



DEPARTMENT OF  
**FINANCE**

ARNOLD SCHWARZENEGGER, GOVERNOR

915 L STREET ■ SACRAMENTO CA ■ 95814-3706 ■ WWW.DOF.CA.GOV

**RECEIVED**

FEB 18 2004

**COMMISSION ON  
STATE MANDATES**

February 13, 2004

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

Dear Ms. Higashi:

The Department of Finance respectfully requests an extension to file comments on various test claims and other filings related to reimbursable state mandated costs submitted by school and community college districts as indicated on Attachment A. Previously, the Commission granted us an extension until February 7, 2004 to file comments on an extensive list of filings. At the Commission's request, we continued to submit comments on a flow basis to the extent possible and prioritized matters that were closer to conclusion.

Although we have now submitted comments on a number of the filings, we were unable to complete our review for several mandates due to our budget-related workload, the complexity and scope of particular filings, and a reduction in staffing. We therefore request extensions on those filings, as specified on the attached list. In most cases, we request an additional 30-day extension to March 8, 2004 to allow us to resolve remaining issues identified during our review.

For a select number of filings, we request an additional 180-day extension to August 9, 2004 in order to invest the significant time required to review these submissions. These filings, mostly new test claims, are either: (1) extensive in length, ranging in the several hundreds of pages; (2) broad in scope, citing numerous statutes that may or may not be directly relevant to the asserted reimbursable mandates; or (3) lacking any clear, concise explanation or evidence to justify the claimants' assertions that the statutes contain mandated activities that are new or material increases in the level of service. Review of these mandates requires significant time for extensive researching of statutes and regulations and development of information on the actual impact of any changes on school district and community college operations. As always, we will continue to submit comments on a flow basis, and would welcome the Commission's suggestions as to the relative priority of test claims that remain pending.

As we have indicated in prior comments for various filings, we believe that such broad-based claims that fail to clearly identify alleged mandated activities by specific statute should not constitute complete test claims, and should be returned by the Commission for refinement. Additionally, we believe that comments should not be solicited from all interested parties until a

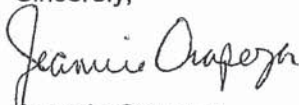
**CSM\_05083**

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

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

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

Sincerely,



Jeannie Oropeza  
Program Budget Manager

Attachment

**Attachment A**

**REQUEST TO COMMISSION ON STATE MANDATES  
FOR EXTENSION TO FILE COMMENTS**

**Request for 30-day extension**

<b>Number</b>	<b>Title</b>	<b>Due Date</b>	<b>Claimant</b>
02-TC-21	Tuition Fee Waivers	2/7/2004	Contra Costa CCD
02-TC-37	Adult Education Enrollment Reporting	2/7/2004	Berkeley and Sacramento City USD
02-TC-46	Discrimination Complaint Procedures	2/7/2004	Santa Monica CCD
02-TC-51	CA Public Records Act (K-14)	2/7/2004	Riverside USD
03-TC-05	CCC Budget and Accounting Manual	2/7/2004	Santa Monica CCD
03-TC-09	Teacher Credentialing	2/7/2004	San Diego COE
03-TC-16	Parental Involvement Programs	2/7/2004	San Jose USD
03-TC-17	California Environmental Quality Act	2/7/2004	Clovis USD
03-TC-02	Uniform Complaint Procedures	2/7/2004	Solano Beach School District
02-TC-32	School Accountability Report Cards III	2/7/2004	Empire Union USD and Bakersfield City USD
03-TC-06	California English Development Test	2/7/2004	Castro Valley USD

**Request for 180-day extension**

<b>Number</b>	<b>Title</b>	<b>Due Date</b>	<b>Claimant</b>
02-TC-22	Disabled Student Programs and Services	2/7/2004	West Kern CCD
02-TC-24	Reporting Improper Governmental Activities	2/7/2004	San Juan USD and Santa Monica CCD
02-TC-25	Notice to Students	2/7/2004	Los Rios CCD
02-TC-27	Employment of College Faculty and Administrators	2/7/2004	Santa Monica CCD
02-TC-28	Cal Grants	2/7/2004	Long Beach CCD
02-TC-31 *	Minimum Conditions for State Aid	2/7/2004	Santa Monica CCD
02-TC-34	Student Records	2/7/2004	Riverside USD and Palomar CCD

PROOF OF SERVICE

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

I, the undersigned, declare as follows:

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

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

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

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

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

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

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

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

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

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

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

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

E-08

State Board of Education  
Attention: Rae Belisle  
721 Capitol Mall, Room 558  
Sacramento, CA 95814

A-08

Office of Planning and Research  
Attention: Tal Finney  
P.O. Box 3044  
Sacramento, CA 95812-3044

C-34

State Architect of California  
Attention: Stephen Castellanos  
1130 K Street, Suite 101  
Sacramento, CA 95814

T-01

Department of Toxic Substances Control  
Attention: Antonette Cordero  
P.O. Box 806  
Sacramento, CA 95812-0806

P-08

Mr. Kenneth J. O'Brien  
Commission on Peace Officers  
Standards & Training  
Administrative Services Division  
Attention:  
1601 Alhambra Blvd.  
Sacramento, CA 95816-7083

Education Mandated Cost Network  
C/O School Services of California  
Attention: Dr. Carol Berg, PhD  
1121 L Street, Suite 1060  
Sacramento, CA 95814

Clovis Unified School District  
Attention: Bill McGuire  
1450 Herndon  
Clovis, CA 93611-0599

Centration, Inc.

Attention: Beth Hunter  
8316 Red Oak Street, Suite 101  
Rancho Cucamonga, CA 91730

D-08

Department of Justice  
Attention: Louis R. Mauro  
1300 I Street, 17<sup>th</sup> Floor  
Sacramento, CA 95814

A-09

Commission on Teacher Credentialing  
Attention: Sam Swofford  
1900 Capitol Avenue  
Sacramento-County, CA 95814-4213

C-27

California Student Aid Commission  
Attention: Diana Fuentes-Michel  
P.O. Box 419026  
Rancho Cordova, CA 95741-9026

B-04

Environmental Protection Agency  
Attention: Deborah Barnes  
1001 I Street  
Sacramento, CA 95812

P-08

Mr. Richard W. Reed  
Commission on Peace Officers  
Standards & Training  
Administrative Services Division  
Attention:  
1601 Alhambra Blvd.  
Sacramento, CA 95816-7083

Spector, Middleton, Young, Minney, LLP  
Attention: Paul Minney  
7 Park Center Drive  
Sacramento, CA 95825

Shields Consulting Group, Inc.  
Attention: Steve Shields  
1536 36<sup>th</sup> Street  
Sacramento, CA 95816

Mandated Cost Systems, Inc.

Attention: Steve Smith  
11130 Sun Center Drive, Suite 100  
Rancho Cordova, CA 95670

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

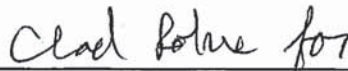
Castro Valley Unified School District  
Attention: Jerry Macy  
4400 Alma Avenue  
Castro Valley, CA 94546

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

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

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

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on February 13, 2004, at Sacramento, California.



Jennifer Nelson