Percentage): Divide the number in Row 74 (Total Tonnage Diverted) by the number in Row 76 (Total Tonnage Generated), Multiply the result by 100.

Rows E, G, I, K, M, O (Actual Tonnage), Rows 1-73, Pages 8-10

As it becomes available, information from Rows E, G, I, K, M, and O is intended to be used in the required annual report updates. Having a format early in the process and using it at the appropriate time will enable a State agency or large State facility to easily provide needed information by April 1 of the required reporting years, commencing in 2002. Rows 74-77 on page 10 should be calculated as per steps 2-5 above.

Section 2: Promotional Programs, Rows 78-106, Page 11

Column B, Rows 78-106, Page 11

List additional existing or proposed promotional programs your agency has.

Column C (Existing), and Columns D, F, H, J, L, N (Proposed), Rows 78-106, Page 11

Put an "X" in Column C if a promotional program exists in 2000. Put an "X" in Columns D, F, H, J, L, and/or N, if a promotional program is proposed for any year from 2001 through 2006.

Columns E, G, I, K, M, O (Implemented), Rows 78-106, Page 11

In future years, indicate whether the proposed program has been implemented by putting an "X" in the appropriate column.

Section 3: Procurement Activities, Rows 107-126, Page 12

Column B, Rows 107-126, Page 12

List additional existing or proposed procurement activities your agency has.

Column C (Existing) and Columns D, F, H, J, L, N (Proposed), Rows 107-126, Page 12

Put an "X" in Column C if procurement of recycled-content products exists for the year 2000.

Put an "X" in Columns D, F, H, J, L, and/or N if procurement of recycled-content products is proposed. Procurement activities should be coordinated through the State Agency Buy Recycled Campaign (SABRC). For more information on this program, see the SABRC Web page at www.ciwmb.ca.gov/StateAgency/, or contact Jerry Hart at (916) 255-4454 or jhart@ciwmb.ca.gov.

Columns E, G, I, K, M, O (Implemented), Rows 107-126, Page 12

In future years, indicate whether the proposed program has been implemented by putting an "X" in the appropriate column.

Part IV: State Agency Integrated Waste Management Plan Questions (pages 13, 14)

State agencies and large State facilities should use this form to provide information regarding the integrated waste management plan. State agencies submitting a modified integrated waste management plan should fill out questions 1, 5, 6, and 7. The Board's publication entitled *Waste Reduction Policies and Procedures for State Agencies* (distributed with this document) provides suggestions for source reduction, recycling, composting, and other programs that can be implemented to reduce the waste stream. You may find information from this publication helpful in filling out Part IV.

State Agency Model Integrated Waste Management Plan
Part I-A: State Agency Information Form

State Agency Name: _____

Address: _____

City: _____ ZIP Code: _____

State Agency Director's Name: _____

Recycling Coordinator: _____

Name: _____

Address: _____

City: _____ ZIP Code: _____

Telephone Number: (_____) _____ E-Mail Address: _____

Fax Number: (_____) _____

Number of Employees: _____

Check this box if the State agency is submitting a modified integrated waste management plan, since the agency has less than 200 full-time employees and generates less than 100 tons of waste statewide, per year.

The signatures below serve to certify that this integrated waste management plan is consistent with and meets the requirements of PRC 42920 (b).

Signature of Chairman, Commissioner, or Director Date

Printed Name Title

State Agency Model Integrated Waste Management Plan

Part I-B: Large State Facility Information Form

Facility: _____

Address: _____

City: _____ ZIP Code: _____

Facility Director: _____

Recycling Coordinator:

Name: _____

Address: _____

City: _____ ZIP Code: _____

Telephone Number: (_____) _____ E-Mail Address: _____

Fax Number: (_____) _____

Number of Employees: _____

The signatures below serve to certify that this integrated waste management plan is consistent with and meets the requirements of PRC 42920 (b).

Signature of District or Facility Director

Date

Printed Name

Title

Signature of Chairman, Commissioner,
Director, or President

Date

Printed Name

Title

Attachment II: State Agency List of Facilities

State Agency of Large State Facility:

No.	Facility Name and Mailing Address <small>(List all facilities that are part of the State Agency or Large State Facility)</small>	Name	City	State	No. of Employees
1					
2					
3					
4					
5					
6					

