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August 20, 2013

Heather Halsey, Executive Director
Commission on State Mandates
U.S. Bank Plaza Building
980 Ninth Street, Suite 300
Sacramento, California 95814

Received
August 21, 2013
Commission on
State Mandates

Re: CSM 05-4206-I-04 San Mateo County CCD
CSM 05-4206-I-08 San Bernardino CCD
Incorrect Reduction Claims
Heath Fee Elimination

Dear Ms. Halsey:

On behalf of the claimants, I am requesting a 60-day extension to respond to the Draft Staff Analysis dated August 2, 2013, and a postponement of the hearing on this matter to December 6, 2013. The staff analysis, which your staff has been developing for several months, will be the basis of decisions made on several future incorrect reduction claims and our response will require the same consideration.

I cannot delegate the response to the staff analysis to support staff. As you may know, because of the date the parameters and guidelines were heard and adopted by the Commission, there are multiple retroactive years of annual claims for four new mandate programs due in November 2013. This includes 19 years for Behavioral Intervention Plans and 11 years for Minimum Conditions for State Aid, which will generate several hundred claims for our company to prepare for its clients. While these claims are due in November, the work to prepare them is already a daily priority. In addition, I have 17 Controller audits in progress for my clients, many of which require frequent attention to the auditor's documentation requests.

Thank you for your consideration of this request.

Sincerely,



Keith B. Petersen

Submitted to the COSM Drop Box for service to listed parties.