



Received  
September 10, 2013  
Commission on  
State Mandates

September 10, 2013

Ms. Heather Halsey  
Executive Director  
Commission on State Mandates  
980 Ninth Street, Suite 300  
Sacramento, California 95814

Dear Ms. Halsey:

As requested in your letter of August 5, 2013, the Department of Finance (Finance) has reviewed the draft expedited parameters and guidelines (Ps and Gs) for the Commission on State Mandates Test Claim 11-TC-02 titled "Immunization Records – Pertussis," submitted by the Twin Rivers Unified School District (claimant).

As the result of our review, Finance has the following concerns and requests that the Ps and Gs be amended accordingly:

Section IV, subsections A and B, paragraphs 2, relate to students who have been conditionally admitted to school but who are not fully immunized against pertussis and have not obtained specified exemptions. The Ps and Gs include as a reimbursable activity providing a notice to parents of such students that evidence of full immunization or lawful exemption must be provided within 10 school days. Because neither statute nor regulations require such a notice to be provided, Finance recommends striking the second sentence of this paragraph.

Section IV, subsections A and B, paragraphs 3, relate to students who are found not to have received all required pertussis immunizations or who are found not to have complied with requirements for conditional admission. The Ps and Gs include as a reimbursable activity notifying the parents or guardians of such students that the school is required to exclude the student from further attendance at school unless written evidence of the required immunization for pertussis, or lawful exemption therefrom, is obtained within 10 school days. This notification is required by regulations for students who have already been admitted. Therefore, Finance recommends the following amendment: "For any already admitted student found not to have received all immunizations for pertussis..."

Section IV, subsections A and B, paragraphs 4, relate to students who fail to obtain the required immunizations within 10 school days, unless the student is exempt for medical reasons or personal beliefs, until the student provides written evidence that he or she has received the pertussis immunization. The Ps and Gs include as a reimbursable activity excluding such students from further attendance at school but do not specify what activities are reimbursable. Finance recommends providing specific guidance regarding what activities relating to excluding a student from attendance are reimbursable.

Pursuant to section 1181.2, subdivision (c)(1)(E) of the California Code of Regulations, "documents that are e-filed with the Commission on State Mandates need not be otherwise served on persons that have provided an e-mail address for the mailing list."

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

Sincerely,



NICK SCHWEIZER  
Program Budget Manager