Part 1 State Agency Waste Reduction Recycling Program Worksheet

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
	Section 1 Program Activities	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
	B1 B2 B3	Projected Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage
1	Source Reduction													
2	Use of Reusable Cups													
3	Use of Electronic Forms													
4	Use of Electronic Media													
5	Double-Sided Copies													
6	Utilize Property Reutilization													
7	Utilize CallMAX													
8	Utilize a Food Exchange													
9	Salvage Yards													
10	Xeriscaping/Grass-cycling													
11	Other Source Reduction Programs													
12														
13														
14														
15	Recycling													
16	Beverage Containers													
17	Cardboard													
18	Glass													
19	Newspaper													
20	Office Paper													
21	Plastics													
22	Scrap Metal													
23	Other Materials													
24														
25														
26														

*B1: Add existing programs or those proposed for implementation; B2: Not listed; B3: Inset; X: If program exists; B3: Inset; X: If program is proposed for implementation

Program Activities	2000		2001		2002		2003		2004		2005		2006	
	Projected Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage
	B 2*	B 3*	B 2*	B 3*	B 2*	B 3*	B 2*	B 3*	B 2*	B 3*	B 2*	B 3*	B 2*	B 3*
27 Other Recycling Programs														
28 Special Collection Programs														
29 Clean-Up Events														
30														
31														
32 Composting														
33 Commercial Pick-Up of Green Waste														
34 Commercial Self-Haul of Green Waste														
35 Food Waste Composting														
36 Other Composting Programs														
37														
3														
3														
4														
4														
42														
43														
44														
45														
46														
47														
48 Special Waste														
49 Construction/ Demolition Recycling														
50 Concrete/Rubble Reuse														
51 Concrete/Asphalt Recycling														
52 Rendering/Grease Recycling														

1400

*B1: Add existing programs to those proposed for implementation; if not listed. B2: Insert "X" if program exists. B3: Insert "X" if program is proposed for implementation.

A	B		C		D		E		F		H		I		J		K		L		M		O	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
	Program Activities		Projected Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	Proposed Tonnage	Actual Tonnage	
53		Tires																						
54		Use of Retreads																						
55		Tire Reuse																						
56		Tire Recycling																						
57		Use of Rubberized Asphalt																						
58		Use of Tire-Derived Products																						
59		Collection Program																						
60		Drop-Off at Landfills																						
61		Used Oil/Antifreeze																						
62		White and Brown Goods (Reuse/Recycling)																						
63		Wood Waste																						
64		Wood Waste Chipping for Mulch or Compost (Drop-Off)																						
65		Brush/Wood Waste Chipping																						
66		Other Special Waste																						
67																								
68																								
69																								
70																								
71																								
72																								
73																								
74		Total Tonnage Diverted																						
75		Total Tonnage Disposed																						
76		Total Tonnage Generated																						
77		Overall Diversion Percentage																						

*B1: Add existing programs or those proposed for implementation, if not listed. B2: insert "X" if program exists. B3: insert "X" if program is proposed for implementation.

	2000	2001	2002	2003	2004	2005	2006
	Existing	Proposed	Proposed	Proposed	Proposed	Proposed	Proposed
	Implemented	Implemented	Implemented	Implemented	Implemented	Implemented	Implemented
78	Web Page						
79	Newspaper Articles/Ads						
80	Brochures/Newsletters, Publications						
81	Fliers						
82	Office Paper Recycling Guide						
83	Fact Sheets						
84	New Employee Package						
85	Outreach (technical assistance, presentations, awards, fairs, field trips)						
86	Seminars						
87	Workshops						
88	Waste Information Exchange						
89	Recycled Goods Procurement Training						
90	Awards Program/Public Awareness						
91	Speakers (staff available for presentations)						
92	Technical Assistance						
93	College Curriculum						
94	Waste Audits						
95	Waste Evaluations/Survey						
96	Other Promotional Programs						
97							
98							
99							
100							
101							
102							
103							
104							
105							
106							

Procurement Activities	2000		2001		2002		2003		2004		2005		2006	
	Existing	Proposed	Implemented	Proposed	Implemented	Proposed	Implemented	Proposed	Implemented	Proposed	Implemented	Proposed	Implemented	Proposed
107 State Agency Buy Recycled Campaign (SABRC)—All procurement activities should be coordinated through SABRC.														
108 Department-Wide Recycled-Content Procurement (RCP) Policy														
109 Exceeding SABRC Goals														
110 Department-Wide Automated Procurement Tracking System														
111 Requiring Recycled-Content Product Certification for All Purchases														
112 Annual Submittal of SABRC Report														
113 Staff Recycled-Content Procurement Training														
114 Participating in Dept. of General Services Buy Recycled Task Force														
115 Proactively Working With RCP Suppliers														
116 Sharing Success Stories With SABRC														
117 Joint Purchase Pools														
118 Other Procurement Activities														
119														
120														
121														
122														
123														
124														
125														
126														

4. Based on the worksheet information provided in Part III, briefly describe the programs proposed for implementation to meet waste diversion goals of 25 and 50 percent. Please include a timeline as to when these programs will be implemented.
5. Does the State agency/large State facility have a waste reduction policy? If so, what is it? See *Waste Reduction Policies and Procedures for State Agencies* for a sample waste reduction and recycling policy statement.
6. Briefly describe what resources (staff and/or funds) the State agency/large State facility plans to commit toward implementing its integrated waste management plan, thus meeting the waste diversion goals outlined in Public Resources Code Section 42921.
7. This question applies only for State agencies submitting a modified IWMP: Briefly describe the waste diversion program activities currently in place.

Appendix 1: Glossary of Terms

Cardboard – Paper product made of unbleached kraft fiber, with two heavy outer layers and a wavy inner layer to provide strength.

Composting – The biological decomposition of organic materials, such as leaves, grass clippings, brush, and food waste into a soil amendment.

Disposal – Management of solid waste through landfilling, incineration, or other means at permitted solid waste facilities.

Diversion Rate – The amount of materials recycled as a percentage of the solid waste stream.

Glass – All products comprised primarily of glass materials, including, but not limited to, containers, windows, fiberglass insulation, reflective beads, and construction blocks.

Grasscycling – The practice of leaving grass clippings on the lawn while mowing, which allows the nutrients to return to the soil, and decreases water needs.

Ledger Paper – A paper category that includes most office paper, such as letterhead, computer paper, copier bond, and notebook paper.

Materials Exchange Programs – Programs in which two or more companies exchange materials that would otherwise be discarded. Programs may also be managed by organizations using electronic and/or catalog networks to match companies that want to exchange their materials.

Newspaper – A paper product including, but not limited to, legislative bills, all papers that come with old newspapers, and newsprint.

Office Paper – See “Ledger Paper.”

Recycled Content Products – A product which has been manufactured using pre-consumer or postconsumer recycled material.

Recycling – The process by which materials otherwise destined for disposal are collected, remanufactured, and purchased.

Source Reduction – Any action undertaken by an individual or organization to eliminate or reduce the amount of materials before they enter the

municipal solid waste stream. This action is intended to conserve resources, promote efficiency, and reduce pollution.

Special Waste – Solid wastes/recyclables that can require special handling and management, such as used motor oil, whole tires, white goods, mattresses, lead-acid batteries, furniture, and medical wastes.

Vermicomposting – The process whereby worms feed on slowly decomposing materials (e.g., vegetable scraps) in a controlled environment to produce a nutrient-rich soil amendment.

Waste Assessment – An on-site assessment of the waste stream and recycling potential of an individual business, industry, institution, or household.

Waste Audits – See “Waste Assessment.”

Waste Evaluation – See “Waste Assessment.”

Waste Generation – Section 18722(g)(2) of Title 14 of the California Code of Regulations provides the following equation for jurisdictions to use in computing waste generation. It applies to State agencies and large State facilities as well.

Expressed as an equation, the total solid waste generated by the jurisdiction shall be computed as follows:

$$GEN = DISP + DIVERT$$

where:

GEN = the total quantity of solid waste generated within the jurisdiction.

DISP = the total quantity of solid waste, generated within the jurisdiction, which is transformed or disposed in permitted solid waste facilities.

DIVERT = the total quantity of solid waste, generated within the jurisdiction, which is diverted from permitted solid waste transformation and disposal facilities, through existing source reduction, recycling, and composting programs.

Waste Stream – The total flow of solid waste generated by a business, industry, institution, household, or municipality [or in this case of this

document, a State agency or large State facility]. Components of the waste stream are reduced by implementing source reduction, reuse, recycling, and composting techniques.

White Goods - Large appliances such as refrigerators, stoves, water heaters, washers, dryers, and air conditioners that are made of enameled metal.

Xeriscaping - The practice of landscaping with slow growing, drought-tolerant plants.

Sources

1. *Definitions*. California Integrated Waste Management Board, 1994. Publication #500-94-039.
2. *Establishing a Waste Reduction Program at Work, Participant's Manual*. California Integrated Waste Management Board, 1996. Publication #442-95-070.
3. *Landfill Mining Feasibility Study*. CalRecovery Incorporated, 1993.
4. *State Agency Buy Recycled Campaign, 1999 manual*. California Integrated Waste Management Board.
5. *Scrap Specifications Circular 1997: Guidelines for Nonferrous Scrap, Ferrous Scrap, Glass Gullet, Paper Stock, Plastic Scrap*. Institute of Scrap Recycling Industries, Inc. 1997.

Commission on State Mandates

Original List Date: 3/20/2001
Last Updated: 2/14/2005
List Print Date: 02/14/2005
Claim Number: 00-TC-07
Issue: Integrated Waste Management

Mailing Information: Draft Staff Analysis

Mailing List

TO ALL PARTIES AND INTERESTED PARTIES:

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, § 1181.2.)

Mr. Jon Stephens South Lake Tahoe Community College District One College Drive South Lake Tahoe, CA 96150	Claimant Tel: (916) 000-0000 Fax: (916) 000-0000
--	---

Ms. Jesse McGuinn Department of Finance (A-15) 915 L Street, 8th Floor Sacramento, CA 95814	Tel: (916) 445-8913 Fax: (916) 327-0225
--	--

Mr. Gerald Shelton California Department of Education (E-08) Fiscal and Administrative Services Division 1430 N Street, Suite 2213 Sacramento, CA 95814	Tel: (916) 445-0541 Fax: (916) 327-8306
---	--

Ms. Cheryl Miller Santa Monica Community College District 1900 Pico Blvd. Santa Monica, CA 90405-1628	Claimant Tel: (310) 434-4221 Fax: (310) 434-4256
--	---

Ms. Annette Chinn Cost Recovery Systems 705-2 East Bidwell Street, #294 Folsom, CA 95630	Tel: (916) 939-7901 Fax: (916) 939-7801
---	--

Mr. Steve Shields Shields Consulting Group, Inc. 1536 36th Street Sacramento, CA 95816	Tel: (916) 454-7310 Fax: (916) 454-7312
---	--

Dr. Carol Berg
Education Mandated Cost Network
1121 L Street, Suite 1060
Sacramento, CA 95814

Tel: (916) 446-7517
Fax: (916) 446-2014

Ms. Harmeet Barkschat
Mandate Resource Services
5325 Elkhorn Blvd. #307
Sacramento, CA 95842

Tel: (916) 727-1350
Fax: (916) 727-1734

Ms. Susan Geanacou
Department of Finance (A-15)
915 L Street, Suite 1190
Sacramento, CA 95814

Tel: (916) 445-3274
Fax: (916) 324-4888

Mr. Allan Burdick
MAXIMUS
4320 Auburn Blvd., Suite 2000
Sacramento, CA 95841

Tel: (916) 485-8102
Fax: (916) 485-0111

Mr. Louis R. Mauro
Attorney General's Office
1300 I Street, 17th Floor
P.O. Box 944255
Sacramento, CA 95814

Tel: (916) 324-5469
Fax: (916) 323-2137

Mr. Steve Smith
Steve Smith Enterprises, Inc.
4633 Whitney Avenue, Suite A
Sacramento, CA 95821

Tel: (916) 483-4231
Fax: (916) 483-1403

Mr. Keith B. Petersen
SixTen & Associates
5252 Balboa Avenue, Suite 807
San Diego, CA 92117

Claimant Representative
Tel: (858) 514-8606
Fax: (858) 514-8645

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

Tel: (866) 481-2642
Fax: (866) 481-5383

Mr. Jim Spano
State Controller's Office (B-08)
Division of Audits
300 Capitol Mall, Suite 518
Sacramento, CA 95814

Tel: (916) 323-5849
Fax: (916) 327-0832

Mr. Jim Jagers

Centratlon, Inc.

12150 Tributary Point Drive, Suite 140

Old River, CA 95670

Tel: (916) 351-1050

Fax: (916) 351-1020

Ms. Deborah Borzeller

California Integrated Waste Management Board (E-10)

Legal Office

1001 I Street, 23rd Floor

P.O. Box 4025

Sacramento, CA 95812-4025

Tel: (916) 341-6000

Fax: (916) 341-6082

Mr. Frederick E. Harris

California Community Colleges

Chancellor's Office (G-01)

1102 Q Street, Suite 300

Sacramento, CA 95814-6549

Tel: (916) 322-4005

Fax: (916) 323-8245

Mr. Joe Rombold

MCS Education Services

11130 Sun Center Drive, Suite 100

Rancho Cordova, CA 95670

Tel: (916) 669-0888

Fax: (916) 669-0889

Ms. Ginny Brummels

State Controller's Office (B-08)

Division of Accounting & Reporting

1 C Street, Suite 500

Sacramento, CA 95816

Tel: (916) 324-0256

Fax: (916) 323-6527
